



# **SAFEGUARDING POLICY**

BPT Trustees  
August 2025

Review Due: August 2027

## **Contents**

Introduction	2
Aims of Policy	2
Principles	2
Scope of Policy	2
Key Contacts	3
Legal Framework	4
Related Policies	4
Definitions	4
Safe Recruitment /Working Practices	5
Code of Conduct	6
Use of Dressing Rooms	7
Confidentiality and Information Sharing	7
Conduct with Vulnerable Adults	7
Members' Club	9
Hires Policy (third-party use of premises)	9
Fobs	9
<b>Annexes:</b>	
A: Safeguarding Incident Form	10
B: Guidance on raising concerns	13
C: Types of Abuse and Neglect	14
Abuse	14
Child Sexual Exploitations (CSE)	15
‘SEXTING’/Youth Involved Sexual Imagery	15
Peer on Peer Abuse	16
Bullying	16

## Introduction

The Old Fire Station (aka SLT Fire Station) is run by three interlinked but legally separate entities:

- SLT Building Preservation Trust Ltd (leaseholder, responsible for facilities, external hires)
- South London Theatre Centre (membership-led theatre company, Youth Theatre, outreach/learning activities, and wardrobe hires)
- SLT Members' Club (runs the Members' Club bar and organises social activities)

For the purposes of this document 'SLT' refers to all three of these entities.

The Old Fire Station is a multi-use community hub. The primary function is to support theatre and the wider arts led by SLT, but is also available for hire for community, work and other uses. It is essential that the various users of this space have a common understanding of and approach to safeguarding.

Children and Young People have contact with SLT in many different ways, so we want them to be safe. SLT is not a child protection agency; however, we are committed to working in a child centred way, where they are valued and respected as individuals and their views and concerns are listened to.

SLT is committed to providing a safe environment for all children (under 18s) and all vulnerable adults as well as staff, SLT Members (including Youth), hires and visitors by promoting a climate where people are confident sharing safety concerns about themselves or others.

## Aims of Policy

The purpose of this policy is to:

- protect children, young people and vulnerable adults who take part in classes, theatre productions and other SLT activities
- provide a safe environment for hires, visitors, or other users of the building, and
- provide the overarching principles that guide our approach to safeguarding and child protection between the different users of the building

## Principles

SLT believes that no child, young person or adult should ever experience abuse of any kind. We have a responsibility to promote the welfare of all children, young people and vulnerable adults and to keep them safe. We are committed to practise in a way that protects them.

We recognise that:

- The welfare of the child is paramount, as enshrined in the Children Act 1989, the Children Act 2004 and the Children and Social Work Act 2017.
- All children and vulnerable adults – regardless of age, disability, sex, racial heritage, religion or belief, sexual orientation or identity or socio-economic background – have a right to equal protection from all types of harm or abuse.
- Some children and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- Working in partnership with children, young people, their parents, carers and other agencies is essential to promote young people's welfare.

## Scope of Policy

This policy covers all activities overseen by SLT Building Preservation Trust Ltd (including Hires), South London Theatre Centre Ltd and the SLT Members Club.

Activities include, but are not limited to:

- SLT events and performances, including visitors and volunteers at such events
- Learning and outreach activities
  - Youth Theatre classes
  - Youth Theatre performances
  - In-house learning/outreach activities, including those that take place off-site
  - Under 18s involved with adult shows
  - Under 18s involved in volunteering
- Members' Club (bar and social activities)
- Hires (external companies or events making use of SLT facilities)

## Responsibilities and Immediate Action

### Key Contacts

Safeguarding children and vulnerable adults is the responsibility of everyone who is a member, or staff of SLT or who uses the building. Specific overarching responsibility lies with the Trustees of the Building Preservation Trust. The following named Officers can be contacted at any time.

The Designated Safeguarding Officer (DSO) is Gerri McAndrew, Trustee

Email: [dso@southlondontheatre.co.uk](mailto:dso@southlondontheatre.co.uk)

Phone: Mobile 07525 361152 Home: 020 8670 9381

The Deputy Designated Safeguarding Officer (DDSO) is Lorna Felix

Email: [lorna@southlondontheatre.co.uk](mailto:lorna@southlondontheatre.co.uk)

Phone: 07973732410

The Youth Theatre Manager is Teresa Donoghue

Email: [Training@southlondontheatre.co.uk](mailto:Training@southlondontheatre.co.uk)

Phone: 07517 645454

You may also contact any of the above via [safeguarding@southlondontheatre.co.uk](mailto:safeguarding@southlondontheatre.co.uk)

The Safeguarding team must be contacted if there are any concerns regarding Safeguarding and, as appropriate, they will liaise with the local authority Safeguarding services:

Lambeth Safeguarding Children Partnership <https://www.lambethsaferchildren.org.uk/>

Andrew Zachariades

Local Authority Designated Officer (LADO)

Child Protection Independent Reviewing Service

Tel: 020 7926 4679

Mobile: 07720 828 700

LADO@lambeth.gov.uk

Online Safeguarding Issues: CEOP via [www.ceop.police.uk](http://www.ceop.police.uk)

NSPCC Helpline: 0808 800 5000 [www.nspcc.org.uk](http://www.nspcc.org.uk)

Childline: 0800 1111 [www.childline.org.uk](http://www.childline.org.uk)

## **Legal Framework**

This policy has been drawn up on the basis of the following law and guidance:

- United Convention and the Rights of the Child 1991
- GDPR and Data Protection Act 2018 (updated 2022)
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006 (amended)
- Protection of Freedom Act 2012
- Children and Families Act 2014
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015
- Safeguarding and promote the welfare to children; HM Government 2015
- Working together to safeguard children 2023

## **Related Policies**

All policies are available on the website [SLT website /policies](#)

- SLT's [Code of Conduct](#)
- SLT's Health and Safety Policy, which incorporates additional information on expected standards of behaviours by members and principles for anyone who is lone working
- Guidance document for directors on working with children in shows, including SLT Chaperone Policy

## **Definitions**

The words **children, child or young person** within this document refer to anyone under 18 who is involved in classes, workshops, theatre productions or social events at SLT, whether they are run by SLT staff and volunteers or external hires.

A **vulnerable adult** within this document is:

- Over 18 years old
- Someone who needs care and support
- At risk of experiencing abuse or neglect
- Someone who can't protect themselves from harm or exploitation

who is involved in classes, workshops, theatre productions, volunteering or social events at SLT, is hiring rooms in the building or someone who may be visiting the building, e.g. to attend exercise classes, hire from wardrobe or participate in a community based event. This list is not exhaustive.

Here are the main factors to consider when assessing vulnerability:

- Mental illness
- Physical disability
- Short-term or long-term illness
- Age
- Homelessness
- Substance abuse

These are all risk factors in an adult being assessed as vulnerable. Not everyone with the above factors is vulnerable and no one point alone is going to determine whether a person is vulnerable.

### **Regulated activity**

#### **Children**

Regulated activity in relation to children can be split into two main categories, these include activities and places of work.

Those working in specified activities will be classed as engaging in regulated activity. Put simply, this is anyone who is teaching/training/instructing/coaching/caring for or supervising children.

People would also be classed as working in regulated activity if they were working in a specified establishment. These are referred to as a limited range of establishments and include, but are not limited to:

- Schools
- Children's homes
- Nurseries

#### **Vulnerable Adults**

Whether someone is working in regulated activity in relation to vulnerable adults is not necessarily determined by their place of work, but on six defined types of activity. A basic outline of these is:

- Providing personal care
- Providing healthcare
- Providing social work
- Assistance with conducting an individual's own affairs
- Assistance with household matters
- Conveying to a place of care/social work

However, whether or not the activity is regulated, we expect all members, employees, visitors and hires to behave to the highest standard when working with children or vulnerable adults.

### **Safe Recruiting / Working Practice**

SLT recognises that policy and procedure is only as effective as the ability and skill of those who operate it. We are therefore committed to recruiting staff and volunteers safely.

Safe recruitment processes will be followed and all staff recruited will be subject to appropriate identity checks. References will be verified and appropriate criminal record checks (DBS) checks, barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties. All checks and information held will be undertaken in accordance

with the Disclosure and Barring Service rules and guidelines. The Youth Theatre Manager is responsible for organising DBS checks via an approved umbrella organisation.

All members, visitors and SLT staff are expected to adhere to the SLT [Code of Conduct](#).

Anyone undertaking teaching or other regulated activities with children or young people (paid or unpaid) must have a satisfactory Enhanced Disclosure and Barring Service (DBS) check before they commence such activity.

A new DBS check must be undertaken for any person working with children or vulnerable adults at SLT. Previous checks from other organisations will not be accepted. A new check should be undertaken at least every three years.

Anyone hiring rooms for the purpose of undertaking regulated activities should show their DBS clearance as part of the hire contract.

Directors, Deputy Directors and Stage Managers of any productions involving children or young people must have an Enhanced DBS check and will be briefed about their responsibilities by the Theatre Committee prior to auditions. This will include the need for Directors and stage managers to meet with the Youth Theatre Manager to ensure procedures are followed appropriately. Directors are responsible for ensuring that all cast and crew are notified of their responsibilities and have read the Theatre-specific version of this Safeguarding Policy. They will also ensure the [SLT Chaperone Policy](#) is followed for productions. DBS checks for Directors, Deputy Directors or Stage Managers should be arranged through the Youth Theatre Manager [Training@southlondontheatre.co.uk](mailto:Training@southlondontheatre.co.uk). Directors have a responsibility to ensure the SLT Chaperone Policy is adhered to.

## Code of Conduct

The SLT [Code of Conduct](#) must be adhered to at all times. In particular there must be no sexual activity or other forms of abuse with any child or in relation to any activity undertaken by SLT or by any hire. Any such activity will be reported, by the SLT Safeguarding team via the LADO, to the responsible authorities. Any such activity will be considered gross misconduct and any member, employee or volunteer found to have undertaken such activities, will be dismissed or have their membership rescinded. Any hires will be barred from further use of the premises. Other breaches of this policy will be investigated in line with the Staff Employee Handbook or SLT [Code of Conduct](#) and appropriate action taken, with advice from the DSO or DDSO.

Where there are credible allegations of peer on peer bullying or other abuse which occurs inside or outside SLT Premises, Youth Theatre reserves the right to remove the perpetrator from youth classes.

See [Annex C](#) for details of types of abuse, neglect and sexual child exploitation.

Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, all members, visitors or employees are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary physically to restrain a child or young person for their own protection or others' safety, this will be appropriately recorded and reported to the DSO and the parents/guardians notified.

Any physical restraint used should 'use no more force than is needed'. This could include guiding a child to safety by the arms, to more extreme circumstances such as breaking up a fight where a young person needs to be restrained to prevent violence or injury. The use of force can involve either passive physical contact such as blocking a door or active physical contact such as leading them by the arm out of a room.

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present. All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/guardians at the earliest opportunity.

For their own safety and protection, adults should exercise caution in situations where they are alone with children. In such rare events, the door to the room in which the meeting is taking place should be left open and another person will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting.

All users of the building should also be alert to the possible risks that might arise from social contact with children and young people outside of the building. This is particularly so for anyone undertaking formal activities with young people, e.g. baby classes or Youth Theatre, etc. Home visits should not take place except where invited by the parents/guardians and they are present. Personal phone or social media details should not be exchanged or responded to. Any unplanned contact of this nature or suspected infatuations or “crushes” must be reported to the DSO. Contact regarding classes or activities must always be managed via the parent or guardian. For 16 to 17year olds, direct contact can be made with permission from parents/carers.

No one will use cameras (digital or otherwise) or camera phones for taking and transferring images of children or young people without permission. Photographs of children or young people must not be stored at home. Should anyone become aware of inappropriate or non-essential use of camera phones, including iPADS, devices and cameras, this should be reported to the DSO.

Photographs may be taken for the purpose of recording a child or group of children participating in theatre activities or celebrating their achievements in an effective way to record their progress and development. All such images will be appropriately stored on SLT Youth Theatre equipment.

Parents, guardians or relatives may only take still or video photographic images of children or young people in organised activities with the prior consent of the person in charge of the activity and then only in designated areas. Images taken must be for private use only. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film. Without this consent, Data Protection legislation would be breached. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

Consent to photographs is via the youth members' LoveAdmin account .

### **Use of Dressing Rooms**

Under the duty of care to safeguard children, SLT has a responsibility for the wellbeing of children in dressing rooms / changing into costume.

A separate changing area must be provided for children to any adults involved in a production. The [SLT Chaperone Policy](#) must also be followed to oversee children who will wait in the dressing room area until called to be on stage.

Where a young child requires assistance with changing, or for those children with a disability who may require additional help that SLT is unable to provide, we ask that the parent/guardian is available to assist with this.

### **Confidentiality and Information Sharing**

Care must be taken to ensure that both adults' and children's confidentiality is maintained and that information is handled and disseminated on a need to know basis only. Individuals must be confident that information held about them by SLT will only be disclosed to others either with their consent or when there is a legal duty to do so.

The principles of the Data Protection Act 2018 must be adhered to when handling personal information, that is: personal information is obtained and processed fairly and lawfully; only disclosed in appropriate circumstances; accurate, relevant and not held for longer than necessary; and kept securely. The Act allows for the disclosure of personal information without consent of the subject in certain conditions, including for the purposes of the prevention and detection of a crime, for example where there is a child protection concern.

It is best practice to gain verbal or written consent, from a child or parent/ guardian before any personal information relating to them is shared with another organisation. However, we may not need to seek consent to share information if it might be unsafe to seek (e.g. seeking consent might increase the risk to the child) or causes an unjustified delay or if it would prejudice the prevention, detection or prosecution of a serious crime. When in doubt, advice should always be sought from someone experienced in dealing with these issues, such as the local Children's Services department or the NSPCC Helpline.

## **Conduct with Vulnerable Adults**

Some adults may be classed as vulnerable because of:

- Mental illness
- Physical disability
- Short-term or long-term illness
- Age
- Homelessness
- Substance abuse

These are all risk factors in an adult being assessed as vulnerable. Not everyone with the above factors is vulnerable and no one point alone is going to determine whether a person is vulnerable.

Adults with full capacity can still be considered vulnerable if they are unable to take care of themselves or protect themselves from significant harm.

### **When safeguarding a vulnerable adult you should:**

- Ensure they can live in safety, free from abuse and neglect.
- Empower them by encouraging them to make their own decisions and provide informed consent.
- Prevent the risk of abuse or neglect, and stop it from occurring.
- Promote their well-being and take their views, wishes, feelings and beliefs into account.

The Government has published [examples of harm](#) which includes, but is not limited to, financial, physical or sexual abuse.

Allegations of harm towards any adult by a member, employee, hire or visitor will be taken seriously and may be reported to the responsible authorities. Any act of harm or abuse by a member, employee or volunteer, will be investigated and where proven, on the grounds of probability, may be dismissed or have their membership rescinded. Any hires will be barred from further use of the premises. Other breaches of this policy will be investigated in line with the Staff Employee Handbook or SLT [Code of Conduct](#) and appropriate action taken.

## **Members' Club**

Volunteers on bar duty are responsible for the safe running of the bar, in line with UK licensing legislation and the SLT Members' Club Rules.

The Members' Club General Committee will ensure that all volunteers on bar duty will be trained to operate the bar in accordance with licensing legislation and the Club Rules. This will include taking appropriate steps to identify, address, and report safeguarding issues (actual and 'near-miss') should they occur, in order to protect vulnerable persons (both children and adults).

In addition, the Members' Club General Committee will put in place appropriate wider measures to support safeguarding objectives.

The Licensing Act 2003 includes the objective to protect children from harm. In accordance with the Club Rules, all children under the age of 16 must be accompanied by an adult who will be responsible for their good conduct and safety. This includes visiting the bar when attending SLT productions and other social events.

Volunteers on bar duty are responsible for the safe running of the bar and members therein and should refuse to serve anyone who they deem potentially a harm to another member or vulnerable to alcohol or substance misuse. Examples could include where a member is displaying unwanted predatory advances to another (intoxicated) adult or where a vulnerable person is coerced into buying drinks for others or is being pressured in some other way.

## **Hires Policy (Third-party use of Premises)**

Where external hires are using SLT premises a valid DBS certificate will be required if they will be undertaking regulated activities with children or vulnerable adults. All hires will be asked to sign a copy of the SLT Safeguarding Policy, or summary version as appropriate, even when the organisation has their own.

The Hire agreement stipulates that the hirer shall abide by the SLT Safeguarding Policy, and sign the agreement to acknowledge that the safeguarding policy has been read and that all concerns relating to abuse of children and vulnerable adults will be reported to the Building Manager (responsible for hires) and the relevant statutory authority.

The Building Manager will immediately notify the DSO of any concerns raised.

## **Fobs**

Access fobs are available for current members of SLT and certain regular hires only. The use of fobs will be monitored by the Building Manager. SLT reserves the right to withdraw fobs where any, even minor, concerns about a member or hire's behaviour is raised.

## Annex A – Safeguarding Incident Form (actual or near miss)

Was this incident      Actual   Y/N      Near miss   Y/N

<b>Section 1</b> <i>Details of referrer (your details)</i>	
Name:	
Role: (Staff/Member/Visitor/Hirer)	
Address:	
Phone number(s):	
E-mail:	

<b>Section 2</b> <i>Details of child concerned</i>			
Name:			
<b>Date of Birth</b>		<b>Age:</b>	
Gender:			
Disability/Special Needs		Yes/No	
If yes, give detail:			
Parents/Carers (names):			
Address:			
Phone Number(s):			
E-mail:			

<b>Section 3</b> <b><i>Details of adult/child against whom the allegation is made</i></b>	
Name:	
Position	
Address	
Phone Number(s):	
E-mail	

<b>Section 4</b> <b><i>The incident/concern</i></b>	
Date of incident:	
Place of incident:	
Did you observe the incident/concern:	Yes/No
If no, give details of the person who did	
Name	
Position	
Contact Details	
<b>Details of concern</b> (include as many details as possible including time it happened, place, if any injuries were sustained, treatment required). Continue on separate sheet if necessary	

<b>Child's account</b> of what happened (please state what the child actually said or indicate if not their exact words). Continue on separate sheet if necessary

**DSO to complete**

Category of referral: (delete as appropriate)

Sexual

Bullying

Physical

Other (state):

**Section 5*****Action taken by SLT***

Police informed:	Yes/No
If yes, give name of the police officer dealing:	
Phone/e-mail contact details:	
Children's Services informed:	Yes/No
If yes name of social worker dealing:	
Phone/e-mail contact details:	
Medical assistance required:	Yes/No
If yes, give details:	
Parents informed	Yes/No

**Signed:****Date**

Details of action taken (or attach report sheet separately).

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## **Annex B: Guidance on raising safeguarding concerns**

It is important that staff, members, visitors or hires are confident in coming forward if they have any suspicions that there has been a safeguarding breach. This could be through having a conversation with a child, witnessing or hearing about an incident between an adult and a child, overhearing a conversation between an adult or child, witnessing or hearing about an incident between an adult and vulnerable adult or even seeing something on a mobile device or on social media. It is always better to raise the issue and have it investigated rather than do nothing and have a safeguarding issue continue.

If a staff member, club member, visitor or hire reports that they have reason to believe a safeguarding issue may have taken place then the Duty Manager (or other notified individual) should immediately take the person wanting to report an incident to a safe and quiet place.

1. Take the member seriously and using the safeguarding incident form (annex A), complete a full account of what happened or nearly happened, listing relevant details of the person reporting the incident including a full name telephone number and address plus an account of what he or she was doing at SLT.
2. At this point the Duty Manager will be able to make a full assessment of the situation and will then look to follow the relevant procedure detailed below.
3. If neither the DSO or DDSO are contactable and the incident requires immediate action then contact either the Lambeth Safeguarding Children Partnership, LADO or the NSPCC helpline for action/advice as soon as possible.

Lambeth Safeguarding Children Partnership <https://www.lambethsaferchildren.org.uk/>

Andrew Zachariades  
Local Authority Designated Officer (LADO)  
Child Protection Independent Reviewing Service  
Tel: 020 7926 4679  
Mobile: 07720 828 700  
LADO@lambeth.gov.uk

Online Safeguarding Issues: CEOP via [www.ceop.police.uk](http://www.ceop.police.uk)

NSPCC Helpline: 0808 800 5000 [www.nspcc.org.uk](http://www.nspcc.org.uk)

Childline: 0800 1111 [www.childline.org.uk](http://www.childline.org.uk)

NSPCC helpline: 0808 800 5000

If the incident is a near miss then the Duty Manager should complete the Safeguarding Form (annex A) and submit a copy to the DSO.

## **Annex C: Types of Abuse and Neglect**

SLT Staff and members and building hires should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. As well as third party abuse, a child may abuse themselves through self-harm or substance abuse and these should be considered as safeguarding issues.

### **Abuse**

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

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology may be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to

appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

In addition to these types of abuse and neglect, members and staff will also be alert to following specific safeguarding issues:

### **Child Sexual Exploitations (CSE)**

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status.

Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour.

A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17 year old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, This will result in an immediate referral to Children's Services.

In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the London Child Protection Procedures. This will determine how and when information will be shared with parents and the investigating agencies.

### **'SEXTING'/Youth Involved Sexual Imagery**

Creating and sharing sexual photos and videos of under-18s is illegal. The term Youth Involved Sexual imagery is a more accurate term for 'sexting' which could be seen to place responsibility with the child who is taking and/or is the subject of the image, without recognising the potential for coercion or threat in the production of that image.

Sharing youth produced sexual imagery, covers the incidents where

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

When such an incident involving youth produced sexual imagery comes to a member or staff's attention, the information must be shared with the DSO with a view to referring to appropriate agencies following the referral procedures. Staff or members should be aware that if a child discloses they have sent or

received a potentially indecent image, these images should NOT be printed, copied or forwarded. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet

Safety (UKCCIS) 'Sexting in schools and colleges' and the DfE's advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE's Advice) (May 2018),

## Peer on Peer Abuse

Children are capable of abusing their peers (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:.

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalones or part of a broader pattern of abuse;
- Upskirting (now a criminal offence), which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, cause the victim humiliation, distress or alarm;
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals

Although it is more likely that girls will be victims and boys perpetrators, all peer on peer abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as "banter", "just having a laugh" or "part of growing up".

Any possible peer on peer abuse case will be shared with the DSO or DDSO in their absence with a view to referring to appropriate agencies following the referral procedures. Any incident of peer on peer abuse will be investigated under the direction of the DSO.

## Bullying

Taken from <https://www.gov.uk/government/publications/preventing-and-tackling-bullying> (July 2017 p. 6) "When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern under the Children Act 1989." Where this is the case, the staff member should discuss with the DSO.

SLT has a strong commitment to anti-bullying and will consider all coercive acts and peer on peer abuse within a child protection context.

We will always ascertain the views and feelings of all children. We acknowledge that children who are affected by abuse or neglect may demonstrate their distress through their words, actions, behaviour, demeanour, activities or other children. In all cases, we have a responsibility to ensure that we support children who are bullied and make appropriate provision for their needs. The nature and level of support will depend on the individual circumstances and the level of need. It is also important to consider the motivations behind bullying behaviour and whether it reveals any concerns for the safety of the perpetrator. When this is the case the children engaging in bullying may need support themselves.

Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to

report other behaviour. Early intervention can help to set clear expectations of the behaviour that is and is not acceptable, and helps stop negative behaviours escalating. This is also true of the use of language which is detrimental to groups such as those with SEND, race, religion, disability, nationality or LGBTQ.