

## Addendum to Safeguarding and Prevent Policy, Strategy and Procedures

### Appendix 1 – Types of Abuse

#### Child Criminal Exploitation

In our policy, we refer to Child Sexual Exploitation but have not explicitly specified what constitutes Child Criminal Exploitation. This can occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons or begin to carry weapons (such as a knife) for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the indicators for boys and girls may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

#### Child Sexual Exploitation

Child sexual exploitation is a form of sexual abuse and can be a one-off occurrence or might happen over time. All children and young people can experience child sexual exploitation. This includes 16 and 17 year olds, who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

#### Peer on Peer Abuse

In our Safeguarding and Prevent Policy, we refer to bullying as peer to peer abuse. In line with Keeping Children Safe in Education 2021, all staff should be aware that children can abuse other children. It is important that staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to any reports.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>10</sup> (also known as sexting or youth produced sexual imagery);
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Staff have a responsibility to challenge inappropriate behaviours between peers. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

#### [Peer on Peer Abuse Procedure](#)

If a member of staff or employer has any concerns regarding peer-on-peer abuse or believe a child is at risk, they must speak to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead who will investigate accordingly.

Please be aware if there are no reports to us as a training provider or to an employer, **it does not mean that it is not happening.**

#### [Serious Violence](#)

Children might become at risk from or can become involved with serious violent crime. Indicators may include:

- Increased absence
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

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

Further advice can be found in the [Preventing Youth Violence and Gang Involvement](#) and [Criminal Exploitation of Children and Vulnerable Adults: County Lines](#).

## Sexual Violence and Sexual Abuse

Sexual violence and sexual abuse can happen anywhere, and all staff working with children through our training provision are advised to maintain an attitude of 'it could happen here'. Staff should be aware of, and respond appropriately to all reports and concerns, including those outside of our training provision, and or online. Any risks or concerns must be reported immediately to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.

When referring to sexual violence, we do so in the context of child on child sexual violence. For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003, as described below;

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice;

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16; 17
- Sexual intercourse without consent is rape.

## Sexual Harassment

When referring to sexual harassment, this is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of a training environment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include;
  - Consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and Sharing nude photographs of U18s is a criminal offence;
  - Sharing of unwanted explicit content;
  - Upskirting (a criminal offence);
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media;
  - Sexual exploitation; coercion and threats

Staff have a responsibility to challenge inappropriate behaviours and prevent an environment that could lead to sexual violence.

### Harmful Sexual Behaviour (HSB)

Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour” (HSB). HSB can occur online and/or face to face and can also occur simultaneously between the two.

When considering HSB, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential, specialist support and advice on HSB is available from the specialist sexual violence sector. Examples can be found below:

- StopItNow - [Preventing harmful sexual behaviour in children - Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.
- The NSPCC provides free and independent advice about HSB: [NSPCC Learning: Protecting children from harmful sexual behaviour](#) and NSPCC - Harmful sexual behaviour framework
- The Lucy Faithfull Foundation has developed a [HSB toolkit](#), which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse

### Sexual Violence, Abuse, Harassment and Behaviour Procedure

If staff or employers have any concerns about the welfare of a child or adult, please act immediately and report to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. It is essential that all learners are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.

In a case where the learner has chosen not to make a report themselves, the Designated Safeguarding Lead will handle this sensitively with the support of local children or adult services.

When there has been a report of sexual violence, Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment will consider:

- The learner, especially their protection and support;
- Whether there may have been other victims,
- The alleged perpetrator(s); and
- All the learners, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and should be kept under review. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. This risk assessment will not replace the Sport Structures risk assessment. At all times, we will actively consider the risks posed to learners and put adequate measures in place to protect them and keep them safe.

Reports will be managed in one of the following ways:

- Internally: we may take the view that the learner(s) concerned are not in need of early help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and bullying policies and by providing internal support. All actions related to the case will be recorded.
- Early help: we may decide that where the learner is a child, they do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life.
- Referral to children's social care
- Reporting to the police.

The needs and wishes of the learner will be paramount (along with protecting the child/adult) in any response. Support will be tailored on a case-by-case basis. Wherever possible, the learner if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the learner's daily experience as normal as possible.

For any scenario or incident relating to sexual abuse, violence, harassment or behaviour, we will review our actions, relevant policies and identify lessons learnt. This could constitute in extra teaching time and/or staff training to minimise the risk of further situations.