

POL-QUA-52

Safeguarding Strategy

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Distribution

All Futures Staff and subcontractors

Related Policies	
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Version	Date	Author	Author's job Title	Changes
V1	Jan 2019	AT		Checks futures policy lead, minor changes
V1	Jan 2019	KM	DSL	Names changes
V2	April 2020	KM	DSL	Annual review
V2	Oct 2020	KM	DSL	6 month review, merge in Prevent strategy from separate doc
V2	Mar 2021	KM	DSL	Review annual changes
V2	Aug 2022	KM	DSL	Transfer to new template add classification
V3	April 2023	KM	DSL	Annual review
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V6	July 2025	AP	ESL	Formal review and structure change of document to align with Safeguarding strategy and processes, removing duplication.
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For Information: Where we refer to as 'Futures' in this policy – we are referencing a group of companies made up of Futures Advice, Skills & employment Ltd and Nottingham & Nottinghamshire Youth Support Ltd

To keep things simple throughout this document, 'we' and 'us' means the Group Companies and its associated brands. This policy applies across all companies within the Group.

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1 Purpose

- 1.1. This Safeguarding Strategy is informed by POL-QUA-0053 Safeguarding Policy v5 that sets out the guiding principles and commitment to safeguarding and promoting the welfare of children, young people, and adults at risk.
- 1.2. This Safeguarding Strategy sets out our expectations and procedures around our approach to ensuring that all of our customers, learners and staff employed by Futures and by our subcontractors are safe. The document also includes our expectations and procedures around our approach to ensuring that all of our customers and learners, supported by Futures' staff and by our employers are aware of/adhere to the principles of the Prevent Duty.

- 1.3. The Strategy has been developed to address the statutory duties as defined by:

For children and young people up to aged 18:

- Working Together To Safeguard Children 2023
- Keeping Children Safe in Education 2025
- Children Act 1989 and 2006
- National Service Framework 2023

- 1.4. Legislation that relates to protection and duty of care:

- HSAW Act 1974
- Human Rights Act 1998
- Sexual Offences Act 2003
- Equalities Act 2010
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006 (revised 2019)
- The Health and Care Act 2022
- The 'Prevent' Duty 2023 (applies to children, young people and adults at risk)
- Counter-Terrorism and Security Act 2015

2 Our Expectations

- 2.1. **Our Safeguarding strategy has been developed through the expectation that Safeguarding is everyone's business.** Safeguarding is a broad subject and encompasses a range of issues taking place in society to shape safeguarding policy at a national level. This includes, but not limited to, modern slavery, radicalisation, cyber bullying, forced marriage, FGM, and sexual exploitation. Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse, neglect and exploitation.
- 2.2. From a Future's perspective safeguarding relates to customers, learners, our staff and subcontractor staff (including volunteers). Our customers are young people and adults at risk. Safeguarding principles apply to all customers.
- 2.3. We will ensure that all subcontractors also adhere to the principles of safeguarding and the Prevent Duty as a contractual requirement.

2.4. We pride ourselves on setting and implementing ambitious targets that actively promote the principles of safeguarding. We will strive to achieve this by:

Having a SMART and challenging Safeguarding Action & Impact Plan and Prevent risk assessment with targets for achieving our objectives so that we are in a position to actively demonstrate our achievements and successes on an annual basis. The Action & Impact Plan and risk assessment will focus on:

- 2.4.1. Ensuring a robust infrastructure is in place which includes designated roles and responsibilities of the Board, CEO, Directors, managers and staff. This includes safe recruitment and vetting of staff and volunteers.
 - 2.4.2. Active engagement from board members, managers, leaders and staff with other partners including the local authorities, police and the regional prevent coordinators
 - 2.4.3. Ensuring staff and subcontractors understand their responsibilities in line with the Prevent Statutory Guidance in having 'due regard to the need to prevent people from being drawn into terrorism'.
 - 2.4.4. Ensuring that customer/learners and staff are aware of their roles and responsibilities in preventing violent extremism.
 - 2.4.5. Ensuring that Futures staff, subcontractors and customers understand their roles within and implications of safeguarding policy and procedures
 - 2.4.6. A clear ethos which upholds core values of shared responsibility and wellbeing for all customers, learners, staff and visitors and promotes respect, equality and diversity and understanding.
 - 2.4.7. Ensuring that staff exemplify British Value in their management, teaching and through general behaviours in the organisation.
 - 2.4.8. Ensuring customer/learner and staff safety and ensure that Futures is free from bullying, harassment and discrimination
 - 2.4.9. Providing support and appropriate sources of advice and guidance for customer/learner and staff who may be at risk, pastoral care is available to all learners and particularly those who are vulnerable to being exploited
 - 2.4.10. Ensuring we have in place clear and effective arrangements for staff development and training in respect of the protection and care of customers/learners
 - 2.4.11. Aligning with policies and guidance in place for staff, customers/learners using IT equipment and Internet safely, legally and securely
 - 2.4.12. Ensuring plans are in place to respond appropriately to a threat or incident within Futures
 - 2.4.13. Ensuring that monitoring and evaluation is ongoing so that we continue to be compliant with all legislation and that policies and procedures are adhered to
- 2.5. The action & impact plan and risk assessment will be reviewed every six months, taking into account the annual local CTLP's. The purpose being to make safeguarding happen in practice and to assess the impact of the activities. It will involve ensuring sharing good practice through the Safeguarding group so that all Divisions and experts are involved in the implementation.

3 Our commitment to staff

- 3.1. The Company aims to be an employer of choice, characterised by recruitment, promotion and retention of our highly talented staff who are committed to the vision of the Company. The Company will treat all staff fairly and will create a positive working environment to enable all to contribute their best.
- 3.2. We will ensure this strategy is linked to other relevant policies and plans relating to our services, employment practices and partnerships.
- 3.3. Key elements:
 - 3.3.1. To challenge and confront all forms of inappropriate behaviour by staff which makes staff feel 'unsafe' and can include derogatory language within our Company and in the external bodies with whom we deal.
 - 3.3.2. To create positive, inclusive environments which are sensitive to the needs of individuals whatever their orientation. (See the Harassment & Bullying Policy, Managing Allegations against Staff Policy)
 - 3.3.3. To ensure all staff are aware of their personal responsibility for safeguarding as part of their job description. Staff have a responsibility to uphold this strategy and adhere to its principles. Managers should ensure that staff are aware of the strategy and how it applies to them in their job. All staff have a responsibility to challenge and report issues relating to safeguarding of customers and staff including harassment and discrimination and to deal with these in a consistent manner. Staff should treat people fairly, with dignity and respect.

4 Responsibilities

4.1. Futures Board Safeguarding Representative

In accordance with the protocols for safeguarding there will be a nominated Board member who will lead on safeguarding and receive regular reports and updates on safeguarding issues from the Futures Executive Safeguarding Lead.

Futures Board receives appropriate safeguarding training which equips them with the knowledge to provide strategic challenge to test and assure themselves that safeguarding policies and procedures in place at Futures are effective and support delivery of services.

4.2. Executive Safeguarding Lead (Director of Operations)

The Executive Safeguarding Lead is responsible for safeguarding and child protection at Futures. The ESL ensures the Board is informed how Futures discharges its duty with regards to safeguarding; reporting deficiencies in procedure or policy and reporting of concerns and referrals. This is undertaken through the Safeguarding Exec Group and Designated Safeguarding Team

4.3. Designated Safeguarding Lead (DSL)

Key role of the Designated Safeguarding Lead is to understand and champion the Safeguarding and Prevent Duty responsibilities of the company, being the central point for processes and records management and represent the company at external inspection or audit. The role supports the Executive Safeguarding Strategic Lead and Executive Safeguarding group to ensure that the company is compliant with its Safeguarding and Prevent Duty responsibilities and applying the guiding principles within the Safeguarding Policy.

4.4. Designated Safeguarding Officers (DSOs)

DSOs provide additional specialist safeguarding support for managers with safeguarding concerns, supporting managers with any specialised training requirements, reviewing safeguarding impact plans across their areas, championing specific safeguarding areas such as mental health, domestic abuse etc.

4.5. Designated Safeguarding Officer – Staff

The DSO within the People & Culture team ensures all staff receive mandatory training in child protection/adults at risk issues on an ongoing basis and are aware of Futures protection procedures. Ensures specialised training is provided for specific roles as required. Responsibility for the company procedures on staff recruitment and vetting. Responsibility for investigation of staff allegations and low-level concerns and where required reporting to LADO within the local authority

4.6. IT Manager

Together with the Executive Safeguarding Lead, has responsibility for meeting the standards of filtering and monitoring for schools and colleges, Keeping Children Safe in Education 2025 (KCSIE) as it applies to Futures.

4.7. Team / Delivery Managers

Responsible for supporting staff with any safeguarding concerns and making referrals where necessary.

4.8. Other Staff

Responsible for supporting customers/learners with safeguarding concerns, making referrals, or signposting to support as required.

Staff working in outside locations: schools, Further Education colleges, Job Centre offices and other delivery outlets such as local authority run one stop shops and youth centres, must familiarise themselves with and follow the policies of the institutions to which they are attached and keep their Futures designated safeguarding lead informed of any disclosures.

All staff who report concerns have a duty to reassure customers and learners that their concern is being taken seriously and that they will be supported and kept safe.

5 Failure to comply

Any failure to comply with the Safeguarding Strategy by employees will be dealt through the disciplinary procedure and could lead to dismissal. For our young people/adult customers, the possible withdrawal of service and for subcontractors, possible termination of contract.

6 Responding to safeguarding concerns

6.1 All safeguarding concerns, discussion and decisions will be recording on Futures safeguarding concern forms and should be sent encrypted to the safeguarding@futuresadvice.org email box within 24 hours.

6.2 If there is an immediate concern the staff member will consult with their direct line manager or DSO before completing the form as reporting urgent concerns takes priority.

- 6.3 All staff will make appropriate safeguarding referrals using the relevant paperwork for their area. The relevant Team Manager will ensure that this is available and ensure there are clear guidelines on its use. Safeguarding forms, and process documentation are listed on the Futures intranet for internal staff and NCS Knowledge Store for NCS subcontractors. **See annex 1 Safeguarding Process**
- 6.4 All staff will share information in accordance with local protocols, the Children Act 2004, which imposes duties on public bodies to share information when this is necessary to safeguard the welfare of a child, Keeping Children Safe in Education 2025 and Working Together to Safeguard Children 2023. Staff can consult their nominated manager/designated person for advice and clarity about sharing information.
- 6.5 Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. Keeping Children Safe in Education 2025 also includes a section on Information Sharing.
- 6.6 The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- 6.7 All staff will maintain and store records in accordance with Futures Data Protection and Information Security policies and local procedures. Any sensitive data e.g., Safeguarding or Child Protection Case Conference minutes must be securely stored and managed in compliance with information security best practice and UK GDPR. The line manager and nominated manager/designated person must have access to this information at all times.

7 Recruitment, Selection and Training Procedures

- 7.1 Futures has written recruitment and selection procedures which can be found on the company Intranet. The policy and procedures are designed with the aim of safe recruitment and vetting of staff.
- 7.2 All new employees are made aware of the policy and procedures during the formal employee induction process. New managers are informed of their role and responsibilities within safeguarding as part of their induction by their line manager.
- 7.3 Safeguarding and Prevent Duty training are mandatory requirements at induction. Regular safeguarding and prevent updates throughout the year with additional specialist safeguarding training for specific roles as required. Safer recruitment training is a mandatory requirement for managers.
- 7.4 Updated and amended procedures are disseminated and reinforced in training sessions, team meetings, and via email communications. Futures' safeguarding policy, Strategy, procedures and guidelines are available to all, being accessible on both the website and intranet.

Annex 1 Safeguarding Process

RECOGNISE

Advisers need to be aware of the various ways that safeguarding issues could arise:

- Disclosure by young person or adult at risk
- You may have concerns about a young person or adult at risk
- Another person may report that they think a young person or adult at risk is being abused or harmed
- You may have concerns that a young person or adult is susceptible to radicalisation
- You may have concerns about the safety of a young person or Adult with their mental health
- You are made aware that a customer has a safeguarding referral already in place and you are working with the lead professional or multi agency team for customer support services.

RESPOND

DO

- Stay calm Provide a listening ear and an open mind
- Be reassuring, particularly that the individual is doing the right thing by telling you
- Be aware that children may not feel ready or know how to tell they are being abused, exploited, or neglected or may not recognise it as harmful

DON'T

- Don't promise to keep the information confidential. Make it clear that you have a duty to refer the matter on with or without their consent
- Don't stop the individual who is freely recalling significant events
- Don't make the individual tell anyone else. S/he may have to be formally interviewed later, and it is important to minimise the number of times information is repeated
- Don't make any suggestions to the individual about how the incident may have happened
- Don't question the individual, except to clarify what they are saying
- Don't discuss the information with anyone other than your line manager, a Safeguarding Officer or an appropriate external agency.

RECORD

- Make a written record of the information whilst young person or adult is present, and include the time, date and persons present, where possible word for word, using quotes
- Afterwards, record the details on a Child Referral Form (For YP) or a Cause for Concern Form (for Adults) – see details on consent. [Click here for forms](#)
- Record basic Details under Safeguarding Section of Web Insight (YP) or on the alert section of Touchpoint (Adults)
- Email for form securely through encryption to safeguarding@futuresadvice.org
- If a safeguarding concern is already in place, we still need to record the details on our systems and update the relevant lead professional if there is an escalation of risk.

REPORT

- Depending upon the setting in which the disclosure occurs you will need to either report to your team manager or to the designated safeguarding officer in the host setting.
- Report the incident/concern as quickly as possible to the team manager or DSO who will evaluate the incident and make a decision to monitor, signpost or make a referral to the appropriate agency.
- If your team manager is not available contact the one of the safeguarding team [meet the team](#) (It is your responsibility to ensure you are aware of the DSO in the host setting where you are working).

If you have immediate concerns that a child or adult is at risk of significant harm contact children's services, Adult services. If you think a criminal offence is being committed contact the police.

**Emergency Services 999 immediate risk 101 can be used for non-immediate Prevent 101 and ask for particular county Police Prevent Team
In urgent cases call the anti-terrorism number 0800789321**

[Contacts link](#)

REFER

- Adviser alerts team manager to possible safeguarding concern, passing on full details using cause for concern form
- Team Manager to assess the concern to determine whether an external referral needs to be made to
 - Children's' or adult services
 - The police
 - Prevent team
- Or if the concern is signpost to support service or monitor.
- Team manager contact one of the DSO's if further guidance is required.
- Team manager to update the cause for concern form with any additional information or actions. And copy to safeguarding@futuresadvice.org
- Where a referral has been made the external agency will conduct their own investigation. Referrer will follow up with the external agency to ensure support is put in place or any further requirements are needed.

Annex 2 Safeguarding Guidelines and Definitions

Definitions:

Children and Young People

The Children Act 2004 defines a child as anyone who has not yet reached their 18th Birthday (regardless of whether or not they are living independently). Although the term 'young person' is often used, this is simply a courtesy term as older children tend not to perceive themselves as children but are still in the age range of the legal definition.

Abuse

A form of maltreatment of a child or adult at risk. Somebody may abuse or neglect a child or adult at risk by inflicting harm or by failing to act to prevent harm. Children or adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Contents:

1	Safeguarding	Section 4: Child Abuse What is child abuse Physical abuse Neglect Sexual abuse Emotional abuse Domestic abuse Bullying & cyber bullying Child on child abuse Child on child sexual violence or harassment Child trafficking Child sexual exploitation Serious violence and criminal exploitation of children, including 'county lines' Cybercrime Female Genital Mutilation (FGM) Children missing education (CME)
2	Children, young people and adults with additional needs	
3	Adults at risk	
4	Child abuse 	
5	Prevent Duty	
6	Online Safety	

Guidelines:

1 Safeguarding

- 1.1. The Children Act 2004 (section 11) places a duty on key people and bodies to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children. Safeguarding and promoting the welfare of children is defined in the guidance document Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2025 as:

- Providing help and support to meet the needs of children as soon as problems emerge

- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

1.2. Safeguarding includes a wide range of specific areas including (but not limited to):

- Abuse, neglect and exploitation
- Bullying, including cyberbullying
- Child abduction and community safety incidents
- Child-on-Child abuse
- Children with family members in prison
- Children Missing from Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Children and the Court System
- Children with family members in prison
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Cybercrime
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- FGM
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Modern Slavery and the National Referral mechanism
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting"
- Online safety
- Preventing radicalisation and extremism
- The Prevent Duty
- Channel
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment between children in schools and colleges
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage

- Upskirting: Additional guidance on the above topic is contained within Keeping Children Safe in Education 2025

- 1.3. Local Safeguarding Children Partnerships in each Local Authority are responsible for developing local policies and procedures, including those relating to the action to be taken where there are concerns about a child's safety and welfare. These procedures will be applied if a child protection referral is made to Children's Services.
- 1.4. The Local Authority has a duty to make enquiries where it has reasonable cause to suspect that a child is suffering or is at risk of suffering significant harm which may be as a result of abuse and /or neglect and exploitation. Indicators of abuse, neglect and exploitation.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse – includes hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. They may be abused by an adult, adults or another child or children. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child

Emotional/Psychological abuse: the persistent emotional maltreatment of a child such as to cause severe and 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 from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone

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

education and all staff should be aware of it and of their policy and procedures for dealing with it.

Neglect and Acts of Omission - 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, for example, 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- 1.5. Detailed definitions of each of these categories and information on the signs and symptoms of abuse can be found in Keeping Children Safe in Education 2025. Staff should familiarise themselves with these, to ensure they are alert to the signs of possible child abuse.
- 1.6. Significant harm is the threshold that justifies compulsory intervention in family life in the best interests of the child. Decisions about significant harm are complex and will be informed by a careful assessment of the child's circumstances.
- 1.7. Recognising abuse is not always easy and it is not the responsibility of Futures staff to investigate and decide whether or not abuse has taken place, or if a child is at risk of significant harm. Staff should however always report any concerns they may have, following the procedure outlined in this document.
- 1.8. **Always report any genuine concerns that you have. Do not let your fear of drawing a wrong conclusion deter you from doing so.**
- 1.9. Where staff have a concern about a child which is not a child protection issue i.e., where there is no suspicion of abuse or neglect, but it is felt that the child may be in need of additional support, a referral should be made to the Local Authority.

2 Children, young people and adults with additional needs

- 2.1. Children, young people and adults with special educational needs and disabilities can face additional safeguarding challenges because:
 - there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - they may be more prone to peer group isolation or bullying (including prejudice based bullying)
 - children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
 - difficulties may arise in overcoming communication barriers and difficulties in managing or reporting these challenges.
 - Organisations must take positive action, where proportionate, to deal with the disadvantages these pupils face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

- The guidance in the Equality Act 2010 looks at the implications of the Public Sector Equality Duty (PSED) for education settings. This includes a need to be conscious that pupils with protected characteristics may be more at risk of harm and integrate this into safeguarding policies and procedures. At Futures we identify customers who might need more pastoral support to be kept safe or to keep themselves safe by assessing our customer and learners needs whilst using our services.
- 2.2. Staff should be aware that safeguarding issues can manifest themselves via **child-on child abuse**. This is most likely to include, but not limited to:
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - Abuse in intimate relationships between children (sometime known as teenage relationship abuse)
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
 - Sexual violence such as rape, assault by penetration and sexual assault (this may include online element which facilitates, threatens and/or encourages sexual violence);
 - Sexual harassment: such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
 - 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - Upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
 - Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- 2.3. Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include females being sexually touched/assaulted or males being subject to initiation-type violence.
- 2.4. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- 2.5. All staff at Futures are aware that mental health problems can, in some cases, be an indicator that a customer or learner has suffered or is at risk of suffering abuse, neglect or exploitation
- 2.6. If staff have a mental health concern about a customer or learner that is also a safeguarding concern, immediate action should be taken by speaking to the Team Manager or Designated Safeguarding Officer.

3. Definition of Adults at risk

Background

- 3.1. The legal basis for responding to concerns regarding the safety and welfare of adults at risk is different to that for children. Working Together to Safeguard Children 2023 only applies to children and young people who have not yet reached age 18. Any incident or concerns relating to a young person or adult above the age of 18, even if they are still at school or college, are covered by Multi-Agency Safeguarding Hub (MASH). They are required to develop policies for responding to allegations and carrying out investigations.
- 3.2. Although the legal basis is different, the principles for staff in identifying and responding to incidents of concern in relation to adults at risk are largely the same as those for children and young people under 18.
- 3.3. Adults at risk of harm The Care Act 2014 defines an adult at risk as someone who is aged 18 or above and:
 - Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
 - Is experiencing, or is 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
- 3.4. Adults considered to be at risk in the above definition therefore may include those who have:
 - A learning / physical / sensory disability (including speech and language disability and communication disorders e.g., autistic spectrum difficulties)
 - Mental ill health or dementia
 - Frailty due to age
 - Acquired brain injury
 - A drug / alcohol problem
 - Certain types of physical illness.
- 3.5. As such, many staff in Futures will come into contact with adults at risk during the course of their work. It should be noted however that a person is not classed as 'at risk' simply because they are elderly or have a disability and that being at risk may not necessarily be a permanent state.
- 3.6. The term 'Adult at Risk' is now more commonly used in place of 'Vulnerable Adult', as 'Vulnerable Adult' may wrongly imply that some of the fault for the abuse lies with the victim.

Abuse in the context of Adults at risk

- 3.7. There is clearly significant overlap between what constitutes abuse of children and in the context of adults at risk, however as this is dealt with under separate legislation, separate guidance applies
- 3.8. Current Department of Health guidance defines abuse as:
'a violation of an individual's human and civil rights by other person or persons.... Abuse may consist of single or repeated acts. It may be physical, verbal, or psychological. It may be an act of neglect or omission to act, or it may occur when an adult at risk is persuaded to enter

into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm, or exploitation of, the person subjected to it. Abuse may be perpetrated as the result of deliberate intent, negligence, or ignorance.

- 3.9. 'Significant harm' should be taken to include: 'ill treatment including sexual abuse and forms of ill treatment which are not physical; the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development.'
- 3.10. The main forms of abuse are:
- Physical abuse - includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions
 - Sexual abuse - includes rape and sexual assault or sexual acts to which the adult at risk has not consented, or could not consent or was pressured into consenting
 - Psychological abuse - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks
 - Financial or material abuse - includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
 - Neglect and acts of omission - includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
 - Discriminatory abuse – based on race, sex and disability, and other forms of harassment, slurs or similar treatment.
- 3.11. There are obvious similarities here with the types of abuse defined earlier in relation to children and young people, with the notable additions being the financial or material abuse and discriminatory abuse categories.
- 3.12. It should be noted that forced marriage also falls within the definition of abuse. Since February 2023 the legal age of consent for a child to marry was raised to 18, it also applies to non-binding, unofficial marriages as well as legal marriages.

4 Child abuse

What is child abuse?

- 4.1. Child abuse happens when a person – adult or child – harms a child. It can be physical, sexual or emotional, but can also involve a lack of love, care and attention. Neglect can be just as damaging to a child as physical or sexual abuse. Children may be abused by:
- family members
 - friends
 - people working or volunteering in organisational or community settings
 - people they know
 - or, much less commonly, by strangers.

- 4.2. Children suffering abuse often experience more than one type of abuse. The abuse usually happens over a period time, rather than being a single, isolated incident. Increasingly, abuse can happen online.

General signs of abuse

- 4.3. Children who suffer abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend. Many of the signs that a child is being abused are the same regardless of the type of abuse. Anyone working with children or young people needs to be vigilant to the signs listed below.
- regular flinching in response to sudden but harmless actions, for example someone raising a hand quickly
 - showing an inexplicable fear of particular places or making excuses to avoid particular people
 - knowledge of 'adult issues' for example alcohol, drugs and/or sexual behaviour which is inappropriate for their age or stage of development
 - angry outbursts or behaving aggressively towards other children, adults, animals or toys
 - becoming withdrawn or appearing anxious, clingy or depressed
 - self-harming or thoughts about suicide
 - changes in eating habits or developing eating disorders
 - regularly experiencing nightmares or sleep problems
 - regularly wetting the bed or soiling their clothes
 - in older children, risky behaviour such as substance misuse or criminal activity
 - running away or regularly going missing from home or care
 - Not receiving adequate medical attention after injuries.
- 4.4. These signs do not necessarily mean that a child is being abused. There may well be other reasons for changes in a child's behaviour such as a bereavement or relationship problems between parents/carers. In assessing whether signs are related to abuse or not, they need to be considered in the context of the child's development and situation.

Physical abuse: what is physical abuse?

- 4.5. Physical abuse happens when a child is deliberately hurt, causing injuries such as cuts, bruises, burns and broken bones. It can involve hitting, kicking, shaking, throwing, poisoning, burning or suffocating. It's also physical abuse if a parent or carer makes up or causes the symptoms of illness in children. For example, they may give them medicine they don't need, making them unwell. This is known as fabricated or induced illness (FII).

Spotting the signs of physical abuse

- 4.6. All children have trips, falls and accidents which may cause cuts, bumps and bruises. These injuries tend to affect bony areas of their body such as elbows, knees and shins and are not usually a cause for concern. Injuries that are more likely to indicate physical abuse include:
- 4.7. Bruising
- bruises on babies who are not yet crawling or walking
 - bruises on the cheeks, ears, palms, arms and feet
 - bruises on the back, buttocks, tummy, hips and backs of legs

- multiple bruises in clusters, usually on the upper arms or outer thighs
- bruising which looks like it has been caused by fingers, a hand or an object, like a belt or shoe
- large oval-shaped bite marks.

4.8. Burns or scalds

- any burns which have a clear shape of an object, for example cigarette burns
- burns to the backs of hands, feet, legs, genitals or buttocks

4.9. Other signs of physical abuse include multiple injuries (such as bruising, fractures) inflicted at different times. If a child is frequently injured, and if the bruises or injuries are unexplained or the explanation doesn't match the injury, this should be investigated. It's also concerning if there is a delay in seeking medical help for a child who has been injured.

Neglect: what is neglect?

- 4.10. Neglect is persistently failing to meet a child's basic physical and/or psychological needs usually resulting in serious damage to their health and development. Neglect may involve a parent's or carer's failure to:
- provide adequate food, clothing or shelter
 - supervise a child (including leaving them with unsuitable carers) or keep them safe from harm or danger
 - make sure the child receives appropriate health and/or dental care
 - make sure the child receives a suitable education
 - meet the child's basic emotional needs – parents may ignore their children when they are distressed or even when they are happy or excited. This is known as emotional neglect.
- 4.11. Neglect is the most common type of child abuse. It often happens at the same time as other types of abuse.

Spotting the signs of neglect

- 4.12. Neglect can be difficult to identify. Isolated signs may not mean that a child is suffering neglect, but multiple and persistent signs over time could indicate a serious problem. Some of these signs include:
- children who appear hungry - they may come to school without lunch money or even try to steal food
 - children who appear dirty or smelly and whose clothes are unwashed or inadequate for the weather conditions
 - children who are left alone or unsupervised
 - children who fail to thrive or who have untreated injuries, health or dental problems
 - children with poor language, communication or social skills for their stage of development
 - children who live in an unsuitable home environment, for example the house is very dirty and unsafe, perhaps with evidence of substance misuse or violence
 - children who have taken on the role of carer for other family members.

Sexual abuse: what is sexual abuse?

- 4.13. Sexual abuse is forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse. Child sexual abuse can involve contact abuse and/or non-contact abuse. Contact abuse happens when the abuser makes physical contact with the child. It includes:
- sexual touching of any part of the body whether the child is wearing clothes or not
 - rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
 - forcing or encouraging a child to take part in sexual activity
 - making a child take their clothes off, touch someone else's genitals or masturbate
 - Non-contact abuse involves non-touching activities. It can happen online or in person and includes:
 - encouraging a child to watch or hear sexual acts
 - not taking proper measures to prevent a child being exposed to sexual activities by others
 - showing pornography to a child
 - making, viewing or distributing child abuse images
 - allowing someone else to make, view or distribute child abuse images.
- 4.14. Online sexual abuse includes:
- persuading or forcing a child to send or post sexually explicit images of themselves, this is sometimes referred to as sexting
 - persuading or forcing a child to take part in sexual activities via a webcam or smartphone
 - having sexual conversations with a child by text or online
 - meeting a child following online sexual grooming with the intent of abusing them.
- 4.15. Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped. Abusers will often try to build an emotional connection with a child in order to gain their trust for the purposes of sexual abuse. This is known as grooming. Spotting the signs of sexual abuse
- 4.16. There may be physical signs that a child has suffered sexual abuse. These include:
- anal or vaginal soreness or itching
 - bruising or bleeding near the genital area
 - discomfort when walking or sitting down
 - an unusual discharge
 - sexually transmitted infections (STI)
 - pregnancy.
- 4.17. Changes in the child's mood or behaviour may also cause concern. They may want to avoid spending time with specific people. In particular, the child may show sexual behaviour that is inappropriate for their age. For example:
- they could use sexual language or know things about sex that you wouldn't expect them to
 - a child might become sexually active at a young age
 - they might be promiscuous.

Emotional abuse: what is emotional abuse?

4.18. Emotional abuse is persistent, and, over time, it severely damages a child's emotional health and development. It involves:

- humiliating, putting down or constantly criticising a child
- shouting at or threatening a child or calling them names
- mocking a child or making them perform degrading acts
- constantly blaming or scapegoating a child for things which are not their fault
- trying to control a child's life and not recognising their individuality
- not allowing them to have friends or develop socially
- pushing a child too hard or not recognising their limitations
- manipulating a child
- exposing a child to distressing events or interactions such as drug taking, heavy drinking or domestic abuse
- persistently ignoring them
- being cold and emotionally unavailable during interactions with a child
- never saying anything kind, positive or encouraging to a child and failing to praise their achievements and successes.

Spotting the signs of emotional abuse

4.19. There aren't usually any obvious physical signs of emotional abuse, but you may spot signs in a child's actions or emotions. It's important to remember that some children are naturally quiet and self-contained whilst others are more open and affectionate. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child or are particularly unusual for their stage of development. Babies and preschool children who are being emotionally abused may:

- be overly affectionate towards strangers or people they haven't known for very long
- not appear to have a close relationship with their parent, for example when being taken to or collected from nursery
- lack confidence or become wary or anxious
- be unable to play
- be aggressive or nasty towards other children and animals.

4.20. Older children may:

- use language, act in a way or know about things that you wouldn't expect for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends
- fear making mistakes • fear their parent being approached regarding their behaviour
- self-harm.

Domestic abuse

Definition

- 4.21. The Domestic Abuse Act 2021 (part 1) introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right. The act defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident between two people over the age of 16 who are 'personally connected' to each other:
- Physical or sexual abuse;
 - Violent or threatening behaviour;
 - Controlling or coercive behaviour;
 - Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property, or obtain goods or services; and
 - Psychological, emotional, or other abuse.
- 4.22. People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other or have shared parental responsibility for the same child or they are relatives.
- 4.23. The definition of Domestic Abuse applies to children if they see or hear or experience the effects of the abuse and they are related to the abusive person or experience it through their own intimate relationships.
- 4.24. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio economic status, sexuality or background and domestic abuse can take place inside or outside of the home.
- 4.25. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.
- 4.26. The National Domestic Abuse helpline can be called free of charge and in confidence 24 hours a day on 0808 2000 247

Spotting the signs of domestic abuse

- 4.27. It can be difficult to tell if domestic abuse is happening, because it usually takes place in the family home and abusers can act very differently when other people are around. Children who witness domestic abuse may:
- become aggressive
 - display anti-social behaviour

- suffer from depression or anxiety
- not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

Bullying and cyberbullying

What are bullying and cyberbullying?

- 4.28. Bullying is behaviour that hurts someone else. It usually happens over a lengthy period of time and can harm a child both physically and emotionally. Bullying includes:
- verbal abuse, such as name calling
 - non-verbal abuse, such as hand signs or glaring
 - emotional abuse, such as threatening, intimidating or humiliating someone
 - exclusion, such as ignoring or isolating someone
 - undermining, by constant criticism or spreading rumours
 - controlling or manipulating someone
 - racial, sexual or homophobic bullying
 - physical assaults, such as hitting and pushing
 - making silent, hoax or abusive calls.
- 4.29. Bullying can happen anywhere – at school, at home or online. When bullying happens online it can involve social networks, games and mobile devices. Online bullying can also be known as cyberbullying.

Cyberbullying includes:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.

Spotting the signs of bullying and cyberbullying

- 4.30. It can be hard to know whether or not a child is being bullied. They might not tell anyone because they're scared the bullying will get worse. They might also think that the bullying is their fault. No one sign indicates for certain that a child's being bullied, but you should look out for:
- belongings getting 'lost' or damaged
 - physical injuries such as unexplained bruises
 - being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
 - not doing as well at school
 - asking for, or stealing, money (to give to a bully)
 - being nervous, losing confidence or becoming distressed and withdrawn

- problems with eating or sleeping
- bullying others.

Child-on-Child Abuse (previously known as Peer-on-Peer)

- 4.31. Futures has a zero-tolerance approach to abuse, and this will never be passed off for example as “banter” as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners and staff.
- 4.32. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school, college, or training provider premises and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
- 4.33. There is a recognition that it is more likely that females will be victims and male perpetrators, but that child-on-child abuse is unacceptable and will be taken seriously.
- 4.34. All staff should understand, that even if there are no reports within Futures premises it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse, they should speak to their designated safeguarding officer (or manager).
- 4.35.** It is essential that all staff understand the importance of challenging inappropriate behaviours between children and young people, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on Child Sexual Violence or Harassment

- 4.36. When responding to concerns relating to child-on-child sexual violence or harassment, Futures will follow the guidance outlined in Part Five of KCSIE 2025
- 4.37. Futures recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment are never acceptable.
- 4.38. Human Rights Legislation updated guidance makes it clear that being subjected to harassment, violence and or abuse, may breach children’s rights, as set out in the Human Rights Act
- 4.39. All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.

- 4.40. When there has been a report of sexual violence or harassment, the DSO will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students and staff and any actions that are required to protect them.

- 4.41. Reports will initially be managed internally by Futures and where necessary will be referred to Integrated Children's Services and/or the Police.

The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult students or staff, and, any other related issues or wider context.

- 4.42. Futures recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

- 4.43. When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:

- Report any concerns to the DSO immediately.
- Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSO.
- Not delete the imagery or ask the child to delete it.
- Not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSO and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSO.

- 4.44. The DSO will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.

- 4.45. Parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.

- 4.46. All decisions and action taken will be recorded in line with our child protection procedures.

- 4.47. A referral will be made to ICS and/or the police immediately if:

- The incident involves an adult (over 18).
- There is reason to believe that a child has been coerced, extorted, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
- The image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
- A child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

4.48. The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.

4.49. In cases where nudes or semi-nudes have been shared, Futures follows the guidance given by the UK Council for Internet Safety (UKCIS):

[Sharing nudes and semi-nudes December 2024](#)

Child trafficking

What is child trafficking?

4.50. Child trafficking is child abuse. It involves recruiting and moving children who are then exploited. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another. Children are trafficked for:

- child sexual exploitation
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking
- forced labour in factories or agriculture
- criminal exploitation such as cannabis cultivation, pickpocketing, begging, transporting, drugs, selling pirated DVDs and bag theft.

4.51. Children who are trafficked experience many forms of abuse, neglect and exploitation. Physical, sexual and emotional abuse is often used to control them and they're also likely to suffer physical and emotional neglect.

4.52. Child trafficking can require a network of organised criminals who recruit, transport and exploit children and young people. Some people in the network might not be directly involved in trafficking a child but play a part in other ways, such as falsifying documents, bribery, owning or renting premises or money laundering (Europol, 2011).

4.53. Child trafficking can also be organised by individuals and the children's own families. Traffickers trick, force or persuade children to leave their homes. They use grooming techniques to gain the trust of a child, family or community. Although these are methods used by traffickers, coercion, violence or threats don't need to be proven in cases of child trafficking - a child cannot legally consent to their exploitation, so child trafficking only requires evidence of movement and exploitation.

4.54. Modern slavery is another term which may be used in relation to child trafficking. Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking (HM Government, 2014). The Modern Slavery Act passed in 2015 in England and Wales categorises offences of slavery, servitude, forced or compulsory labour and human trafficking (NCA, 2017).

Spotting the signs of child trafficking

4.55. Signs that a child has been trafficked may not be obvious, but you might notice unusual behaviour or events. These include a child who:

- spends a lot of time doing household chores
- rarely leaves their house, has no freedom of movement and no time for playing
- is orphaned or living apart from their family, often in unregulated private foster care
- lives in substandard accommodation
- isn't sure which country, city or town they're in
- is unable or reluctant to give details of accommodation or personal details
- might not be registered with a school or a GP practice
- has no documents or has falsified documents
- has no access to their parents or guardians
- is seen in inappropriate places such as brothels or factories
- possesses unaccounted for money or goods
- is permanently deprived of a large part of their earnings
- required to earn a minimum amount of money every day or pay off an exorbitant debt
- has injuries from workplace accidents
- gives a prepared story which is very similar to stories given by other children.

4.56. There are also signs that an adult is involved in child trafficking, such as:

- making multiple visa applications for different children
- acting as a guarantor for multiple visa applications for children
- travelling with different children who they're not related to or responsible for
- insisting on remaining with and speaking for the child
- living with unrelated or newly arrived children
- abandoning a child or claiming not to know a child they were previously with.

Child sexual exploitation

4.57. The statutory definition of Child Sexual Exploitation (CSE) can be found in the KCSIE 2025 guidance.

The definition is:

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

4.59. Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;

- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

4.60. Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

Serious Violence and Criminal exploitation of children, including ‘county lines’.

- 4.61. 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
- 4.62. All staff should be aware of the 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.

Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

What is child criminal exploitation?

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

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

Information about Child Criminal Exploitation can be found in KCSIE (2025)

- 4.64. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.
- 4.65. Some of the following can be indicators of Child Criminal Exploitation:
- Children who appear with unexplained gifts or new possessions
 - Children who associate with other young people involved in exploitation
 - Children who suffer from changes in emotional well-being
 - Children who misuse drugs or alcohol
 - Children who go missing for periods of time or regularly come home late; and
 - Children who are absent from education

What is county lines exploitation?

- 4.66. County lines is a major, cross-cutting issue involving:
- Drugs
 - Violence
 - Gangs
 - Safeguarding

- criminal and sexual exploitation
- modern slavery
- missing persons

4.67. And the response to tackle it involves:

- the police
- the National Crime Agency
- a wide range of government departments
- local government agencies
- VCS (voluntary and community sector) organisations

The UK government defines county lines as:

- 4.68. “County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line.” They are likely to exploit children, young people and adult at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.”
- 4.69. Exploitation is an integral part of county lines offending model with children and adults at risk exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- 4.70. Children and adults at risk can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 4.71. County lines activity and the associated violence, drug dealing, and exploitation has a devastating impact on young people, adult at risk and local communities.

Cybercrime

- 4.72. Futures recognises that young people and adults with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- 4.73. If staff are concerned that a customer or learner may be at risk of becoming involved in cyber-dependent cybercrime, the DSO will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- 4.74. Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

Female Genital Mutilation (FGM).

- 4.75. Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.
- 4.76. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from Personal, Social and Health Education (PSHE)
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

- 4.77. FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.
- 4.78. Indications that FGM may have already taken place may include:
- difficulty walking, sitting or standing and may even look uncomfortable
 - spending longer than normal in the bathroom or toilet due to difficulties urinating.
 - spending long periods of time away from a classroom during the day with bladder or menstrual problems.
 - frequent urinary, menstrual or stomach problems.
 - prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return
 - reluctance to undergo normal medical examinations.
 - confiding in a professional without being explicit about the problem due to embarrassment or fear.
 - talking about pain or discomfort between her legs
- 4.79. The Serious Crime Act 2015 sets out a duty on professionals to notify police when they discover that FGM appears to have been carried out on a girl under 18. This this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).
- 4.80. Staff must report where they discover that an act of FGM appears to have been carried out to the Designated Safeguarding Officer, so that this can be reported to the police and social care.
- 4.81. So-called 'honour-based' abuse (HBA) encompasses 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. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

- 4.82. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Children Missing Education (CME)

- 4.83. Knowing where children/ young people/ adults at risk are during school/college or working hours is an extremely important aspect of Safeguarding. Missing school/college or working can be an indicator of abuse, neglect and exploitation and may also raise concerns about others safeguarding issues, including the criminal exploitation of children. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community.
- 4.84. Futures will monitor attendance carefully and address poor or irregular attendance without delay.
- 4.85. We will always follow up when our learners or staff do not attend training or work.
- 4.86. General information and advice for schools and colleges can be found in the Government's [Missing Children and Adults Strategy](#).
- 4.87. In response to the Guidance in KCSIE 2025 Futures has:
- Staff who understand what to do when learners do not attend regularly
 - Appropriate procedures for learners who are absent from education
 - Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
 - Children who are absent from education
 - All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse, neglect and exploitation such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines.
 - It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage.
 - Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

5 Prevent Duty

- 5.1. As part of the Counter Terrorism and Security Act 2015, Futures has a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty.'
- 5.2. Where staff are concerned that children, young people and any adult customer or staff are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.
- 5.3. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.
- 5.4. We use the curriculum to ensure that our learners understand how people with extreme views share these with others, especially using the internet.
- 5.5. Staff should be alert to changes in children's and adults' behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead making a referral.
- 5.6. Futures are committed to ensuring that our learners are offered a balanced curriculum that aims to prepare them for life in modern Britain including fundamental British values.
- 5.7. Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.
 - Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
 - Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
 - Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 5.8. Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.
- 5.9. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

Recognising Extremism

5.10. 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, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

6 Online Safety

6.1. It is essential that customers and learners are safeguarded from potentially harmful and inappropriate material or behaviours online. Futures will adopt a whole organisational approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

6.2. Futures identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four 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, 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/>)

6.3. Futures has a separate Online Safety Policy which reflects the above, the policy is on the company website alongside our safeguarding policy and other relevant policies.