



**Child and Adult at Risk Policy -
Safeguarding**

Purpose	
Policy on identifying and responding to concerns regarding the safeguarding and protection of children, young people and adults at risk	
Key words	
Safeguarding, vulnerable, protection, prevention, safe, abuse, Prevent, extremism, radicalisation, terrorism, children, adults	
Document Control Number:	16 – Child and Adult at Risk Policy
Version:	10
Date Adopted:	18.09.17
Name of Owner:	Sophia Franzen
Title of Owner:	Operations Director
Name of Responsible Group:	Senior Management Team
Date issued for Publication:	6 th October 2022
Expiry Date:	06 th October 2023
Review Date:	06 th October 2023
Target Audience:	All Acorn Training Employees

Version Control

Version Number	Date	Comments (Description change and amendments)
5	18.09.17	Review of policy, counter terrorism appendix added
6	10.09.18	Policy title changed to Adults at risk Full policy reviewed for wording vulnerable to adult at risk where appropriate Wording change Designated Safeguarding Lead to Officer Phone numbers updated Links for further information reviewed Working Together to Safeguard Children 2018 Keeping Children Safe in Education: DfE July 2018 Appendix 2 updated Internal reporting of employees posing a risk updated
7	12.06.2019	Reviewed 12.06.2019 by Siobhan Clegg and Hifsa Haroon-Iqbal (Regional Prevent Lead Further and Higher Education (West Midlands) Department for Education) Reviewed 28.11.2019 by Siobhan Clegg. No changes required.
8	07.10.2020	Reviewed by Sophia Franzen 07.10.2020 updates 11.8 added referrers to the FGM Act passed by Scottish Parliament 19 th March 2020 Appendix 1 – Physical abuse and banning of smacking children using the defence of reasonable force, across the UK. Timeframes added
9	27.08.2021	Keeping Children Safe in Education: DfE From September 2021 Appendix 1 update to include, Peer on peer abuse, sexting, up skirting, county lines 19. Where children require a social worker
10	06.10.2022	Review of keeping Children Safe in Education Terminology – ‘peer on peer’ abuse has been changed to ‘child on child’ abuse Appendix 7: Sexual abuse by young people

CONTENTS

Part 1: Safeguarding Policy		
1.	Introduction	Page 6
2.	Overall aims	Page 7
3.	Key Principles	Page 8
4.	Key Processes	Page 8
5.	Expectations	Page 8
6.	The Designated Safeguarding Officer	Page 9
7.	The Management Team	Page 11
8.	A Safer Culture	Page 11
	7.1 Safer recruitment and selection	Page 11
	7.2 Employee support	Page 11
9.	Our Role in the Prevention of Abuse	Page 12
	8.1 The curriculum	Page 11
	8.2 Other areas of work	Page 12
10.	Safeguarding learners/customers/service users who are at risk of radicalisation	Page 12
	9.6 Risk reduction	Page 13
	9.8 Response	Page 13
11.	Safeguarding learners/customers/service users who are Vulnerable to Exploitation, Forced Marriage, Female Genital Mutilation or Trafficking	Page 14
12.	What We Do when we are Concerned	Page 14
Part 2: The Key Procedures		
	Chart: Responding to concerns about a child / adult at risk	Page 16
13.	Involving Parents / Carers	Page 17
14.	Multi-Agency Work	Page 17
15.	Our Role in Supporting Children / adult at risk	Page 17
16.	Responding to an Allegation about a Member of Employee	Page 18
17.	Children / adult at risk with Additional Needs	Page 18
18.	Children / adult at risk in Specific Circumstances	Page 19
Appendices		
	Appendix 1: Definitions and Indicators of Abuse	Page 23

1. Neglect	Page 23
2. Physical Abuse	Page 23
3. Sexual Abuse	Page 24
4. Sexual Exploitation	Page 25
5. Child on child abuse	Page 25
6. Sexting	Page 26
7. Up skirting	Page 26
8. County Lines	Page 26
9. Emotional Abuse	Page 26
10. Responses from Parents/Carers	Page 27
11. Disabled Children and adults	Page 28
Appendix 2: Dealing with a disclosure of abuse	Page 29
Appendix 3: Allegations about a Member of Employee, Director or Volunteer	Page 30
Appendix 4: Indicators of Vulnerability to Radicalisation	Page 32
Appendix 5: Preventing Violent Extremism – Roles and Responsibilities of the Single Point of Contact (SPOC)	Page 34
Appendix 6: Counter-Terrorism and Security Act	Page 36
Appendix 7: Sexual abuse by young people	Page 37

For more information contact: **Sophia Franzen – Operations Director**

Equality Statement – Due Regard

Acorn Training Ltd aims to design and implement policy documents that meet the diverse needs of our service, population and workforce, ensuring that none are placed at a disadvantage over others.

It considers the provisions of the Equality Act 2010 and promotes equal opportunities for all.

This document has been assessed to ensure that no one receives less favourable treatment on the protected characteristics of their age, disability, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership, race, religion or belief, pregnancy and maternity.

In carrying out its functions, Acorn Training Ltd must have due regard to the different needs of different protected equality groups.

This applies to all the activities for which Acorn Training Ltd is responsible, including policy development and review.

Reporting to Prime Providers and Funding Bodies

Where appropriate, there may be the need to inform a prime provider of irregularities or specific issues within the remit and scope of this policy. At all times, this should be discussed with the Managing Director or the delegated officer. A non-conformity/incident report should be raised in line with our ISO9001 accredited quality management system to aid and facilitate reporting.

Individuals may also wish to refer to the whistle blowing process where it is not deemed appropriate to report to the Managing Director or their delegated officer.

Training

The following training is required to support implementation and ongoing maintenance of this policy:

- Senior management team to receive copy of Business Continuity Plan for it to be reviewed and stored off site in case of disaster recovery

1. INTRODUCTION

1.1 Safeguarding is defined as –

- Protecting children and adults at risk from maltreatment;
- Preventing impairment of a child or adult at risk, health or development;
- Ensuring that children are growing up and adults at risk are living in circumstances consistent with the provision of safe and effective care; and
- Acting to enable all children and adults at risk to have the best life chances.

1.2 Acorn Training Ltd is committed to safeguarding and promoting the welfare of all its learners / customers / service users. We believe that:

- All children / young people and adults at risk have the right to be protected from harm;
- Learners / customers / service users need to be safe and to feel safe when accessing our services
- Learners / customers / service users need support which matches their individual needs, including those who may have experienced abuse;
- Learners / customers / service users have the right to speak freely and voice their values and beliefs;
- All Learners / customers / service users must be encouraged to respect each other's values and support each other;
- All Learners / customers / service users have the right to be supported to meet their emotional, and social needs as well as their educational needs – a happy healthy sociable child / young person will achieve better educationally and adults at risk remain safe and independent;
- Our services can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk-taking behaviours; and

- All employee and visitors have an important role to play in safeguarding Learners / customers / service users and protecting them from abuse.

1.3 Acorn Training Ltd will fulfil their local and national responsibilities as laid out in the following documents: -

Child Protection

- Children Act 1989
- Protection of Children Act 1999
- Adoption and Children Act 2002
- Every Child Matters 2003
- National Service Framework 2004
- Children Act 2004
- Local Safeguarding Children Board functions
- What to do if you are worried a child is being abused 2006
- Children and Young People Act 2008
- Laming reports
- The Education Act 2002
- Mental Health and Behaviour in schools: Departmental Advice (DfE 2014)
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education: DfE September 2021

Adult at risk Protection

- National Assistance Act [section 47]1948/1951
- Mental Health Act 1983/2007
- Police and Criminal Evidence Act 1984
- National Health Service and Community Care Act 1990
- Family Law Act 1996
- Human Rights Act 1998
- Care Standards Act 2000
- No Secrets 2000
- Sexual Offences Act 2003
- Domestic Violence Crime and Victims Act 2004
- Safeguarding Adults [ADASS] 2005
- Mental Capacity Act 2005/Deprivation of Liberty [April] 2009
- Safeguarding Vulnerable Groups Act 2006

2. OVERALL AIMS

2.1 This policy will contribute to safeguarding our learners / customers / service users and promoting their welfare by:

- Clarifying standards of behaviour for employee and learners / customers / service users;
- Contributing to the establishment of a safe, resilient and robust ethos within the organisation, built on mutual respect, and shared values
- Introducing appropriate work within the curriculum;
- Encouraging learners / customers / service users / parents and carers to participate;
- Alerting employee to the signs and indicators that all might not be well;
- Developing employee awareness of the causes of abuse;
- Developing employee's awareness of the risks and vulnerabilities their learners / customers / service users face;
- Addressing concerns at the earliest possible stage; and
- Reducing the potential risks learners / customers / service users face of being exposed to violence, extremism, exploitation, or victimisation

2.2 This policy will contribute to supporting our learners / customers / service users by:

- Identifying and protecting the most vulnerable and at risk
- Identifying individual needs where possible; and
- Designing plans to meet those needs.

2.3 This policy will contribute to the protection of our learners / customers / service users by:

- Including appropriate work within the curriculum;
- Implementing child protection and safeguarding adults at risk policies and procedures; and
- Working in partnership with learners / customers / service users, parents and agencies.

3. KEY PRINCIPLES

3.1 These are our key principles of safeguarding:

- Always see the child / adult at risk first.
- Never do nothing.
- Do with, not to, others.
- Do the simple things better.
- Have conversations, build relationships.
- Outcomes not outputs.

3.2 In addition we champion the following key messages.

- Every learner / customer / service user is entitled to a rich and rounded curriculum.

- Acorn Training Ltd operate with public money: this should be spent wisely, targeting resources on the evidenced needs of learners / customers / service users. Assurance and audit are important aspects of this.
- Individual directors and senior managers can and should take the lead on specific aspects of company policy such as safeguarding.

4. KEY PROCESSES

- 4.1 All employee should be aware of the guidance issued by their local authority safeguarding children board and adult social care departments

5. EXPECTATIONS

- 5.1 All employees and visitors will:

- Be familiar with this safeguarding policy;
- Be subject to Safer Recruitment processes and checks, whether they are a new employee, supply employee, contractors, volunteers etc.
- Be involved in the implementation of individual education programmes, integrated support plans, child in need plans interagency child protection plans and care plans;
- Be alert to signs and indicators of possible abuse (See Appendix One for current definitions and indicators);
- Record concerns and give the record to the Designated Safeguarding Officer **Sophia Franzen**; and
- Deal with a disclosure of abuse from a child in line with the guidance in Appendix Two - you must inform the Designated Safeguarding Officer immediately, and provide a written account as soon as possible; within 2 hours

- 5.2 All employees will receive basic level one training at least once every three years. Key employees will undertake level two and level three training as agreed by the Designated Safeguarding Officer.

6. THE DESIGNATED SAFEGUARDING OFFICER

- 6.1 Our Designated Safeguarding Officer on the senior leadership team is **Sophia Franzen**. She has lead responsibility and management oversight and accountability for child protection and adults at risk activity.

Contact Details:

Email: sophia.franzen@acorntraining.eu

Mobile: 07971391445

- 6.2 The Designated Safeguarding Officer will lead regular case monitoring reviews of at-risk learners / customers / service users. These reviews must be evidenced by minutes and recorded in case files.
- 6.3 When Acorn Training Ltd has concerns about a learners / customers / service user, the Designated Safeguarding Officer will decide what steps should be taken and should advise the Managing Director where appropriate.
- 6.4 Child and adults at risk protection information will be dealt with in a confidential manner. Employees will be informed of relevant details only when the Designated Safeguarding Officer feels their having knowledge of a situation will improve their ability to deal with an individual child / adult and risk and / or family. A written record will be made of what information has been shared with whom, and when.
- 6.5 Child protection records will be stored securely in a central place separate from academic records. Individual files will be kept for each child: Acorn Training Ltd will not keep family files. Files will be kept for at least the period during which the learners / customers / service users attending Acorn Training Ltd services, and beyond that in line with current data legislation and guidance.
- 6.6 Access to these records by employees other than by the Designated Safeguarding Officer will be restricted, and a written record will be kept of who has had access to them and when.
- 6.7 Parents will be aware of information held on their children and kept up to date regarding any concerns or developments by the appropriate employee. General communications with parents will be in line with any home/company policies and give due regard to which adults have parental responsibility.
- 6.8 **Do not disclose to a parent any information held on a child if this would put the child at risk of significant harm.**
- 6.9 If a learner/customer/service user moves from Acorn Training Ltd services, child protection records will be forwarded on to the Designated Safeguarding Officer at the new provider, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two organisations may be necessary. We will record where and to whom the records have been passed and the date.
- 6.10 If sending by post records will be sent by “Special/Recorded Delivery”. For audit purposes a note of all records transferred or received should be kept in either paper or electronic format. This will include the name, date of birth, where and to whom the records have been sent and the date sent and/or received (see Information Security Policy).

- 6.11 If a learner/customer/service user is permanently excluded and moves to a Pupil Referral Unit, child protection records will be forwarded on to the relevant organisation.
- 6.12 Where an at risk young person is moving to a Further Education establishment, consideration should be given to the student's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support.
- 6.13 When a Designated Safeguarding Officer resigns their post or no longer has child protection / adult at risk responsibility, there should be a full face to face handover / exchange of information with the new post holder.
- 6.14 In exceptional circumstances when a face to face handover is unfeasible, the Managing Director will ensure that the new post holder is fully conversant with all procedures and case files.

7. The Management Team

- 7.1 The Management Team is accountable for ensuring the safety of the organisation
- 7.2 The Management Team will ensure that:
- Acorn Training Ltd has a safeguarding policy in accordance with national best practice and funding body requirements;
 - Acorn Training Ltd operates, "safer recruitment" procedures and ensures that appropriate checks are carried out on all new employees and relevant volunteers;
 - At least one senior member of the leadership team acts as a Designated Safeguarding Officer;
 - The Designated Safeguarding Officer attends appropriate refresher training every two years;
 - All employees who work at Acorn will undertake training annually
 - Temporary employees and volunteers are made aware of Acorn Training Ltd arrangements for child protection and adults at risk and their responsibilities;
 - Acorn Training remedies any deficiencies or weaknesses brought to its attention without delay; and
 - Acorn Training has procedures for dealing with allegations of abuse against employees / volunteers.
- 7.3 The Managing Director reviews its policies / procedures annually
- 7.6 The Operations Director / Designated Safeguarding Officer is nominated to be responsible for liaising with the local authority (LADO) and other partner agencies in the event of allegations of abuse being made against the Managing Director.

8. A SAFER CULTURE

Safer Recruitment and Selection

- 8.1 Acorn Training Ltd pays full regard to 'Keeping Children Safe in Education' (DfES 2021). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS).
- 8.2 All recruitment materials will include reference to the company's commitment to safeguarding and promoting wellbeing.
- 8.3 Gareth Fallows and Sophia Franzen have undertaken Safer Recruitment training. One of the above will be involved in **all** employee /volunteer recruitment processes and sit on the recruitment panel.

Employee support

- 8.4 We recognise the stressful and traumatic nature of child protection work. We will support employees by providing an opportunity to talk through their anxieties with the Designated Safeguarding Officer and to seek further support as appropriate.

9. OUR ROLE IN THE PREVENTION OF ABUSE

- 9.1 We will provide opportunities for learners/customers/service users to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.

The curriculum

- 9.2 Relevant issues will be addressed through the pastoral curriculum, for example self-esteem, emotional literacy, assertiveness, power, sex and relationship education, e-safety and bullying.
- 9.3 Relevant issues will be addressed through other areas of the curriculum, for example, employability, one to one support sessions, enrichment activities

Other areas of work

- 9.4 All our policies which address issues of power and potential harm, for example bullying, equal opportunities, handling, positive behaviour, will be linked to ensure a whole organisation approach.
- 9.5 Our safeguarding policy cannot be separated from the general ethos of the company, which should ensure that learners/customers/service users are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

10. SAFEGUARDING LEARNERS / CUSTOMERS / SERVICE USERS WHO ARE AT RISK OF RADICALISATION

- 10.1 Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families who are at risk of radicalisation from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children, young people and adults to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- 10.2 Acorn Training values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. British Values underpin the core values at Acorn Training Ltd and are embedded into all our activities. Both learners, customers, service users and employees have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 10.3 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in supporting terrorism or in committing acts of terrorism. The normalisation of extreme views may also make children, young people and vulnerable adults to future manipulation and exploitation. Acorn Training Ltd is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- 10.4 Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix Four.
- 10.5 Acorn Training Ltd seeks to protect children, young people and adults at risk against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.
- Risk reduction**
- 10.6 The management team and the Designated Safeguarding Officer will assess the level of risk within the company and put actions in place to reduce that risk. Risk assessment may include consideration of the company's curriculum, policies, the use of company premises by external agencies, integration of learners/customers/service users by

gender and SEN, anti-bullying policy and other issues specific to the company's profile, community and philosophy.

- 10.7 This risk assessment will be reviewed as part of the annual safeguarding policy review.

Response

- 10.8 Acorn Training Ltd, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding Officer. The SPOC for Acorn Training Ltd is Sophia Franzen. The responsibilities of the SPOC are described in Appendix Five.
- 10.9 When any employee has concerns that a learner / customer / service user may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC. Depending on the nature of the referral, the SPOC will take advice from the FEHE coordinator. Issues of immediate concern will be referred to the police.
- 10.10 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

11. SAFEGUARDING LEARNERS / CUSTOMERS / SERVICE USERS WHO ARE AT RISK TO EXPLOITATION, FORCED MARRIAGE, FEMALE GENITAL MUTILATION, OR TRAFFICKING

- 11.1 Our safeguarding policy above through the Company's values, ethos and behaviour policies provides the basic platform to ensure children, young people and adults at risk are given the support to respect themselves and others, stand up for themselves and protect each other.
- 11.2 Acorn Training Ltd keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
- 11.3 Our employees are supported to recognise warning signs and symptoms in relation to specific issues, include such issues in an age appropriate way in their curriculum,
- 11.4 Acorn Training Ltd works with and engages our families and communities to talk about such issues,

- 11.5 Acorn Training Ltd are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
- 11.6 Our Designated Safeguarding Officer knows where to seek and get advice as necessary.
- 11.7 Acorn Training Ltd brings in experts and uses specialist material to support the work we do.
- 11.8 When working with learners from Scotland Acorn Training Ltd will support the legislation in implemented by the Scottish Parliament where there are key differences. Passed by Parliament on 19th March 2020.
<https://www.legislation.gov.uk/asp/2020/9/enacted>

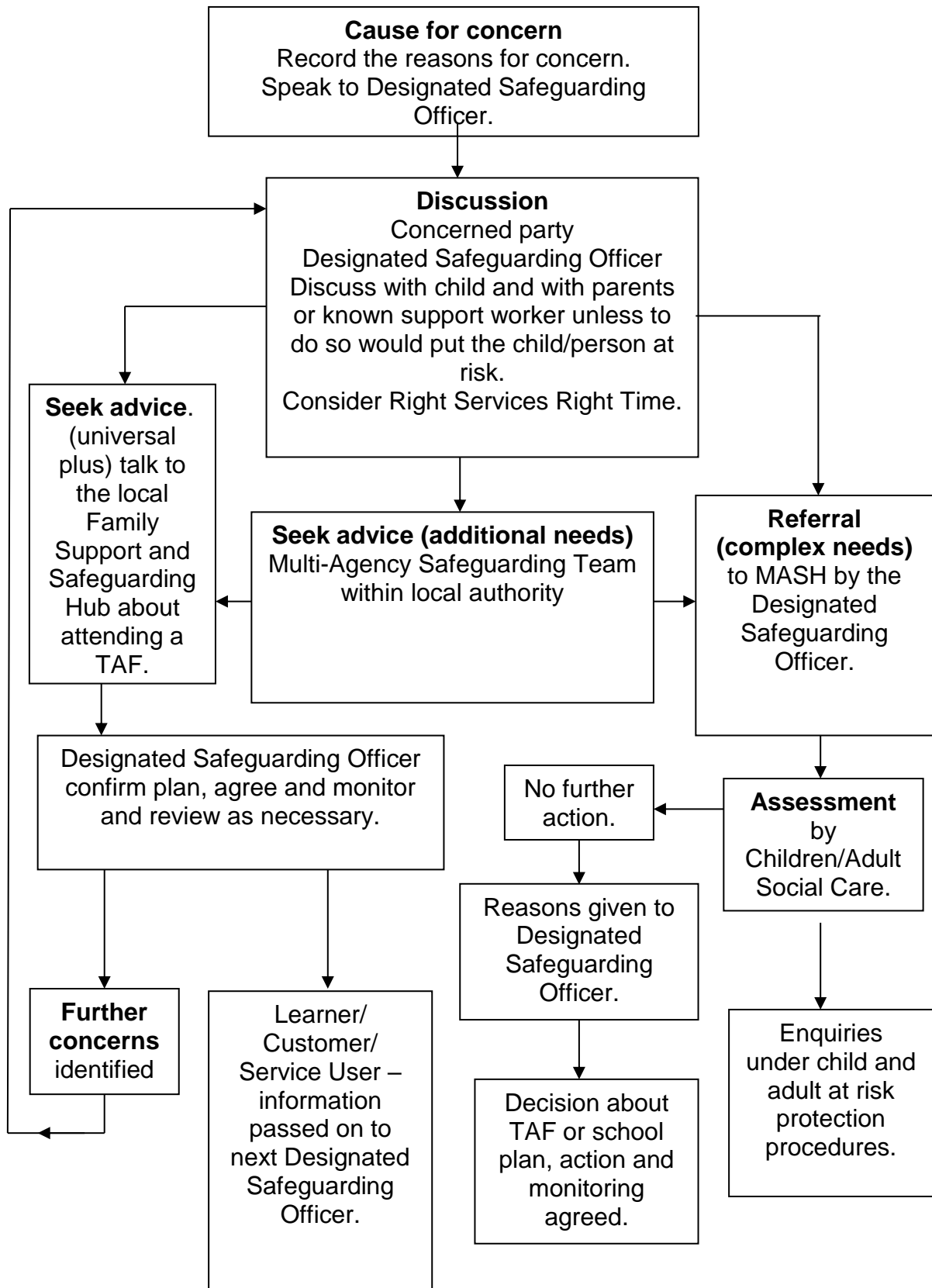
12. WHAT WE DO WHEN WE ARE CONCERNED

- 12.1 Where risk factors are present but there is no evidence of a particular risk then our DSO /SPOC advises us on preventative work that can be done within the company to engage the learner/customer/service user into mainstream activities and social groups. The DSO may well be the person who talks to and has conversations with the person's family, sharing the company's concern about the young person's vulnerability and how the family and company can work together to reduce the risk.
- 12.2 In this situation, depending on how worried we are and what we agree with the parent and the young person (as far as possible) –
- The DSO/SPOC can decide to notify the local Multi-Agency Safeguarding Team of the decision so that a strategic overview can be maintained and any themes or common factors can be recognised; and
 - The company will review the situation after taking appropriate action to address the concerns.
- 12.3 The DSO/SPOC will also offer and seek advice about undertaking an early help assessment such as the family Common Assessment Framework (fCAF) and/or making a referral to children's social care. The local family support and safeguarding team can assist us.
- 12.4 If the concerns about the learner/customer/service user are significant and meet the additional needs/complex need criteria, they will be referred to the local Multi-Agency Safeguarding Team or Police (in the case of an adult). This includes concerns about a child/young person who is affected by the behaviour of a parent or other adult in their household.
- 12.5 Regional Further Education / Higher Education Prevent Co-ordinators play a key role in the delivery of Prevent, providing further and higher

education providers with support to build resilience against the dangers of radicalisation. We will actively work with Co-ordinators in our area and attend regional Prevent update events.

THE KEY PROCEDURES

RESPONDING TO CONCERNS ABOUT A CHILD OR ADULT AT RISK



13. INVOLVING PARENTS / CARERS

- 13.1 In general, we will discuss any child protection concerns with parents / carers before approaching other agencies, and will seek their consent to making a referral to another agency. An appropriate employee will approach parents / carers after consultation with the Designated Safeguarding Officer. However, there may be occasions when the company will contact another agency **before** informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.
- 13.2 Parents/Carers/Service Users/Employers will be informed about our safeguarding policy through our website, course handbook and Online Portfolio system.

14. MULTI-AGENCY WORK

- 14.1 We work in partnership with other agencies in the best interests of the learner/customer/service user. Acorn Training Ltd will, where necessary, liaise with a nurse and doctor, and make referrals to children's/adult social care. Referrals should be made by the Designated Safeguarding Officer to the Multi-Agency Safeguarding Team. Where the child or adult already has a safeguarding social worker, the request for service should go immediately to the social worker involved, or in their absence to their team manager.
- 14.2 We will co-operate with any child protection enquiries conducted by children's social care: the company will ensure representation at appropriate inter-agency meetings such as integrated support plan meetings initial and review child protection conferences, and core group meetings.
- 14.3 We will provide reports as required for these meetings. If the company is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents / carers at least 24 hours prior to the meeting.
- 14.4 Where a learner/customer/service user is subject to an inter-agency child protection plan or a multi-agency risk assessment conference (MARAC) meeting, the company will contribute to the preparation, implementation and review of the plan as appropriate.

15. OUR ROLE IN SUPPORTING CHILDREN AND ADULTS AT RISK

- 15.1 We will offer appropriate support to individual children and adults at risk who have experienced abuse or who have abused others.
- 15.2 An individual support plan will be devised, implemented and reviewed regularly. This plan will detail areas of support, who will be involved,

and the child / adult's wishes and feelings. A written outline of the individual support plan will be kept in the child / adult's individual protection record.

- 15.3 learners / customers / service users who abuse others will be responded to in a way that meets their needs as well as protecting others within the organisation's community through a multi-agency risk assessment. We will ensure that the needs of learners/customers/service users who abuse others will be considered separately from the needs of their victims.
- 15.4 We will ensure the company works in partnership with parents / carers and other agencies as appropriate.

16. RESPONDING TO AN ALLEGATION ABOUT AN EMPLOYEE

- 16.1 This procedure should be used in any case in which it is alleged that an employee, director, visiting professional or volunteer has:
- Behaved in a way that has harmed a learner / customer / adult or may have harmed a child;
 - Possibly committed a criminal offence against or related to a learner / customer / adult; or
 - Behaved in a way that indicates s/he is unsuitable to work with children or adults at risk
- 16.2 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for employees within the company to abuse children or adults at risk.
- 16.3 All employees working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and adults at risk immediately. Allegations or concerns about colleagues and visitors must be reported direct to the Designated Safeguarding Officer unless the concern relates to the Designated Safeguarding Officer. If the concern relates to the Designated Safeguarding Officer, it must be reported immediately to the Managing Director.

17. CHILDREN WITH ADDITIONAL NEEDS

- 17.1 Acorn Training Ltd recognises that while all children, young people and adults have a right to be safe, some children, young people and adults may be more vulnerable to abuse, for example those with a disability or special educational need, those living with domestic violence or drug / alcohol abusing parents / carers / partners, etc.
- 17.2 When the company is considering excluding, either fixed term or permanently, an at risk learner / customer / service user who is the subject of a child / adult at risk protection plan or where there is an

existing child / adult protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the Senior Management Team.

18. CHILDREN IN SPECIFIC CIRCUMSTANCES

- 18.1 Guidance on learners/customers/service users in specific circumstances is in the local Safeguarding Children Board's procedures as listed and is drawn up on as an example of best practice. All contact details for local advice should be directed to Designated Safeguarding Officer in the first instance.

[Bullying](#)

[Child Sexual Exploitation](#)

[Domestic Violence and Abuse](#)

[E-Safety – Children Exposed to Abuse through the Digital Media](#)

[Female Genital Mutilation](#)

<https://www.gov.uk/government/publications/counter-terrorism-bill-overarching-documents>

<https://www.gov.uk/government/publications/counter-terrorism-and-security-act-factsheets>

<https://www.gov.uk/government/publications/counter-terrorism-and-security-act-impact-assessments>

19. WHERE CHILDREN REQUIRE A SOCIAL WORKER

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding officer should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare.

Where a child leaves Acorn Training the designated safeguarding officer will ensure their child protection file is transferred to the provider or college as soon as possible, to allow the new provider or college to continue supporting learners who have had a social worker and been victims of abuse and have that support in place for when the learner arrives, also ensuring secure transit, and confirmation of receipt should will be obtained.

In addition to the child protection file, the designated safeguarding officer will consider if appropriate to share any information with the provider or college in advance of a learner leaving. For example, information that would allow the provider or college to continue supporting learners who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and have that support in place for when the learner arrives.

APPENDICES

APPENDIX ONE

DEFINITIONS AND INDICATORS OF ABUSE

1. NEGLECT

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate 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.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor school attendance or often late for school;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers

2. PHYSICAL ABUSE

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

New laws are coming into place across the UK to abolish the defence of reasonable punishment when smacking a child. Under current guidance and timeframes, it will become illegal to smack a child in;

- Scotland no later than October 2020
- Wales from 21st March 2022
- England no date set at present

3. SEXUAL ABUSE

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

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;

- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.
- Non-consensual sharing of nudes and semi nudes

4. SEXUAL EXPLOITATION

Child sexual exploitation occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children’s social care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity);
- Entering and/or leaving vehicles driven by unknown adults;
- Possessing unexplained amounts of money, expensive clothes or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.

5. CHILD ON CHILD ABUSE

Child on child abuse is abuse of one learner by another and may cover any aspect of safeguarding, including domestic abuse between learners aged under-18 and who are in a relationship. In allegations of child-on-child abuse the parents/carers of both learners should be informed (unless to do so would place either at risk of harm) and a risk assessment should be carried out to determine the appropriateness of the alleged perpetrator remaining in centre whilst the matter is investigated.

Staff should be particularly vigilant to instances of sexual abuse and sexual harassment amongst learners and all instances should be treated seriously, and never dismissed as merely 'banter'. Online bullying is a particular aspect of child-on-child abuse that staff need to be vigilant of, particularly with the move to on-line teaching.

6. SEXTING

Sexting is defined, for the purpose of this policy, as the sharing of sexual images created by a young person under-18, or another young person, of themselves. This includes both still and moving images. Any images created should not be viewed, copied, or reproduced in any form when investigating an allegation, unless this is the only way to determine the facts of the case, in which case permission from DSO should be obtained. As with child-on-child abuse, the parents/carers of any young people involved should be informed of the allegation unless to do so would place them at risk of harm.

If the the incident involves an adult or child under the age of 13, there is reason to believe that the young person has been coerced, blackmailed, or groomed, or is not able to give informed consent, the image has been shared without consent and with malicious intent. A referral to CYPS or the police should be made.

7. UPSKIRTING

Upskirting is where someone takes a photograph under a person's clothing without their knowledge and/or consent. The intention is to view the victims' genitals or buttocks (with or without underwear) to gain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence in the UK. Anyone, of any gender, can be a victim.

8. COUNTY LINES

County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons.

9. EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another

person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. 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

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self harming, drug or solvent abuse;
- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

10. RESPONSES FROM PARENTS

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed;
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb);
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development;
- Reluctance to give information or failure to mention other known relevant injuries;
- Frequent presentation of minor injuries;

- A persistently negative attitude towards the child;
- Unrealistic expectations or constant complaints about the child;
- Alcohol misuse or other drug/substance misuse;
- Parents request removal of the child from home; or
- Violence between adults in the household.

11. DISABLED CHILDREN

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Unwillingness to try to learn a child's means of communication;
- Ill-fitting equipment. for example, callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

APPENDIX TWO

DEALING WITH A DISCLOSURE OF ABUSE

When a child or adult tells me about abuse s/he has suffered, what must I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB It is not an employee's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to children's social care without delay, by the Designated Safeguarding Officer.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Officer.

APPENDIX THREE**ALLEGATIONS ABOUT AN EMPLOYEE,
OR VOLUNTEER**

1. Inappropriate behaviour by an employee / volunteers could take the following forms:
 - **Physical**
For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
 - **Emotional**
For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
 - **Sexual**
For example, sexualised behaviour towards pupils, sexual harassment, sexual assault and rape.
 - **Neglect**
For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.

2. If a child makes an allegation about an employee, governor, visitor or volunteer the Designated Safeguarding Officer should be informed immediately. The Designated Safeguarding Officer should carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Designated Safeguarding Officer should not carry out the investigation him / herself or interview pupils.

3. The Designated Safeguarding Officer must exercise, and be accountable for, their professional judgement on the action to be taken, as follows –
 - If the actions of the employee, and the consequences of the actions, raise credible child protection concerns the Designated Safeguarding Officer will notify the Local Authority Designated Officer (LADO) Team. The LADO Team will advise about action to be taken and may initiate internal referrals within children's/ Adult's social care to address the needs of children / young people / adults likely to have been affected.
 - If the actions of the employee, and the consequences of the actions, do not raise credible child / adult protection concerns, but do raise other issues in relation to the conduct of the employee or the learner(s)/customer(s)/service user(s), these should be addressed through the company's own internal procedures.
 - If the Designated Safeguarding Officer in liaison with HR decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this

conclusion, and the reasons for the decision should be recorded on the child and adult at risk protection file.

4. Where an allegation has been made against the Managing Director, then the Operations Director takes on the role of liaising with the LADO team in determining the appropriate way forward.

APPENDIX FOUR

INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Learners / customers / service users may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that Acorn Training Ltd employees are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
 - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
 - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and

belonging;

- Personal Circumstances – migration; local community tensions; and events affecting the learner/customer/service user’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
 - Unmet Aspirations – the learner/customer/service user may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
 - Special Educational Need – learner/customer/service user may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include:
- Being in contact with extremist recruiters;
 - Accessing violent extremist websites, especially those with a social networking element;
 - Possessing or accessing violent extremist literature;
 - Using extremist narratives and a global ideology to explain personal disadvantage;
 - Justifying the use of violence to solve societal issues;
 - Joining or seeking to join extremist organisations; and
 - Significant changes to appearance and / or behaviour;
 - Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

APPENDIX FIVE**PREVENTING VIOLENT EXTREMISM -
ROLES AND RESPONSIBILITIES OF THE SINGLE POINT OF CONTACT
(SPOC)**

The SPOC for Acorn Training Ltd is Sophia Franzen, who is responsible for:

- Ensuring that employees of the company are aware that you are the SPOC in relation to protecting students/pupils from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing learner/customer/service user from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of Acorn Training Ltd in relation to protecting learner/customer/service users from radicalisation and involvement in terrorism;
- Monitoring the effect in practice of the curriculum and policies to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the school about the safeguarding processes relating to protecting learner/customer/service users from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the company for case discussions relating to learner/customer/service users who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information from in relation to referrals of vulnerable learner / customer / service users into the Channel* process;
- attending Channel* meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions to the Channel* Co-ordinator; and
- Sharing any relevant additional information in a timely manner.
- Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to establish an effective multi-agency referral and intervention process to identify vulnerable individuals;

- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- Communicating with the Prevent FEHE co-ordinator as a first point of call for all queries relating to the further and higher education sectors.

APPENDIX SIX**COUNTER-TERRORISM AND SECURITY ACT 2015****The act**

The Counter-Terrorism and Security Act contains powers to help the UK respond to the threat of terrorism. It received Royal Assent on 12 February 2015. The act will:

- disrupt the ability of people to travel abroad to engage in terrorist activity and then return to the UK
- enhance the ability of operational agencies to monitor and control the actions of those who pose a threat
- combat the underlying ideology that feeds, supports and sanctions terrorism

The act will:

- give the police power to temporarily seize a passport at the border, so that they can investigate the individual
- create a Temporary Exclusion Order that can temporarily disrupt a British citizen suspected of involvement in terrorist activity abroad from returning to the UK (so that when individuals do return, it is done in a manner which we control)
- place strong restrictions on where individuals can go, and require them to attend meetings as part of their ongoing management (e.g. with the probation service or JobCentre Plus employees)
- improve law enforcement agencies' ability to find out who is responsible for sending internet communications accessing an internet communications service
- enhance our aviation, maritime and rail border security, with provisions relating to passenger data, 'no fly' lists, and security and screening measures
- ensure that UK-based insurance firms cannot reimburse the payment of terrorist ransoms
- clarify the scope of power to examine goods at (or near) ports

- provide a general duty on a range of organisations to prevent people being drawn into terrorism
- put Channel (the government's voluntary programme for people vulnerable to being drawn into terrorism) on a statutory basis

APPENDIX SEVEN

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate sexual behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

Equality – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive and assertive tendencies

Consent – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society’s standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Acorn Training have developed monthly sexual health workshops for all 16-18 learners.