The Anne Frank Trust Safeguarding policy

Safeguarding is everyone's responsibility

Designated Safeguarding Lead

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Signed:

The Anne Frank Trust CEO

Introduction

This document contains a policy statement (Part One) and procedural guidance (Part Two). The functions of each are set out briefly below.

Part One – Policy Statement. The policy statement sets out the broad framework of principles within which the particular area of work will be carried out. It sets out the organisation's broad style and approach to the issue, including any aims and guiding principles.

Part Two – Procedural Guidance. The procedural guidance sets out the detail staff require to carry out their duties in this particular area of work. It also sets out the specific tasks involved in undertaking this area of work and identifies who is responsible for carrying them out.

Part 1

1. Policy Statement

The Anne Frank Trust UK is an education charity, that empowers young people with the knowledge, skills and confidence to challenge all forms of prejudice and discrimination.

Our education programmes use Anne Frank's powerful life story and diary as their starting point. We are the only organisation in the UK licensed to use Anne Frank's name and writing to make links with issues in contemporary society.

We understand that safety is built through practical changes in the 'real world' but also through trusting and empowering relationships. How we work on safeguarding is the responsibility of all The Anne Frank Trust staff, trustees, volunteers and contractual workers to promote the welfare, dignity and choices of children we work with.

We are committed to building an environment, which is safe for all children. Furthermore, we understand the intersections of various factors such as class, gender, race, sexual orientation, faith, and disability can further increase a child's marginalisation from the appropriate support and add additional barriers to their journey to safety.

At The Anne Frank Trust we aspire to create safe spaces for action for all children we work with and this safeguarding policy sets out our values and the guidance for staff in how to work in line with these values.

We also believes that children's space for action is expanded when we work respectfully both with children and young people in mind and through the provision of services for children and young people.

We will ensure that all of our staff (whatever their form of employment or volunteering status) are equipped to listen and understand the needs of children from induction through to continuing professional development.

We utilise human rights framework with children's rights are the heart of what we do. This includes the legal requirements placed on us by UK law and best practice in line with the global conventions on child rights.

2. Purpose of the Policy

This policy demonstrates the values of The Anne Frank Trust and highlights our commitment to ensure that children are free from harm.

We will support our staff team to be confident in creating an empowering strengths-based space for children alongside other organisations, such as schools and local authorities.

We are also providing a framework so that staff can respond appropriately to safeguarding concerns.

In doing this we will;

- Uphold the rights of children to enjoy an environment that is safe, caring, happy and free from fear and abuse.
- Recognise the impact of prejudice and discrimination on children's lives.
- understand that abuse occurs within all cultural, ethnic and religious communities and that children or adults may be abused by family, friends, partners, professionals or strangers.
- Work to end all forms of abuse and violence believing we all have a role to play
- Recognise the resilience and strength that children possess and will always respect this and work alongside them.

2.1 Definitions

- The Anne Frank Trust recognises a 'child' as someone up to his/her/their 18th birthday in accordance with the United Nations Convention on the Rights of the Child.

- The definition of a 'vulnerable adult' is defined by government guidance called No secrets as people who are or may be in need of community care services because of mental or other disability, age or illness, and/or who are unable to care for themselves or unable to protect themselves from significant harm or exploitation.

- ‘A parent/carer’ may be the responsible adult who has legal responsibility for a child or a vulnerable adult.

- ‘Staff’ refers to employees, volunteers and anyone involved in paid or unpaid work on behalf of The Anne Frank Trust.

- ‘Child protection’ is part of safeguarding and promoting welfare. In the context of our work at The Anne Frank Trust it refers to the activity that is undertaken with respect of specific children and young people who are suffering, or are likely to suffer significant harm.

- ‘Significant harm’ in line with section 120 of the Adoption and Children’s Act means not only ill treatment, but also the impairment of, or an avoidable deterioration in, physical or mental health, and the impairment of physical, intellectual, emotional, social, or behavioural development.

- ‘Informed consent’ is the process of getting permission before conducting an intervention or disclosing personal information. It means that the person involved understands the implications of giving her consent and understandings that she will not be disadvantaged in the event that she doesn’t give consent. It is given on a case by case basis and must be actively sought.

- ‘Gillick competency and Fraser guidelines’ are frameworks based on a 1985 legal judgement by the House of Lords and were created to help professionals balance the need to listen to children’s wishes with the need to negotiate with them to keep them safe from significant harm. They help professionals to assess whether children and young people have the maturity, mental capacity and Space for Action to make their own decisions and understand the implications of those decisions.

- GDPR principles include a clearer proactive obligation to take reasonable steps to delete or correct inaccurate data that we hold on children. It includes data given to us directly and data that someone else has provided to us in relation to that individual. New legislation gives everyone the right to review their data for accuracy and to make sure that inaccurate personal data is corrected or deleted without delay.

- New GDPR requirements mean that organisations must ensure that within client records we are distinguishing where data has been collected from and when it was checked for accuracy with clients.

- ‘Do No Harm (DNH)’ is a framework which was devised to help international development professionals apply conflict sensitivity to their programming, developed in the 1990s by a collective of international and local NGOs working in conflict and post-conflict settings. It is an important

tool for The Anne Frank Trust as we work collaboratively with children, young people who use our services to restore power, choice and dignity;

2.2 Types of Abuse and their Definitions

The attached appendix 1 details types of abuse children may experience. This is a useful guide to understanding forms of abuse children may experience for your own knowledge.

3. Legislation and Guidance

The Anne Frank Trust's approach to safeguarding and related issues is set within the following legal framework and recommendations:

- The Children Act 1989 (amended under the Adoption of Children Act 2002) which requires agencies working with a child to ensure that the needs of a child are always paramount and that their wishes are taken into account. The Children Act 2004 which introduces a number of changes to the way the child protection system is structured and organised.
- Working Together to Safeguard Children (Department of Education 2000 and updated 2013) which sets out how agencies and professionals should work together to promote children's welfare and protect them from harm.
- Relevant government guidance on safeguarding children: 'What to do if you're worried a child is being abused: Advice for practitioners' DOE 2015
- The Children Act 1989 With reference to the UN Convention on the Rights of the Child which states that children have an inalienable right to protection "from all forms of physical, or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation including sexual abuse" (article 19).
- Sexual Offences Act 2003.
- Protection of Freedoms Act 2012
- No secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse - published in 2000 by the Department of Health and the Home Office.
- Safeguarding Adults: A National Framework of Standards for good practice and outcomes in adult protection work (ADSS 2005)
- The London Child Protection Procedures and Guidance (London Safeguarding Children Board, available at www.londoncp.co.uk)
- The Human Rights Act 1998 which requires public agencies to ensure that a person's human rights are safeguarded and that when there is a conflict in the rights of one person in relation to another they are balanced appropriately
- The Equality Act 2010 which puts a responsibility on public authorities to have due regard to the need to eliminate discrimination and promote equality of opportunity. This applies to the process of identification of need

and risk faced by the individual child or vulnerable adult and the process of assessment.

- The Disclosure and Barring Service is responsible for helping employers to prevent unsuitable people from working with vulnerable groups, including children. This includes processing requests for criminal records checks, deciding whether it is appropriate for a person to be placed on or removed from a barred list.
- The Data Protection Act 1998 which requires that personal information, is obtained and processed fairly and lawfully, that it is accurate, relevant and not held longer than necessary, that it is kept securely and only disclosed in appropriate circumstances.
- Prevent Duty Guidance England and Wales 2015

This policy also reflects the equivalent Scottish, Welsh and Northern Irish law and guidance, namely:

- Children and Young People (Scotland) Act 2014
- National Guidance for Child Protection in Scotland 2014
- Safeguarding Children: Working Together under the Children Act 2004
- The Children (Northern Ireland) Order 1995
- Revised Prevent Duty Guidance for Scotland 2015
- Sexual Offences Scotland Act 2009

4. The Scope of Safeguarding within The Anne Frank Trust

The Anne Frank Trust may come across safeguarding issues in several ways:

- Working in primary and secondary schools across the country delivering workshops and core programmes
- Through the engagement of young people in the Youth Empowerment Programme- Including mentoring, workshops, events and trips
- Young people representing the organisation at events and organisations activities
- Online workshops and events
- Pupil referral units, secure units and other alternative provision settings
- Through the training of professionals and community members
- Monitoring and evaluation work, including supporting case studies through our media work.

The Anne Frank Trust takes seriously the obligation to recognise safeguarding within all aspects of its work and ensure that all of its work is undertaken in the best interests of children and families in a way which promotes their safety, dignity and freedom.

5. Our Safeguarding commitments

The Anne Frank Trust is committed to designing and delivering programmes, which are empowering, enabling and meaningful to children and young people to tackle prejudice and discrimination.

The Anne Frank Trust will ensure that safeguarding is a key element of the organisations health and safety risk assessment procedures, the business planning and business continuity plans and built into project and teamwork plans. The senior management team and the board of trustees retain overall responsibility for the safeguarding activities of the organisations. It will be a standing item in the Board Sub groups.

We want to ensure that staff are confident in their safeguarding responsibilities and have the structures and operational support necessary to undertake their role.

The Anne Frank Trust commits to incorporating children and young peoples' expertise and voice into the design, delivery and evaluation of programmes, operations and activities, which involve or impact upon children and young people.

This will include:

- Updating the child safeguarding policy yearly
- Being clear on who the Designated Safeguarding Leads (DSLs) are in the staff team and trustee board
- Building a safeguarding, strengths-based culture where staff, volunteers and children know how they can discuss concerns and know that their concerns will be taken seriously
- Ensuring that staff are supported with guidance and best practice on working with the particular needs of children and young people
- A requirement of Disclosure checks from all relevant staff and volunteers
- Ensure that all staff and volunteers fully understand our Safeguarding policy;
- The safety of the physical environment – including a point of contact for any concerns about the environment in which staff maybe working in

Staff awareness

- All staff will be made aware of this policy as part of their initial induction process and there will be regular briefings and updates for all staff.
- A named safeguarding lead will be available for safeguarding concerns – staff will be clear on who that is and what the reporting structures are during their induction process.

- All staff must complete safeguarding training after joining the team and will receive regular safeguarding training and refreshers.
- Regular updates will be made by managers through staff and team meetings and through information sharing on Teams.
- Managers will regularly ensure that staff are following the safeguarding policy as needed. This is particularly vital when staff are working directly with children and young people as part of a project.

Reviewing the Policy and Procedure

This policy and procedure will be reviewed every year by the board of trustees, youth board (if appropriate) and the Directors. The review will include checking of accuracy in details in the policy as well as updates of any changes in national policy.

6. Responsibility and accountability

Creating a culture of safety, dignity and respect is everyone's responsibility within the organisation. The Anne Frank Trust commits to safe and responsible recruitment. We ensure we follow best practice for recruitment, to have a staff team with the right skills, values and experience to create a strengths based culture that can prioritise the needs and wishes children.

The Board and Directors

The Board and Directors are accountable for this Policy and its implementation and have overall oversight of the policy and ensuring that it filters through the organisation as a priority area. One Director, the CEO and one member of the trustee board will act as the main leads for Safeguarding for the organisation, they will have specific role descriptions and accountability mechanisms as the safeguarding leads.

The Board and Directors must prioritise child safeguarding awareness training for themselves and their teams (including volunteers), contractors, partners working with them and communities involved in The Anne Frank Trust programmes.

They should provide budget lines for such activities to ensure staff are trained and the training is regularly refreshed.

Assistant Directors/Managers

Managers are responsible for promoting awareness of this policy with people they manage. Overall responsibility for identifying individuals who particularly work with

children and ensuring that they receive appropriate levels of child safeguarding training, commensurate with the risk profile of their role, lies with managers.

Managers at all levels have a particular responsibility to support and develop systems that create and maintain a safe working environment.

Managers at all levels are also responsible for ensuring child safeguarding good practice with regard to risk management assessments of activities and implementation of corresponding mitigations to ensure child safety.

Other staff and volunteers

All staff have a responsibility for safeguarding children and young people they may come into contact with as part of their work. They should ensure that they have read the safeguarding policy and are aware of the procedures addressed in the policy and who the safeguarding lead is that they should report to.

If you are in receipt of an allegation, then you must inform the Designated Safeguarding Lead (DSL) immediately. You should create a signed and dated record of the details as you know them.

All subjects of complaints will be treated with respect and all allegations will be treated confidentially. You may wish to seek support from your Union or Staff Representative (where applicable) if you are an employee.

Part 2

Safeguarding Procedures

This procedure outlines the response of The Anne Frank Trust staff in the case that there are allegations of abuse regarding children and young people during the course of their work for the charity.

1. What to do if you have concerns about a child

If any member of The Anne Frank Trust staff have concerns about a child or young person because of something you have seen or heard, or a child may have disclosed something to **you then you must inform the Trust's Designated Safeguarding Lead** with respect to the child's dignity and privacy. Abuse thrives in secrecy and silence and disrupting this is a key feature in creating a safer culture at The Anne Frank Trust.

If you are delivering in **schools** it is vital to know who the DSL is in the school you are working in in case of any safeguarding concerns and inform them, an also the Trust's DSL.

For the **Youth Empowerment Programme**, where staff will have direct responsibility for children and young people, you must report any concerns to the

Trust'sDSL. You may need to inform the DSL in the school if you are in the school premises.

The full process on what to do next is detailed below.

1.1 Talking directly about abuse

It takes extraordinary courage to start to talk about abuse. For children and young people it can be harder because of their relative lack of power in systems. It's vital that all of our staff who have direct contact with children and young people have this in mind to be able to provide them with the understanding and compassion they need.

Starting to talk about abuse is a journey, not one act or action, it therefore requires safety and trust.

Children who have experienced abuse may start to talk directly or indirectly about their experiences and sometimes they may start sharing details of abuse before they are ready to put their thoughts and feelings in order.

Children and young people may not always be aware that they are letting you know about their abuse experiences through their actions and/or behaviour.

Sometimes children and young people make references to their experiences of abuse, or give partial details. They may withhold some information for a variety of different reasons, such as:

- They are afraid they will get in trouble with or upset their family
- They want to deflect blame in case of family difficulties
- They feel ashamed and/or guilty
- They need to protect themselves from having to relive traumatic events.
- They can often feel confused about their feelings for the perpetrator

Not all discussions about abuse will lead to a formal report of abuse or a case being taken to court, but all experiences should be respected and taken seriously.

1.2 Barriers to disclosure

Some children and young people are reluctant to seek help because they feel they don't have anyone to turn to for support. This can often be due to sharing what has happened to them and not receiving a positive response of support previously.

Children can also feel:

- That they won't be taken seriously
- Too embarrassed to talk about what has happened to them

- Worried about who else might find out if they tell
- They don't trust adults around them
- Fear about the consequences of what happens next
- Worried about making the situation worse
- Overwhelmed by the formal procedural elements of disclosing abuse

It's also important to remember that not all children and young people realise that what they are experiencing is abuse, for example young people who are sexually groomed.

1.3 If you are worried about a child or young person;

RECEIVE: Listen to the child/young person and accept what they are telling you. Encourage the child/young person to allow another person to be present. It is okay to ask questions e.g. 'I notice you don't appear to be yourself today', Can you tell me how you are feeling? and you can ask them to clarify what they have said. You can ask questions such as: 'Tell me a bit more…', 'Can you explain that…' or 'Can you describe' … (TED – Tell, Explain and Describe). But **NEVER** ask **leading** questions

REASSURE: Stay calm and reassure them they have done the right thing. Do not promise confidentiality. Explain you may need to share what they are telling so you can help them. Reassure them they are not to blame or in trouble for what they have told you.

REACT: Explain what you have to do next. Do not pass judgement or show shock or disquiet.

RECORD: Record what was said as soon as possible after any disclosure (it is important to record the same language/words used by the child). Make a note of any signs or injuries and any behaviour. Where possible draw a picture to indicate location of injuries (appendix 5). The person who receives the allegation or has a concern should complete the organisations notification of a safeguarding concern form in appendix 4**, ensuring it is signed and dated on each page.** Respect confidentiality and file all documents securely.

SUPPORT: Offer support to the child or young person throughout any process that may happen to them. Make sure the child or young person will be safe. Get support for yourself through your line manager or agreed alternative.

It is important to remember the following:

- **Do not promise confidentiality and ensure that you explain this to the child and young person once a disclosure is being made. This needs to happen straight away.**

- Listen to what is being said, without displaying shock or disbelief
- Believe what is said
- Reassure the child, but only as far as is honest, don't make promises you may not be able to keep
- Do reassure and alleviate guilt, if the child refers to it
- Do not interrogate the child; it is not your responsibility to investigate
- Do not ask leading questions; always ask open questions such as 'do you want to add anything else?'
- Explain what you have to do next and who you have to talk to
- Take notes if possible or write up your conversation as soon as possible afterwards
- Record the date, time, place, any non-verbal behaviour and the words used by the child (do not paraphrase)
- Record statements and observable things rather than interpretations or assumptions
- Whatever the nature of your concerns, discuss them with your manager and seek the support of a safeguarding lead
- Acknowledge what that child has shared with you and thank them for telling you

It's vital that any child or young person who is trying to explain what has happened to them feels that they are being listened to and taken seriously.

It is also important that we maintain a non-biased approach when dealing with children and young people and follow The Anne Frank Trust's procedures to ensure each case is treated in a fair and transparent manner and that the child or young person gets the protection and support that they are entitled to.

Children, Young people and especially those who experience additional vulnerabilities or marginalisation including learning difficulties and/or disabilities may need additional support to discuss their experiences.

1.4 Responding to Safeguarding concerns

There are three core elements to our work interacting with children and young people, these are:

- Work directly in schools,
- Working in young offenders institutes
- Our youth empowerment programme.

Each has a slightly different route in how we respond to safeguarding concerns we might come across. Please follow the guidance below, and if unsure, talk to your manager and DSL.

Working in schools delivering core programme/workshops

Inform the schools designated safeguarding lead in the school/venue you are working in and complete the school's Child Protection Concern Form (or Equivalent). You must also inform The Trust's DSL.

If you cannot access this, then use The Anne Frank Trusts Notification of a Safeguarding Concern and/or a Children's Social Care Referral form (appendix 4).

If you are unable to access the DSL, and need to email the form through, ensure that you email the form in a password protected document and the password in a separate email or over the phone, and delete the electronic document, once it is sent over.

Make sure that you inform a member of the schools senior leadership team of your concern before leaving the school if the designated safeguarding lead or deputy are unavailable and make note of their name and role, and pass their details onto The Anne Frank Trust DSL, Sarah Nuzum.

On the rare occasion when a school's DSL or deputy DSL cannot be reached and the school's Child Protection procedure cannot be followed, it falls to the Anne Frank Trust UK's DSL to make the appropriate referral.

In every case the DSL should refer this to Children's Social Care Services (in the local authority the child is from) as follows:

- To the Local Authority's Children's Services Referral and Assessment Team or the Police (The latter should be contacted immediately if urgent action is needed to protect the child)

If the DSL is unsure due to the complexity of about whether a case should be formally referred, or has a general concern about a child's health or development, advice should be sought from one of the following:

- Children's Social Care Services Referral and Assessment Team
- Local Authority's Lead Officer for Child Protection
- Police Child Protection Unit
- NSPCC Child Protection Helpline
- Camden Child Safeguarding Children's Board- Camden LADO 010 7974 4556

Working in young offender institutions (YOI)/ secure units

One the rare occasion we may work in Young Offenders Institutes/secure units:

- Complete the YOI's Safeguarding Protection Concern Form (or equivalent) and hand to the prison's or YOI's governor, or the deputy governor if he/she/they are unavailable. If you do not have access to the prison's or YOI's Safeguarding Protection Concern Form, please use the Anne Frank Trusts Safeguarding Protection Concern Form (Appendix 4). All concerns or allegations must be taken seriously and acted upon promptly, therefore concerns should NOT be emailed.
- Be aware that the institutions governor will follow his or her own procedure of safeguarding protection. This is not your role.
- As soon as practically possible, inform either of Anne Frank Trust's DSL of the concerns that have been raised. Their contacts are details at the top of the document
- The DSLs will note actions and outcomes in the incident file contacting the prison or YOU's governor to ensure they have all they need to follow their own procedure
- The person who referred the concern will be kept informed where possible

Working directly with children and young people on the Youth Empowerment Programme

We have direct case responsibility for ambassadors who are part of the Youth Empowerment Programme. If you have any concerns about safeguarding for any child you are working with, you should immediately raise these concerns with the Trust's DSL as soon as it possible.

If you are reporting a safeguarding incident, you must fill in The Anne Frank Trust Notification of a Safeguarding Concern and/or a Children's Social Care Referral (Appendix 4) and if relevant, the Injury concern form (appendix 5).

This will then allow the DSL to make contact with the relevant local child protection services local to the child, which can be found on the website for the local authority the child lives in. And then note actions and outcomes in the Notification of a Safeguarding Concern and/or a Children's Social Care Referral (Appendix 4).

It may also be relevant where there is a strong relationship with the school, that they are informed, if this is deemed appropriate.

In serious cases contacting the police may be necessary to assess the situation and take the appropriate action to protect the child.

If you have had to make a verbal referral to local children's services, you should follow this up with a written referral as soon as possible, ideally within 48 hours.

If it is agreed with the DSL that a referral is not required at this point in time, agreement should be reached regarding whether and how further investigation will take place, and how the situation will be monitored.

Parental Consultation

It may not be appropriate to inform a parent of a safeguarding concern. ONLY the DSL, should be contacting a parent, if they feel it is appropriate to do so.

Professionals should seek, in general, to discuss concerns with the family and, (unless there is reason why this can't happen) where possible seek the family's agreement to making a referral unless this may, either delay the referral or place the child at increased likelihood of suffering Significant Harm.

A decision by any professional not to seek parental permission before making a referral to Children's Social Care Services must be approved by their manager, recorded and the reasons given. Where a parent has agreed to a referral, this must be recorded and confirmed on the Notification of a Safeguarding Concern and/or a Children's Social Care Referral (appendix 4).
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Where the parent is consulted and refuses to give permission for the referral, the DSL will seek advice and guidance on this, unless to do so would cause undue delay. The outcome of the consultation and any further advice should be fully recorded.

If, having taken full account of the parent's wishes, it is still considered that there is a need for a referral, then the DSL will note the following:

- The reason for proceeding without parental agreement must be recorded;
- The Children's Social Care Services team should be told that the parent has withheld her/his permission;
- The parent should be contacted by the referring professional to inform her/him that after considering their wishes, a referral has been made

If action is required in the absence of the identified designated safeguarding lead, they must be informed at the first opportunity following the action.

The police, children's and adult's social care services and the NSPCC have statutory responsibilities with regard to carrying out an investigation of alleged or suspected abuse.

The person who raises a concern will be kept informed where appropriate.

If the child appears to be at risk of significant harm, then a referral MUST ALWAYS be made to the police or NSPCC Child Protection Helpline: 0808 800 5000

Further information is provided below on how to proceed if you have any concerns about a young person you are working with.

DEALING WITH SEXUALISED BEHAVIOUR AND ALLEGATIONS OF SEXUAL ASSAULT: WHAT IS SEXUAL VIOLENCE AND SEXUAL HARASSMENT?

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

Sexual violence is defined 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.

All staff should recognise that children are capable of abusing their peers. This is a form of **abuse** and should never be tolerated or passed off as "**banter**" or "part of growing up". **Both the victim and perpetrator(s) will be treated as being at risk and supported accordingly.**

STAFF SHOULD BE AWARE OF THE IMPORTANCE OF:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

NSPCC HELPLINE

There is a new NSPCC helpline to support children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance. **The Report Abuse in Education helpline** provides appropriate support and advice to victims of abuse, and concerned adults, including onward action such as contacting the police if they wish to.

This dedicated helpline offers support to:

- all children and young people making current and non-recent disclosures of abuse.
- any children or young people who want to talk about being involved or witnessing any incidents.
- any adults who have experienced non-recent abuse.
- parents and carers who have any concerns about their own or other children.
- professionals who work in schools and need support in this or related issues.

What is consent?

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.

Recognising harmful behaviours

The term 'sexually abusive' is mainly used to indicate sexual behaviours that are initiated by a child where there is an element of manipulation or coercion or where the subject of the behaviour is unable to give informed consent. By contrast, the term 'sexually problematic' is more often used to refer to sexual activities that may not include an element of victimisation **but** may interfere with the development of the child demonstrating the behaviour or which might provoke rejection, cause distress or increase the risk of victimisation of the child.

The important distinction here is that while abusive behaviour is by definition also problematic, problematic behaviours are not necessarily abusive (Hackett, 2004).

As useful umbrella term is 'harmful sexual behaviours' which disentangle normal, problematic and harmful sexual behaviours in children.

Children and young people with harmful sexual behaviours (Hackett, 2014)

The framework below provides a good starting point for DSLs to use when considering cases of sexual harm.



Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment.
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. Whilst not intended to be an exhaustive list, 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 (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and

consider the experience of the victim) 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:
- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and
- upskirting.

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Peer on Peer/Child on Child Abuse

Children can abuse other children. This is generally referred to as peer-on-peer abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

THE RESPONSE TO A REPORT OF SEXUAL VIOLENCE OR SEXUAL HARASSMENT

- The initial response to a report from a child is important. How we respond to a report my encourage or undermine the confident of the victim, or future victims to report or come forward.
- It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment.
- Nor should a victim ever be made to feel ashamed for making a report.
- It is important to note that children may not find it easy to tell staff about their abuse verbally. Students may show us signs that something is not right through their behaviours - in the hope that an adult will notice.

So-called 'honour-based' abuse (including Female Genital Mutilation)

'Honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including **female genital mutilation (FGM), forced marriage, and practices such as breast ironing.**

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. **All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.** Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL. As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. **Whilst some females will be taken out of the UK to have this procedure inflicted upon them. It is known that it is also carried out discreetly within the UK.**

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on education professionals. If a staff member, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they must PERSONALLY report this to the police. Unless the staff member has good reason not to, they should still consider and discuss any such case with the Trust's DSL and the school's DSL.

Female genital mutilation is classified into four major types:

- Clitoridectomy: partial or total removal of the clitoris (a small, sensitive and erectile part of the female genitals) and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris).
- Excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are "the lips" that surround the vagina).
- Infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed bycutting and repositioning the inner, or outer, labia, with or without removal of the clitoris.

- Other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterizing the genital area.

The child victim regularly suffers a number of the following health implications including:

- trauma
- wound infection, septicaemia, tetanus
- issues with urine retention
- HIV & hepatitis infection
- abscess or cyst formation
- excessive growth of scar tissue
- pelvic infection due to menstrual obstruction
- obstruction to urinary flow & urine infections
- broken/fractured bones.
- infertility or complications with childbirth and newborn deaths

FGM indicators

The girl may confide that she is to have a "special procedure ", which will make her a woman or talk of a ceremony taking place for her or other siblings. There may be talk of vaccinations or talk of absence fromschool. Girls are more at risk of FGM during school summer holidays.

A girl or her family may talk about a long holiday to her country of origin or to a country where the practice is prevalent. This is not enough on its own but might be significant when added to other concerns. For example,if a mother or an older sibling had already undergone FGM.

Signs that FGM may have occurred.

- Prolonged absence from school with a noticeable change in behaviour on return
- Finding it difficult to sit still and appears to be experiencing discomfort or pain.
- Spending a long time away from class for toilet breaks
- Asking to be excused from PE or swimming.
- Suddenly visiting the school nurse more frequently
- A sudden change in dress

For FGM: STAFF MUST PERSONALLY REPORT THIS TO THE POLICE AND ALSO LIAISE WITH RELEVANT DSLs

You should be prepared to provide the call handler with the following information:

- explain that you are making a report under the FGM mandatory reporting duty.
- your details: name, contact details (work telephone number and e-mail address) and times when you will be available to be called back.
- job role.

- place of work.
- details of the Trust's and School's designated safeguarding lead, - their name and contact details (work telephone number and e-mail address).
- student's details: name, age/date of birth, address.
- confirm that you have undertaken, or will undertake, safeguarding action as per the Trust's safeguarding policy.
  You will be given a reference number for the call. Keep this number and share this with the DSLs.

2. Recording Procedure

The Anne Frank Trust has a digital confidential file, which is kept in the confidential file on the S drive, and only senior management team have access to this file.

The following information needs to be recorded:

- Concerns
- Suspicions
- Worrying observations
- Behavioural changes
- Actions and outcomes

Reasonable grounds for concern include:

- Specific indication from a person under 18 that he/she/they had been abused
- An account by a person who saw any abuse taking place
- Evidence, such as an injury or behaviour which is consistent with abuse and unlikely to be caused any other way
- An injury or behaviour which is consistent both with abuse and with an innocent explanation where there are indicators supporting the concern e.g. patterns of injuries an implausible explanation, dysfunctional behaviour
- A consistent indication, over a period of time that a child is suffering from emotional or physical neglect
- Exposure to extremist materials and influences (when operating this policy we use the following accepted Governmental definition of extremism which is: '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; and/or calls for the death of members of our armed forces whether in this country or overseas.'

See appendix 1 for 'Characteristics of different types of abuse'

2.1 Making Notes

Evidence of a complaint can be vital in evidencing the truthfulness about a child or young person's experience. Your notes can be useful sources of support for them. Follow the guidelines in section 1.3 and make sure that notes are kept 'verbatim', with necessary details, and without assumptions or interpretations. Keep your notes securely and confidentially. If you have made notes on a concern, allegation or incident of abuse you must report this to the DSL within one working day of the concern being written down.

The DSL should review the details of the suspected/alleged abuse and the safeguarding leads should refer the matter to an external agency where they feel that the young person may be in need and/or may be at risk of suffering imminent significant harm.

Any action to be taken by The Anne Frank Trust, including that agreed with the referral agency should be noted and the DSL needs to confirm that this action is being/has been taken.

2.2 Making a Referral

At The Anne Frank Trust it will be the responsibility of a DSL to make a referral to a local authority children's or adults social care department.

Firstly, the DSL will seek the advice of the duty social worker to discuss the concerns. The Duty Social Worker will advise you whether or not your concerns do justify making a referral

Where a decision to make a referral is made, this needs to take place immediately by telephone, with a follow up written referral being sent to a named person within children's or adult's social care services within a maximum of 2 days.

Where a referral is being made within London, The London Child Protection Procedures and Guidance should be referred to. Available at www.londoncp.co.uk.

Local authority Referral and Assessment Teams are normally open 9am - 5pm Mondays to Fridays. Out of Hours services are available outside those times. When making a referral, you will need to provide the following information, to hand when you telephone:

- The name, address, date of birth and gender of the child or vulnerable adult
- The names and contact telephone numbers of parents, carers or close family members if known

- The name, address and telephone number of the person's Doctor and other involved health professionals if applicable
- Other services the person is engaged with
- The school attended by the child if applicable
- The incidents which give rise for concern with dates and times
- The nature of the injuries observed, and/or the reason for your concerns

Following a telephone referral, you will be expected to follow this up in writing, within one working day.

Having made a referral, you should receive some information from the local authority social care services within one working day. If you do not receive any response within this time please check that the referral has been received.

3. Information sharing

Why information sharing is important

Sharing information about a child's wellbeing helps professionals build a clearer picture of the child's life and gain a better understanding of any risks the child is facing.

Any information sharing should reflect the locally agreed Information Sharing Protocols relevant to where the safeguarding concern is located. This includes local child and adult safeguarding, multi-agency risk assessment conference and multi-agency safeguarding hub information sharing protocols.

When information is shared:

- It must go directly to the right person, marked as private and confidential if written
- The recipient must be clear about what they are expected to do with the information
- The information sharing process must be a secure and confidential
- Next steps and any further action must be agreed between the sender and recipient of the information.

The information should only be retained if entirely necessary and held in a confidential file which is kept in a locked, restricted access area.

The retention of files relating to safeguarding:

- should be kept for 6 years after the last contact

3.1 What information to share

It is incredibly important that any information you share must be factual, appropriate and contextual.

You should always make sure you share the information quickly and securely as soon as a disclosure is made. This is so that the details will be fresh in your mind and action can be taken quickly.

All information, which is shared, should be based on information you have and not based on opinions (although your professional insight may be useful later).

4. Confidentiality

Never promise a child that you will keep the things they are telling you a secret. Explain that you need to share what they have told you with someone who will be able to help.

Information should only be shared with people who need to know, if unsure contact a The Anne Frank Trust Safeguarding designated Lead for support.

If a child or young person needs confidential help and advice, direct them to Childline. Calls to 0800 1111 are free and children can **contact Childline online**.

5. Responding to Concerns about Child Abuse through Online Services

Suspicions of child abuse identified through contact using The Anne Frank Trust online services (emails, website, social media etc) should be responded to in the same way as concerns identified within any other environment, utilising the information available.

If someone who is behaving suspiciously online or there are concerns that grooming may be taking place, you should contact the police.

If you have been sent something that you have reason to believe may be images or videos of abuse (NEVER open or forward suspect attachments) inform the DSL immediately, who will be responsible for reporting this to the police.

6. Safer Recruitment

At The Anne Frank Trust we understand the importance of Safer recruitment as a set of practices that help to ensure that staff and volunteers we employ are suitable to work with children and young people. This is a vital part of creating a safe and positive environment and making a commitment to keep children safe from harm.

6.1 Verifying references

At The Anne Frank Trust we ensure to check references that are shared as part of the recruitment process to ensure that we are able to make decisions that reflect as much information as possible about the suitability of applicants to work or volunteer with children.

As part of this process we ensure the following:

- The suitability and ability of the applicant to work with children and young people
- The knowledge and understanding of child protection and safeguarding of the applicant.
- Ensuring information provided in the reference is consistent with the information provided by the candidate in their application form and interview. Any discrepancies, concerns, or vague statements will be followed up

6.2 Criminal records checks

All employees at The Anne Frank Trust have criminal records checks, (Disclosure and Barring Service- DBS) as part of the recruitment process, particularly vital for those working directly with children and young people. This ensures that any employees within the organisation does not have anything of concern on their record that would prohibit them from working or volunteering with children.

The DBS offers various levels of Disclosure from Basic to Enhanced. The level of Disclosure needed may depend on the nature of the work to be carried out and applicant's interaction with children. Many schools and local authorities who enquire or engage with AFT in education programmes require that AFT staff have been through the disclosure process.

By carrying out these checks prior to engaging an employee and prior to the start of the employee training, AFT are demonstrating our commitment to the promotion of a healthy and safe environment for the children we work with.

Disclosure Scotland

The Protecting Vulnerable Groups (PVG) membership scheme is managed and delivered by

Disclosure Scotland. It enables organisations to make more thorough checks, particularly for positions that involve regular unsupervised contact with children or vulnerable groups.

If Disclosure Scotland decides that someone is unsuitable to have unsupervised contact with children or vulnerable groups, they'll bar them from working with them, and inform their current employers.

By carrying out these checks prior to engaging an employee and prior to the start of the employee training, AFT are demonstrating our commitment to the promotion of a healthy and safe environment for the children we work with.

(See Appendix 4 for AFT Child Protection Declaration Form to be completed by all new staff).

7. Allegations Involving a Member of Staff / Volunteer

The Anne Frank Trust ensures that those who work with, or on behalf of, children and young adults are competent and safe to do so. Likewise, anyone who comes into contact with children and young adults in their work has a duty of care to safeguard and promote their welfare. The Anne Frank Trust will take all allegations about the conduct of our staff and volunteers seriously.

For the benefit of all concerned it is essential that a clear process exists for the investigation and resolution of allegations.

The Anne Frank Trust UK has a DUAL responsibility in respect of both the child and the employee although our first priority is to ensure that no child or vulnerable adult is exposed to unnecessary risk.

The Anne Frank Trust UK will ensure that the same person does not have responsibility for dealing with the child protection/safeguarding protection issues and the staff member's issues.

An allegation against an employee should be assessed promptly and carefully. If reasonable grounds for concern exist, a formal report should be made, and the appropriate authorities contacted.

The reporting procedures outlined in these Guidelines should be followed. If the incident takes place in school or with a school student then the school's DSL should be informed, as outlined in the above procedures, they will in turn follow their own Child Protection procedures and inform the primary carers and the child/young person. If it has occurred in a young offenders' institute, their DSL should be informed. If it is an allegation through the youth empowerment programme, this will be dealt with directly by Anne Frank Trust's DSL. All incidents must be reported to the Trust's DSL.

Any external organisation should maintain a close liaison with the relevant authorities and the Anne Frank Trust UK will ensure that their actions do not undermine or frustrate any assessment or investigation made by the relevant authorities.

Agreed procedures should be followed in the context of the applicable employment contract and the rules of natural justice. The employee has a right to know of any allegation made and of their right to respond. The Anne Frank Trust UK will take protective measures appropriate to the level of risk while not unreasonably penalising the worker - unless necessary to protect the child.

Protective measures might mean increased supervision or assignment to different duties. The employees may be suspended pending assessment and investigation. The Anne Frank Trust UK will seek legal advice on procedures or protocol if in doubt.

Two members of staff will form the two key roles in any case involving allegations against members of staff. These are the Chief Executive and a member of Senior Management Team who has not been directly involved in the line management of the staff member. **In all cases two separate procedures must be followed:**

- In respect of the child or vulnerable adult the DSL and where appropriate, the member of Senior Management Team will deal with issues related to the child or vulnerable adult.
- In respect of the person against whom the allegation is made the Chief Executive will deal with issues related to the staff member.

If allegations are made against one of the DSLs, then the Designated Safeguarding Trustee should be contacted and will act in respect of the child or vulnerable adult involved.

If allegations are made against the Chief Executive or a member of the Senior Management Team, then the Chair of the Board of Trustees will act in respect of the staff member.

The Anne Frank Trust will ensure that all individuals' rights are respected. The Anne Frank Trust will ensure that the child/young person is dealt with in an age-appropriate manner. The staff member/s involved will be informed as soon as possible of the nature of the allegation and will be given the opportunity to respond to any allegation.

All decisions must be documented.

Possible courses of action include (and may run concurrently):

- A report to the police if there is evidence that a criminal offence has taken place
- A report to the Local Authority Designated Officer
- Implementation of the disciplinary procedure
- A referral to local authority children's or adult's social care services for an assessment of the individual's needs.

If the allegation does not indicate a potential criminal offence or safeguarding issue, the matter may be resolved under internal HR procedures.

It may be necessary to suspend the member of staff while an investigation is carried out.

It is a requirement that a summary of any allegations made and the outcome of any investigation is kept on the HR file of the person concerned. This record will be kept for 10 years or until retirement, whichever is sooner. Other records may be held by agencies involved in investigating allegations. Information may also be disclosed in future references.

'Whistle Blowing' is supported by the Public Interests Disclosure Act 1999, which offers a level of employment protection to employees who report concerns about poor or dangerous practices.

8. Creating a safer culture

The Anne Frank Trust is committed to creating a culture of safety in the organisation and recognise that this entails ensuring that safeguarding is at the heart of the organisations work.

In order to create a safer culture within the organisation, all staff and volunteers should feel they have a responsibility for this policy and be empowered to speak out if they have concerns.

As part of developing a safe culture for speaking out against abuse, induction for all new staff and volunteers will ensure that safeguarding is a key element within it.

8.1 Induction

The Anne Frank Trust will make sure that **all new staff and volunteers:**

- have read and understand the safeguarding and child protection policies and procedures (appendix 3)
- know how to spot the signs that a child may be experiencing abuse
- know how to respond appropriately if a child makes a disclosure about abuse
- know what to do if they have concerns about a child's wellbeing.
- Have the names and contact details of our DSLs – staff and board

All staff and volunteers should complete safeguarding training as part of their induction, even if they have received training in a prior job. It's important to make sure everyone has up-to-date knowledge and skills and understands how safeguarding works in your organisation.

8.2 Code of Conduct

The Anne Frank Trust has a code of conduct which sets out how we expect those in the organisation to behave. (Appendix 2)

It includes trustees, agency staff, volunteers, students on work placement and anyone who is undertaking duties for the organisation, whether paid or unpaid.

The code of conduct encourages all staff to build Trusting and Respectful relationships that;

- Are based on openness, honesty, trust and respect
- Avoid favouritism
- Encourage patience with others
- Demonstrate caution when you are discussing sensitive issues with children or young people
- Ensure your contact with children and young people is appropriate and relevant to your work
- If a child specifically asks for or needs some individual time with you, ensure other staff or volunteers know where you and the child are. Only provide personal care in an emergency and make sure there is more than one adult present if possible

8.3 Upholding this code of behaviour

You should always follow this code of behaviour and never rely on your reputation or that of our organisation to protect you. If you have behaved inappropriately, you will be subject to our disciplinary procedures. Depending on the seriousness of the situation, you may be asked to leave The Anne Frank Trust.

Depending on the type of behaviour this may also mean that we may also make a report to statutory agencies such as the police and/or the local authority child protection services. If you become aware of any breaches of this code, you must report them to the safeguarding lead. If necessary you should follow our whistle blowing procedure.

8.4 Staff Management

The Anne Frank Trust are making these following commitments in order to protect both staff (full-time, part-time and freelance) and young people.

- That all staff will read and comply with our Safeguarding and Child Protection Policy statement.
- All permanent staff will receive induction and training in Safeguarding and Child Protection.
- Part-time or freelance staff and volunteers must agree to abide by our Safeguarding and Child Protection Policy and Code of Behaviour and have completed Safeguarding and Child Protection training where necessary.
- All staff will receive necessary supervision and their work practices will be reviewed as part of their annual appraisal.

- AFT will undertake to advise organisations, schools and local authorities that we work with of our Safeguarding and Child Protection Policy.
- If we have concerns about the welfare of a child/young person, we will respond to the needs of the child at all times.
- In the event of a complaint against a member of staff, the designated safeguarding lead will immediately ensure the safety of the child/young person and will inform the relevant personnel.

9. Online Safety

Aim

- To protect all children and young people taking part in Anne Frank Trust's educational programmes and who make use of technology (such as mobile phones and the internet) whilst they are within the care of the organisation.
- To provide staff and freelancers with policy and procedure information regarding online safety
- To ensure AFT is operating in line with our values and within the law regarding how the organisation uses information technology

9.1 Online safety checklist

1. Understand the safety aspects including what is acceptable and unacceptable behaviour when using digital technology such as social media sites (e.g. Twitter and Facebook), apps, mobile phones and the internet.

2. When engaging with digital technology/social media companies (e.g. Facebook, Twitter or Instagram), ensure staff and freelancers adhere to relevant legislation and good practice guidelines.

3. Ensure that adequate privacy settings are in place either restricting or allowing access to photos, personal information, comments about others, friends and followers.

4. Ensure that staff and freelancers are aware of the need to protect their privacy online.

Staff and freelancers are encouraged to carefully consider to whom they give access to their personal information online. All staff and freelancers should ensure a clear differentiation between their personal and professional profiles.

For more information on the risks of online abuse and exploitation visit CEOP (Crime Exploitation and Online Protection command) at https://www.ceop.police.uk/safety-centre/

9.2 Potential risks to children and young people using social networking and other interactive services

Risks associated with using interactive services include cyber bullying, grooming and potential abuse by online predators, identity theft and exposure to

inappropriate content including self-harm, racism, hate and adult pornography. It is important to give careful consideration to the use of social media and to balance the benefits of creativity, spontaneity and immediacy of the communication with the potential risks, including the risks to children and young people.

Potential risks can include, but are not limited to:

- bullying by peers and people they consider "friends"
- posting personal information that can identify and locate a child offline
- sexual grooming, luring, exploitation and abuse contact with strangers
- exposure to inappropriate content
- involvement in making or distributing illegal or inappropriate content
- theft of personal information
- exposure to information and interaction with others who encourage self-harm
- exposure to racist or hate material
- radicalisation
- glorifying activities such as drug taking or excessive drinking
- physical harm to young people in making video content, such as enacting and imitating stunts and risk-taking activities
- leaving and running away from home as a result of contacts made online

10. Personal information

1. The Anne Frank Trust will not allow any student without the necessary media release forms to be filmed or photographed as part of any campaign. Consent forms should explain the use of the campaigns and films on social media and identify the potential risks involved. Facilitators should check all necessary forms have been submitted by all children or young people involved.

2. Personal information pertaining to individual students must not be made available, irrespective of whether a safeguarding concern exists or not. Personal information refers to full names, addresses, contact details and date of birth. Descriptors online should be restricted to role (e.g. Peer Guide(s)/Anne Frank Ambassador(s)/Participant(s)/Student(s)) and their school.

3. There might be occasions when personal details could be disclosed inadvertently. Facilitators should remain vigilant against accidental disclosure, e.g. names on worksheets.

4. Films and/or campaigns may involve young people taking on acting roles as a victim of prejudice-based bullying or abuse, or as a perpetrator of this abuse. This could potentially expose young people to negative comments from people viewing the campaigns. Disclaimers stating that these scenarios are fictional and that the

students in the films and/or campaigns are portraying roles must be added to the start of the film.

5. Under no circumstances should facilitators provide their own personal email or social media addresses. Only staff's professional email addresses be shared if necessary.

6. This professional email address should also be provided to young people to use in the event of needing to communicate via email with external contacts. Students should not give out any personal contact information directly to a staff member. Parental consent MUST be obtained for the collection of any personal contact information, which is secured & confidentially stored on the Trust's database. This will only be required for the Youth Empowerment Programme.

7. All emails with students should have the lead teacher copied in, to maintain transparency of communications with students.

8. Facilitators should not use their own personal social media for any communication with young people. Facilitators might consider going socially private in a live social media workshop to reduce the opportunity for any ambassador to try to make contact.

11. Data Protection considerations

The Anne Frank Trust must ensure that its use of social media does not infringe upon relevant data protection laws or breach confidentiality. When promoting events and competitions online and collecting personal information about users, including children and young people, the requirements concerning the collection of personal information, as set out in the General Data Protection Regulations 2018 should be followed.

11.1 Management of social media platforms

1. The role of AFT staff in terms of a film/campaign is equivalent to that of an Executive Producer. All content to be made public must be authorised by AFT and checked for appropriateness. Students must be made aware not to post directly onto the social media campaigns, and that they must seek approval from AFT staff via email. Emails will be monitored only during office hours.

2. Online comments during and after a campaign/event must be stringently monitored. Comments will only be monitored during office hours, at least twice a day.

3. Instagram and You Tube platforms must be set up with strong profanity filters. This allows over 700 potentially offensive words and phrases to be automatically blocked from comments.

4. Facebook "Reviews" must be disabled to control the additional method of commenting publicly. This feature is predominantly used by business and offers little for short-term campaigns.

5. Campaigns and films may be shared by Anne Frank Ambassadors and schools on their personal social media pages. This means that AFT will not have control on

the comments left on these pages. We are committed to supporting children and young people if they receive any negative comments from sharing any content from The Anne Frank Trust.

11.2 Communicating with host schools

1. Schools might expect disclosure particularly relating to bullying or online abuse following workshops that deal with important but sensitive issues.

2. As part of the pre-programme administration, the Anne Frank Trust must send the host school a copy of the Anne Frank Trust Safeguarding and Child Protection Policy and details outlining the suitability of the programmes for their students. It is the sole responsibility of the host school to inform AFT if they have any concerns about the content in advance of the programme and to also make decisions on the suitability of the workshop for specific students. Facilitators are in no position to make this judgement and must rely on the host school.

12. About the NSPCC Helpline

If we have worries about a child's safety or welfare, the NSPCC Helpline offers vital support for our staff. Whatever the concern, the NSPCC are there 24 hours a day to offer help, advice and support. The **NSPCC Helpline on 0808 800 5000** is free from a landline, and from most mobile networks. Supported by their trained helpline advisors you can discuss anything you need to about a child. They will listen and help you to explore your options. You don't have to say who you are, and you can talk to them in confidence in almost all situations. However, if you tell them something that leads them to believe a child is in immediate danger, they have a duty to pass these details on.

Adult safeguarding in prisons and young offender institutions means keeping prisoners safe and protecting them from abuse and neglect. Prison staff have a common law duty of care to prisoners that includes taking appropriate action to protect them. Prisons have a range of processes in place to ensure that this duty is met. These also ensure that prisoners who are unable to protect themselves as a result of care and support needs are provided with a level of protection that is equivalent to that provided in the community.

APPENDIX 1

DIFFERENT TYPES OF ABUSE - MORE INFORMATION AND SPOTTING THE SIGNS

Concerns of abuse or neglect - spotting the signs

Spotting signs of abuse or neglect in people requires a knowledge of what is normal for the child or adult, a reflection of their physical or behavioural changes over time, and for children, a knowledge of child development. As visitors to schools, colleges, prisons and other institutions, it may be difficult for Anne Frank Trust UK staff to have an insight into any long-term changes in a child or adult, but we have a duty to report any concerns of abuse or neglect when it is spotted.

What are the signs of abuse or neglect?

The following signs of abuse are not exhaustive, and a child or adult may be subject to more than one type of abuse.

Physical abuse

Physical signs include:

- finger mark bruising on cheeks or any other area of the body where bruises are unlikely to appear in everyday play
- presence of injuries that are in several stages of healing suggesting that a person has experienced repeated maltreatment over time
- injuries to the soles of the feet
- bald patches on a person's head
- bite marks
- injuries that form a shape or pattern
- scald marks and burning, including cigarette marks
- black eyes
- marks that might indicate a person has been restrained or strangled
- broken bones
- any injuries that are inconsistent with the explanation given.

Behavioural signs include:

- flinching when touched
- inability to recall how injuries occurred
- avoiding getting changed for sporting or other activity
- wearing trousers and shirts or blouses with long sleeves even on hot sunny days, although remember to consider this in the light of the individual (e.g. dressed modestly for religious and/or cultural reasons)
- reluctance to go home
- excessively eager to please

- being very aggressive or withdrawn
- attempts to run away
- being sad, frequently crying
- drug and/or alcohol misuse
- any behaviour that is not consistent with a child's stage of development.

Sexual abuse

Physical signs include:

- stomach pains
- genital soreness, bleeding or discharge
- recurring genital-urinary infections
- discomfort in walking or sitting
- sexually transmitted infections.

Behavioural signs include:

- a change in behaviour
- not wanting to undress
- sexual knowledge, language and behaviours beyond their age
- eating disorders
- fear or avoidance of being with a person or a group of people
- being withdrawn
- self-harming
- unexplained amounts of money
- disturbed sleep
- sexualised drawings
- change in handwriting
- the types of questions asked (do they suggest sexual knowledge that a child should not have).

Emotional abuse

Physical signs include:

- self-harm marks
- erratic weight or growth patterns
- delayed development, either physically or emotionally
- erratic behaviour.

Behavioural signs include:

- difficulty in forming relationships
- inappropriate attention-seeking
- being withdrawn
- unexplained underachievement at school
- self-harming
- bed-wetting
- disturbed sleep.

Neglect

Physical signs include:

- unattended medical or dental problems
- lack of energy due to inadequate food intake and/or poor nutrition
- poor personal hygiene/unwashed clothing
- inadequate clothing (not having warm clothes in winter)
- untreated skin or hair problems (rashes, sores, flea bites, head lice)
- consistent hunger/big appetite - can't seem to eat enough
- very thin or swollen stomach
- lack of muscle tone (bones appearing to stick out).

Behavioural signs include:

- demanding constant attention and affection
- difficulty in making friends
- missing or irregularly attending school or nursery
- stealing or begging food from others
- emotional withdrawal
- anti-social behaviour
- alcohol or substance misuse
- developmental delay (weight, language, social skills).

Signs of extremism or radicalisation

The government's Prevent Strategy lists the following signs in a Vulnerability Assessment Framework. They are split into three areas as follows:

1. Engagement with a group, cause or ideology.
2. Intent to cause harm.
3. Capability to cause harm.

Bullying and cyberbullying

Bullying is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

Bullying can include:

- verbal abuse, such as name calling and gossiping
- non-verbal abuse, such as hand signs or text messages
- emotional abuse, such as threatening, intimidating or humiliating someone
- exclusion, such as ignoring or isolating someone
- undermining, by constant criticism or spreading rumours
- controlling or manipulating someone
- racial, sexual or homophobic bullying
- physical assaults, such as hitting and pushing
- making silent, hoax or abusive calls
- online or cyberbullying

What is online or cyberbullying

Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos.

Children may know who's bullying them online - it may be an extension of offline peer bullying -or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of engaging in bullying behaviour.

Cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - so it can feel like there's no escape.

Cyberbullying can include:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos

- 'trolling' - the sending of menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- sending explicit messages, also known as sexting
- pressuring children into sending sexual images or engaging in sexual conversations

Signs of bullying or cyberbullying

- belongings getting “lost” or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others

Children and young people who are bullied are more at risk of developing mental health problems, including depression and anxiety. Children at the highest risk are those who are both bullied, and who bully others.

Children who are bullied also:

- have fewer friendships
- aren’t accepted by their peers
- are wary and suspicious of others
- have problems adjusting to school and don’t do as well

Online abuse

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online).

Children can feel like there is no escape from online abuse - abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

Many of the signs that a child is being abused are the same no matter how the abuse happens.

A child may be experiencing abuse online if they:

- spend lots, much more or much less time online, texting, gaming or using social media
- are withdrawn, upset or outraged after using the internet or texting
- are secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet

Sexting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages. Sexting may also be called trading nudes, dirties or pic for pic. There is no control over how the image is shared and it can lead to blackmail, bullying, unwanted attention and emotional harm.

Sexting can be seen as harmless but creating or sharing explicit images of a child is illegal, even if the person doing it is a child.

A young person is breaking the law if they:

- take an explicit photo or video of themselves or a friend
- share an explicit image or video of a child, even if it's shared between children of the same age
- possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created

However, as of January 2016 in England and Wales, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest. Currently, a similar approach is being taken in Scotland.

Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they're a risk.

Child Sexual Exploitation Definition:

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

Signs of abuse in prisons and young offender institutions

Physical abuse includes:

- any form of assault
- misuse of restraint or inappropriate physical sanctions
- withholding food or drink; force-feeding
- wrongly administering medicine
- failing to provide physical care and aids to living

Emotional or psychological abuse includes:

- verbal abuse
- threatening abandonment or harm
- isolating
- taking away privacy or other rights
- harassment or intimidation
- blaming
- controlling or humiliation
- financial or material abuse includes:
- withholding money or possessions
- theft of money or property
- fraud
- intentionally mismanaging finances
- borrowing money and not repaying discriminatory abuse - including verbal harassment or other maltreatment due to a prisoner's protected characteristics

Neglect is a failure to identify and meet the needs of a prisoner or young offender, for example:

• by ignoring medical, emotional or physical care needs

• failing to provide access to appropriate health, care and support or educational services

• withholding of the necessities of life, such as medication, adequate nutrition and heating

Neglect also includes:

• self-neglect, which covers a wide range of behaviour such as neglecting to care for one's personal hygiene, health or surroundings and behaviour such as hoarding

Domestic Abuse and violence - is a pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex partner, but also by a family member or carer.

Coercive control is a crime which creates invisible chains and a sense of fear that pervades all elements of a victim's life. It works to limit their human rights by depriving them of their liberty and reducing their ability for action.

Physical abuse –includes hitting, kicking, throwing, shaking, strangling, burning, poisoning and suffocating.

Emotional abuse – is the persistent emotional ill treatment and bullying of someone else, it might look like constant criticism, shouting, undermining confidence, imposing age, physical ability or developmentally inappropriate expectations on a person, seeing or hearing the ill treatment of another.

Sexual abuse – can be direct and indirect, including forcing or enticing to take part in sexual activity, rape, showing pornography, encouraging inappropriate sexual behaviour, inappropriate sexual remarks or content in communications and grooming a person in preparation for abuse (including via the internet).

Sexual exploitation - a form of sexual abuse that involves being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It involves manipulation and coercion.

Commercial exploitation – exploitation in the area of work or other activities for the benefit of others and to the detriment of someone's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.

Neglect – is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of their health, development or wellbeing. This includes not providing basic food, required

medication, warmth, shelter or protection, inadequate supervision, failure to ensure adequate access to appropriate medical care or treatment, exposure to undue cold, heat or unnecessary risk or injury.

Economic abuse – covering all economic resources including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Discriminatory abuse – including anti-Semitic, islamophobia, racist, sexist, homophobic, transphobic, abelist, and other forms of harassment, slurs or similar treatment.

Institutional abuse - repeated instances of poor care of individuals or groups of individuals through neglect or poor professional practice as a result of structures, policies, processes and practices within an organisation.

Online and Digital Abuse- online platforms are increasingly used to perpetrate abuse. This can include perpetrators monitoring of social media profiles or emails, abuse over social media such as Facebook or Twitter, sharing intimate photos or videos without your consent, using GPS locators or spyware. This also includes avenues for abuse targeted at children and young people like grooming.

Grooming - when a person tries to 'set up' and 'prepare' another person to be the victim of sexual abuse and comprises actions deliberately undertaken with the aim of befriending and establishing an emotional connection, to lower the person's inhibitions in preparation to sexually assault them, or to exploit them. Although not all sexual-abuse is preceded by grooming, it is a very common and deceitful process, which can be used by strangers or by those known to the victim.

Abuse can also take place in the online environment and can include cyber bullying, grooming, the sharing of age or mental capacity inappropriate images and messages, and the creation or sharing of sexual abuse images.

Female Genital Mutilation (FGM) - is a deliberate action where female genitals are cut or changed, without any medical need for this procedure.

Sexual harassment- unwanted behaviours that are of a sexual nature.

Forced marriage- occurs when one or both people are forced into a marriage against their wishes and where abuse and coercion has been used to make it happen.

Appendix 2

BEHAVIOUR AND GOOD PRACTICE WHEN WORKING WITH CHILDREN AND YOUNG PEOPLE

Codes of behaviour

- Treat children, young people as individuals
- Listen to and respect them
- Involve them in decision making, where appropriate
- Provide encouragement and support regardless of ability
- Use appropriate language (physical and verbal)
- Encourage a positive awareness
- Respect their personal space
- Create an atmosphere of trust and encourage group feedback
- Lead by example
- Be aware of limitations e.g. due to medical condition
- Respect differences

Good Practice

- Observe appropriate dress and behaviour.
- Maintain awareness around language and comments made.
- If working with children/young people outside school, register each child i.e. name, address, phone, emergency contact (comply with data protection regulations)
- Make primary carers (Schools/Parents), young people, facilitators and visitors aware of these procedures.
- Be inclusive of people with special educational needs and disabilities
- Plan and be prepared
- Discuss boundaries on behaviour and related sanctions, where appropriate, with them and their schools
- Report any concerns about the wellbeing of the children/young people to the DSLs and follow reporting procedures.
- Be aware of bullying and encourage children to report any concerns or worries.
- Evaluate work practices on a regular basis.
- Report and record any incidents or accidents.
- Review and update policy and procedures on an annual basis.
- Keep primary carers (usually schools) informed of any issues that concern their children.

- Ensure proper supervision where possible. If a facilitator is left alone in a one to one situation, s/he should make sure that it is in an easily accessible space i.e. leave exit doors open.
- Ensure clear communication between facilitator and group and also with organisation.
- Don't be passive in relation to concerns.
- Don't let a problem get out of control.
- Workshops and exhibition sessions should be in an open environment. Inappropriate behaviour
- Do not deliberately put yourself in a situation where you are left alone with a child or young person (e.g. giving lift home in car).
- Do not use or allow offensive or sexually physical and/or verbal language.
- Do not single out a particular person for unfair favouritism, criticism, ridicule or unwelcome focus or attention.
- Do not allow or engage in inappropriate touching of any form.
- Do not hit or physically chastise.
- Do not share personal contact details.
- Do not meet or socialise inappropriately with children/young people e.g. outside of structured organisational activities.

Physical contact

Avoid physical contact AT ALL TIMES with young people during our education programmes, exhibitions or events. This is for your protection as much as it is for the young person.

Appendix 3

Safeguarding and Child Protection Policy: Statement of Understanding

I, _____, hereby acknowledge and declare that:
Print Name

(i) I am aware that the Anne Frank Trust UK's Safeguarding and Child Protection Policy and Procedures are available to me on SharePoint, in the employee handbook, or upon request to the Designated Safeguarding Lead. It is my responsibility to familiarise myself with these policies.

I confirm that I have received, read and understood the Safeguarding and Child Protection Policy document
(ii) If applicable, in addition, I confirm that I have attended the appropriate level of Child Protection training (Level 1, 2 or 3).

(iii) I agree to conduct my activities in accordance with the Anne Frank Trust UK's Safeguarding and Child Protection Policy and understand that breaching these standards may result in disciplinary action up to and including termination or other legal remedy available to the organisation.

Signed: _____

Date: _____

Appendix 4

Notification of a Safeguarding Concern and/or a Children's Social Care Referral

Please use this form;

- To report that you have a safeguarding concern about a child
- To inform that you have made a referral to children's social care.

Name of worker completing form:			Date of form completion:	
Name of Child	Gender	DOB	New referral	
Please write what you were told in its exact terms. Be as factual as possible and use the student's own words where possible. Include presentation of child (physical, emotional, behavioural etc.) use the Physical Injury Concern Form to indicate any marks seen.				
Summary of support in place:				
Signature (DSL):				

Appendix 5

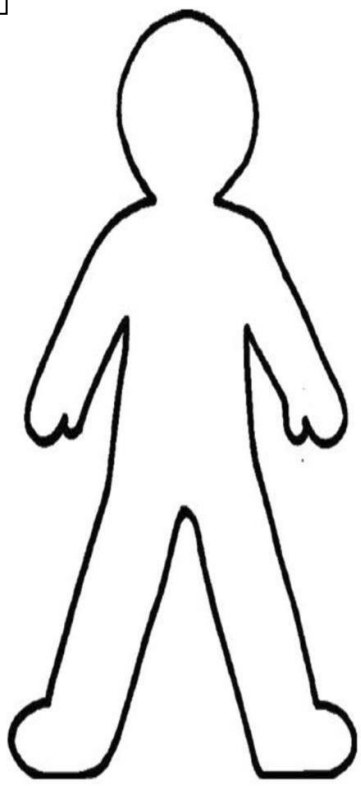
Physical Injury Concern Form

Please indicate where on the child's body you have seen markings or are concerned there may be. Once done attach to the corresponding Child Protection Concern Form.

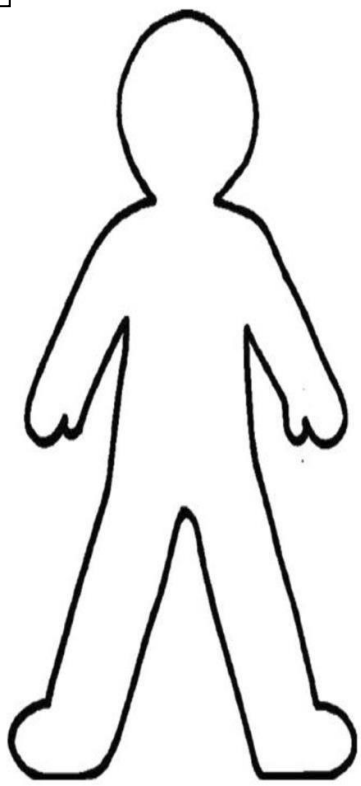
Please note that no examination of the child should be undertaken by AFT staff. If the
child can indicate allow them to show you any marks and record on this sheet.

Name of child:
Gender:

Front



Back



AFT Staff Signature:

Name of Child Protection Lead:

Signature and date: