

37. Child Safeguarding Policy Statement

Policy Statement: Every child has the right to protection from abuse and exploitation. Safeguarding - and the protection of all children - is everyone's responsibility. NTC believes that it is always unacceptable for any child to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children by a commitment to practice which protects them. The safeguarding of all children will be made possible by adhering to our safeguarding policies, procedures and processes and by working in partnership across the organisation - as well as with external organisations and statutory bodies. **NTC recognises and is committed to the following principles:**

- The welfare of the child is paramount
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm, abuse and/or exploitation
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues surrounding disabilities
- Working in partnership across NTC - and with children, their parents, carers & other external agencies and statutory bodies - is essential in promoting children's welfare.

Purpose & aim of policy: NTC will always seek to provide protection for the children who receive the organisation's services. To this end, NTC will provide all staff with guidance on procedures they should adopt in the event that they suspect a child may be experiencing, or be at risk of, harm. NTC believes that a child should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and to keep them safe. We are committed to practice in a way that protects them.

Who this policy applies to: This policy applies to everyone that comes into contact with NTC - including as applicable - Managing Directors and the Executive Team, Senior Managers, Management Team, Employees, Sessional Workers, Agency Staff, Contractors, Suppliers, Volunteers, Students on work experience, as well as anyone working on behalf of NTC. **Safeguarding is everyone's responsibility!**

NTC will seek to safeguard children effectively through taking a child-centred approach to its responsibilities and by doing the following:

- Valuing children by listening to and respecting them
- Adopting child protection guidelines through procedures and a code of conduct for staff
- Developing and implementing an effective e-safety policy and related procedures
- Recruiting staff safely, ensuring all necessary checks are made
- Sharing information about child protection and good practice with children, parents, carers and staff
- Sharing information about concerns with agencies who need to know - and involving parents, carers and children appropriately
- Providing effective management for staff through supervision, support and training.

Principles of a child-centred approach: NTC will always seek to underpin its policy on safeguarding children by:

- Being **vigilant** and notice when things are troubling children
- **Understanding** what is happening - as well as hearing and understanding the child - and then **acting** upon that understanding
- Developing an on-going **stable** relationship of trust with children
- **Respecting** children and treating them with the expectation that they are competent, rather than assume they are not
- Providing **information** and **engagement** with children by keeping them informed about and involved in procedures, decisions, concerns and plans

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- **Explaining** to children the outcome of assessments and decisions - as well as the reasons if their views have not met with a positive response
- **Support** children in their own right and not just as a member of their family
- Providing access to **advocacy** to assist children in putting forward their views
- **Involving** children and their parents and carers in developing and shaping safeguarding policies and procedures.

Reviewed & Updated: March 2018

NTC will review this **Child Protection Safeguarding Policy Statement** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.



Stephen Jones
Head of Provision

38. Code of Good Safeguarding Practice when Working with Children

Introduction: Every staff member associated with NTC has been selected to work with the organisation, because they have demonstrated a desire to provide a positive, fun and safe environment for children and young people. Any person working with children is automatically placed in a position of trust - that carries with it authority, status, power and responsibility. It has been proven, that where adults are positive role models - and display high moral and ethical standards - the benefits to a child's development can be significant.

Duty of Care: Every staff member that works with NTC has a legal responsibility to provide a duty of care. This duty of care means that each and every individual adult must take all reasonable steps to ensure the safety of any child involved in an activity for which they and NTC are responsible. This duty of care is extended by a moral responsibility to work at developing a culture in which all children can take part in activities in a safe and enjoyable environment.

Relationship of Trust: NTC recognises that genuine and appropriate relationships do occur between staff members and the children that use the organisations services. While the relationship of trust should always be nurtured, allowing appropriate relationships to lead into sexual, or inappropriate relationships, will always be wrong. NTC staff members need to be aware of the power and influence that can be exercised over a child. Where activities undertaken by NTC have an element of competitiveness e.g. selection to play, mentoring, assessment etc., a child can become dependent on the adult - and thereby, be more vulnerable. Therefore, it is vital that staff recognise their responsibility - and ensure that they do nothing to abuse their position of trust.

Good Safeguarding Practice: Despite having the best safeguarding policies and procedures; and the most effective safeguarding induction training and refresher training - there can still be many situations, that an NTC staff member may find themselves in, which could be misconstrued and/or misinterpreted by others. NTC wants to help reduce such situations from occurring - and which could be viewed from the outside as inappropriate, poor practice, or abusive. **Therefore:**

- **By developing the following standards of good safeguarding practice, NTC is seeking to ensure that all of its staff are protected from false allegations relating to child safeguarding concerns.**
- **By NTC staff members following these standards of good safeguarding practice, we further live and breathe our mission of protecting all children.**

Ultimately though, every staff member should never believe that they can rely on their own good reputation; or the good reputation of NTC to protect them. All NTC staff members should always behave and conduct themselves in such a way as to ensure that nothing they do can be misconstrued or misinterpreted.

Underpinning Principles of NTC's Good Safeguarding Practice: For the avoidance of doubt, the following forms an unequivocal and unalterable core standard and principle that applies to all adults that work with - and for - NTC, in any capacity:

- **Never develop or nurture an inappropriate relationship (or any form of inappropriate contact) with a child, that in any way falls outside of the work that you have been authorised to undertake on behalf of NTC.**
 - An **inappropriate relationship** with a child also includes a sexual relationship, or any form of sexual contact.
 - **N.B. Inappropriate contact** would include a breach of any of the good safeguarding practices detailed under any of the headings below, where contact is being made in breach of any instruction to the contrary.

Important note: Even if a child is aged 16 years or older, it is forbidden for an NTC staff member to have a sexual relationship; sexual contact; or an otherwise inappropriate relationship with them. Any such behaviour - by any NTC staff member - towards any person under the age of 18 years of age, represents a serious breach of trust and is not acceptable under any circumstances.

In circumstances, where the above underpinning principle is breached by a staff member, they will be subject to NTC's disciplinary procedures. Any breach of the above underpinning principle involving a volunteer - or member of staff from another organisation - will result in them being asked to leave NTC.

Furthermore, any such breaches of NTC's underpinning principle, by staff will always result in a referral being made to one or more statutory agencies such as the Police, the Local Authority Children's Social Care Department, and/or the Disclosure and Barring Service.

Not-with-standing the above underpinning principle, it is NTC's intention to regularly review the following guidelines - relating to standards of good safeguarding practice - to ensure that they reflect the very latest best practice; and that they take account of the ever-changing safeguarding risks that children can face.

Code of Good Safeguarding Practice when Working with Children continued...

General Good Safeguarding Practice: NTC staff members must adhere to the following:

- Never exaggerate or trivialise child abuse issues.
- Never make inappropriate promises to a child, particularly in relation to confidentiality.
- Do not ask a child to keep a secret.
- Do not jump to conclusions about others, without first checking the facts.
- Never allow allegations by a child to go unchallenged, unrecorded - or in any way not acted upon.
- Never agree to meet a child on their own on a one to one basis. If such a situation should be requested by a child, then you are required to immediately speak with NTC's DSO.

Behaviour Good Safeguarding Practice: NTC staff members must adhere to the following:

- Never act in a way towards a child that can be perceived as threatening or intrusive. This includes verbal aggressiveness and shouting.
- Do nothing that would cause a child to lose self-esteem e.g. by embarrassing, humiliating, undermining them; or otherwise acting in a way that would reduce them to tears.
- Never make sarcastic, insensitive or derogatory comments (or gestures) to a child, even if this was meant to be in fun.
- Never make sexually suggestive comments (or gestures) to a child, even if this was meant to be in fun.
- Never patronise or treat a child as if they are silly.

In addition to not behaving in any of the ways listed above, NTC staff members should always be careful not to behave in any of the ways listed above either in front of - or within the presence of - a child, even though it is not intended to be directed towards the child.

Communication Good Safeguarding Practice: NTC staff members must adhere to the following:

- Never use inappropriate language in the presence of a child.
- Do not allow children to use inappropriate language unchallenged.

Personal Contact Good Safeguarding Practice: NTC staff members must adhere to the following:

- Never allow - or take part in - any form of inappropriate touching of a child.
- Never take part in any rough, physical, or sexually-provocative games - which includes horseplay of any kind.
- Do not undertake things of a personal nature for a child which they can do for themselves, unless you have been requested to provide that assistance by their parent or carer.

N.B. It is recognised that some children may need help with such things as tying laces and this is acceptable. This element of good safeguarding practice does not preclude attending to an injured or ill child, or from rendering first aid.

Personal Information Good Safeguarding Practice: NTC staff members must adhere to the following:

- Never let a child have your personal home address.
- Never let a child have your personal telephone number/s.
- Never contact a child via text message using a personal phone.
- Never email a child from a personal email address.

N.B. Where emailing or texting a children is an accepted and documented operational procedure of NTC, this email and/or text must at all times come from the authorised NTC email account or work mobile phone - and each child's parent/carers must be copied into the email or text.

Physical Contact Good Safeguarding Practice: NTC staff members should only use appropriate physical contact if the sole aim is to:

- Develop sports skills techniques.
- Treat an injury.
- Prevent an injury or accident from occurring.
- To meet the professional requirements of the sport or activity being undertaken.

Acceptable physical contact - as outlined above - would always take place in an open or public environment; and would never take place in secret or out of sight of others.

Code of Good Safeguarding Practice when Working with Children continued...

N.B. In all circumstances where physical contact is required, the adult must always explain the nature and reason for the physical contact; and reinforce the teaching or coaching skills being used. Unless the NTC staff member is responding to an emergency situation, the adult must always seek the child's permission for initiating the required physical contact.

Appropriate physical contact will never involve touching in or around the genital area, the buttocks and/or the breasts. In addition, any physical contact anywhere else on the body should not cause a child distress or embarrassment.

Positive Influence Good Safeguarding Practice: NTC staff members must adhere to the following:

- Never smoke in front of children - or in any place that you could be seen smoking by them.
- Never consume alcohol in front of children - or in any place that you could be seen drinking alcohol by them.
- Never offer children drugs or other illegal substances.
- Never offer children sexual materials **e.g.** adult magazines, adult videos and/or adult website addresses etc.
- Never accept bullying, rule violations, cheating or the use of prohibited substances - such as performance enhancers etc.

Supervision Good Safeguarding Practice: NTC staff members must adhere to the following:

- Never leave a child unsupervised.
- Do not treat any child more favourably than others.
- Avoid spending too much time alone with any one particular child where you are away from other adults.
- A child must never be taken to an adults home.
- Never go to a child's home where you would be alone with them.
- Do not be in a dressing room with a child on your own. If this is unavoidable, ensure the door remains open.
- Should circumstances require adults and children to share a dressing room, adults are required to provide the child with privacy and ensure that the adult showers and changes at a separate time to the child.
- Mobile phones - and any technology capable of taken photos or videos - are not permitted to be used in changing rooms.
- Never share a room with a child.

Social Media Good Safeguarding Practice: NTC staff members must adhere to the following:

- Never contact or communicate with a child through social media sites; or via any other form of social media app or interface.
- Never permit a child to be added to your social media feed/s or social media apps.

Where a child requests to be added to any personal social media feed or social media app, you must immediately refuse the request and communicate the attempt to connect with you through social media to NTC's DSO. NTC's DSO will explain to the child that staff are not permitted to have child participants on their social media feeds; and that they should not send such requests again.

N.B. There may be circumstances where an NTC staff member may have a child participant on their social media feed - or on social media apps - as a consequence of appropriate contact prior to commencing work with NTC; or before the child became a participant with NTC. In all circumstances, NTC staff members should disclose this social media connection to the DSO and then delete all social media connections with that child. NTC's DSO will explain to the child and/or their parent/carer the reasons this action has been taken.

Social media definition: Social media is an interactive online media that allows users to communicate instantly with each other or to share data in a public forum. It includes social and business networking websites such as Facebook, Myspace, Reddit, Twitter and LinkedIn. Social media also covers video and image sharing and blogging websites such as YouTube, Instagram, Google+, Tumblr and Flickr, as well as personal blogs, any posts made on other people's blogs and all online forums and noticeboards. This is a constantly changing area with new websites and apps being launched on a regular basis and therefore this list is not exhaustive. This element of NTC's social media good safeguarding practice policy applies in relation to any social media that staff members and volunteers may use, regardless of whether it is specifically detailed in the definition above or not.

Transport Good Safeguarding Practice: NTC staff members and volunteers must adhere to the following:

- Never use a mobile phone while driving with a child or children - whether or not the mobile phone meets handsfree legislation.

Code of Good Safeguarding Practice when Working with Children continued...

- No adult is permitted to transport a child or children if they are in an unregulated job category.
- Never transport a child or children if not in possession of the relevant licence entitlement; or the relevant insurances.
- You should not transport a child without another adult being present.

N.B. Where such a journey is unavoidable, then the staff member required to transport the child **must** first speak to their line manager or NTC's DSO and gain the consent of that other person **prior** to making the journey. The staff member must also ensure that they communicate with the parent/carer of the child to ensure that they are also fully aware that their child is being transported without another adult being present.

In all cases where the above procedure is used to transport a child without another adult being present, the staff member must complete a journey log and submit this at the end of each week to NTC's DSO. NTC will monitor journey logs to further reduce situations where a child needs to be transported by a lone adult.

In all cases where a child is transported as a single passenger - without another adult being present - the child should sit in the back seat of the vehicle and wearing their seat belt.

Reviewed & Updated: March 2018

NTC will review this **Code of Good Safeguarding Practice when Working with Children** at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

39. Introduction to Child Safeguarding

The purpose of this introduction is to ensure that everyone that this Safeguarding Handbook applies to has a clear understanding of what is meant by child protection and child safeguarding - and thereby has no confusion as to what their responsibilities are.

Definition of child protection: Child protection is part of safeguarding and promoting welfare and refers to the activity that is undertaken by NTC staff members to protect specific children who are suffering, or are likely to suffer, significant harm.

Definition of safeguarding: Safeguarding and promoting the welfare of children is defined by the UK Government's guidance, **Working Together to Safeguard Children** as the following:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Definition of child abuse: Child abuse is any action by another person that causes significant harm to a child. The abuse can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Child abuse will often take place over a period of time, rather than being a one-off event. Children may be abused in a variety of settings - such as the family, institutional or community setting. A child can be abused by those known to them or, more rarely, by others e.g. via the internet. An abuser can be an adult or adults, or another child or children and harm may occur intentionally or unintentionally.

The core definitions of harm are outlined below and are as defined by the UK Government's guidance **Working Together to Safeguard Children**.

Sexual abuse: Sexual abuse involves forcing or enticing a child to take part in sexual activities - not necessarily involving a high level of violence - and 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.

Abusers 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.

Emotional abuse: Emotional abuse is the persistent emotional maltreatment of a child so 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.

It's important to remember that parents and/or caregivers of children with multiple needs may find it difficult to ensure that the full range of the child's needs, including their emotional needs, are met. Whilst it may prove difficult to include such children in everyday activities alongside other family members, not to include them may be harmful.

Physical abuse: 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.

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

Introduction to Child Safeguarding continued...

Once a child is born, neglect may involve a parent or caregiver failing to:

- Provide adequate food, clothing or shelter - including exclusion from home or abandonment
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision - including the use of inadequate care-givers
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. However, what is known, is that neglect - in whatever form it takes - can be just as damaging to a child as physical abuse.

Although these four categories of abuse in this introduction are those detailed in the UK Government's guidance **Working Together to Safeguard Children**, there are numerous more detailed categories of abuse that it is important all NTC staff members are aware of. The next section **Recognising the Signs of Child Abuse** - as well as the sections that follow it - provide a fuller breakdown of all the recognised categories of child abuse and further guidance on how to help safeguard and protect children.

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NTC will review this **Introduction to Child Protection** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

40. Recognising the Signs of Child Abuse

Recognising child abuse is not easy. NTC does not believe it is the responsibility of its staff members to decide whether or not child abuse has taken place - or if a child is at significant risk of harm from someone. However, every NTC staff member has both a responsibility and duty - as set out in this Handbook - to act in order that the appropriate agencies can investigate and take any necessary action to protect a child.

Therefore, this section starts by providing greater detail about the four core categories of abuse detailed in the UK Government's guidance **Working Together to Safeguard Children**. This Handbook then provides more specific guidance on how to help safeguard and protect children in relation to many of the other recognised types of child abuse. The following information is provided to help all NTC staff members to be more alert to the signs of possible abuse.

Sexual abuse: A child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact and it can happen online. Sometimes the child won't even understand that what's happening to them is abuse - or that it is wrong.

Defining child sexual abuse: There are two different types of child sexual abuse - **contact abuse** and **non-contact abuse**. Further information on each type is detailed below:

- **Contact abuse** involves touching activities where an abuser makes physical contact with a child, including penetration. **It includes the following:**
 - a) Sexual touching of any part of the body - whether the child's wearing clothes or not
 - b) Rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
 - c) Forcing or encouraging a child to take part in sexual activity
 - d) Making a child take their clothes off, touch someone else's genitals or masturbate
- **Non-contact abuse** involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet and flashing. **It includes the following:**
 - a) Encouraging a child to watch or hear sexual acts
 - b) Not taking proper measures to prevent a child being exposed to sexual activities by others
 - c) Meeting a child following sexual grooming with the intent of abusing them
 - d) Online abuse including making, viewing or distributing child abuse images
 - e) Allowing someone else to make, view or distribute child abuse images showing pornography to a child
 - f) Sexually exploiting a child for money, power or status (This is known as child exploitation and is covered in further detail later in this section)

Changes in behaviour which can indicate sexual abuse include:

- Staying away from certain people
- Avoiding being alone with people, such as family members or friends
- Seeming frightened of a person or a reluctance to socialise with them
- Showing sexual behaviour that's inappropriate for their age
- Becoming sexually active at a young age
- Being promiscuous
- Using sexual language or knowing information that you wouldn't expect them to
- Having physical symptoms such as anal or vaginal soreness, an unusual discharge, sexually transmitted infection (STI) and/or pregnancy

Emotional abuse: Children who are emotionally abused suffer ongoing emotional maltreatment or emotional neglect. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development as well as causing serious harm.

Defining emotional abuse: Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child.

Children who are emotionally abused are usually suffering another type of abuse or neglect at the same time - but this may not always be the case.

Recognising the Signs of Child Abuse continued...

Physical abuse: It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them.

Defining physical abuse: Physical abuse is deliberately hurting a child and causing injuries such as bruises, broken bones, burns or cuts. There's no excuse for physically abusing a child. It causes serious, and often long-lasting, harm - and in severe cases, death. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell - this is known as fabricated or induced illness (FII).

Neglect: Neglect is the ongoing failure to meet a child's basic needs. It's dangerous and children can suffer serious and long-term harm. Neglect is also the most common form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents or carers. A child who is neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - and even death.

Defining neglect: There are four specific types of neglect and each is listed below with further detail:

- 1. Physical neglect:** This is failing to provide for a child's basic needs such as food, clothing or shelter. It is also failing to adequately supervise a child, or provide for their safety.
- 2. Educational neglect:** Failing to ensure a child receives an education.
- 3. Emotional neglect:** Failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, intimidating or isolating them. This form of neglect is often the most difficult to prove.
- 4. Medical neglect:** Failing to provide appropriate health care, including dental care and refusal of care or ignoring medical recommendations.

Neglect can have serious and long-lasting effects. It can be anything from leaving a child home alone to the very worst cases where a child dies from malnutrition or being denied the care they need. In some cases, it can cause permanent disabilities. Neglect can be really difficult to identify, making it hard even for professionals to take early action to protect a child.

Changes in behaviour which can indicate neglect: Having one of the signs or symptoms below doesn't necessarily mean that a child is being neglected. However, if NTC staff members ever notice multiple, or persistent signs, then it could indicate that there is a serious problem. Children who are neglected may have:

- Poor appearance and hygiene
- Health and development problems
- Housing and family issues

Reviewed & Updated: March 2018

NTC will review this **Recognising the Signs of Child Abuse** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

41. Child Abuse: Bullying & Cyberbullying

There is clear evidence that **bullying is abusive and will include at least one or more of the four core categories of abuse - sexual abuse, emotional abuse physical abuse and/or neglect. For this reason, bullying in all its forms has been included in NTC's Safeguarding Handbook.**

Bullying and cyberbullying: Bullying can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

Defining bullying: Bullying is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. **Bullying includes the following:**

- **Verbal abuse** - such as name calling and gossiping
- **Non-verbal abuse** - such as hand signs or text messages
- **Emotional abuse** - such as threatening, intimidating or humiliating someone
- **Exclusion** - such as ignoring or isolating someone
- **Undermining** - by constant criticism or spreading rumours
- **Controlling or manipulating** someone
- **Physical assaults** - such as hitting and pushing
- **Making silent, hoax or abusive calls**
- **Online or cyberbullying** - further details are provided below

Defining online or cyberbullying: Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos. Children may know who's bullying them online - as it may just be an extension of offline peer bullying they are already experiencing - or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of an individual engaging in bullying behaviour. Because cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - it can feel like there is no escape. **Cyberbullying includes the following:**

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

Bullying can also be motivated by a discrimination towards the person being bullied. Further details of these types of bullying are provided below:

- **Racial bullying** - identified by the motivation of the bully, the language used, and/or by the fact that victims are singled out because of the colour of their skin, the way they talk, their ethnic grouping or by their religious or cultural practices
- **SEN & Disability bullying** - this is where children are singled out because of a disability; and which deaf children can be bullied more than other children with SEN's or disabilities
- **Sexual bullying** - behaviour, which whether physical or non-physical, is based on a person's sexuality or gender; and is when sexuality or gender is used as a weapon by boys or girls towards other boys or girls. Sexual bullying is more prevalent towards girls than boys
- **Homophobic/Bi-phobic bullying** - irrational dislike, hatred or fear of individuals that are, or are perceived to be lesbian, gay or bisexual
- **Transphobic bullying** - transphobic is an umbrella term to describe people whose gender is not the same as - or does not sit comfortably with - the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, cross dresser, non-binary, gender queer

Child Abuse: Bullying & Cyberbullying continued...

Changes in behaviour which can indicate a child is being bullied or cyberbullied: It can be hard for adults, including parents, to know whether or not a child is being bullied. A child might not tell anyone because they're scared the bullying will get worse. They might think that they deserve to be bullied, or that it's their fault. However, the following should be looked out for by NTC staff members:

- Belongings getting "lost" or damaged
- Physical injuries - such as unexplained bruises
- Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- Not doing as well at school
- Asking for, or stealing, money - to give to a bully
- Being nervous, losing confidence, or becoming distressed and withdrawn
- Problems with eating or sleeping
- Bullying others

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children - to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). For this reason, NTC has put in place rigorously enforced anti-bullying strategies.

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NTC will review this **Child Abuse: Bullying & Cyberbullying** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

42. Child Abuse: Child Sexual Exploitation

Child sexual exploitation (CSE): Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status. Children may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children are trafficked into - or within the UK - for the purpose of sexual exploitation. Sexual exploitation can also happen to children in gangs.

Defining child sexual exploitation: Sexual exploitation of children involves exploitative situations, contexts and relationships where children - 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 on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition e.g. being persuaded to post sexual images on the Internet and via mobile phones without immediate payment or gain.

In all cases, those exploiting the child 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's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Child Sexual Exploitation** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

43. Child Abuse: Child Trafficking

Child trafficking: Child trafficking is child abuse and is a type of abuse where children are recruited, moved or transported and then exploited, forced to work, or sold. They are often subject to multiple forms of exploitation. Children are trafficked for many reasons which include:

- Child sexual exploitation
- Benefit fraud
- Forced marriage
- Domestic servitude such as cleaning, childcare, cooking
- Forced labour in factories or agriculture
- Criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another. Trafficked children experience multiple forms of abuse and neglect because physical, sexual and emotional violence are often used to control victims of trafficking. Children who are trafficked are also likely to be physically and emotionally neglected.

Defining child trafficking: The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in human beings'. **Official definition of child trafficking produced by the Council of Europe and ratified by the UK government in 2008**

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Child Trafficking** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

44. Child Abuse: Domestic Abuse

The reason domestic abuse is detailed in the child abuse section of NTC's Safeguarding Handbook is because any young person under the age of 18 years of age is classed as a child for the purposes of safeguarding legislation. Therefore, an awareness of the different forms of domestic abuse is essential if NTC staff members are going to be able to safeguard young people who may be experiencing it. It will also help staff to understand better the harm domestic abuse may be having on children who witness it in their home lives.

Domestic abuse: Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. However, domestic abuse isn't just physical violence - it also includes any emotional, physical, sexual, financial or psychological abuse. It can happen in any relationship, and even after the relationship has ended. Both males and females can be abused or be abusers. Witnessing domestic abuse is also child abuse. Teenagers can also suffer domestic abuse in their relationships. Domestic abuse can seriously harm children.

Defining domestic abuse: Domestic abuse can include the following:

- Sexual abuse and rape
- Punching, kicking, cutting, hitting with an object
- Withholding money, or preventing someone from earning money
- Not letting someone leave the house
- Reading emails, text messages or letters
- Threatening to kill or harm them, another family member or pet

The definition of domestic abuse also includes the following two types of behaviour:

- **Controlling behaviour** - where a person uses a range of acts to make a person subordinate and/or dependent by isolating them from sources of support, exploring their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- **Coercive behaviour** - which is an act or pattern of acts of assaults, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

The impact of domestic abuse on an individuals' health and wellbeing can include:

- Psychological and psychiatric problems such as depression, anxiety, despair, post-traumatic stress disorder. Indicators may be stress, self-harm and or suicide attempts.
- Symptoms related to musculoskeletal disorders and chronic pain, genitor-urinary disorders, and respiratory illness. Injuries can include contusions, abrasions, lacerations, burns, fractures, dislocations, bruises, lost teeth, internal injuries, gynaecological problems and miscarriages.

Domestic abuse can take many forms and the following provides further information:

Domestic abuse - sexual: This form of abuse is where an individual is forced to participate in unwanted, unsafe, and/or degrading sexual activity.

- **Defining sexual abuse:** Rape and sexual abuse is common in abusive relationships as a person's right to consent is likely to be ignored. A person who has suffered rape or sexual abuse may also suffer severe psychological affects due to the prolonged level of fear they experienced.

Domestic abuse - physical & emotional: This form of domestic abuse can be verbal or nonverbal.

- **Defining physical abuse:** This is a form of abuse where the aim is to - chip away at the confidence and independence of victims with the intention of making them - compliant and limiting their ability to leave.
- **Defining emotional abuse:** This includes verbal abuse such as yelling, name-calling, blaming and shaming, isolation, intimidation, threats of violence.

Domestic abuse - economic or financial: The purpose is to limit the victims' ability to access help.

Child Abuse: Domestic Abuse continued...

- **Defining economic or financial abuse:** Examples of ways this is committed include:
 - Controlling finances - withholding money and or credit cards
 - Exploiting assets
 - Withholding necessities, food and/or toiletries
 - Preventing the person from working, or forcing them to work, against their will
 - Deliberately running up debts.

Domestic abuse - honour based violence (HBV): This form of domestic abuse is perpetrated in the name of so called 'honour'. It may be a violent crime or incident which may have been committed to protect, or defend the honour of the family or community.

- **Defining HBV:** Is often linked to family members or acquaintances who 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. Examples of why HBV may be committed against people include:
 - Becoming involved with a boyfriend or girlfriend from a different culture or religion
 - Wanting to get out of an arranged marriage
 - Wanting to get out of a forced marriage - a forced marriage is very different to an arranged marriage where both parties have agreed
 - Wearing clothes or taking part in activities that may not be considered traditional within their culture.

Women and girls are most common victims of HBV; however, it can also affect men and boys.

Not all crimes of 'honour' include violence, but it is none-the-less domestic abuse and can include the use of threats of violence; sexual or psychological abuse; being held against their will; or taken somewhere they don't want to go.

Please refer to NTC's full policy on HBV in this section of the Safeguarding Handbook.

Domestic abuse - forced marriage: This form of abuse is where a marriage is performed under duress and does not have the full consent of both parties.

- **Defining forced marriage:** Victims of forced marriage may be the subject of physical violence – rape – abduction - false imprisonment – enslavement - emotional abuse - and murder.

It is important not to confuse 'forced' marriage with 'arranged' marriage. In the instance of an 'arranged' marriage both parties are freely consenting.

Domestic abuse - FGM: FGM, also referred to as female circumcision, involves females - usually under the age of 16 - undergoing procedures wrongly believed to ensure their chastity and marital fidelity.

Please refer to NTC's full policy on FGM in this section of the Safeguarding Handbook.

Domestic abuse - elder abuse: This form of domestic abuse is where an elderly person is abused by someone usually in a position of trust.

- **Defining elder abuse:** This is where harm or distress is caused to an elderly person within a relationship - where this is an expectation of trust. Most typical abusers are partners, adult children or family members.

Domestic abuse - against people with disabilities: This form of abuse is where people with disabilities are more vulnerable to domestic violence.

- **Defining domestic abuse against people with disabilities:** This is where a person with a limiting illness or disability experiences violence.

Child Abuse: Domestic Abuse continued...

Domestic abuse - teen dating: Domestic violence is not just limited to adults as young people are subject to relationship abuse too.

- **Defining teen dating abuse:** This form of domestic abuse is where a young person is assaulted, experiences sexual violence and/or victimisation.

Domestic abuse - during pregnancy: Domestic violence can start or worsen during pregnancy.

- **Defining domestic abuse during pregnancy:** This form of abuse can cause placental separation, foetal fractures, antepartum haemorrhage, rupture of the uterus, pre-term labour and impacts upon the health of a woman and her baby through poor diet and restricted access to antenatal care.

Domestic abuse - within LGBT relationships: Domestic abuse is not limited to heterosexual relationships. It's thought that around 25% of LGBT people suffer through violent or threatening relationships with partners or ex-partners - roughly the same proportion as heterosexual women.

- **Defining domestic abuse within LGBT relationships:** This is a form of domestic violence in gay, lesbian, bisexual and transgender relationships; and which can be motivated by concerns around homophobia and gender discrimination. Abuse can include wanting relationship exclusivity quicker than the person is comfortable with - and can include being pushed into living together, or getting married. In addition, this abuse can include jealousy, isolating the person and even threats of outing them.

Domestic abuse - against men: Men who experience domestic abuse from a current or former partner find it difficult to get support. This can be due to any number of reasons, including love for a partner, embarrassment or shame, as well as concern for any children - and simply not knowing where to go. According to the abuse charity ManKind, male victims are more than twice as likely as women to keep the abuse secret and not seek help.

- **Defining domestic abuse against men:** Domestic abuse against men doesn't just mean that acts of physical violence and sexual abuse are involved; it can also take the form of controlling behaviour - which includes such behaviours as jealousy, put downs, lack of privacy and being emotionally blackmailed. It can result in the person changing their behaviour to avoid conflict; and feeling as if they are constantly walking on egg shells.

Domestic abuse - stalking: This is a form of abuse where a person is being stalked or harassed and the obsessive or repeated behaviour is unwanted by the victim.

- **Defining stalking:** Stalking is where a stranger or acquaintance may wilfully and repeatedly follow, watch and/or harass another person.

Any allegation of stalking should be taken very seriously as it is synonymous with increased risk of serious harm or murder.

Help and guidance covering all forms of domestic abuse can be obtained from Victim Support by telephoning 0808 168 9111 or by visiting the website below:

[Get Help with Domestic Abuse](#)

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Domestic Abuse** and best good practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

45. Child Abuse: Female Genital Mutilation

Female genital mutilation (FGM): There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous - as well as being a criminal offence.

Defining FGM: FGM is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or sunna.

The law and FGM: FGM has been a criminal offence in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. Since July 2015, anyone can apply to the court for an FGM Protection Order if they are concerned that someone is at risk of FGM. Breaching an FGM Protection Order is a criminal offence with a maximum sentence of five years' imprisonment. Since October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales.

Professionals must make a report to the Police, if, in the course of their duties:

- They are informed by a girl under the age of 18 that she has undergone an act of FGM
- They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18

Changes in behaviour which can indicate a child has undergone FGM: A girl or woman who has had FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear

Changes to look out for which may indicate a child is at risk of undergoing female genital mutilation: A girl at immediate risk of FGM may ask a teacher, or another adult for help if she suspects FGM is going to happen, or she may run away from home or miss school. Although the girl may not know what's going to happen, she might talk about:

- Being taken 'home' to visit family
- A special occasion to 'become a woman'
- An older female relative visiting the UK

Please note: Although this Safeguarding Handbook is specifically concerned with child protection and safeguarding, the following is relevant to this aim:

There is no requirement for automatic referral of adult women with FGM to adult social services or the Police. Therefore, referral to the Police **must not** be introduced as an automatic response when identifying adult women with FGM - and each case has to therefore be individually assessed. Adult women with FGM should be supported by offering referral to community groups who can provide the appropriate support, and clinical intervention - or other services as appropriate e.g. through an NHS FGM clinic. However, the wishes of the woman concerned must be respected at all times.

Where this note becomes of relevance to NTC's child safeguarding policies is that if the woman who has undergone FGM is pregnant - then the welfare of the unborn child or others in her extended family must be considered at this point - as these children are potentially at risk of FGM also and safeguarding action must be taken accordingly.

If any NTC staff member is in any way concerned about a girl being at risk of FGM, they must immediately bring their concerns to the attention of NTC's DSO.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Female Genital Mutilation** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

46. Child Abuse: Grooming

Grooming: Many children do not understand that they have been groomed; or that what has happened is abuse. Children can be groomed online, or in the real world - and this can take place by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female and they can be any age.

Defining grooming: Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation.

How grooming happens: Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time gaining a child's trust. They may also try to gain the trust of the whole family so they can be alone with the child. Groomers manage to do this by:

- Pretending to be someone they are not e.g. saying they are the same age online
- Offering advice or understanding
- Buying gifts
- Giving the child attention
- Using their professional position or reputation
- Taking them on trips, outings or holidays.
- Using secrets and intimidation to control children

Once a groomer has established trust, they then exploit the relationship by isolating the child from friends or family and making the child feel dependent on them. They will use any means of power or control to make a child believe they have no choice but to do what the groomer wants. Groomers may introduce 'secrets' as a way to control or frighten the child. Sometimes they will blackmail the child, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

Online grooming: It's easy for groomers to hide their identity online. They may pretend to be a child and then chat and become 'friends' with children they are targeting. Groomers can use social media sites, instant messaging apps including teen dating apps, or online gaming platforms to connect with a child. They can spend time learning about a child's interests from their online profiles - and then use this knowledge to help them build up a relationship.

Groomers may look for:

- Usernames or comments that are flirtatious or have a sexual meaning
- Public comments that suggest a child has low self-esteem or is vulnerable

Groomers don't always target a particular child. Sometimes they will send messages to hundreds of children and wait to see who responds. Groomers no longer need to meet children in real life to abuse them. Increasingly, groomers are sexually exploiting their victims by persuading them to take part in online sexual activity.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Grooming** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

47. Child Abuse: Harmful Sexual Behaviour

Harmful sexual behaviour: Children who develop harmful sexual behaviour harm themselves and others. **Harmful sexual behaviour includes:**

- Using sexually explicit words and phrases
- Inappropriate touching
- Using sexual violence or threats
- Full penetrative sex with other children or adults

Sexual behaviour between children is also considered harmful if one of the children is much older - particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them e.g. if the older child is disabled.

Why children develop harmful sexual behaviour: Children who develop harmful sexual behaviour have usually experienced abuse and neglect themselves. A 2013 study of children with harmful sexual behaviour suggested that two-thirds had experienced some kind of abuse or trauma such as physical abuse, emotional abuse, sexual abuse, severe neglect, parental rejection, family breakdown, domestic violence, and parental drug and alcohol abuse. Around half of them had experienced sexual abuse.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Harmful Sexual Behaviour** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

48. Child Abuse: Honour Based Violence

Honour based violence (HBV): This is a form of domestic abuse which is perpetrated in the name of so called 'honour'. It may be a violent crime or incident which may have been committed to protect - or defend the honour of the family - or community.

Defining HBV: Is often linked to family members or acquaintances who 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. Examples of why HBV may be committed against people include:

- Becoming involved with a boyfriend or girlfriend from a different culture or religion
- Wanting to get out of an arranged marriage
- Wanting to get out of a forced marriage - a forced marriage is very different to an arrange marriage where both parties have agreed
- Wearing clothes or taking part in activities that may not be considered traditional within their culture.

Women and girls are most common victims of HBV, however it can also affect men and boys.

Not all crimes of 'honour' include violence, but it is a sub-heading of domestic abuse such as threats of violence, sexual or psychological abuse, being held against their will, or taken somewhere they don't want to go.

It should be noted that NTC's HBV policy does not stand alone, but is inexorably linked to domestic abuse. This policy sits alongside - and should be used in conjunction with - NTC's safeguarding policies and procedures.

Please refer to NTC's policy on Domestic Violence in this section of the Safeguarding Handbook.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Honour Based Violence** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

49. Child Abuse: Modern Slavery

Modern slavery: Modern slavery takes many forms encompassing slavery, servitude, forced or compulsory labour and human trafficking.

Defining modern slavery: Modern slavery is where offenders - known as slave drivers or traffickers - coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. Slave drivers or traffickers may sexually exploit children, force them to work for little or no pay and/or force them to commit criminal activities.

The cross-government strategy to approach fighting modern slavery in the UK and internationally focuses on 4 areas based on the 'four Ps' structure:

- **Pursue:** Prosecute and disrupt the activities of those responsible for modern slavery
- **Prevent:** Prevent people from engaging in modern slavery
- **Protect:** Protect vulnerable people from exploitation by raising awareness and helping to increase resilience against modern slavery
- **Prepare:** Improve victim identification and provide them with better support and protection.

Modern slavery is broken down into the following four categories:

- a. Labour exploitation
- b. Domestic servitude
- c. Sexual exploitation
- d. Criminal exploitation

The above four categories are further sub-divided into the following 17 areas:

a. Labour exploitation...

1. **Exploited for multiple purposes in isolated environments:** This is where a person is exploited for labour in an isolated location. This may even be on the offenders' property and normally in squalid conditions. This person will be subjected to repeated abuse and rarely paid.
2. **Work for offenders:** This is where a person is forced to work directly for offenders on sites - or businesses that the offender controls (can be known as a gangmaster) - for little or no pay.
3. **Work for someone other than offenders:** This is where a person is employed legitimately by an employer unrelated to the offender, however, the offender will have control of their bank account and will take most, if not all of their wages.

b. Domestic servitude...

4. **Exploitation by partner:** This is where a person is forced to undertake household chores for their partner and partners relatives. If the person is married to the offender, it may have been an arranged or forced marriage.
5. **Exploitation by relatives:** This is where a person lives with family and extended family and is exploited for household chores and childcare. Children are very often the victims of this form of exploitation.
6. **Exploitation by a person not related:** This is where the person is living with strangers and are forced to undertake household chores. Normally they will also be confined to the house.

c. Sexual exploitation...

7. **Child sexual exploitation - group exploitation:** This is where the child is sexually exploited by groups of offenders. This is normally for personal gratification, but can also be for forced sex work - in fixed or changing locations. Offenders will often transport the child to different locations to abuse them.
8. **Child sexual exploitation - single exploiter:** This is where the child is sexually exploited by an individual. They will groom the child and then use them for sexual exploitation.
9. **Forced sex work in fixed location:** This is where the person is trafficked and exploited in an established location for sex work e.g. brothels and massage parlours.
10. **Forced sex work in changing location:** This is where a person is forced into sex work and where the location changes. Normally advertised online and will be found at locations that include streets, clients' residence, hotels and pop-up brothels.
11. **Trafficking for personal gratification:** This is where a person is trafficked to a residential site that is controlled by the offender - and where the offender sexually exploits the person for their own gratification.

Child Abuse: Modern Slavery continued...

d. Criminal exploitation:

12. **Forced gang-related criminality:** This is where a person is forced to undertake gang related criminal activities. It is very often children that are exploited and who are forced by gangs to transport drugs and money.
13. **Forced labour in illegal activities:** This is where a person is forced to provide labour to offenders. This will be for illegal purposes and the most common example is where they are forced to cultivate cannabis in a private residence.
14. **Forced acquisitive crime:** This is where a person is forced to carry out crimes such as shoplifting and pickpocketing. They may be provided with food and accommodation, but would rarely be paid.
15. **Forced begging:** This is where a person is transported to locations to beg on streets for money, which is then taken by the offender. This type of exploitation is very often committed against children or adults at risk.
16. **Trafficking for forced sham marriage:** This is where traffickers transport EU nationals to the UK and sell them to an exploiter. The exploiters will then marry the victims to gain immigration advantages and often sexually abuse them.
17. **Financial fraud (including benefit fraud):** This is where a person is exploited financially and most commonly their identity documents are taken and used to claim benefits.

The law on modern slavery: The Modern Slavery Act 2015 has consolidated all current offences relating to trafficking and slavery as detailed above. Modern slavery is a hidden crime, usually made up of a series of different events, often taking place in different countries - and frequently involving multiple victims and offenders - who may be involved at different times. These crimes of modern slavery often consist of three distinct stages:

- **Recruitment**
- **Exploitation**
- **Transportation.**

The complexity of this crime is recognised in the **Palermo Protocol** on human trafficking, which is a key piece of international anti-trafficking legislation. This protocol identifies three elements of human trafficking as the:

- **Act** of human trafficking - which includes the recruitment of victims
- **Means** - which is referring to the ways in which offenders carry out the act of human trafficking e.g. through force, abuse of power and/or coercion
- **Purpose** - this element of human trafficking being the way in which victims are exploited.

If a child makes a disclosure, or there are suspicions of an act of modern slavery, NTC staff should immediately speak to the organisations DSO. If a child is in immediate danger, then the police should be called immediately on 999.

All concerns or reports relating to Modern Slavery will be dealt with by using NTC's Procedure for Responding to Signs or Suspicions of Abuse in the Safeguarding Handbook.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Modern Slavery** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

50. Child Abuse: Non-Recent Abuse

Non-recent abuse is also known as Historical Abuse. It is never too late to report a claim of abuse and can be reported to the police regardless of how long ago it happened.

Defining non-recent abuse: Non-recent abuse is where there has been an allegation of abuse - which can be neglect, physical, sexual or emotional abuse - and which has been made by, or on behalf of, a person who is now 18 years old or over, relating to an incident that took place when they were under the age of 18 years old.

It is more likely that someone who has been abused as a child will suffer abuse again and this is known as victimisation.

Long term effects of non-recent abuse: People who have been previously neglected or abused may experience, emotional difficulties, mental health problems, problems with drug and alcohol abuse, poor physical health, struggles with parenting and/or their relationships, as well as having learning difficulties and/or behavioural problems.

Supporting disclosures of non-recent abuse that has not previously been reported: In situations where NTC receive a disclosure of non-recent abuse that has not previously been reported - relating to a person who is still a child - NTC's DSO will always adhere to the appropriate reporting procedure as outlined in this Safeguarding Handbook.

Therefore, every report of non-recent abuse - of a person who is still a child - will always be acted upon in accordance with the law relating to the protection of children and NTC's policies, procedures and processes in this Safeguarding Handbook.

Supporting disclosures of non-recent abuse of adults: It is acknowledged that if the disclosure of non-recent abuse relates to a person who is now aged 18 years of age or older, that person cannot be forced or compelled to report the abuse to the police if they do not want to. In such cases, NTC will offer reassurance to them that should they wish to report the matter in the future, they will be provided with the help and support to do so.

However, if an adult - who discloses non-recent abuse - wants to make a report, they may want support from NTC to do so. In these circumstances NTC's DSO will take the following steps:

- Advise them they can contact make a report to the local police on the non-emergency number - **101**
- The 101 operator will put them through to the **Sexual Offences Liaison Officer (SOLO)** - who will take an initial statement and then arrange to meet at another time for a more detailed statement
- If the adult does not feel comfortable in reporting the non-recent abuse directly to the - they will be advised to make contact with the **NSPCC helpline - 0808 800 5000**. The NSPCC will discuss the various reporting options available to them

NTC's DSO will make it clear that the organisation will continue to support them through the process if required.

Supporting disclosures of non-recent abuse that have previously been reported: The process that will be followed in these circumstances will depend on the current age of the person:

- If the person is a child NTC's DSO will follow the relevant policies, procedure and process detailed in this Safeguarding Handbook

If the person is making the disclosure is over 18 years of age, NTC's DSO will recommend the following agencies:

- **National Association for People Abused in Childhood (NAPAC):** This agency can provide support for the person who has been abused, as well as other family members and friends, as well as advising on who else can provide help. In addition, NAPAC can advise and support NTC's DSO (or other NTC staff members) who are providing support to the abused person...

[Visit NAPAC Website](#)

- **Samaritans:** This is a telephone service that provides confidential emotional support for people experiencing distress or despair and are available 365 days a year...

[Visit Samaritans Website](#)

Child Abuse: Non-Recent Abuse

- **Adults GP:** The persons GP will be able refer them for the appropriate support they need such as counselling
- **British Association for Counselling & Psychotherapy (BACP):** If they would prefer not to speak with their GP they can search for private counselling if this was preferred...

[Visit BACP Website](#)

- **Rape Crisis:** This agency provides a directory of local support services...

[Visit Rape Crisis Website](#)

As for all other situations, should an NTC staff member feel that a person is in immediate danger, then the police should be called without delay on 999.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Non-recent Abuse** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

51. Child Abuse: Online Abuse

Online abuse: This type of abuse can result in a child experiencing any other numerous types of abuse - including cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world - for example bullying or grooming. However, it may also be that the abuse only happens online e.g. persuading children to take part in sexual activity online.

The unique problem of online abuse: A real problem is that children can feel like there is no escape from online abuse - as abusers can contact them at any time of the day or night. Online abuse results in children being abused in what should be considered safe places like their bedrooms - and images and videos can be stored and shared with other people.

Defining online abuse: Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.

This section relating to online abuse should be read in conjunction with the other types of child abuse that are outlined in this Safeguarding Handbook.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Online Abuse** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

52. Child Abuse: Peer on Peer Abuse

Peer on peer abuse: Peer on peer abuse is where a child is exploited, bullied or harmed by another child (known as a peer) i.e. someone who is either the same age or older, but where both parties are under the age of 18.

Defining peer on peer abuse: Peer on peer abuse takes many forms, but often includes the following different categories of abuse:

- **Bullying:** A child may spread rumours, hit, push, name call and/or threaten another child
- **Cyber bullying:** Cyber bullying is the same as bullying - but the bullying is conducted online using social media networks etc.
- **Emotional abuse:** A child humiliates, threatens, criticises, uses as a scape-goat and/or makes another child a subject of their jokes
- **Initiation/hazing:** This is where a child or children induct new comers into a group by making them undertake dares, or be part of an initiation ceremony
- **Physical abuse:** A child hurts another child deliberately i.e. by biting, kicking, punching and/or the pulling of hair
- **Prejudiced behaviour:** This is where a child targets another child - that may have disabilities, special needs, cultural differences and/or a different sexual identity - to make the other child feel powerless, worthless or excluded
- **Sexting:** A child shares indecent images or videos of themselves - either naked or semi-naked - to another child; and also includes the sending of sexually explicit messages
- **Sexual abuse and/or sexually harmful behaviour:** A child uses inappropriate sexual language, sexual threats, sexually touching, or has full penetrative sex with another child
- **Sexual exploitation:** This is where a young person may think that they are in a relationship with another young person and they receive gifts, money or affection in return for them performing sexual activities on the other young person, or on someone else. This form of abuse can lead to grooming which is where an emotional connection is gained with a child - to develop their trust - and which is actually for the purposes of sexual abuse, sexual exploitation, or the trafficking of the child. Children can be groomed online or face to face and/or by a stranger, or even by someone that the child knows
- **Teenage relationship abuse:** This is where a young person is assaulted, experiences sexual violence, or is victimised by their partner, who is also under the age of 18 years old. Further information relating to teenage relationship abuse is provided in the Domestic Abuse section of this Safeguarding Handbook.

Further information & guidance related to peer on peer abuse: Many of the different types of abuse detailed above are referenced in greater detail throughout this section of the Safeguarding Handbook. Staff are advised to familiarise themselves with all the areas of child abuse in this handbook and follow the relevant guidance, advice and reporting procedures relevant to the situation e.g. in circumstances of bullying, NTC staff should follow the policy and procedures relating to anti-bullying. If in doubt staff should always speak to NTC's DSO.

As for all other situations, should an NTC staff member feel that a child is in immediate danger, then the police should be called without delay on 999.

Dealing with allegations of peer on peer abuse: In most instances, the conduct of a child towards another child will be covered by NTC's Behaviour Code for Children - within this Safeguarding Handbook. However, NTC also understands that some allegations might be of such a serious nature that they raise safeguarding concerns in themselves e.g. allegations which include physical abuse, emotional abuse, sexual abuse and sexual exploitation etc.

Accordingly, whilst NTC understand the risks of peer on peer abuse and will work proactively to minimise the chances of it happening, the organisation has also developed a Peer on Peer Abuse policy - to deal with allegations of abuse made against a child by another child - for any situations when the Behaviour Code for Children is not the appropriate response.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Peer on Peer Abuse** and good practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

53. Child Abuse: Sexting

Sexting: Sexting can happen anywhere, as all that is needed is access to a mobile phone, tablet, smartphone or laptop i.e. any device that allows a child to share media and messages.

Defining sexting: Sexting is where someone shares indecent images or videos of themselves - either naked or semi-naked - with another child or adult. Sexting also includes the sending of sexually explicit messages (even if those messages are sent in the form of a code). Sexting may also be referred to as:

- **Trading nudes**
- **Dirtyies**
- **Pic for Pic.**

Understanding why children are sexting: There are many reasons why children are sexting - which include the following...

- They think everyone else is doing it
- Because it boosts their self-esteem
- As part of flirting
- Exploring their sexual identity and sexual feelings
- To connect with and make new friends on social media
- Because they may be finding it hard to say no to someone who is asking for explicit images - especially if the person asking is being persistent.

Risks associated with sexting: Sexting may seem harmless, but once an image or message has been sent the sender has no control over what happens to that image or message - and whether it will become public. This means they can be saved or copied by others (even if shared privately) and can leave the sender vulnerable to the following...

- **Blackmail:** People may threaten to share images with others, unless the sender gives more images, or pays money
- **Bullying:** Images or messages may be shared with the sender's peers - which could result in them being bullied
- **Unwanted attention:** Sex offenders know where to search for images and may then collect or modify them for inappropriate and/or illegal use
- **Emotional distress:** Knowing that an image or message has been shared may make the sender feel embarrassed and humiliated, which in turn could lead to such things as the sender self-harming or feeling suicidal.

The law on sexting: It is illegal to create or share explicit images of a child, even if the person doing so is a child themselves. Therefore, a child is automatically breaking the law if they:

- Take an explicit image or video of themselves or a friend
- Share an explicit image or video of a child - even if it's shared between children of the same age - and even if the images being shared is of themselves
- Possess, download or store an explicit image or video of a child, even if permission has been given for it to be created in the first place.

Crime outcome 21: If a child is found creating or sharing images, the police can choose - under **Crime Outcome 21** - to record that a crime has been committed, but that the taking of formal action isn't in the public interest. Crimes recorded this way are unlikely to appear on future DBS records or checks, unless the child has been involved in other similar activities, which may indicate that they are a risk.

What to do if a child makes a disclosure about sexting: The **National Police Chief's Council (NPCC)** recommends that safeguarding should be the main concern of any investigation into a sexting incident. Therefore, if a child discloses concerns relating to sexting, then the NTC staff member should attempt to identify the following information, as discreetly as possible:

- Whether they are referring to an image, video or message?
- How the child is feeling?
- Whether they know how widely the image has been shared and with whom?
- Whether there are any adults involved?
- Whether the image, video or message is on an NTC device, or their own personal device?

Child Abuse: Sexting continued...

The NPCC further recommends that every effort should be made to avoid unnecessarily criminalising a child. Therefore, if after investigating, the images were not intended to cause harm - and the child or children involved had given consent - the decision may be made to handle the incident within the framework of NTC's safeguarding policies and procedures.

If further investigation into a sexting disclosure is required - under NTC's safeguarding policies and procedures - the following steps should be adhered to:

- Inform NTC's DSO immediately as they will be ultimately accountable for the investigation
- Avoid looking at the image, video or message
- If the image, video or message is on an NTC device this will need to be isolated - which may affect all network users. In such circumstances, NTC's SSM and/or DSO will take the necessary action
- NTC's DSO will be the person responsible for accurately recording (in writing) the details of the incident, along with the actions taken.

NTC's DSO will be required to contact the police and children's social care in the following circumstances:

- Somebody involved in the incident is over the age of 18 or under the age of 13
- There are any concerns about the ability for any child involved to have given consent
- The images are extreme, or show violence
- The incident appears to have been intended to cause physical or emotional harm
- There is any reason to believe that the child has been blackmailed, coerced or groomed.

Should an NTC staff member feel that a child is in immediate danger, then the police should be called without delay on 999.

Advice to help have explicit images removed: The DSO can support the child to take the following action...

- Report the image to the site that is hosting it
- Inform the **Child Exploitation and Online Protection Centre (Managing CEOP)** of the **National Crime Agency (NCA)** if it is believed that the child is at risk of abuse...

Contact the Managing CEOP

- Contact the **Internet Watch Foundation (IWF)** and **Childline (0800 1111)** who will work together to get an image removed...

Contact the IWF

Ongoing support: NTC will ensure that those affected by a sexting incident receive ongoing support from the organisations DSO - with the involvement of parents and carers - unless such involvement has been identified as a risk. NTC's DSO will make a referral to the appropriate counselling service, if this is requested, or it is felt necessary and/or appropriate.

The damage inflicted by sexting can frequently be underestimated, as it is still deemed harmless by most. Sexting can cause considerable distress to children - to the extent that it affects their health, development - and in the extreme - can cause them significant harm, including self-harm or suicide. For this reason, NTC will rigorously enforce its approach to sexting.

Reviewed & Updated: March 2018

NTC will review this **Child Abuse: Sexting** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

56. Responding to Signs or Suspicions of Abuse Procedure

The following procedure applies to any NTC member of staff who may be concerned about the safety and protection of a child. The different types of abuse have been detailed in sections 41 through to 53 of this Handbook. NTC staff should refer back to these sections when reading this procedure.

Where there is concern relating to a child being vulnerable to radicalisation, extremism, or that they are being drawn into extremism, please refer to section 108 of this Safeguarding Handbook which provides detailed guidance under NTC's Prevent Duty.

Purpose and aim of this procedure: NTC aims to ensure that those children who attend and/or participate in activities or events organised by NTC - as well as any other children who may come to the attention of NTC - receive the protection and support they need if they are at risk of abuse or radicalisation. This procedure provides clear direction to NTC staff if they have concerns that a child who is in need of protection.

How abuse might be disclosed: There are numerous ways that an NTC member of staff may be made aware of abuse or the risk of abuse. These include...

- A child might make a direct disclosure about themselves
- A child might make a direct disclosure about another child
- A child might offer information that is worrying, but not a direct disclosure
- A member of NTC staff might be concerned about a child's appearance or behaviour, or about the behaviour of a parent or carer towards a child
- A parent or carer might make a disclosure about abuse that a child is suffering, or is at risk of suffering
- A parent might offer information about a child that is worrying, but not a direct disclosure.

When talking to a child - who has told you that they are/or another child is being abused - please take account of the following guidance:

1. Reassure the child that telling someone about it was the right thing to do
2. Tell them that you now have to do what you can to keep them (or the child who is the subject of the allegation) safe
3. Let the child know what you are going to do next and who else needs to know about it
4. Let the child tell their whole story - don't try to investigate or quiz the child - but make sure that you are clear as to what they are saying
5. Ask the child what they would like to happen as a result of what they have said, but don't make or infer promises you can't keep
6. Give the child the **ChildLine** phone number which is **0800 1111**.

How to help a child in immediate danger or in need of emergency medical attention:

- If the child is in immediate danger and is with you, remain with them and call the **Police** on **999**
- If the child is elsewhere, contact the **Police** on **999** and explain the situation to them
- If the child needs emergency medical attention, call an **ambulance** by dialling **999** and while you are waiting for it to arrive, get help from NTC's first aider
- If a first aider is not available, use any first aid knowledge that you may have yourself to help the child
- You must also make contact with NTC's DSO to let them know what is happening.

Informing the family & the LADO: A decision will need to be made about who should inform the child's family and the Local Authority Children's Social Care Department - and when they should be informed. If the Police are now involved, then the Police and/or the health services should be part of this decision. Consider the welfare of the child in the decision making as the highest priority. Issues that will need to be taken into account as part of the decision making process are:

- The child's wishes and feelings
- The parent's right to know - unless this would place the child or someone else in danger, or would interfere with a criminal investigation
- The impact of telling, or not telling the parent
- The current assessment of the risk to the child, as well as the source of that risk
- Any risk management plans that currently exist for this child.

Once any immediate danger - or emergency medical need - has been dealt with, follow the steps set out in the Flow Chart to Follow when Responding to Signs of Abuse in this Safeguarding Handbook.

Responding to Signs or Suspicions of Abuse Procedure continued...

Keeping a record of your concerns: Use the **Reporting Concerns about a Child Form** (available for NTC's DSO). The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory child protection authorities if a referral to them is needed. The form should be signed and dated by all those involved in its completion and kept confidentially on the child's file and in line with NTC's Data Protection Policy. The name of the person making the notes should be written alongside each entry.

Reporting child protection concerns: If a child is in need of emergency medical attention or in immediate danger, follow the procedure set out in the earlier section above on **How to help a child in immediate danger or in need of emergency medical attention**.

How NTC will support staff: NTC recognises that staff working for the organisation - and who have become involved in supporting/working with an individual who has suffered harm (or appears to be likely to suffer harm) may find the situation stressful and upsetting.

It is NTC's paramount concern that in these circumstances staff receive all necessary support.

How NTC will support staff: Accordingly, NTC will support any staff member who finds themselves in this situation, by providing an opportunity to talk through any anxieties, concerns and worries with NTC's DSO. In all cases - and where required or considered appropriate - NTC and the DSO will seek-out further support for staff.

This could be provided by, for example, Occupational Health and/or a teacher/trade union representative as appropriate.

How NTC will support the senior safeguarding team: NTC will ensure that the SSM, DSO and DDSO have access to the necessary support to enable them to effectively manage the demands of the role and to be able to support NTC staff as has been outlined above.

Such support will include attending appropriate safeguarding workshops, courses and/or meetings, as well as any safeguarding events and support provided by NTC's Local Authority.

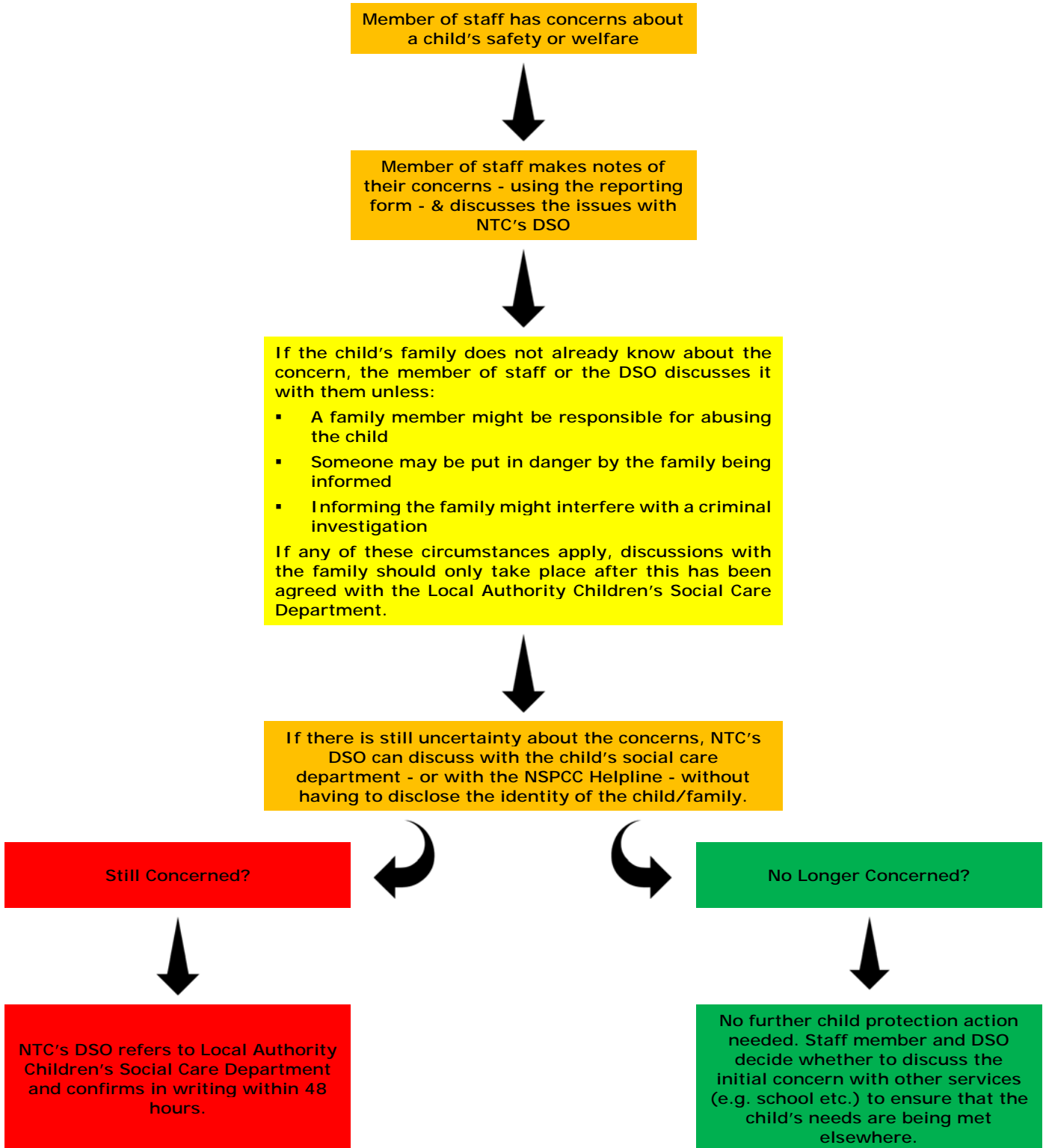
Any member of staff - who is struggling with any issues or concerns as a consequence of their safeguarding responsibilities - are encouraged to speak with the NTC's DSO who will be able to provide, or access, the appropriate support.

NTC staff should now take the steps set out in the Responding to Signs of Abuse Flowchart on the following page to ensure the concern is dealt with.

Reviewed & Updated: March 2018

NTC will review this **Responding to Signs or Suspicions of Abuse Procedure** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

57. Responding to Signs or Suspicions of Abuse Flowchart



Reviewed & Updated: March 2018

NTC will review this **Responding to Signs or Suspicions of Abuse Flowchart** and good practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

59. Dealing with Allegations of Abuse made against Staff Policy

Policy statement: NTC has developed clear policies and procedures for dealing with allegations against NTC staff who work with children. Examples of allegations that would be covered by this policy, although not intended to be exhaustive, include:

- **Behaviour that has, or may have, harmed a child**
- **Criminal acts against - or related to - a child**
- **Behaviour towards a child or children in a way that indicates they may pose a risk of harm to children**

Principles: In the first instance, any such allegation against an NTC member of staff must be reported immediately to NTC's DSO. NTC's DSO must immediately make NTC's Managing Director aware of the allegation and the Managing Director will then be responsible for notifying the named Board Safeguarding Lead and the SSM - if different from the Managing Director.

The Board Safeguarding Lead is responsible for informing the Board within 24 hours of the allegation.

Reporting time limits: NTC's DSO is accountable for contacting the LADO and informing them of all allegations that have come to their attention **within 24 hours of the allegations being made.**

DBS Referral: As a provider of regulated activity, NTC has a legal duty to make a referral to DBS in certain circumstances. NTC's DSO - supported by NTC's SSM - will seek support from the Local Authority's Designated Officer when a DBS referral needs to be made.

Information and further advice relating to making a DBS referral being available here:

[Get DBS Referral Advice](#)

Reviewed & Updated: March 2018

NTC will review this **Dealing with Allegations of Abuse made against Staff Policy** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

60. Dealing with Allegations of Abuse made against Staff Procedure

Purpose of procedure: This procedure outlines what should happen if a safeguarding allegation is made against any adult working for, or involved with, NTC. The procedure provides clear direction to those NTC staff who are called upon to deal with such allegations - and how to manage the investigations that may result from them.

The aims of this procedure are:

- To ensure that children who access the services and facilities provided by NTC - and any other children who may come to its attention - are protected and supported following an allegation that they may have been abused by an adult from within NTC
- To ensure that there is a fair, consistent and robust response to any allegations made, so that the risk posed to other children by an abusive individual is managed effectively
- To facilitate an appropriate level of investigation into allegations - whether they are said to have taken place recently; at any time the person in question has been employed by/volunteered with NTC; or prior to the person's involvement with NTC
- To ensure that NTC continues to fulfil its responsibilities towards members of staff who may be subject to such investigations
- To ensure that individuals are able to continue in their role if they have been at the centre of allegations that are unfounded or deemed to be malicious in origin.

Who does this procedure apply to:

- Any NTC staff member to whom an allegation of abuse has been made and which involves another NTC staff member
- Any member of NTC's executive team, senior managers - including NTC's DSO and wider safeguarding team - as well as NTC line managers and supervisors, who may be required to deal with such allegations and manage investigations that result from them.

How an allegation of possible abuse may be disclosed: Allegations might be made against an adult working for, or who is involved with NTC in the following manner...

- By a child or parent/carer making a direct allegation against an NTC staff member
- By a child or parent/carer expressing discomfort with the behaviour of an NTC staff member that falls short of a specific allegation
- By another NTC staff member directly observing behaviour that is a cause for concern
- By NTC being informed by the Police - or another statutory authority - that an NTC staff member is the subject of an investigation
- By information emerging from the renewal of a DBS check that suggests that an NTC staff member may have committed an offence - or may have been involved in an activity - that could compromise the safety of the children they work with at NTC
- By an NTC staff member telling someone at NTC that they have been the subject of allegations; have actually harmed a child; or have committed an offence against (or related to) a child

The following pages outline the procedure to be followed to when an allegation of abuse is made against an NTC staff member and is broken down into the distinct sections:

- **The Procedure**
- **Conducting an Investigation**
- **Reporting an Allegation or Concern**
- **When to Involve the LADO**
- **Dealing with a Criminal Offence**
- **Talking to the Parents about the Allegation or Concern**
- **Talking to the Person who is the Subject of the Allegation**
- **Taking Disciplinary Action**
- **Supporting the Person at the Centre of the Allegation**
- **Managing Risks**
- **Following Investigation the Employee Returns to Work**
- **Following Investigation the Employee is Dismissed**
- **Keeping a Record of the Investigation**

Dealing with Allegations of Abuse made against Staff Procedure continued...

The Procedure	
There are potentially two issues that need to be dealt with as a matter of urgency...	
Issue 1	Is a child in immediate danger, or do they need emergency medical attention? <ul style="list-style-type: none"> ▪ If the child is in immediate danger and is with you, remain with them and call the Police on 999 ▪ If the child is elsewhere, contact the Police on 999 and explain the situation to them ▪ If the child needs emergency medical attention, call an ambulance by dialling 999 and while you are waiting for it to arrive, get help from NTC's first aider ▪ If a first aider is not available, use any first aid knowledge that you may have yourself to help the child ▪ You must also make contact with NTC's DSO to let them know what is happening.
	The NTC staff member or NTC's DSO should also inform the child's family if the child is in need of emergency medical attention - and arrange to meet them at the hospital or medical centre. The parents/carers should be informed that:
	<ul style="list-style-type: none"> ▪ An incident has occurred ▪ That the child has been injured ▪ That immediate steps have been taken to get help.
Issue 2	Is the person at the centre of the allegation working with children now?
	If this is the case, the concern needs to be discussed immediately with NTC's Managing Director, the SSM and the DSO. Either the Managing Director, SSM or DSO should then, in a sensitive manner, remove the staff member involved in the allegation from direct contact with children.
	It should then be explained to the person, in private, that there has been a complaint made against them, although the details of the complaint should not be given at this stage. The person should be informed that further information will be provided as soon as possible but that, until consultation has taken place with the relevant agencies and within the organisation, they should not be working with children. It may be best, under the circumstances, for the person to return home on the understanding that either NTC's Managing Director or DSO will telephone them later in the day.
	The information provided to them at this stage will need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the LADO, the Local Authority's Children's Social Care Department and the Police.
	If the person is a member of a Trade Union or other professional organisation, they should be advised to make contact with that Body. Arrangements should also be made for the NTC staff member to receive ongoing support in line with the responsibilities the organisation has towards their welfare.
Conducting an Investigation	
Once the above issues have been addressed, attention can now turn to dealing with the implications of the allegations. There are up to three possible lines of enquiry when an allegation is made:	
1	A Police investigation of a possible criminal offence.
2	Enquiries and an assessment by the Local Authority Children's Social Care Department about whether a child is in need of protection.
3	Investigation by NTC - and possible disciplinary action being taken against the person in question. This will include implementing a plan to manage any risk posed by the individual to children connected with NTC until the outcome of the other investigations and enquiries are known.
Reporting an Allegation or Concern	
4	If the allegation is made by a child or family member to an NTC staff member - or if an NTC staff member observes concerning behaviour by a colleague at first hand - this should be reported immediately to the staff member's line manager and NTC's DSO - who will be NTC's lead in relation to handling the allegation.
5	If a staff member has received an allegation or observed something of concern about their own manager, the staff member should report the allegation or concern to the person more senior to their own manager.
6	If the person who is the subject of the concern is the DSO, the matter should be reported to NTC's Managing Director and SMM of NTC.

Dealing with Allegations of Abuse made against Staff Procedure continued...

When to Involve the LADO	
The DSO must report the allegation to the LADO within 24 hours if the alleged behaviour suggests that the person in question:	
A	May have behaved in a way that has harmed or may have harmed a child
B	Has possibly committed a criminal offence against, or related to a child
C	Has behaved towards a child in a way that suggests that they may be unsuitable to work with children
This should also happen even if the individual has volunteered the information themselves.	
7	The LADO may be told of the allegation from another source. If this is the case, then the first information received by NTC may be when the LADO makes contact with NTC's DSO in order to explain the situation.
8	Whoever initiates the contact, there will be discussion between the LADO and NTC's DSO to share information about the nature and circumstances of the allegation, and to consider whether there is any evidence to suggest that it may be false or unfounded.
9	If there is any reason to suspect that a child has suffered (or be likely to suffer) significant harm and there are no obvious indications that the allegation is false, the LADO, in cooperation with NTC, will make an immediate referral to the Local Authority Children's Social Care Department to ask for a strategy discussion.
10	The LADO and NTC's DSO will take part in the strategy discussion. NTC's DSO - and any other representative from NTC - will co-operate fully with this - and any subsequent discussion with the Children's Social Care Department.
11	NTC will ask from the outset that the Children's Social Care Department shares any information obtained during the course of their enquiries with NTC's DSO where it has any relevance to the person's employment or volunteering with the organisation.
Dealing with a Criminal Offence	
12	If there is reason to suspect that a criminal offence may have been committed (whether or not the threshold of significant harm is reached), the LADO will contact the Police and involve them in a similar strategy discussion, which will include NTC's DSO.
13	The LADO - and any other representative from NTC - will cooperate fully with any discussion involving the Police and will ask for similar cooperation from the Police in terms of the sharing of information relevant to the person's employment or volunteering with the organisation.
14	Discussions with the Police will also explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place - or whether disciplinary action must wait until the criminal process is completed.
Talking to the Parents about the Allegation or Concern	
15	If the child's parents/carers do not already know about the allegation, NTC's DSO and the LADO will discuss how they should be informed and by whom.
Talking to the Person who is the Subject of the Allegation	
16	The person at the centre of the allegation will be informed as soon as possible after the initial consultation with the LADO. However, if a strategy discussion with Children's Social Care or the Police is needed, this might have to take place before the person concerned can be spoken to in full. The Police and Children's Social Care Department may have views on what information can be disclosed to the person.
17	Only limited information will be given to the person in question, unless the investigating authorities have indicated that they are happy for all information to be disclosed - or unless there is no need for involvement from these statutory agencies.
18	NTC's DSO will keep in close communication with the LADO and the other agencies involved, in order to manage the disclosure of information appropriately.

Dealing with Allegations of Abuse made against Staff Procedure continued...

Taking Disciplinary Action	
19	If the initial allegation does not involve a possible criminal offence, NTC's DSO and the line manager of the person at the centre of the allegation will consider whether formal disciplinary action is needed.
20	If the Local Authority Children's Social Care Department has undertaken any enquiries to determine whether a child or children are in need of protection, NTC's DSO will take account of any relevant information from these enquiries when considering whether disciplinary action should be brought against the person at the centre of the allegations.
The following timings should be kept to wherever possible, depending on the nature of the investigation:	
21	If formal disciplinary action is not needed, other appropriate action should be taken within three working days
22	If disciplinary action is required - and can be progressed without further investigation - this should take place within 15 days
23	If NTC decides that further investigation is needed in order to make a decision about formal disciplinary action, NTC's DSO will discuss with the LADO the possibility of this investigation being done by an independent person to ensure that the process is objective. Whether or not the investigation is handled internally or independently, the report should be presented to NTC's DSO within 10 working days .
24	Having received the report of the disciplinary investigation, NTC's DSO should decide within two working days whether a disciplinary hearing is needed.
25	If a disciplinary hearing is needed, it should be held within 15 working days .
26	NTC's DSO will continue to liaise with the LADO during the course of any investigation or disciplinary proceedings - and will continue to use the LADO as a source of advice and support.
If a criminal investigation is required, it may not be possible to make decisions about initiating disciplinary proceedings - or about the person's future work arrangements - until this is concluded. The Police are required to complete their work as soon as reasonably possible and to set review dates, therefore NTC's DSO will either liaise with the Police directly or via the LADO to check on the progress of the investigation and criminal process.	
27	The Police are required to inform NTC immediately if the person is either convicted of an offence or acquitted or, alternatively, if a decision is made not to charge them with an offence, or to administer a caution. In any eventuality, once the outcome is known, NTC's DSO will contact the LADO to discuss the issue of disciplinary proceedings.
If the allegation is substantiated and if, once the case is concluded, NTC dismisses the person or ceases to use their services, or the person ceases to provide their services, NTC's DSO will consult with the LADO about referral of the incident to the DBS. This should take place within a month.	
Supporting the Person at the Centre of the Allegation	
28	The first priority of NTC must always be the safety and welfare of children. However, as an NTC staff member, the person who is the subject of the allegation has a right to be treated in a fair, sensitive and non-judgemental manner - and to have their privacy respected - as far as this ensures the safety of the child and other children.
29	Information about the allegation must only be shared on a need to know basis with those directly responsible for supervising and managing the staff member. Any other information e.g. explanations to other staff members as to why the person is not at work or working to different arrangements, should be agreed and negotiated with the individual concerned.
30	If the person is a member of a Trade Union or a professional organisation, they should be advised to make contact with that body as soon as possible after being informed that they are the subject of an allegation. Arrangements should also be made for them to receive ongoing support and information about the progress of the investigation.

Dealing with Allegations of Abuse made against Staff Procedure continued...

Managing Risks	
31	The possible risk of harm to children presented by the person who is the subject of an allegation needs to be carefully managed both during and after any conclusion to the investigation processes following the allegation. This means that NTC may need to consider suspending the person if there is cause to suspect that a child may be at risk of significant harm, or if the allegation is serious enough to warrant investigation by the Police - or if it is so serious that it could lead to dismissal.
A decision to suspend should not be taken automatically, as there may be other ways of managing any risk presented by the person.	
32	The situation should be discussed fully between NTC's DSO, the individual's line manager and the LADO - who will seek the views of the Police and the Children's Social Care Department on the question of possible suspension. The conclusions of the discussion should also be carefully documented. Grounds for suspension should be clearly set out if this is the conclusion. If suspension is not the conclusion, then a clear plan should be made as to how any possible risk posed by the individual is to be managed. This could involve, for example, changes to the person's duties so that they do not have direct contact with children, and/or increased levels of supervision whilst at work.
Following Investigation the Employee Returns to Work	
33	If it is decided, once the case has been concluded, that a person who has been suspended - or who has taken sick leave due to the stress induced by the allegation - is able to return to work, NTC's DSO and the line manager of the person who has been the subject of the allegations should consider how best to support the individual in this process.
34	A plan to facilitate a return will be drawn up in consultation with the individual themselves and should take into account the need to manage any remaining child protection risks; as well as supporting the person concerned, after what will have been and will remain a very difficult experience.
35	If the allegation is found to be without substance or fabricated, NTC will consider referring the child in question to the Children's Social Care Department for them to assess whether they are in need of services or whether they may have been abused by someone else. If it is felt that there has been malicious intent behind the allegation, NTC will discuss with the Police whether there are grounds to pursue any action against the person responsible.
Following Investigation the Employee is Dismissed	
36	If the decision is that the person cannot return to work and has to be dismissed or chooses to resign, then NTC's DSO and the LADO will discuss the need for the matter to be referred to the DBS and/or to any professional body to which the person may belong.
NTC does not enter into compromise agreements with individuals who resign following the conclusion of investigations into allegations made against them, and will always comply with its statutory obligations to share information about the individual in the interests of protecting children.	
Keeping a Record of the Investigation	
37	All those involved in dealing with the allegation should keep clear notes of the following: <ul style="list-style-type: none"> ▪ The allegations made ▪ How they were followed up ▪ Any actions and decisions taken including the reasons for why.
38	These notes should be compiled gradually as the situation unfolds, with each entry being made as soon as possible after the event it describes. The notes should be signed and dated by the person making them, and the person's name should be printed alongside.
39	The notes should be kept confidentially on the file of the person who is the subject of the allegation. Discussion should take place with the LADO to determine whether any aspects of the notes may not be shared with the person concerned. If there are no reasons not to do so, a copy of the records should be given to the individual.
Notes must be held on file for a 10 year period, whether or not the person remains with NTC for this period.	

Reviewed & Updated: March 2018

NTC will review this **Dealing with Allegations of Abuse made against Staff Procedure** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

61. Dealing with Allegations of Peer on Peer Abuse Policy

Policy statement: NTC has developed clear policies and procedures for dealing with allegations of peer on peer abuse for NTC staff who work with children. Examples of allegations that would be covered by this policy, although not intended to be exhaustive, include:

- Behaviour that has, or may have, harmed a child
- Behaviour towards a child in a way that indicates they may pose a risk of harm to other children
- Sexually harmful behaviour and/or sexual exploitation etc.
- Bullying, cyber bullying, sexting etc.
- Prejudiced behaviour.

Principles: In the first instance, any such allegation against an NTC member of staff must be reported immediately to NTC's DSO. NTC's DSO must immediately make NTC's Managing Director aware of the allegation and the Managing Director will then be responsible for notifying the named Board Safeguarding Lead and the SSM - if different from the Managing Director.

The Board Safeguarding Lead is responsible for informing the Board within 24 hours of the allegation.

Reporting time limits: NTC's DSO is accountable for contacting the LADO and informing them of all allegations that have come to their attention **within 24 hours of the allegations being made.**

Reviewed & Updated: March 2018

NTC will review this **Child Protection Safeguarding Policy Statement** and good practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.

62. Dealing with Allegations of Peer on Peer Abuse Procedure

The different types of abuse that one child can do to another child have been detailed in sections 47 through to 59 of this Handbook. NTC staff members should refer to these sections when reading this procedure.

Purpose of procedure: This procedure outlines what should happen if an allegation of peer on peer abuse is made. The procedure provides clear direction to those NTC staff who are called upon to deal with such allegations - and how to manage investigations and care plans which may result from them.

The aims of this procedure are:

- To ensure that children who attend NTC - and any other children who may come to the attention of NTC - are protected and supported following an allegation that they may have been abused by another child involved with NTC
- To ensure that there is a fair, consistent and robust response to any allegations of this nature so that any risk posed to other children by the child in question is managed effectively
- To facilitate an appropriate level of investigation into allegations, whether they relate to recent alleged activity, said to have taken place during the time that the child in question has been involved with NTC, or whether they relate to abuse which allegedly took place prior to the child's involvement with NTC
- To ensure that NTC continues to fulfil its responsibilities towards children who may be subject to such investigations and are in need of support
- To ensure that there is an appropriate response in situations where allegations are unfounded or deemed to be malicious in origin.

Who does this procedure apply to:

- Any NTC staff member to whom an allegation of abuse has been made and which involves a child attending NTC
- Any member of NTC's executive team, senior managers - including NTC's DSO and wider safeguarding team - as well as NTC line managers and supervisors, who may be required to deal with such allegations and manage investigations that result from them.

How an allegation of possible abuse against another child may be disclosed: Allegations might be made against a child involved with NTC in the following manner...

- A child or parent/carer might make a direct allegation against another child
- A child or parent/carer might express discomfort with the behaviour of another child that falls short of a specific allegation
- Another child or an NTC staff member may directly observe behaviour from one child towards another that gives cause for concern
- NTC may be informed by a parent/carer, or by the Police - or another statutory authority - that a child is the subject of an investigation
- A child may volunteer information to NTC that they have harmed another child - or is at risk of doing so - or has committed an offence against (or related to) a child.

How to Respond to a Child Disclosing that they (or another Child) is being Abused by a Child	
a.	Reassure the child that they have done the right thing by telling someone about it.
b.	Tell them that you now have to do what you can to keep them (or the child who is the subject of the allegation) safe.
c.	Let the child know what you are going to do next and who else needs to know about it.
d.	Let the child tell their whole story - don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying.
e.	If possible, explain to the child's parent/carer what has happened. Do this first without the child there, and then summarise it again in front of the child so that it is an open subject between parent/carer and child. This may enable them to talk about it together more easily.
f.	Check out what the child would like to happen as a result of what they have said, but don't make or infer promises you can't keep.
g.	Give the child the ChildLine phone number - which is 0800 1111
h.	Make sure that the parent/carer has support too.

Dealing with Allegations of Peer on Peer Abuse Procedure continued...

How to Respond to a Child who says that they have Abused another Child	
a.	Reassure the child that they have done the right thing by telling someone about it.
b.	Tell them that you now have to do what you can to keep them and the child who has been abused safe.
c.	Let the child know what you are going to do next and who else needs to know about it.
d.	Let the child tell their whole story - don't try to investigate or quiz the child - but make sure that you are clear as to what they are saying.
e.	In conjunction with advice from NTC's DSO, if there is no risk to the child from the child's parent/carer, then explain to the parent/carer what has happened. Do this firstly without the child there, and then summarise it again in front of the child so that it is an open subject between parent/carer and child. This may enable them to talk about it together more easily.
f.	Check out what the child expects to happen as a result of what they have said - offer reassurance where appropriate, but don't make or infer promises you can't keep.
g.	Reassure the child that, with help, the problem can be sorted out and that what has happened does not make them an abuser for life.
h.	Give the child the ChildLine phone number - which is 0800 1111
i.	Remember that the child who has behaved in this way is a child in need of support.
j.	Make sure that the parent/carer has support too.

Recording the Concerns
Use the Reporting Concerns about a Child Form (available from NTC's DSO) to record the concern and for the clear steps on how you should deal with it. The full step by step procedures are detailed within this Peer on Peer Abuse Policy .
The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory child protection authorities if a referral to them is needed.

Is this a Child Safeguarding Issue or is it Bullying?	
1	When faced with a situation of one child behaving inappropriately towards another, a decision needs to be made about whether the problem behaviour constitutes bullying or a child safeguarding concern. This is a decision that needs to be reached by NTC's DSO, in consultation with the staff member responsible for the child; the staff member's line manager; and, if necessary, the Local Authority Children's Social Care Department.
A	If the conclusion is that the behaviour is an example of bullying, and if both children attend NTC, it needs to be dealt with under the Anti-bullying Policy & Procedure detailed in this Safeguarding Handbook.
B	If, however, it is behaviour that could be described as child abuse and has led to the victim possibly suffering significant harm, then it must be dealt with under the Dealing with Allegations of Peer on Peer Abuse Procedure . This should include all incidents of sexual assault and all but the most minor incidents of physical assault.

Use the checklist on the following page to help identify what may be bullying behaviour and what may be peer on peer abuse...Dealing with Allegations of Peer on Peer Abuse Procedure continued...

Dealing with Allegations of Peer on Peer Abuse Procedure continued...

The Following Checklist can be used to Help Inform the Decision	
Is it Bullying?	Is it Peer on Peer Abuse
The difference of power between the bully and the person being bullied is relatively small.	The difference of power between the child who is abusing and the person being abused is significant e.g. there is an age difference of more than two years.
When considering the above examples give due consideration to whether there is a significant difference in terms of size or level of ability - and whether the abuser holds a position of power (such as being a helper, volunteer or informal leader) as well as if the victim is significantly more vulnerable than the other child.	
The bullying behaviour is from a number of children acting in a group, rather than from just one child.	The behaviour involves sexual assault or physical assault - other than the most minor physical assault.
It may also, but not necessarily, be directed towards a group of other children rather than an individual child.	The child who is the victim of the behaviour may have suffered significant harm.
The behaviour has not previously been a concern and the bully/bullies may have been responding to group pressure.	The behaviour is not a one-off incident and is part of a pattern of concerning behaviour on the part of the child who is abusing.
The behaviour is perceived as bullying by the victim.	The behaviour, if sexual, is not part of normal experimentation that takes place between children.
The behaviour involves teasing or making fun of someone, excluding a child from games and conversations, pressurising other children not to be friends with someone, spreading hurtful rumours, cyberbullying, shouting at or verbally abusing someone.	The behaviour may not necessarily be perceived by the victim as abusive, particularly if it is sexual in nature. The behaviour includes the circulating of inappropriate photographs, and images, drawings and or messages.
The behaviour might also include stealing someone's possessions, making threats, or harassment on the basis of race, gender, sexuality or disability. In addition, the legislation relating to sexting and the sexting guidance provided in the Safeguarding Handbook should be taken into account when reaching a decision.	
Physical or sexual assault, or forcing someone to do something embarrassing, harmful or dangerous is also included in the list of bullying behaviours, but are the most likely to constitute peer on peer abuse if the victim suffers significant harm as a result of the behaviour.	

Is this Sexual abuse or Normal Experimentation?
All children develop an interest in their own sexuality from a young age and seek to learn about sex from their peers. It is important not to label normal, healthy behaviour as deviant or abusive. It is equally important not to allow sexually abusive behaviour perpetrated by one child towards another to go unchecked - as this is harmful both for the victim and the perpetrator. There are ways of assessing whether sexual behaviour between children is abusive or not.
Indicators of Sexually Abusive Behaviour
<ul style="list-style-type: none"> ▪ There is a significant difference in age, dominance or understanding between the children ▪ The behaviour was accompanied by the use of threats or bribes ▪ The behaviour was carried out in secret
For the purposes of this Peer on Peer Abuse Procedure , it is enough to say that if there is any question that the behaviour could be abusive, the matter should be discussed - by NTC's DSO - with the Local Authority Children's Social Care Department, or with the NSPCC Helpline which is 0808 800 5000 . This can initially take place without the names of the children being disclosed, although such information will have to be provided if the view of the Children's Social Care Department or the NSPCC is that the behaviour may constitute significant harm and that an investigation is needed.

Dealing with Allegations of Peer on Peer Abuse Procedure continued...

What to do if there are Concerns of Peer on Peer Abuse	
Issue 1	<p>If you believe that the child who has been allegedly abused, or the child who has allegedly perpetrated the abuse, is in immediate danger, or they need emergency medical attention, you must take the following action:</p> <ul style="list-style-type: none"> ▪ If the child is in immediate danger and is with you, remain with them and call the Police on 999 ▪ If the child is elsewhere, contact the Police on 999 and explain the situation to them ▪ If the child needs emergency medical attention, call an ambulance by dialling 999 and while you are waiting for it to arrive, get help from NTC's first aider ▪ If a first aider is not available, use any first aid knowledge that you may have yourself to help the child ▪ You must also make contact with NTC's DSO to let them know what is happening.
Issue 2	<p>A decision will need to be made about when and who should inform the families of both the child who has been abused and the child who has allegedly perpetrated the abuse, as well as the Local Authority Children's Social Care Department.</p> <p>If the child who is the alleged victim is not known to NTC, it is not the NTC's staff members role to inform the child's family. Even if the child who is the alleged victim is known, the Police and/or the Health Services, should be part of the decision making process if they have been contacted. The paramount consideration should always be the welfare of the children involved.</p> <p style="text-align: center;">Issues that will need to be taken into account are:</p> <ul style="list-style-type: none"> ▪ The children's wishes and feelings ▪ The parents' right to know (unless this would place the child who has allegedly perpetrated the abuse in danger, or would interfere with a criminal investigation) ▪ The impact of telling, or not telling, the parents ▪ The current assessment of the risk to the child who has been abused and the source of that risk ▪ The current assessment of any risk to the child who has allegedly perpetrated the abuse and the source of that risk ▪ Any risk management plans that currently exist for either child

Peer on Peer Abuse Procedure	
1	The member of staff who has been informed of the allegation - or who has the concern - should make notes of what they have been told (or their direct concerns) using the Reporting Form (available from NTC's DSO) and this should be discussed with NTC's DSO within 24 hours .
2	<p>If both children are known to NTC (and if their families do not already know about the allegation or concern) the NTC's DSO should discuss it with them unless:</p> <ul style="list-style-type: none"> ▪ The view is that someone (for example the child who has allegedly perpetrated the abuse) may be put in danger by the family being informed ▪ Informing the family might interfere with a criminal investigation
If either of these circumstances applies, discussions with the families should only take place after this course of action has been agreed with the Local Authority Children's Social Care Department.	
3	If only the child who is alleged to have harmed another child is known to NTC then, subject to the considerations set out above, discussions with only this child's family should take place.
4	The child who is the subject of the allegation should also be informed of what has been said about them. However, if the view is that Children's Social Care Department or the Police should be involved, the child should only be informed after discussion and agreement with these agencies. These agencies may have views about what information should be disclosed to the child at this stage.

Dealing with Allegations of Peer on Peer Abuse Procedure continued...

5	If there is still uncertainty about whether the allegation or concern constitutes peer on peer abuse, NTC's DSO should discuss it with Children's Social Care Department - or with the NSPCC Helpline - without disclosing the identity of either child/family.
6	If, having discussed the situation fully and taken advice as necessary, NTC's DSO concludes that the alleged behaviour does not constitute peer on peer abuse, then consideration should be given to whether NTC's Anti-bullying Policy and Procedures should be used (if both children are known to the organisation) and whether either or both children should be referred for other services.
7	If the view is that the behaviour does indeed amount to peer on peer abuse, then NTC's DSO should refer both children to the Local Authority Children's Social Care Department and confirm the referral in writing within 24 hours .
8	Pending the outcome of the referral to the Children's Social Care Department - and the possible investigation or assessment that may follow from this - any risk that may be posed to other children (by the child who has allegedly harmed another child) will need to be carefully managed. This should be done on an inter-agency basis in accordance with procedures developed by the LSCB - for children who display harmful behaviour towards others.
9	NTC's DSO should enquire of the Children's Social Care Department whether these procedures are being used and, if so, should ask to be involved in - or at least kept informed of - inter-agency decisions made in accordance with these procedures.
10	If the procedures are not being used, but NTC remains concerned that the child could pose a risk to other children, then NTC's DSO should consider whether the child can continue to be involved with NTC and if so, on what basis. This is a situation that needs to be kept under regular review as the investigation and assessment conducted by the statutory agencies is carried out and reaches a conclusion. It may also need to be reviewed regularly following the conclusion of the assessment process, as the child may be receiving support that should - with time - reduce the level of risk they present.

If the allegation is found to be without substance or fabricated, NTC will consider referring the child who was said to have been harmed to the Children's Social Care Department for them to assess whether they are in need of services (for example, the child may have been abused by someone else).

If it is felt that there has been malicious intent behind the allegation, NTC will discuss with the Police whether there are grounds to pursue any action against the person responsible.

Recording the Concerns

Use the **Reporting Concerns about a Child Form** (available from NTC's DSO) to record the concern and for the clear steps on how you should deal with it. The full step by step procedures are detailed within this **Peer on Peer Abuse Policy**.

The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory child protection authorities if a referral to them is needed.

Reviewed & Updated: March 2018

NTC will review this **Dealing with Allegations of Peer on Peer Abuse Procedure** and best practice at least annually. In addition, more frequent reviews will be undertaken following any major safeguarding incident, incident learning outcomes, organisational changes, as well as changes to legislation.