

	Title:	Safeguarding Procedure			Ref:	PRO-020	UKSA
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Caring	Approved by:		Chris Frisby				

UKSA is committed to safeguarding children and adults and actively seeks to create a safe and welcoming environment. Doing nothing is not an option.

Introduction

UKSA is committed to safeguarding children, and adults with care and support needs (students/individuals) taking part in UKSA activities. UKSA will take all reasonable steps to ensure that, through appropriate procedures and training, students in UKSA activities and training do so in a safe environment. We recognise that the safety and welfare of the student is paramount and that all participants, whatever their age, gender, ability, culture, ethnic origin, colour, religion or belief, social status or sexual identity, have a right to protection from abuse.

Any young person under the age of 18 and adults with care and support needs (CASN) who may be at risk of abuse or harm are protected by the laws and guidance associated with safeguarding.

Incidents are not common BUT UKSA has an ethos that an incident could happen involving any student. Staff are therefore required to be mindful that any young person under the age of 18 and any adult with care and support needs must be safeguarded whether this is in the home, in school, in UKSA, in the workplace or in any other setting.

Every person, be that staff member, trustee, student or volunteer is expected to demonstrate professional curiosity when they have a concern, no matter how low level or isolated the initial concern may seem, staff should seek to explore the matter further using the processes set out in this procedure and implementing their knowledge gained through their safeguarding training. Staff also have a legal duty to report to the designated member of staff if they have cause for concern and believe that an individual for whatever reason has:

- Harmed a child or adult with care and support needs (CASN) or is doing so
- Caused a child or adult with CASN to be harmed
- Put a child or adult with CASN at risk of harm
- Attempted to harm a child or adult with CASN
- Incited another person to harm a child or adult with CASN
- Or is a victim of harm
- Or is at risk of radicalisation

Designated Persons

Although everyone has a role to play in ensuring that children are safe, the Director of Training & Operations (see contact details in Appendix 1) is UKSA's 'DSO' and has specific responsibility for implementing this policy and acts as the point of contact to receive information.

It is the responsibility of the Director of Training & Operations (or Deputy in their absence) to:

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- Maintain an up-to-date policy and procedures, compatible with the governing bodies guidelines
- Ensure that all staff and/or third parties are issued with the policy and understand its importance, at induction to the organisation and arrange regular follow ups
- To ensue relevant staff are clear in the use of CPOMS.
- It is the responsibility of the Director of Finance (Manager of HR in their absence) to:
- Advise on the safer recruitment procedures for compliance with child protection issues.
- **The Designated Safeguarding Officer will:**
- Ensure that all relevant staff, volunteers, trustees and managers receive appropriate and timely training in safeguarding practices and procedures.
- Advise the management team and board of trustees on child protection and adults with care and support needs
- **If there is a concern, the Designated Safeguarding Officer or Designated Safeguarding Leads will:**
- Be the first point of contact for any concerns or allegations, from children or adults, ensuring that confidentiality is maintained.
- The DSO will decide on the appropriate action to be taken, in line with UKSA's procedures, governing body guidelines and the law.

Please remember: Any concerns big or small can be raised by any member of staff.

Visitor Access, Risk Assessment and Restrictions (Including Individuals on the Sex Offenders Register)

Any person presenting a potential safeguarding risk—whether due to information that they are on the Sex Offenders Register (SOR), subject to a statutory order, or otherwise identified as posing a risk—must be managed in accordance with this Procedure.

Notification

Where concerns arise, staff must immediately inform the Designated Safeguarding Lead (DSL) or Deputy DSL.

Risk Assessment

The DSL will carry out a dynamic, case-specific risk assessment considering:

- the nature, seriousness, and recency of any offence(s);
- the purpose and necessity of the visit;
- whether children or vulnerable adults will be present;
- any statutory restrictions (e.g., SHPO, SRO);
- advice or information from police or safeguarding partners.

Decision-Making and Controls

Based on this assessment, UKSA may implement proportionate safeguarding controls, including:

- refusing entry to the individual;

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- restricting access to specified areas;
- requiring continuous supervision;
- terminating entry if emerging information increases risk.

Recording and Reporting

All decisions, actions and rationales must be:

- documented in the safeguarding system;
- linked to POL-001 Safeguarding Policy requirements;
- reviewed and updated as required;
- shared with safeguarding partners where appropriate under statutory guidance.

What is Safeguarding?

Children's safeguarding (students aged under 18)

It is recognised that no single agency will have a full picture of a child's needs. Education, as an important part of a young person's life, has a key role to play in keeping children safe. Government statutory guidance, 'Keeping children safe in education' defines safeguarding as:

- protecting children from maltreatment.
- preventing impairment of children's mental and physical health or development.
- ensuring children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Everyone working in education, who comes into contact with a child and their family, therefore has a role to play in safeguarding, even when not working directly with young people on a day-to-day basis.

Adult Safeguarding

Adult safeguarding is working with adults with care and support needs to keep them safe from abuse or neglect. It is an important part of what many public services do, and a key responsibility of local authorities and other agencies including education. Some of these students may be more at risk due to having identified and existing care and support needs, others may become vulnerable due to a change in circumstances or new information being shared while studying at college.

The Care Act 2014 introduced a legal duty to make enquiries about adult safeguarding concerns, under section 42. The safeguarding duties apply to an adult who:

- Has needs for care and support (whether the local authority is meeting any of those needs) and
- Is experiencing, or at risk of, abuse or neglect and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Safeguarding duties – all students

Any young person under the age of 18 and adults with care and support needs (CASN) who may be at risk of abuse or harm are protected by the laws and guidance associated with safeguarding.

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Incidents are not common BUT UKSA has an ethos that an incident could happen involving any student. Staff are therefore required to be mindful that any young person under the age of 18 and any adult with care and support needs must be safeguarded whether this is in the home, in school, in UKSA, in the work place or in any other setting.

Every person, be that staff member, trustee, student or volunteer is expected to demonstrate professional curiosity when they have a concern, no matter how low level or isolated the initial concern may seem, staff should seek to explore the matter further using the processes set out in this policy and implementing their knowledge gained through their safeguarding training. Staff also have a legal duty to report to the designated member of staff if they have cause for concern and believe that an individual for whatever reason has:

- Harmed a child or adult with care and support needs (CASN) or is doing so
- Caused a child or adult with CASN to be harmed
- Put a child or adult with CASN at risk of harm
- Attempted to harm a child or adult with CASN
- Incited another person to harm a child or adult with CASN
- Or is a victim of harm
- Or is at risk of radicalisation

Types of Harm

All staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of UKSA, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, and it is important to consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse and harmful sexual behaviour in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Harm can take many forms, but it is categorised under the following themes:

- Physical abuse
- Sexual abuse, harassment – ‘Harmful Sexual Behaviour’
- Emotional / psychological abuse
- Child on child abuse
- Neglect or acts of omission.
- Financial and material abuse

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- Domestic abuse
- Self-neglect
- Organisation abuse
- Modern slavery
- Fabricated or induced illness
- Hate crime
- Child sexual exploitation and online grooming
- Positions of trust offences
- Child Criminal Exploitation – including County Lines and local drug networks
- People can also be vulnerable to radicalisation and extremism.

For further guidance on what may be considered a summary of factors which may lead to safeguarding concerns please refer to Appendix 7.

UKSA contributes to inter-agency work in support of safeguarding young people and adults with care and support needs, working closely with social care, the police and healthcare services to promote the welfare of students and protect them from harm. On occasion this requires UKSA to make appropriate referral to external agencies, including the police.

The procedures in this policy must be followed whenever an allegation of abuse is made or where there is a suspicion that abuse may be taking place. Think family, e.g. what is going on at home/who else is in that home/has there been a change in the people in the student's life? A student may be reporting / talking about their home life in a way that gives rise for concern – always seek advice from the Designated Safeguarding Lead or DSO if you are in any way worried or concerned about information that a student has shared, or changes in behaviour you may have observed.

Remember, always seek advice, this is called contextualised safeguarding.

To support safeguarding, it may on occasion be necessary to refer to other policies and procedures. In all cases safeguarding will take precedent over other policy and procedure areas.

Raising awareness of safeguarding procedures

It is important that all members of UKSA's community recognise the role they play in safeguarding. Safeguarding must be a topic covered within the induction of every member of staff whether they are students, staff, trustees or volunteers.

Education Students: Within the induction programme students will be made aware of the following:

- What constitutes abuse under Safeguarding
- How to keep themselves safe online
- What is Child on child Abuse
- Harmful Sexual Behaviour
- The reporting procedures for self-referral or reporting suspected abuse of a friend or colleague
- To whom the referral should be made
- The responsibility each learner has for each other.
- UKSA will also provide students aged 16 with a programme of pastoral tutorials through the year, which focuses on the above and other key topics relating to student well-being.

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Staff and volunteers: On their first day of employment or volunteering, all staff and volunteers will be made aware of the following as part of their induction programme:

- The procedure for reporting issues associated with safeguarding, guidance / policies for both children and adults
- The key personnel to whom any concern should be raised
- The responsibility of members of staff under the Safeguarding Policy and Procedure
- Keeping children safe in education 2022 with the updates from 2024, Statutory guidance for schools and colleges, Part 1: Information for all school and college staff.

All new staff will satisfactorily complete safeguarding training at the start of their employment journey. In addition, delivery staff will receive training on preventing radicalisation, equality and diversity, and online safety.

All staff must update their training in safeguarding as a minimum every three years and this is monitored and reported to trustees on a termly basis. Staff with designated responsibility for safeguarding undergo updated safeguarding training at Level 3 every two years. In addition, all staff must receive safeguarding updates at least annually. This may take the form of e-bulletins or staff briefings.

Dealing with disclosure of abuse and the procedure for reporting concerns

Any individual who discloses an allegation of abuse or neglect should always be treated with respect and with consideration for their well-being at each stage of the process.

It is important that when any member of staff deals with an allegation / disclosure they must reassure the student that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A student should never be given the impression that they are creating a problem by raising a concern or reporting any type of abuse or be made in any way to feel ashamed. Abuse that occurs online or outside of UKSA should not be downplayed and should be treated equally seriously.

Step one: - how to manage the initial disclosure

- If the person making the disclosure is the person being abused, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided.
- Ask questions in an open way, not to judge or criticise, Staff should not assume that they know what is happening.
- Demonstrate professional curiosity, for example think family; are there other siblings/ children or adults with care and support needs in the same environment?
- The use of leading questions can cause problems for any subsequent investigation and court proceedings.
- Use the TED principle – Tell me / Explain / Describe – these are not leading questions but act as a safe prompt.
- If this doesn't work, use closed, specific style questions that start with a W or H, for example, Who? What? How?
- Promises of confidentiality must not be given as the matter may develop in such a way that these promises cannot be honoured.

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Step two – ensure a record is made as soon as possible (See Appendix 3 for UKSA’s Safeguarding Reporting Form)

Information sharing is essential for effective safeguarding and promoting the welfare of children and adults with care and support needs. It is a key factor identified in many child safeguarding practice reviews (SPRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe. See Appendix 4 the ‘Seven golden rules to sharing information’.

A full record of any disclosure shall be made as soon as possible of the nature of the disclosure and any other relevant information. It is important that you record the account using CPOMS or UKSA’s paper safeguarding form Appendix 3, if you do not have access to CPOMS, including:

- the date, time and location
- the context which lead to the disclosure being made
- the place where the alleged abuse happened
- your name and the names of others present
- the name of the person sharing the information and, where different, the name of the person who has allegedly been abused
- the nature of the disclosure and alleged abuse
- a description of any injuries observed, using the body map in Appendix 5 (recording disclosures) to pinpoint any physical harm, being careful to ensure left and right sides of the body are reflected accurately e.g. from the person’s perspective of left and right, not your own perspective.
- an account of the allegation that should be signed, timed and dated by the person completing the report
- if the disclosure extends over more than one-page, individual pages should be numbered, with each page signed and dated
- If the disclosure is made by an adult and is a safeguarding concern, then it is important to record their consent to the referral and their desired outcome from the safeguarding referral
- if the situation is urgent, staff to contact the police on 999 or 101 and continue to follow the safeguarding procedure flowchart see Appendix 2.

Step three - referring the concern for action

- Any suspicion, allegation or incident of abuse must be reported to the Designated Safeguarding Leads as soon as possible and within one working day.
- A member of staff may seek additional support from their line manager or other manager as appropriate.
- The process will vary as set out below depending on whether the students is a child or an adult.
- CPOMS access staff will record the concern on CPOMS and take action as per training.

For Children (anyone aged under 18)

- The nominated member of staff following disclosure shall telephone and report all allegations and incidents of abuse of those under 18 to the Children’s Reception Team (CRT) for initial consideration and enquiries using the [Inter Agency Referral Form](#), (this form can be found at the LSCP IOW web site this may then be passed to the Multi Agency Safeguarding Hub (MASH) or closed with recommendations or closed with no further action
- Where there is clear evidence that abuse or harm has occurred (section 47) this must be reported to the CRT via a telephone call, followed by the submission of a completed inter agency referral form (IARF).

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- Where harm or abuse is suspected (section 17), this must be reported to the CRT via the submission of a completed IARF.

For adults

- Where the safeguarding concern relates to an adult with care and support needs the nominated member of staff will discuss with the adult and establish with them what outcome (s) they would like to be implemented.
- For adults with care and support needs over the age of 18 concerns should be reported to the adult safeguarding team via a telephone call and followed up using the safeguarding concern referral form

Learning difficulties and/or disabilities:

Some people with learning difficulties and/or disabilities may need different support to other persons e.g. in the way their physical/ mental condition might mask possible abuse and their ability to verbalise their concerns.

14 – 16-year-old students: Where a disclosure is made by a 14 – 16-year-old learner, staff should follow the same procedures as outlined in this policy. If the young person is enrolled at a school, UKSA's DSL or DSO will liaise with the DSL from that school, ensuring that the learner is informed of this process, if appropriate. It should be noted that the learner may not be enrolled at a school and therefore the process for post-16 learners will be followed.

Next steps following referral

The nominated member of staff should discuss with Children's Social Care or Adults Safeguarding team what action will be taken to inform the parents / carers/ home setting and a note of that conversation should be made and recorded under the student's name on CPOMS.

Where necessary and appropriate staff will liaise with the police in order to protect children and adults with CASN from harm. If you're concerned about a child's safety, you should call the police if the child is in immediate danger:

- **Call 999:** If the child is in immediate danger, call the police on 999.
- **Follow your organization's procedures:** If the child is not in immediate danger, you should follow your organization's safeguarding policies and procedures.
- **Contact the police:** You should contact the police if the situation is an emergency, or if there is a risk of serious injury or a serious crime is in progress or about to happen.

The nominated member of staff for the PREVENT agenda (which is the Designated Safeguarding Officer) should be contacted directly where there are concerns over the risk of radicalisation. The nominated member of staff will conduct an initial risk assessment and refer to the Children's Reception Team (CRT) (IOW Social Care) in the case of an under 18 and to the Channel Co-ordinator, the Strategic Manager for Regulatory and Community Safety Services, IOW Council as appropriate for over 18s.

Records

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The nominated member of staff shall ensure the information below is inputted to CPOMS:

- The report (Appendix 3 Safeguarding Reporting Form)
- Any notes, or correspondence
- Any other relevant material dealing with the matter.

Copies of reports etc are retained for a minimum period of 25 years.

Copies of reports regarding allegations made against staff shall be kept securely by HR Manager at least 25 years.

The record should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome
- It may be that at the time of the record the decision was taken not to take any action, this information must also be recorded, the note should include who the information was discussed with and the reason no action was taken

Conflict resolution/ escalation policy

Following a referral to Children's Reception Team or Adult Safeguarding there may be occasion when the referrer has a professional difference of opinion in respect to the outcome of the referral. There may also be occasions when a conference attendee representing UKSA does not agree with the outcome or procedure under which the conference was conducted – this applies to Child Protection (CP) and Child in Need (CIN) meetings and processes. Decisions made by Social Care / Police may be appropriately challenged and escalated using the Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) Safeguarding Procedures Manual – Escalation Policy for the resolution of professional disagreement (<https://hipsprocedures.org.uk/skyty/safeguarding-partnerships-and-organisational-responsibilities/escalation-policy-for-the-resolution-of-professional-disagreement>).

Reporting and dealing with allegations of abuse against members of staff (Also please refer to QHR-032 Whistleblowing Policy).

Where an allegation of abuse is made and it involves a member of staff the steps laid out in Keeping children safe in education, statutory guidance for schools and colleges, part 4, pages 56-68, will be followed (Department for Education, Sep 2021)

https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf

For adults with care and support needs refer to the 4LSAB Guidance on managing allegations against people in a position of trust. https://hampshiresab.org.uk/professionals-area/hampshire_4lsab_multiagency_safeguarding_adults_policy_guidance/

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In the first instance the DSO should immediately discuss the allegation with the Local Authority Designated Officer (LADO). The purpose of this initial discussion is to consider the nature, content and context of the allegation and agree a course of action.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. The decision and a justification should be recorded and agreement reached on what information should be put in writing to the individual concerned and by whom.

The designated trustee with responsibility for Safeguarding will be kept informed. As deemed necessary she/he will keep the Chair of Trustees informed of the incident and any action taken.

The DSO will maintain records of factors which influenced their decisions and associated paperwork and correspondence.

Parents or carers of a young person or an adult with care and support needs should be told about the allegation as soon as possible, if they do not already know of it (subject to discussion with the relevant authority). They should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including whether the matter had led to action being taken under UKSA's internal policies and procedure.

If the DSO is the subject of the allegation or complaint, the matter must be reported directly to the CEO

If the CEO is subject to any such allegation or complaint, the DSO will contact the Chair of Trustees.

Managing reports and concerns regarding sexual harassment and sexual violence (harmful sexual behaviour – child on child)

UKSA operates a zero-tolerance approach to all kinds of unacceptable behaviour including of a sexual nature. UKSA however, recognises that abuse can happen and acting swiftly to minimise these behaviours is key to establishing a respectful and safe environment. Unacceptable behaviour can include verbal or physical action, both in person or online. Where there is an allegation of abuse, staff deal with the concern/incident/allegation in the following way:

- Staff will always act appropriately and swiftly respond to any unacceptable behaviour reported to them or that they may observe and ensure it is taken seriously. Incidents should never be downplayed or dismissed as 'banter' or an accepted part of life, both in a professional and personal setting.
- If an occurrence of sexual harassment or sexual violence is reported to a member of staff, or they observe sexual harassment or sexual violence themselves, staff will take the following actions:
 - Be respectful and believing of the information being shared with them.
 - Talk to the students involved, if appropriate, depending upon the nature of the occurrence/alleged occurrence.
 - Establish the facts, if appropriate to do so; it may be that the full safeguarding flowchart procedure will be implemented at this stage and the DSL OR DSO will appropriately manage the situation.
 - If the abuse/alleged abuse has occurred online, and involves nude/semi-nude images, staff must avoid viewing these images. Staff must not ask for the images to be shared with them.

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- If appropriate, staff will involve their line manager or student mentor. Following this discussion, the full safeguarding flowchart procedure may be implemented, and the DSL or DSO will, as appropriate, manage the situation.
- At all stages the student will be consulted as to how they would like to proceed. In some situations, this may not be possible, however, every step must be taken to reassure the student and keep them informed of what is happening.
- Use the Student Disciplinary Procedure to manage incidents of abuse, as appropriate.
- If necessary, inform external organisations of the abuse/alleged abuse (e.g. the police); the Hampshire Constabulary Community Partnership Information form may be used for non-urgent information sharing (<https://www.safe4me.co.uk/portfolio/sharing-information/>).
- Record all incidents of Harmful Sexual Behaviour recognising that abuse may take the form of a variety of unacceptable behaviours. The notes will be clear and outline the nature of the abuse/alleged abuse, outcome of any investigations and concerns raised, and action taken.
- If the abuse/alleged abuse is between two students, UKSA will follow, as deemed appropriate, the advice contained within the Department for Education guidance "Sexual violence and sexual harassment between children in schools and colleges" (<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>). This includes guidance on the continued education of both the victim and (alleged or proven) perpetrator.
- If the sexual abuse is historical/non-recent (delayed reporting) the college will follow the Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) Safeguarding Children Partnership guidelines (<https://hipsprocedures.org.uk/pkyvqh/safeguarding-practice-guidelines/historical-non-recent-abuse-delayed-reporting/#s3659>).

Students that are potentially at greater risk of harm and information on types of abuse and safeguarding issues

While all students may be at risk of harm, there are some individuals who may be at a greater risk due to their circumstances. Keeping Children Safe in Education Part One for all Staff Working in Education provides a detailed overview of the types of concerns and circumstances that may lead to a safeguarding risk and some of these may also be relevant to adult students. A summary of these is provided below including where appropriate specific information relating to services on the Isle of Wight are included.

Early Help – indicators of children and families who may benefit from coordinated support

Any child may benefit from early help, but all UKSA staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health support need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited

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- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, and
- is persistently absent from education, including persistent absences for part of the school day.

Students with a social worker

Students that need a social worker due to safeguarding or welfare needs are either Looked After Children (LAC), an adult with a care and support needs, subject to Child in Need (CIN) or Child Protection (CP) plans. These students may need a social worker due to abuse, neglect or complex family circumstances.

The local authority has a duty to share this information, to ensure a smooth transition into UKSA and enable the best academic and pastoral support possible is put into place. UKSA appropriately shares information regarding a student's legal status and care arrangements with staff as appropriate and where it is in the safeguarding interest of the young person.

Safeguarding students with special educational needs (SEN)

UKSA recognise the additional challenges that may be faced by students with special educational needs (SEN) and disabilities. Safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of students. Care is taken that assumptions are not made that indicators of possible abuse such as behaviour, mood and injury are not assumed to relate to the student's disability without further exploration; the potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

Mental health

All staff should also be aware that mental health problems may, in some cases, be an indicator that a child or adult with CASN has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately qualified professionals should attempt to make any formal diagnosis of a mental health condition. Staff, however, are well placed to observe students or adults with CASNs day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a concern about an adult with CASN, or a child or young person's mental wellbeing, that is also a safeguarding concern, immediate action should be taken, following the UKSA's safeguarding procedures.

Prevent duty guidance

The Counter-Terrorism and Security Act places a duty on college, to have due regard to the need to prevent people from being drawn into terrorism, this is known as the Prevent duty.

Where staff are concerned that young people are developing extremist views or show signs of becoming radicalised, they should discuss this with one of the DSL's.

All staff receive training at induction on prevent and regular updates / refresher briefings are provided at least every three years and are incorporated into the annual safeguarding briefing. In addition, key safeguarding staff have received further in-depth training about the Prevent duty and tackling extremism and are able to support staff with any concerns they may have.

UKSA supports young people to understand how people with extreme views share these with others, especially using the internet.

UKSA is committed to ensuring that its students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching UKSA values and British values which reflect each other supports quality teaching and learning, whilst ensuring students understand how to make a positive contribution to the development of a fair, just and civil society.

Recognising extremism: early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views or expressing white supremacist and far right-wing extremist views
- advocating violence towards others.

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Prevent duty guidance for FE institutions updated April 2024 and is available online at <https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales>.

UKSA works alongside The IW college if it is felt a Prevent Duty risk assessment and action plan is required which summarises the self-assessment that the college has conducted in regard to the Prevent Duty, the associated risks and the resulting actions.

Child on child abuse including Mate and Hate crimes

UKSA has a zero-tolerance approach to bullying and child on child abuse and this is emphasised to all students as part of their induction. All staff are trained as part of their safeguarding updates to recognise and to ensure they take action when there is evidence of suspicion of any kind of peer-on-peer abuse. Dealing with allegations of abuse by young people and peer on peer abuse

Child on child abuse occurs when a young person is exploited, bullied and/or harmed by their peers who are the same or similar age; everyone directly involved in child-on-child abuse is under the age of 18. Child on child 'abuse can relate to various forms of abuse, which includes but is not limited to:

- Bullying (including Cyber bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children
- Physical Abuse such as hitting, kicking, shaking, biting, hair pulling or other causes of physical harm – this may include an online element, where threats are made
- Sexual Violence, such as rape, assault by penetration and sexual assault (this may include an on-line element which facilitates, threatens and /or encourages sexual violence
- Sexual harassment and harmful sexual behaviours such as sexual comments, remarks, jokes and on-line sexual harassment, which may be stand alone or part of a pattern of behaviour. In addition, up skirting, which is a specific criminal offence.
- Causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (this is called sexting and Youth produced sexual imagery).

Mate crimes happen when people are befriended by someone who uses the relationship to exploit or abuse the person; this can take the form of, but is not limited to, financial, bullying or sexual abuse and can be (but not exclusively seen) where a person may have a cognitive difficulty.

Hate crime is defined as 'any criminal offence which is perceived, by the victim or any other person, to be motivated by hostility or prejudice towards someone based on a personal characteristic'.

Peer on peer abuse and the action UKSA takes is not limited to reports of behaviours from inside UKSA. UKSA recognises its responsibility to act if the matter has happened within UKSA, outside or online.

Staff will always appropriately and swiftly respond to any unacceptable behaviour reported to them or that they may observe.

If an occurrence of abuse is reported to a member of staff/ or they observe themselves, staff will:

- Be respectful – occurrences should always be treated seriously and should not in any circumstances be treated or dismissed as 'banter' or being 'harmless'.

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- Talk to the students involved – if appropriate – depending upon the nature of the occurrence
- Establish the facts, if appropriate to do so; it may be that the full safeguarding flowchart procedure will be implemented at this stage and the DSL or DSO will manage the situation, as appropriate
- If the abuse/ alleged abuse has occurred online and involve nude/semi-nude images, staff must avoid viewing these images. Staff must not ask for the images to be shared with them.
- If appropriate, involve their line manager OR student mentor. Following this discussion the full safeguarding flowchart procedure may be implemented and the DSL or DSO will, as appropriate, manage the situation.
- Consult the student at all stages as to how they would like to proceed. In some situations this may not be possible, however, every step must be taken to reassure the student and keep them informed
- use the Student Disciplinary Policy to manage incidents of peer-on-peer abuse as appropriate.
- Where appropriate, inform external organisations (e.g. the police) of the abuse.
- Record all incidents of peer-on-peer abuse. Recognising that abuse may take the form of a variety of unacceptable behaviours, such as bullying, the notes will be clear and outline the nature of the abuse, the outcome of any investigations and concerns raised, and what action was taken.
- If the abuse/ alleged abuse is between two students, UKSA will follow, as deemed appropriate, the advice contained within the Department for Education guidance “Sexual violence and sexual harassment between children in schools and colleges” (<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>).

Sexual Violence and Harassment – Harmful Sexual Behaviours

Sexual violence and sexual abuse and harassment can occur anywhere, and all staff are advised to maintain an attitude of “It Could happen here”. Peer on peer harmful sexual behaviour and abuse can happen both on and offline and between children of any age and sex. It can also occur between a group sexually assaulting or sexually harassing a single child or group of children. Children do sometimes abuse their peers in this way and these sexual offences could be deemed a criminal offence as they are covered by the Sexual Offences Act.

Upskirting

‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and is part of the Voyeurism (Offences) Act April 2019.

What to do if you suspect harmful sexual behaviour may be happening

In cases where it is suspected that a young person may be abusing another young person, UKSA will follow the guidelines laid out by the Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) Safeguarding Children Partnership (<https://hipsprocedures.org.uk/qkyyh/children-in-specific-circumstances/bullying>) and that contained in [Keeping Children Safe in Education 2024](#)

Placing the student at the heart of the response and actions

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The wishes of the student who has been subjected to alleged abuse should be taken into account when deciding how to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with UKSA's duty and responsibilities to:

- protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- Importance of understanding intra familial harms and any support for siblings following incidents
- Are there ongoing risks to the victim, other children, adult students or school or college staff, and
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Students who may be more at risk of harmful sexual behaviour

Staff should be aware that some students are potentially at greater risk, evidence shows that girls, students with SEND and those that are part of the LGBTQ+ community, are at greater risk of being sexually harassed and abused.

Educating students and staff on harmful sexual behaviours

UKSA recognises that abuse between peers happens, including harmful sexual behaviour. In order to educate and minimise occurrences of such behaviour UKSA takes the following steps.

Education students:

- Students participate in a structured induction, this includes an external speaker delivering a session on behaviours, equality, diversity, unconscious bias and prejudicial language.
- Students participate in an initial induction with the welfare team, the focus of this session is how to access help and support.
- Students participate in a series of tutorials delivered by the welfare team, the focus of the initial tutorial is keeping themselves safe.

All staff:

- All staff have undertaken a safeguarding briefing, this included clear definitions of abuse, acknowledging that peer on peer abuse is happening, both inside and outside UKSA and online, and how staff should deal with this, including disclosures.

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- All staff are scheduled to undertake safeguarding refresher training, for the academic year 2024, the focus of which will include Harmful Sexual Behaviours and online safety.
- UKSA have updated their Safeguarding Policy in line with Keeping Children Safe in Education 2023/24 which includes reflecting the latest guidance on these key topics.

Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Online safety and cyber enabled crime

All users of technology can be vulnerable to exploitation or abuse. It is important that college staff and volunteers are alert to potential risks to themselves, as well as students. Risks can occur whilst learning online in college, learning at home or when using mobile technology, and steps have been taken to mitigate the risk of this occurring.

The breadth of issues classified within online safety is considerable, but can be categorised into the following areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, being encouraged or seeking to participate in dangerous online challenges, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

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- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

UKSA continues to invest in up-to-date and appropriate filtering and monitoring systems to safeguard students from inappropriate usage and exposure to illegal, inappropriate and harmful material.

Child criminal exploitation (CCE) and Child sexual exploitation (CSE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however you should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the

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production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

County lines / Local Drugs Networks

County Lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of "deal line". This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Local Drugs Networks involve community based criminal activity, often based around families and known associates within the local community. Children and young people can be drawn into this through family involvement and can lead to anti-social behaviour like shoplifting and theft, as well as harm and threats in the community. It is important to recognise that this often leads to direct involvement in drug dealing on a local level within the community. There is often a subtle level of grooming and abuse because peer exploitation can involve family members and a child's own group of friends to which loyalties can be deeply embedded, and so makes it much harder to break the cycle of abuse and grooming as they may well have known these people for many years. In addition, young people will be trying to find their way through their teenage years and may be involved because they really want to fit in with their peer group.

LGBTQ+ students

While many LGBTQ+ students may have no additional vulnerabilities, however, there is a risk that some individuals may be at increased risk of abuse from peers or be vulnerable to exploitation. Where a LGBTQ+ student is potentially at increased risk, it may be appropriate to refer them to their Student Mentor and/or another trusted member of staff that the young person has identified who can support them and advocate for them where necessary.

Modern slavery and the National Referral Mechanism (NRM)

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. [Modern slavery: how to identify and support victims](#).

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Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behavior, as well as the family being asked to leave a property. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The Homeless Reduction Act factsheet and statutory guidance can be found [here](#). If a member of staff becomes aware that their student is at risk of, or is homeless, then the DSL Team must be made aware.

Homeless families – appropriate support and intervention will be offered in the family context.

Homeless 16- and 17-year-olds – those living independently through possible exclusion from the family home – referrals will be made based upon the circumstances.

So called 'honour based' abuse including female genital mutilation (FGM) and forced marriage

So called 'honour-based' abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

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

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

Women and girls are the most common victims of honour-based violence, however, it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage being held against your will or taken somewhere you don't want to go
- assault.

Female genital mutilation (FGM)

FGM is the partial or total removal of the female genitalia for non-medical reasons. It is also known as female circumcision, cutting or Sunna. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence. 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.

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Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers (lecturers). If a teacher, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Forced Marriage

Forced marriage is a crime in England, where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are threatened, coerced or abuse is used, to cause a person into marriage. It is recognised in the UK as a form of domestic or child abuse and a serious abuse of human rights.

If there are concerns that a person (male or female) is in danger of forced marriage, it should be reported to a DSL or who will contact the Forced Marriage Unit (FMU) (Tel: 020 7008 0151 or email: fmu@fco.gov.uk) for advice. Depending upon the advice received, the DSL or DSO will then contact the MASH to ask that the matter be investigated further. Further information is available and the Forced Marriage Unit has published statutory guidance which can be found [here](#).

Attendance and safeguarding

The vast majority of students attend their lessons on time and in full. When students are absent, in most cases this will be for valid and easily explained reasons. Following a period of student absence, be it for an extended period or recurrent short absences and including where absence has been consistent / high previously, staff need to be curious to the reasons and open to the potential that there could be an underlying risk of harm, such as from child criminal exploitation, such as county lines, child sexual exploitation or modern slavery. If staff have a concern regarding a student following a period of absence this should be discussed with a member of the safeguarding team. If felt appropriate further discussion will be had with the student and as appropriate their parent/carer. If deemed necessary a referral may be made to the Children's Reception Team (CRT) and information shared with the police via an Operation Endeavour CPI form, available [here](#).

Domestic abuse

Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to:

- psychological
- physical
- sexual
- economical abuse
- emotional
- coercive and controlling – which covers post separation abuse

Exposure, by seeing or hearing domestic abuse and or violence can have a long term emotional and psychological negative impact on children, young people and adults with care and support needs. Helpful guidance with respect to signs and symptoms can be found on the NSPCC website (<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms->

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[effects/](#)). The new Domestic Abuse Act 2021 provides additional protections for victims and for the first time there is the introduction of a national definition and the recognition of the impact of domestic abuse on children (<https://www.gov.uk/government/publications/domestic-abuse-bill-2020-factsheets>).

Operation Encompass is a national project that is in place on the island. This system ensures early notification if the Police are called to an incident of domestic abuse, where the children in the household have been impacted by the incident (even if this does not take place within the home). The college are notified of the incident, usually before the start of the next college day and depending upon the circumstances the college will appropriately share the information within the organisation and put in place appropriate support, depending on the needs of the student.

Handling the Media

If there is an incident at UKSA which attracts media interest, or if you are contacted by the media with an allegation concerning a guest, student or employee, do not give any response until you have had an opportunity to check the facts and seek advice from the DSO or Director of Business Development and Marketing.

Photography

Publishing articles and photos in club newsletters, websites, local newspapers etc is an excellent way of recognising young people's achievements and of promoting the organisation and the sport as a whole. However, it is important to minimise the risk of anyone using images in an inappropriate way. Digital technology makes it easy to take, store, send, manipulate and publish images. There are two key principles to bear in mind:

Before taking photos or video, obtain written consent from the child's parents/carers or the young adult and students themselves for their images to be taken and used

- A consent should be completed and signed by a parent/carer – see Medical Form.
- Any photographer or member of the press or media attending an event should wear identification at all times and should be fully briefed in advance on your expectations regarding his/her behaviour and the issues covered by these guidelines.
- Do not allow a photographer, aside from authorised UKSA staff, to have unsupervised access to young people at the event or to arrange photo sessions outside the event.
- Consent should also be obtained for the use of video as a coaching aid. Any other use by a coach will be regarded as a breach of the UKSA Code of Conduct.
- Care must be taken in the storage of and access to images.

When publishing images, make sure they are appropriate and that you do not include any information that might enable someone to contact the child

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- It is preferable to use a general shot showing participants on the water or a group shot, without identifying them by name.
- If you are recognising the achievement of an individual and wish to publish their name with their photo, DO NOT publish any other information (eg. where they live, name of school, other hobbies and interests) that would enable someone to contact, befriend or start to 'groom' the child or vulnerable adult.
- Ensure that the students pictured are suitably dressed, to reduce the risk of inappropriate use.

Most water-based activity takes place in areas that are open to the public and it is therefore not possible to control all photography, but any concerns about inappropriate or intrusive photography, or about the inappropriate use of images, should be reported to the organisation's DSO and treated in the same way as any other child protection concern. Parents/carers and spectators should be prepared to identify themselves if requested and state their purpose for photography/filming.

The use of cameras or camera phones in changing areas should not be permitted in any circumstances. Such use should be regarded as a form of bullying.

Good Practice Guidelines

Culture

UKSA recognises that it is important to develop a culture within our organisation where both children and adults feel able to raise concerns, knowing that they will be taken seriously, treated confidentially and will not make the situation worse for themselves or others. Some children and adults may be more vulnerable to abuse or find it more difficult to express their concerns. For example, some students with a learning difficulty and / or disability may be especially vulnerable or have difficulties in communicating problems or worries. UKSA will work alongside students to ensure they are supported to share their views. Staff need to be mindful and vigilant at all times.

Minimising risk (see also Good Practise Guide Appendix 6)

UKSA plans the work of the organisation and promotes good practice to minimise situations where staff are working unobserved and could take advantage of their position of trust. The safeguarding training given to all instructors and volunteers and is extended to managers and trustees of UKSA to support planning and safe operational practices. UKSA recognise that good practice protects everyone-students, volunteers and staff.

It is preferable for staff members to stay away from residential, changing and shower rooms while there are children there. If it is essential, in an emergency situation, for a male to enter a female changing room or vice versa, they should be accompanied by another adult of the opposite gender. UKSA carries out risk assessment on an on-going basis and designates separate adult and children sleeping, changing, and shower areas, dependant on student mix. The only exception is when adult group leaders/teachers accompanying their group sleep in separate rooms in the same dormitory block as the children from their group.

Safeguarding forms part of the Risk Management Register for governance purposes which is subject to regular review by the Directors, Trustees and external audit.

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Contact by electronic and social media is now a popular means of communication among students and UKSA has implemented a full social media policy and IT, Internet, Email and Telephone policy) for those members of staff who communicate information to students or potential students by this method as part of their role at UKSA. As part of the induction process, all employees and Third Parties are advised they should not engage in activities with students using social media sites such as Facebook; nor should they provide their personal details to any student such as home address, home telephone number, mobile telephone number, e-mail addresses or social media profile, nor ask for those details for personal use from any student.

A safeguarding group meets regularly (monthly) and more frequently in the case of a specific concern, to discuss safeguarding matters at UKSA including the practical application of best practice and procedures, training and risk management, and acts as an internal audit. The group is chaired by the DSO, and attendees include senior representatives and all members of the DSL team.

Sources of Further Information - None

GDPR

Information and documentation will be held and processed in line with GDPR guidelines.

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Appendix 1



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Gemma Maskell
Welfare Officer
07795 208256
gemma.maskell@uksa.org

If above are unavailable, contact: Director, Dept Manager or if out of normal working hours, Hotel Duty Manager

This policy compliments the following organisations Safeguarding Policies and Guidelines and is subject to revision:

Royal Yachting Association 'RYA' – Jacquie Reid, RYA Safeguarding & Equality Manager Telephone: 023 8060 4104 Email: disclosure@rya.org.uk
Visting Isle of Wight LADO c/o MASH, Hampshire CC, Parkway, 94-96 Wickham Rd, Fareham PO16 7JL Telephone: 01962 876364 Email: child.protection@hants.gov.uk
Isle of Wight 'Safeguarding Children Partnership' Telephone: 01983 814545 Email: SCP@iow.gov.uk
Hants Direct Children's Services Telephone: 0300 300 0117 Out of Hours: 0300 555 1373
Isle of Wight Youth Trusts – Counselling + Listening to the Under 25s Web: http://www.iowyouthtrust.co.uk/menu Tel: 01983 529569 Email: info@iowyouthtrust.co.uk
Isle of Wight Council – Childrens Services Department Web: https://www.iow.gov.uk/children-and-family-support/childrens-services/commissioning-data-children-and-family-services/children-and-families-services/

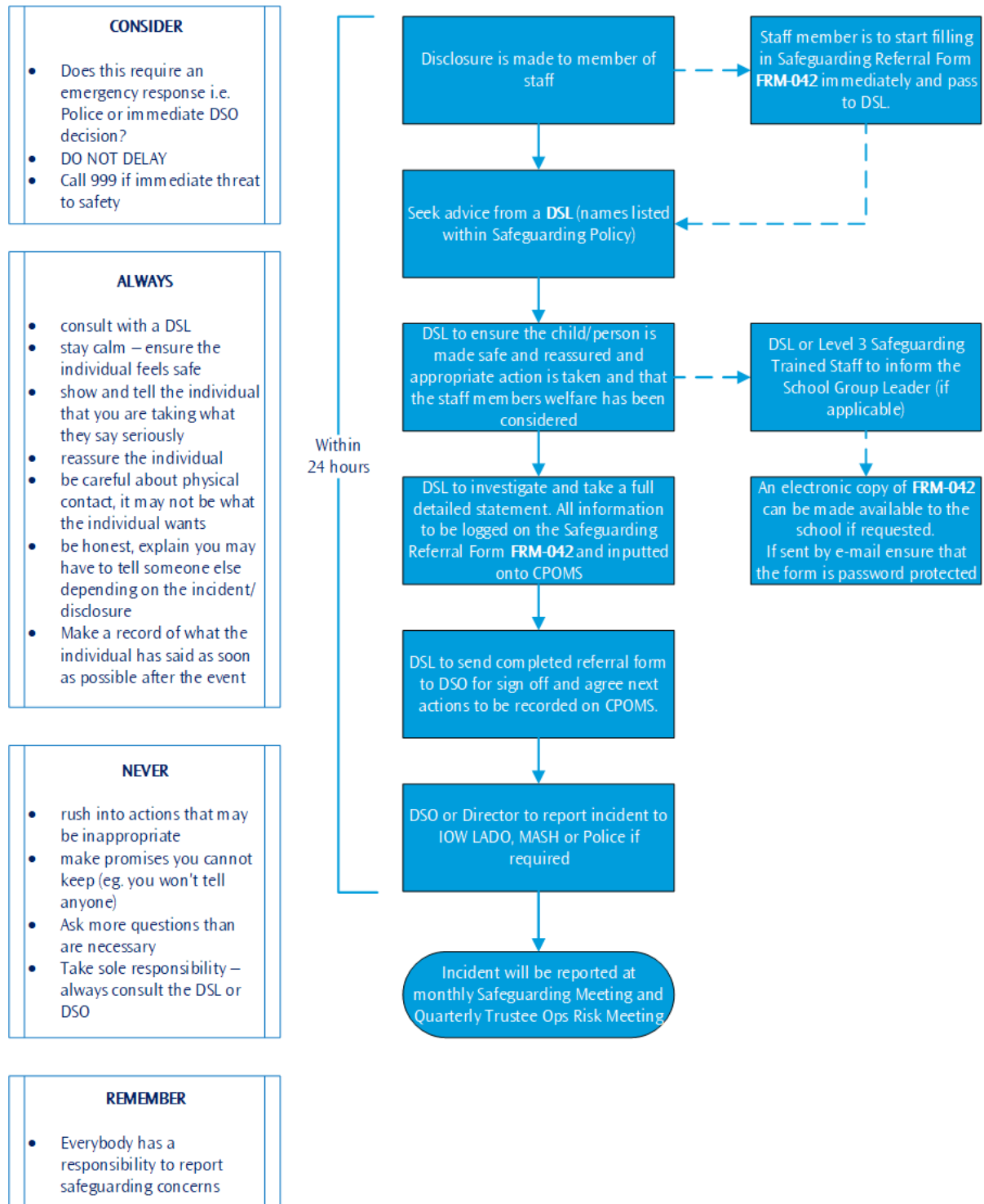
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Caring	Approved by:		Chris Frisby				

NSPCC: www.nspcc.org.uk/what-you-can-do/report-abuse

Childline: www.childline.org.uk

Think U Know: www.thinkuknow.co.uk

Safeguarding Reporting Process – PCS-001



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Appendix 3 - Safeguarding Confidential Referral Form FRM-042

Physical Abuse	Emotional Abuse	Sexual Abuse	Bullying	Domestic Abuse	Neglect	Child Safety	Mental Health	Online Safety	Substance Misuse	Exploitation

Yachting	Watersports	Youth Development	Pool	Staff

A UKSA Related Incident	A Non UKSA Related Disclosure
Incidents that have occurred within the UKSA site relating to staff, students and visitors	All disclosures that occurred outside of UKSA and do not relate to UKSA staff or activities

Date and time of incident/disclosure:	Date:		Time:	
Date and time form completed	Date:		Time:	
Details of person completing form:	Name:			
	Position:			
	Contact No.:			
Details of person involved:	Name:			
	Age:			
	Position:			
Details of associated individuals involved:	Name:			
	Age:			
Details of School Group or Course of individuals involved:	School / Course:			

Nature of incident, disclosure, complaint or allegation:	
In the event of hospitalisation, individual medical form must be completed to accompany this report:	
Date/Time	Description

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Follow-up action taken by DSO:	
Date/Time	Description

Police Details if applicable:		
If Police contacted, complete details of person handling the case:	Name:	
	Police Ref No:	
	Position:	
	Telephone No.:	

Was a body map or appendices included?	Yes / No
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Signature of person completing this form:	
Signature of DSL including date:	
Signature of DSO including date:	

Is this case Open or Closed?	Open / Closed
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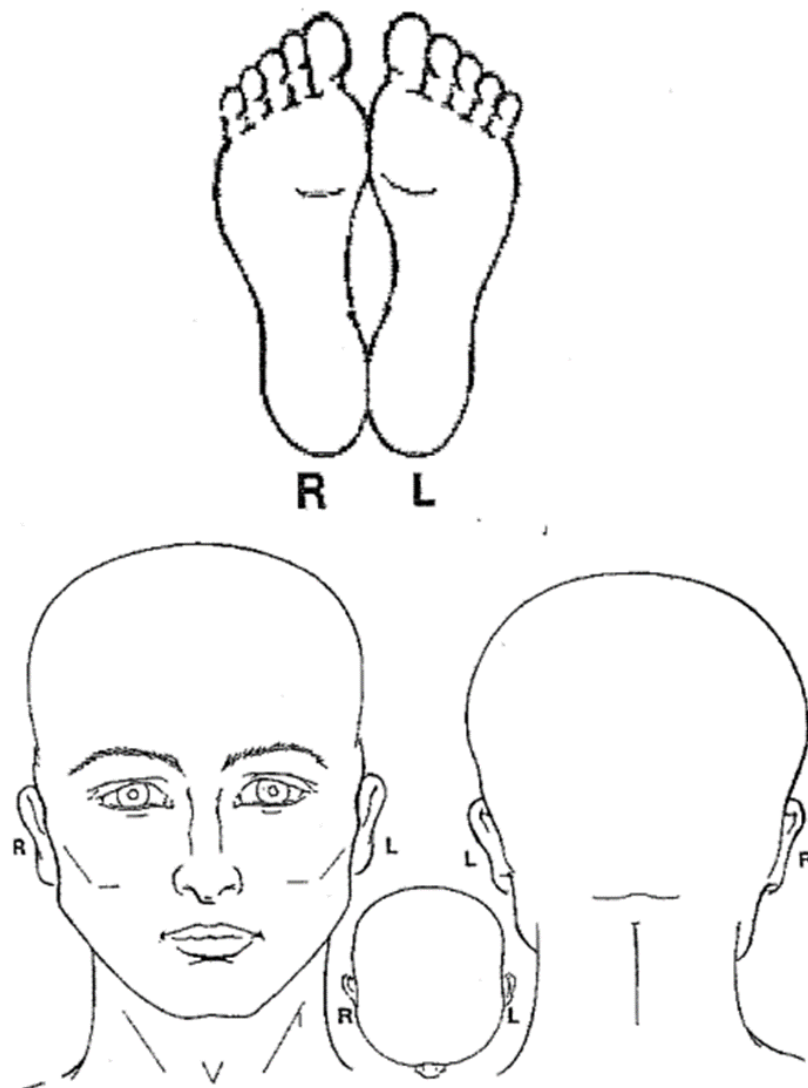
Appendix 4: The seven golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

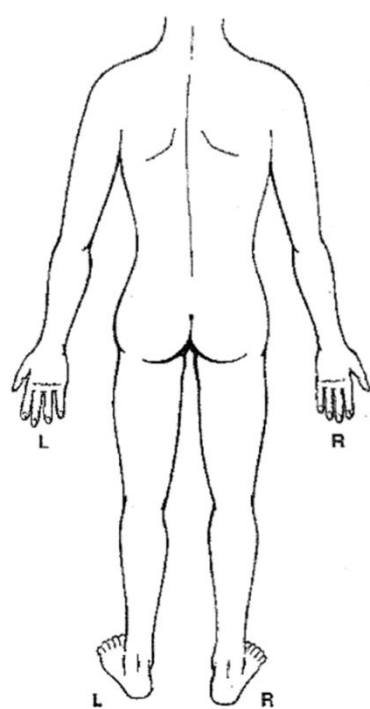
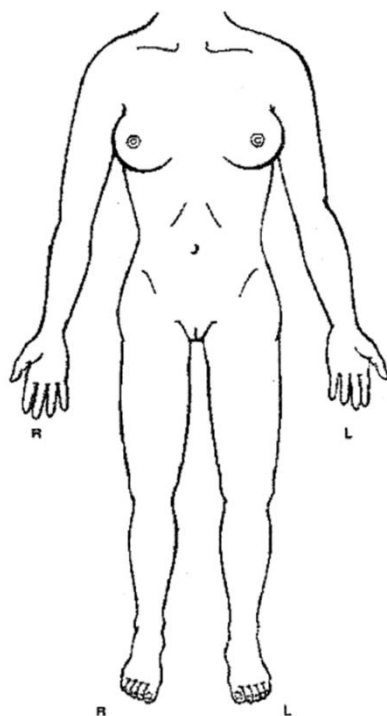
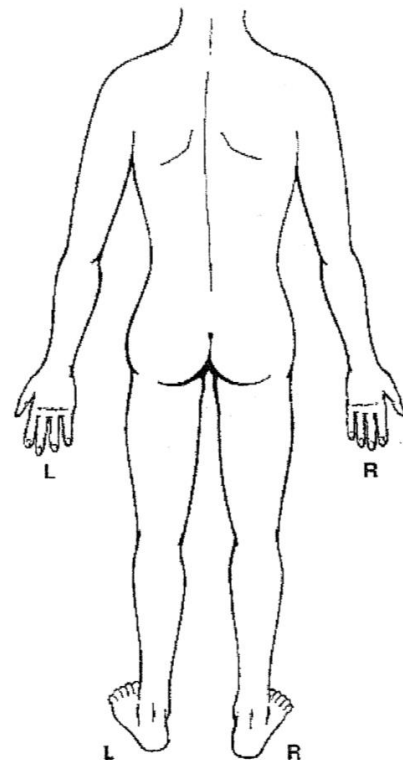
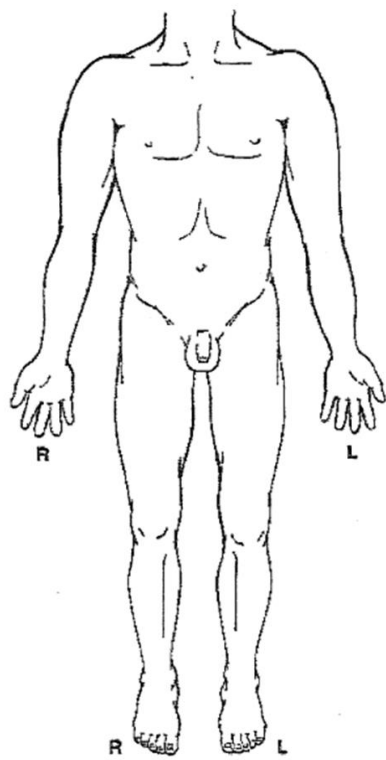
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Appendix 5: Recording of physical injury (body map diagram)

The accurate recording of information is vital following any disclosure or observation. The body maps below may be used to assist in the accurate recording when a possible injury has occurred, any injury should be recorded whether this is accidental or non-accidental. This feature is available on CPOMS.



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Appendix 6

Good Practice Guide for Instructors, Coaches and Volunteers

This guide only covers the essential points of good practice when working with children and young people. You should also read the organisation's Child Protection Policy and Procedures which are available for reference at all times.

- Avoid spending any significant time working with children in isolation
- Do not take children alone in a car, however short the journey
- Do not take children to your home as part of your organisation's activity
- Where any of these are unavoidable, ensure that they only occur with the full knowledge and consent of someone in charge of the organisation or the child's parents
- Design training programmes that are within the ability of the individual child
- If a child is having difficulty with a wetsuit or buoyancy aid, ask them to ask a friend to help if at all possible
- If you do have to help a child, make sure you are in full view of others, preferably another adult
- Restrict communications with young people via mobile phone, e-mail or social media to group communications about organisational matters. If it's essential to send an individual message, copy it to the child's parent or carer.

You should never:

- engage in rough, physical or sexually provocative games
- allow or engage in inappropriate touching of any form
- allow children to use inappropriate language unchallenged, or use such language yourself when with children
- make sexually suggestive comments to a child, even in fun
- fail to respond to an allegation made by a child; always act
- do things of a personal nature that children can do for themselves.

It may sometimes be necessary to do things of a personal nature for children, particularly if they are very young or disabled. These tasks should only be carried out with the full understanding and consent of the child (where possible) and their parents/carers. In an emergency situation which requires this type of help, parents should be fully informed. In such situations it is important to ensure that any adult present is sensitive to the child and undertakes personal care tasks with the utmost discretion.

Please remember: Any concerns can be raised by any member of staff.

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Appendix 7:

A summary of factors which may lead to safeguarding concerns

- Child abduction and community safety incidents
- Child missing from home or care
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation
- County lines and Local Drugs Networks
- Domestic abuse
- Drugs and substance misuse
- Fabricated or induced illness
- Faith-based abuse
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate crime
- Homelessness
- Mental health
- Modern Slavery
- Missing children and adults
- Online safety and cybercrime
- Peer on peer (child on child) abuse
- Preventing radicalisation
- Private fostering
- Sexual violence and sexual harassment between children in schools and colleges – harmful sexual behaviour (HSB) including intra familial harm
- So-called ‘honour-based’ violence, including female genital mutilation (FGM) and forced marriage

All staff have a legal duty to report any concerns regarding FGM directly to the police immediately and should inform the Designated Safeguarding Lead of the action they have taken.

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Appendix 8:

Further Guidance on Harm

Part One – Young people (children) – persons who have not reached their 18th birthday – Please see Part 1 of KCSIE 2022 for a detailed guide

Part Two – Adults at risk (as defined in Part Two)

PART ONE - HARM TO CHILDREN

Types of harm to children under 18 (Definitions taken from Working Together to Safeguard Children (July 2018))

Emotional abuse:

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child 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 a 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 cyber bullying), 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.

Physical abuse:

A form of abuse which 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.

Sexual abuse:

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-

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penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect:

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

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

The Hampshire and Isle of Wight Neglect Tool Kit can be viewed online at <https://www.hampshirescp.org.uk/toolkits/neglect/>. This includes the 2020 – 2023 revised neglect strategy.

PART TWO – ADULTS WITH CARE AND SUPPORT NEEDS

Adults with care and support needs are defined as an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse or neglect

as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Safeguarding adults - definition of abuse

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted.

UKSA:

- recognises that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

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- promotes the adult's wellbeing¹ in the safeguarding arrangements, recognising that people have complex lives and being safe is only one of the things they want for themselves.
- aligns to the Mental Capacity Act 2005.

Abuse of a person at risk may consist of a single act or repeated acts affecting more than one person. It may occur as a result of a failure to undertake action or appropriate care tasks. It may be an act of neglect or an omission to act, or it may occur where a person is persuaded to enter into a financial or sexual transaction to which they do not, or cannot, consent. Abuse can occur in any relationship and any setting and may result in significant harm to or exploitation of, the individual. In many cases abuse may be a criminal offence. Intent is not an issue at the point of deciding whether an act or a failure to act is abuse; it is the impact of the act on the person and the harm or risk of harm to that individual.

¹ Wellbeing, as defined in Section 1 of the Care Act 2014.

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Types of abuse	Behaviours include
Physical	Hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
Sexual	Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting
Psychological	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
Financial or material	Theft, fraud, exploitation, pressure in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
Neglect and acts of omission	Ignoring medical or physical care needs, failing to provide access to appropriate health, social care, welfare benefits or educational services, withholding the necessities of life such as medication, adequate nutrition and heating
Discriminatory	Racism, sexism or acts based on a person's disability, age or sexual orientation. It also includes other forms of harassment, slurs or similar treatment such as disability hate crime.
Domestic abuse	Psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.
Organisational abuse	Neglect and poor care practice within a care setting such as a hospital or care home or in relation to care provided in someone's own home ranging from one off incidents to on-going ill-treatment. It can be neglect or poor practice as a result of the structure, policies, processes and practices within a care setting.
Modern slavery	Encompassing slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
Self-Neglect	Covers a wide range of behaviour including neglecting to care for one's personal hygiene, health or surroundings and behaviour such as hoarding.

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Six principles of adult safeguarding

In May 2013, the Department of Health published the government's policy on adult safeguarding. This outlines six key principles for use by Local Safeguarding Adult Boards and member agencies for both developing and assessing the effectiveness of their local safeguarding arrangements. The Isle of Wight College embed these principals into the policy and practice working to safeguard adults:

1. **Empowerment** - presumption of person led decisions and informed consent.
2. **Prevention** - it is better to take action before harm occurs.
3. **Proportionality** - proportionate and least intrusive responses appropriate to the risk presented.
4. **Protection** - support and representation for those in greatest need
5. **Partnership** - local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
6. **Accountability** - accountability and transparency in delivering safeguarding.

The criteria used to identify whether an issue should be raised as a safeguarding concern are as follows:

- Does the adult have care and support needs?
- Is abuse or neglect by a third party alleged or are there risks relating to self-neglect?
- Is the adult unable to protect him or herself against harm or exploitation?
- If the answer is YES, then you have a 'safeguarding concern'.

A safeguarding concern is about a person with care and support needs is experiencing, or is at risk of abuse, neglect or exploitation including self-neglect, or where a person at risk may be being harmed by others usually in a position of trust, power or authority. Safeguarding concerns should be made to Adult Services by anyone when:

- The person has needs of care and support and there is a concern that they are being or are at risk of being abused, neglected or exploited
- There is concern that the adult has caused or is likely to cause harm to others
- The adult has capacity to make decisions about their own safety and wants this to happen
- The adult has been assessed as not having capacity to make a decision about their own safety, but a decision has been made in their best interests to raise a safeguarding concern
- A crime has been or may have been committed against an adult who lacks the mental capacity to report a crime and a 'best interests' decision is made, this is reported to the Police and then a referral to Adult safeguarding is made
- The abuse or neglect has been caused by a member of staff or a volunteer
- Other people or children are at risk from the person causing the harm
- The concern is about organisational or systemic abuse
- The person causing the harm also has care and support needs.

The Care Act 2014 guidance requires adult safeguarding to be person centred – no decision about me without me, adult safeguarding is person led and outcome focused.

A useful source of information is The Isle of Wight Safeguarding Adults Board – follow the link [here](#).

Further information and Government guidance are available on the following links:

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- [GOV.UK website](#)
 - [Working Together to Safeguard Children \(July 2018\)](#)
- [Keeping Children Safe in Education \(Sep 2022\)](#)
- [Hampshire, Isle of Wight, Portsmouth and Southampton \(HIPS\) Safeguarding Children Partnership – procedures manual](#)
 - Neglect strategy and toolkit <https://www.iowscp.org.uk/Resources-IOW#Toolkits>
- [Isle of Wight Local Safeguarding Adults Board 4LSAB](#)
 - [Isle of Wight Adult Safeguarding, Decision Making Guidance and Tools](#)
 - [Isle of Wight Adult Social Care Safeguarding Process](#)
 - [Safeguarding children who may have been trafficked](#)

Other sources of information and advice:

- [Adults Health and Care Safeguarding Guidance for Provider Services](#) - version 7, January 2018- Hampshire County Council Safeguarding and Governance Team

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues (e.g. NSPCC).

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Appendix 9

Other sources of help and advice

Thinkuknow www.thinkuknow.co.uk	CEOP's educational programme that aims to empower and protect children and young people from sexual abuse and exploitation.
Safe safe.met.police.uk	Information about all sorts of crime from the Metropolitan Police.
Trapped: County Lines www.youtube.com/watch?v=pLhGpS1f-F0	Video that can be used promote debate.
Safe4Me resources www.safe4me.co.uk/resources	toolkits providing resources, activities and advice to help schools, professionals and parents to keep children and young people safe.
Criminal exploitation of children and vulnerable adults	County Lines guidance report from the Home Office. assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf
Fearless www.fearless.org/en	National website to access non-judgemental information and advice about crime and criminality. Uniquely, Fearless provides a safe place to give information to about crime - 100% anonymously.
Childline www.childline.org.uk	National free and confidential advice and support for all young people up to 19 years old
Child Exploitation and Online Protection Command (CEOP) www.ceop.police.uk/safety-centre	National Crime Agency Command that exists to bring online child sex offenders, including those involved in the production, distribution and viewing of child abuse material, to justice.
Disrespect Nobody www.disrespectnobody.co.uk	National campaign to help young people understand what a healthy relationship is and to help re-think their views of controlling behaviour, violence, abuse, sexual abuse and what consent means within their relationships.
National Crime Agency www.nationalcrimeagency.gov.uk	National law enforcement agency to protect the public from the most serious threats by disrupting and bringing to justice those serious and organised criminals who present the highest risk to the UK.

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National Domestic Violence Helpline (Refuge & Women's Aid) www.nationaldomesticviolencehelpline.org.uk	National support line and site for women and girls who are experiencing violence, or who have experienced it in the past. The Helpline is staffed by fully-trained female support workers who can provide confidential, non-judgmental emotional support and information on a range of issues – from reporting to the police, to accessing local services in your area. Tel: 0800 200 0247
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Rape Crisis rapecrisis.org.uk	Organisation that exists to promote the needs and rights of women and girls who have experienced sexual violence, to improve services to them and to work towards the elimination of sexual violence
The Men's Advice Line www.mensadviceline.org.uk	National help and support site & line for male victims of domestic violence Tel: 0808 801 0327
NSPCC https://www.nspcc.org.uk	National Society for the Prevention of Cruelty to Children – visit the website for telephone numbers and services
Youth Trust iowyouthtrust.co.uk	Get Help – Youth Trust counselling service
Community Children and Adolescent Mental Health Service (CAMHS)	Child and Adult mental Health service, 5-7 Pyle Street, Newport (currently in temporary accommodation planning to return to Pyle St. September 2020) Tel: 01983 523602 (Mon–Thurs: 08:30–17:00 / Friday: 08:30–16:30) CAMHSE email: iownt.spcamhs@nhs.net Out of Hours Tel No: contact the appropriate GP OR NHS 111 service
Single Point of Contact (SPOC)	Mental Health services for adults Tel: 01983 526654
Paragon on 0800 234 6266 or (Isle of Wight) paragoniow@theyoutrust.org.uk	Domestic Violence, sexual Abuse and domestic abuse service Email: aragoniow@theyoutrust.org.uk Tel: 0800 234 6266
Mind	infoline 0300 123 3393 info@mind.org.uk

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Isle of Wight Mental Health Support Resources (all ages)	www.iwmentalhealth.co.uk
Safe4U safehaven@twosaints.org.uk	Community Mental Health Safe Haven (for adults) If you are aged 18 or over, you can either drop in to the Safe Haven at 7 High Street, Newport, PO30 1SS or call the Community Mental Health Safe Haven where trained professionals can discuss your mental health concerns and provide you with some help. Telephone: 01983 520168 or by email: safehaven@twosaints.org.uk This service operates Monday to Friday between 5pm-10pm and 10am-10pm (weekends and bank holidays).
Hope Line – Suicide Prevention	If you are under 35 and experiencing distress/ despair and suicidal thoughts and feelings, call Papyrus's HopelineUK from 9am to 10pm weekdays and 2pm to 10pm on weekends. Call HopelineUK on 0800 068 41 41 or Text 07786 209697.
Shout	Shout also offers confidential 24/7 crisis text support for times when you need immediate assistance. Text "SHOUT" to 85258 or visit Shout Crisis Text Line