**IntoUniversity Safeguarding Policy**

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**Our Safeguarding Policy**

This policy applies to all staff including: senior managers, trustees, paid staff, sessional and temporary staff, students and volunteers working on behalf of IntoUniversity.

**The purpose of this policy**

- To protect the children, young people and vulnerable adults who engage with IntoUniversity services
- To provide staff and volunteers with the principles and practices which guide our approach to safeguarding and child protection

IntoUniversity believes that it is always unacceptable for anyone to experience abuse of any kind. We recognise our responsibility to safeguard the welfare of all children and vulnerable adults. We are committed to the safe working practices outlined in this policy to achieve this.

Whilst the majority of the charity’s work takes place with children under the age of 18, from time to time staff will support young people over the age of 18 or come into contact with adults, some of whom will be vulnerable. This policy therefore includes references to vulnerable adults as well as children and young people.

**References**

This policy has been drawn up on the basis of law and guidance that seeks to protect children and vulnerable adults, namely:

- Children Act 1989 (and 2004 amendment)
- United Convention of The Rights of the Child 1991
- Human Rights Act 1998
- European Convention of Human Rights 1953
- Sexual Offences Act 2003
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2019
- NSPCC Safer Recruitment Guidance
- Sexual Violence and Sexual Harassment between Children (May 2018)
- Information Sharing 2018
- Counter Terrorism and Security Act 2015
- Statutory Guidance on the Prevent Duty
- Statutory guidance on FGM
We recognise that:

- The welfare of the child is paramount, as enshrined in the Children Act 2004 and this is true for all children regardless of age, disability, gender, race, religion/belief, sex or sexual orientation.
- Some children are additionally vulnerable due to previous experiences, their level of dependency, communication needs or other issues.
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people’s welfare.
- Vulnerable adults may also require safeguarding.

We seek to keep children, young people and vulnerable adults safe by:

- Valuing them, listening to, and respecting them.
- Employing a Safeguarding Manager who is the Designated Safeguarding Lead (DSL) and appointing a wider Safeguarding Team of Deputy Designated Safeguarding Leads comprising of senior leaders and managers.
- Adopting child-centred safeguarding policies and practices and ensuring they are known and followed throughout the organisation.
- Providing effective management of cases through supervision, support, training and robust recording and monitoring procedures.
- Following safer recruitment guidelines, ensuring recruitment is safe and all necessary checks are made.
- Designating a DBS Manager for the organisation.
- Recording and storing information professionally and securely. Sharing information regarding our safeguarding practices with students, their families, staff and volunteers through a variety of means, including displays, newsletters and one-to-one discussions.
- Escalating and sharing concerns and relevant information about children and vulnerable adults to agencies that need to know. Children, vulnerable adults and their families are routinely included in this process.
- Managing allegations against staff and volunteers appropriately and involving other agencies when required.
- Providing a comprehensive training package for staff to ensure they are promoting the welfare and safety of children and young people in their day-to-day work.
- Creating and maintaining a safe, anti-bullying environment with policies to address any bullying or unsafe behaviour which may occur.

1: Practices and procedures

1.1 Where there is a suspected concern or a direct disclosure of abuse from a child or young person, IntoUniversity staff and volunteers must:

- Inform the Centre Leader and/or the Safeguarding Manager as soon as practically possible. If neither are available, contact another member of the Safeguarding Team (see appendix B)
● The Centre Leader will then decide whether the concern can be managed by the centre team or whether guidance needs to be sought from a member of the Safeguarding Team. If in doubt, the Safeguarding Manager or another member of the Safeguarding Team should always be contacted for advice.

● The Safeguarding Manager/Team along with the centre team will assess the next steps which may include making a referral to the Local Authority, contacting parents and/or informing school. If a referral is made this should be done first by phone and followed in writing within 24 hours. If someone is at an immediate risk of significant harm the matter should be immediately referred to the Police or Children's Social Care.

● If the concern is relating to a young person under the age of 18 it should be shared with their parent/guardian and their consent sought. The concern may not be shared with a parent/guardian if it would be unsafe to do so or increase the risk of harm to the young person.

● Regardless of whether a referral is made, all observations, relevant information and actions taken should be recorded as soon as possible on Salesforce (IntoUniversity’s database).

● If a written referral is required a copy should be shared with a member of the Safeguarding Team for review. The Centre Leader will then share this with the Local Authority.

● An acknowledgment from the Local Authority should be received within 24 hours. If none is received, a follow up with the service by the Centre Leader is required.

It is the responsibility of the staff or volunteer who received the disclosure/highlighted the suspected concern/made the observation to follow up with the Centre Leader to ensure the required action(s) has taken place in a timely fashion. Once confirmation of the follow up has been received responsibility then lies with the Centre Leader.

1.2 Allegations against staff and volunteers

Allegations against staff and volunteers can arise and IntoUniversity is committed to having systems in place to deal with them fairly and consistently.

Allegations could involve a direct allegation of abuse or could relate to staff conduct which may fall short of professional standards.

Allegations can be made by colleagues, volunteers, parents or young people. All should feel safe to express them without fear of victimisation.

Allegations can also arise because of misunderstanding or misinterpretation. They can be a way of seeking attention or, in extreme cases, maliciously motivated.
It is essential that all allegations against staff are immediately brought to the attention of the Senior Management Team. The Senior Management Team may consult the Safeguarding Team if appropriate. IntoUniversity has a whistle blowing policy that should be used if the allegation concerns a member of the Senior Management Team.

If the allegation is against a volunteer, this should be raised with the Centre Leader and then the Safeguarding Team should be informed. The Senior Management Team will also be notified.

The following action should be taken in the event of an allegation:

- Make sure that the child, young person or vulnerable adult is safe and away from the alleged perpetrator.
- Refer the matter immediately to the Senior Management Team (staff) or the Safeguarding Team (volunteer) who will advise on next steps.
- The Senior Management Team/Safeguarding Team will discuss and consider the need for a referral to the Local Authority.
- Follow any advice given regarding contact with the parents/carers if the alleged victim is a person who has not yet reached the age of eighteen.
- IntoUniversity’s disciplinary procedures may be implemented, irrespective of the action that is taken by social workers or the police.
- Consider whether the alleged perpetrator has access to children, young people or vulnerable adults elsewhere and if so who needs to be informed.
- IntoUniversity will work closely with the Local Authority as well as the police in following procedures.
- IntoUniversity will follow up any external investigation with an internal review to ensure any changes needed are put in place.
- IntoUniversity will keep a record of all allegations and reviews as this information will need to be provided to the Local Safeguarding Board, which has responsibility to monitor practice and collect data on an annual basis.

### 1.3 Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. ([https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding](https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding))

If staff and volunteers are made aware of possible abuse or significant harm at school, online or in the community they must take steps to ensure the student is protected from harm. They should follow the same procedure as they would in section 1.1 and follow the flow chart in Appendix A.
2. Internet and computer safety

2.1 IntoUniversity is committed to safeguarding children and young people online. IntoUniversity has a robust filtering system on its networks to attempt to limit access to inappropriate material.

2.2 Students are educated via classroom displays about the risks, as well as methods of reporting abuse in the event they feel vulnerable.

2.3 It is acknowledged that a high proportion of the student body at IntoUniversity will have access to 3G and 4G networks. Staff operate a vigilant approach when students are using their own technology and understand that abuse can happen online. The same safeguarding procedures should be followed as with any other safeguarding concern.

2.4 IntoUniversity uses a Virtual Learning Environment (VLE). The VLE has no capacity to communicate with others and/or store information.

2.5 IntoUniversity uses an online platform called IU Connect for Student Associates and sixth form students. The platform is set up to ensure that students under the age of 18 years are not visible to, and cannot communicate with, other users, with the exception of current IntoUniversity staff.

3. Recruitment, selection and training

3.1 IntoUniversity appoints staff and volunteers using safer recruitment practices.

3.2 All roles are advertised with the clear requirement that all staff and volunteers of the charity who are eligible for an enhanced DBS will be checked, including verifying the applicants’ identity. All staff applicants must complete a declaration on the application form declaring any criminal convictions.

3.3 The application process and/or interviews for staff and long term volunteers (Academic Support Tutors, Mentors and Interns) include safeguarding and safer recruitment questions. These questions gauge the candidate’s motivation and attitudes to working with children, young people and vulnerable adults.

3.4 On conditional offer, written references for staff and long term volunteers are checked. For staff, any gaps / inconsistencies in employment are investigated and staff applicants’ identity and qualifications are verified.

3.5 All staff and long term volunteers undergo safeguarding training during their training and induction period. Trustees also receive safeguarding training.

3.6 If a former staff member or volunteer returns to work or volunteer with the organisation, despite any former relationship, they will be treated as a new joiner until their DBS has been returned.
4. Confidentiality

4.1 IntoUniversity has a robust information sharing policy.

4.2 Safeguarding concerns and disclosures are shared on a need to know basis and should not be shared with colleagues unless instructed by either a Centre Leader or a member of the Safeguarding Team.

4.3 All copies of referral forms will be kept securely on the Salesforce database.

5. Parental involvement

5.1 Written permission is always obtained in advance for all onsite and offsite activities from the person with parental responsibility. If written permission hasn’t been received centres will then seek verbal permission in the interim and record that this has been received.

5.2 Whenever it is safe and possible parental consent is always sought to make referrals to Local Authorities or external agencies.

5.3 IntoUniversity supports students in attaining work experience placements. Parent/guardians are informed of the steps that IntoUniversity takes to safeguard young people on placement. The charity informs all partner organisations that young people under the age of 18 are not to be left alone with an employee of the organisation in a private place. The charity stipulates that if it is necessary for a student to work in private with an employee, they do so in a room with a glass window and/or a room with a door that is left open. If a situation was to arise where this is not possible – for example if a student is required to travel alone in a car with an employee – that the organisation makes IntoUniversity aware of this as soon as possible (ideally before the placement commences) in order that special permission is obtained from the student’s parent/guardian ahead of the placement. Organisations are also made aware of IntoUniversity’s Safeguarding Policy and all employees are expected to adhere to this policy whilst hosting work experience students.

6. Risk Assessments

6.1 IntoUniversity’s risk assessments cover all staff and volunteers who work and interact with children, young people and vulnerable adults as part of the service. In preparing risk assessments for off-site visits, staff should ensure that other agencies, where appropriate, have a risk assessment in place.

6.2 Individual risk assessments will be completed for young people with extenuating circumstances to ensure they can participate in on- and offsite activities.

6.3 Risk assessments are never written in isolation and are shared with a senior member of the IntoUniversity team to ensure thoroughness, accuracy and feasibility.

7. DBS Disclosure Procedures
7.1 All paid staff and all volunteers that have regulated contact with IntoUniversity’s young people must have a satisfactory enhanced DBS check. The charity will ensure that all paid staff are registered on the online update service from March 2019. No unsupervised contact with young people will be authorised until the DBS check has been returned and approved. During this period all staff and volunteers will be supervised by an IntoUniversity staff member who has undergone a satisfactory enhanced DBS check.

7.2 In advance of DBS clearance being received all staff and volunteers must complete a Disclosure Declaration Form. This form will be held securely by IntoUniversity. Any foreseen disclosure should be raised to the DBS Manager at this stage.

7.3 In the event a DBS application returns an adverse disclosure, further consideration will need to be given to the applicant. The DBS Manager and Safeguarding Team will review and risk assess if this person is suitable to work with IntoUniversity’s young people. If any external agencies need to be contacted, permission will be sought from the individual. If they are unable to reach an outcome or need further input, a Risk Assessment Panel will gather to review the information. The panel will include: the DBS Manager, Safeguarding Manager, Trustee with responsibility for Safeguarding and a member of the Senior Management Team.

7.4 The Risk Assessment Panel will make a decision on whether to employ the applicant as a paid member of staff or permit them to volunteer. In making this decision the panel may take the following into account:
• The nature and seriousness of the offence(s)
• The age at which the offence(s) was committed
• The time elapsed since the offence(s) was committed
• Any further offence(s)
• Circumstances at the time of the offence(s)
• The potential risk to children/young people/vulnerable adults
• Legal advice
• Whether the applicant declared any offences on the Disclosure Declaration Form (see Appendix E), job application form and/or at interview

7.5 The Risk Assessment Panel will decide whether any further action is required, for example contacting the police or safeguarding authorities.

7.6 The Risk Assessment will be kept securely on file.

8. Secure Handling

8.1 General principles: As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, IntoUniversity complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe
handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

8.2 Storage and access: Volunteer and staff certificate information is stored electronically in the charity’s secure cloud-based databases. Access to volunteer certificate information is restricted according to operational requirements. Access to staff certificate information is restricted to the HR and DBS teams. No hard copies of certificate information are retained by the charity.

8.3 Handling: In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We centrally maintain a record of all those with access to certificate information. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

The charity is required to retain certificate information in order to demonstrate ‘safer recruitment’ practice for the purpose of safeguarding audits.

8.4 Usage: Certificate information is only used for the specific purpose for which it was requested.

8.5 Retention: Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints, or for the purpose of completing safeguarding audits.

8.6 Disposal: Once the retention period has elapsed, we will ensure that any DBS certificate information is removed from the cloud-based databases.

However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates, and the details of the recruitment decision taken.

9 Special Education Needs (SEN)

9.1 IntoUniversity recognises that students who have SEN needs are more vulnerable of being isolated from their peers, and are at a higher risk of safeguarding concerns. IntoUniversity requests information about students SEN needs during the registration process. As each student and SEN need is unique, centres create and offer support which will work for that particular student and record any additional support being utilised.

9.2 All staff and volunteers should be aware of students’ different needs and the additional vulnerabilities that children with SEN or another disability face. It is imperative that staff do not assume behaviour is related to a student’s SEN and consider it may be a sign or indicator of possible abuse. This is covered in training for all Centre Leaders and Education Workers.

10. Glossary of safeguarding roles and terminology

10.1 Safeguarding: safeguarding and promoting the welfare of children means:

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

10.2 **Child Protection** is part of safeguarding and refers to an action taken to protect a specific child at risk of harm.

10.3 A **Section 47** enquiry is initiated to decide whether and what type of action is required to safeguard and promote the welfare of a child who is suspected of, or likely to be, suffering significant harm. Local authority social workers have a statutory duty to lead Section 47 Enquiries. The police, health professionals, teachers and other relevant professionals should support the local authority in undertaking its enquiries.

10.4 **Children’s Social Care** refers to the work of local authorities exercising their social services functions with regard to children. Arrangements for children’s social care will differ within each local authority and each Centre Leader should ensure that s/he is familiar with the systems operated by their Local Authority.

10.5 **Children/young people**: includes everyone under the age of 18.

10.6 A **vulnerable adult** refers to a person who is 18 years of age or over and who is, or may be, in need of community care services by reason of mental or other disability, age or illness and who is, or may be, unable to take care of him/herself, or unable to protect him/herself against significant harm or serious exploitation.

11. **Internal Roles and Responsibilities**

11.1 **The Trustees** are responsible for ensuring that an appropriate Safeguarding Policy is in place and for nominating a ‘Safeguarding Trustee’.

11.2 **The Safeguarding Trustee** has oversight of **IntoUniversity’s Safeguarding policy and procedures**, and responsibility for promoting the safeguarding of children and young people within the charity.

11.3 **The Chief Executive** is responsible for ensuring that the Safeguarding policy is implemented within **IntoUniversity** as a whole and providing appropriate staff and volunteer training where necessary. The Chief Executive is a member of the Safeguarding Team.

11.4 **The Safeguarding Manager is the Designated Safeguarding Lead (DSL)**. They are responsible for internal staff training and for ensuring that the charity is kept abreast of current legislation and best practice. They are also responsible for coordinating, processing and keeping records of all incidents and all referrals to external agencies.

11.5 **The Safeguarding Team (Appendix B)** are made up of experienced staff who are Deputy Designated Safeguarding Leads and take on the role of DSL when the DSL is either unable to enact this role or absent. They support, consult and liaise with the Safeguarding
Manager to ensure transparency in **IntoUniversity** safeguarding practices.

**11.6 The DBS Manager** is responsible for ensuring that all employed staff have a current DBS clearance. The DBS Manager is a member of the charity's Senior Leadership Team.

**11.7 Centre Leaders** are responsible for the implementation of the safeguarding policies in their centres and the enactment of safe working practices. They also manage safeguarding cases in their centre and undertake the responsibility to alert and follow the guidance given to them by the Safeguarding Team. They should also be aware of their Local Authorities guidance and work with the Safeguarding team to ensure **IntoUniversity**'s policies are in line with and complement local procedures. Centre Leaders are also responsible for ensuring volunteers at their centre have the necessary DBS checks carried out for the role they are undertaking.

*All staff and volunteers are responsible for safeguarding children, young people and adults. They should be diligent in immediately sharing suspicions or disclosures with the Centre Leader and/or the Safeguarding Manager/ Safeguarding Team member. It is everyone's responsibility accurately to record information.*

**12. External Roles and Responsibilities**

**12.1 The Local Authority Designated Officer (LADO)** is responsible for managing all allegations made against staff and volunteers who work with children and young people in their specific locality. Every Local Authority should have their own LADO. The LADO may also be contacted by the charity as a source of advice.

**12.2 Local Authority Social Services.** Each Local Authority will have a team overseeing safeguarding within its area. Each centre should be aware of which Local Authority they reside in. Any concerns raised about children, young people or adults within **IntoUniversity** will be referred to the Local Authority.

**12.3 The Police.** Can be contacted on 101 (non-emergency) or 999 (emergency) If there is a direct disclosure of serious or immediate harm. If a member of staff is unsure if the police need to be called, they can consult with the Safeguarding Team for advice.

**12.4 Other Agencies.** Other agencies who may be involved with the care of children, young people and adults include: schools, housing organisations, social services, health services and other third sector agencies. Liaison with these agencies may be necessary in particular cases.
Appendix A: Safeguarding Flowchart- process for managing a Safeguarding concern or disclosure

I have a concern about a young person.
***
A young person has made a direct disclosure to me.
***
I witnessed behaviour by, towards, near to a young person which concerned me.

In the first instance discuss with your Centre Leader (CL).
If they aren't available or you are the CL move directly to next step

This is or might be a safeguarding concern.
***
I want/need some advice and help.

This is a behaviour concern and not safeguarding
We feel confident managing this in centre
If more support is needed, contact your Cluster Manager

This is not an emergency
We feel confident to manage this in centre
This may involve talking to the student, their family or school

Call Safeguarding on 07784228942
They will be able to help and advise you. They may ask you for more information or to take additional steps. If in any doubt please ask.

If you are ever unsure please call Safeguarding 07784228942

If you are ever unable to get though on the Safeguarding number and it is a clear that a child is in immediate danger contact the police on either 101 or 999.
If you are unable to reach anyone on the Safeguarding number please contact another member of the Safeguarding team.

Record all details on Salesforce within 24 hours. This will generate an automatic email to the Safeguarding team. If you need help recording a safeguarding issue please either refer to the procedure for recording or contact the Safeguarding Manager for support.
If you need help, support or advice on a Safeguarding concern, please call the Safeguarding Team on 0784228942.

Your Safeguarding Team

Sophie Houghton, Acting Safeguarding Manager
Designated Safeguarding Lead (DSL)

If you are in a time pressured situation and cannot get through on the safeguarding line please try any of the below numbers

Deputy Safeguarding Leads

Rachel Carr
02072430242
07817822759

Elly Rundle
02072430242
07718124388

Louise Lane
0117 987 8421
07817800417
Appendix C. Legislative Framework

The legislative bases for protecting Children and Young People are the Children Acts of 1989 and 2004. The Children Act 1989 is the legislative basis both for protecting Children and Young People from significant harm and promoting the provision of services for Children and Young People in need. The Children Act 2004 sets out the vision for Children and Young People in terms of five key outcomes:

- staying safe
- being healthy
- enjoying and achieving
- making a positive contribution
- achieving economic well-being.

The ‘staying safe’ outcome is underpinned by a statutory duty of all agencies working with Children and Young People to promote safeguarding in the way it carries out its function.

3.2 Section 11 of The Children Act 2004 says that every organisation working with children, young people and parents that receives grant funding must show that they are run safely.

3.3 Children and Young People have a legal right to be protected from harm under the Children Act 1989 and also the European Convention of Human Rights 1953.

3.4 Sections 36 to 41 of the Counter Terrorism and Security Act 2015 sets out the duty on local authorities, schools and organisations to provide support for people vulnerable to being drawn into terrorism. This is known as the Channel programme. The Safeguarding Team should be contacted in the event that any staff member has a concern about a child or young person being vulnerable to being drawn into terrorism and all Centre Leaders are familiar with the Channel Programme.

Appendix D: National and Local Guidance

4.1 The Government’s ‘Working Together to Safeguard Children’, sets out how statutory and voluntary agencies should work together to promote the safety and welfare of Children and Young People.

4.2 In addition each Local Authority will have its own local guidance. Each IntoUniversity Centre Leader should be familiar with this guidance and consult with the Safeguarding Team if the local guidance raises any issues for IntoUniversity’s Safeguarding Policy and practice.
**Appendix E: Staff and Volunteer Disclosure Declaration Form**

This form should be completed and signed by every employee or volunteer at the time of completing a DBS application.

This form will be held on record until your DBS certificate has been returned, and it will only be retained after this point if required to support the recruitment decision, or for safeguarding purposes. Once you have received the DBS certificate you need to bring this to the IntoUniversity centre at the earliest possible opportunity. Please note that failure to bring in you DBS disclosure may result in you being unable to continue with your volunteering/work commitments.

All questions must be answered.

<table>
<thead>
<tr>
<th>Name of DBS Applicant</th>
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<tbody>
<tr>
<td>Applicant’s role at IntoUniversity</td>
<td></td>
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<tr>
<td>Staff member processing this form</td>
<td></td>
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</tbody>
</table>

Have you been subject to any disciplinary procedures relating to the safety and welfare of children or young people including any instance where the disciplinary sanction has expired or where the allegation was unfounded and/or no disciplinary sanctions were imposed? If so please give details.

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<tr>
<th>Yes</th>
<th>No</th>
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</thead>
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Have any official allegations or concerns ever been expressed about your suitability to work with children and young people? If so please give details, including whether the allegation or concern was investigated, the outcome and how the matter was resolved.

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<tr>
<th>Yes</th>
<th>No</th>
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Do you have any convictions, cautions, reprimands or final warnings which would not be filtered in line with current guidance?

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<th>Yes</th>
<th>No</th>
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If you answered Yes, please provide further details:

Signed

Date
Appendix F: Peer on peer abuse policy

IntoUniversity is committed to the prevention, early identification and appropriate management of peer-on-peer abuse (as defined below) both within and beyond the IntoUniversity local learning centres.

This policy:
• sets out our strategy for identifying and appropriately managing peer-on-peer abuse.
• applies to all staff and volunteers
• is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed.
• is IntoUniversity’s overarching policy for any issue that could constitute peer-on-peer abuse.

It relates to, and should be read alongside, the safeguarding policy.

What is peer-on-peer abuse?
Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children, and within children’s relationships (both intimate and non-intimate), friendships, and wider peer associations. Peer-on-peer abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence. Online peer-on-peer abuse is any form of peer-on-peer abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, peer-on-peer grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

How can a child who is being abused by their peers be identified?
All staff should be alert to the well-being of young people and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ. Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse and can include:
• failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected,
• physical injuries,
• experiencing difficulties with mental health and/or emotional wellbeing,
• becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much,
• broader changes in behaviour including alcohol or substance misuse,
• changes in appearance and/or starting to act in a way that is not appropriate for the child’s age, and

• abusive behaviour towards others

Abuse affects children very differently. The above list is by no means exhaustive, and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances.

How should staff and volunteers respond to concerns or allegations of peer-on-peer abuse?

It is essential that all concerns/allegations of peer-on-peer abuse are handled sensitively, appropriately and promptly.

Any response should:

- include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- treat all children involved as being at potential risk - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. IntoUniversity should ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it.
- Staff should manage the child’s expectations about information sharing, and keep them and their parents/guardians informed, where appropriate and safe to do so. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), a member of the Safeguarding Team or Centre Leader should discuss the proposed action with the child/children and their parents and obtain parental/guardian consent to any referral before it is made.

What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?

If a child speaks to a member of staff about peer-on-peer abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details, please see the procedure set out in the safeguarding policy.

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with a member of the Safeguarding Team without delay so that a course of action can be agreed.

If a child is in immediate danger, or at risk of significant harm, a referral to children’s social care and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by a member of the Safeguarding Team, the Safeguarding Team should be informed as soon as possible that a referral has been made.

How will IntoUniversity respond to concerns or allegations of peer-on-peer abuse?

A member of the Safeguarding Team will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected. The Safeguarding Team should always use their professional judgement to determine whether it is appropriate for alleged

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3 It should be noted that there is currently no definitive list of indicators of peer-on-peer abuse. The above list has been drawn from the NSPCC’s Signs, symptoms and effects of child abuse and neglect: https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/
behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the Safeguarding Team may wish to consult with children’s social care and/or any other external agencies on a no-names basis to determine the most appropriate response.