



## Peer Productions - Safeguarding Policy

**Date Issued: 13 July 2022**  
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Trustee signature:

A handwritten signature in black ink that reads "Nina Lemon". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Trustee Full Name: NINA LEMON

Trustee Full Name: CAROLINE HOARE

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| 1. Safeguarding Policy Statement   |    |

## **1a) The purpose and scope of this policy statement**

Peer Productions is a youth arts training charity dedicated to transforming young people's lives through theatre. We do this by:

- Providing training opportunities for young actors (aged 18 - 24 years) with and without learning disabilities.
- Providing drama activities in local schools for children (aged 7 - 18 years).
- Providing extra-curricular drama activities for children (aged 8 - 18 years).
- Delivering plays and workshops in schools and community settings.

The purpose of this policy statement is:

- To protect children and vulnerable adults who receive Peer Production's services from harm.
- To provide staff and volunteers, as well as children, vulnerable adults and their families, with the overarching principles that guide our approach to protecting children, young people and vulnerable adults

This policy applies to anyone working on behalf of Peer Productions, including senior managers and the board of trustees, paid staff, volunteers, sessional workers and learners.

**CHILD** - A child is defined as being under the age of 18 years by the Children Act 1989.

**VULNERABLE ADULT** - There is no legal definition of “vulnerable adults” but in general terms an adult who is considered vulnerable may be defined as any person aged 18 or over who:

- Is, or may be, unable to care for themselves by reason of mental, physical or learning disability, age or illness
- Is or may be unable to take care of him or her self or unable to protect him or her self against significant harm or serious exploitation.

## **1b) Legal framework**

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and vulnerable adults in England.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:

- Keeping Children Safe in Education 2023 (KCSIE)
- Working Together to Safeguard Children 2018 (WTSC)
- Framework for the Assessment of Children in Need and their Families 2000
- The Education Act 2002
- The Human Rights Act 1998
- The Equality Act 2010 (including the Public Sector Equality Duty)
- The Care Act 2014
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Bill

## **1c) Supporting Documents**

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents:

- Code of conduct for staff and volunteers
- Safer Recruitment policy
- Child on Child and Young Person on Young Person Abuse Policy
- Whistle blowing policy
- Health and Safety Policy
- Induction Policy
- Keeping records on children policy
- Learner behaviour policy
- Learner Code of Conduct- Disciplinary and Misconduct Procedures and Complaints and Appeals
- Internet, IT, digital, messaging and social media
- Complaints Policy

## **1d) Our Beliefs**

### **We believe that:**

- Children and vulnerable adults should never experience abuse of any kind.
- We have a responsibility to promote the welfare of all children and vulnerable adults, to keep them safe and to practise in a way that protects them.
- The welfare of children and vulnerable adults is paramount in all the work we do and in all the decisions we take.
- Working in partnership with children, vulnerable adults, their parents, carers and other agencies is essential in promoting children and vulnerable adults welfare.
- All children and vulnerable adults, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- Some children and vulnerable adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

- Extra safeguards may be needed to keep children and adults who are additionally vulnerable safe from abuse.

### **We will seek to keep children and vulnerable adults safe by:**

- Valuing, listening to and respecting children and vulnerable adults.
- Appointing a Designated Safeguarding lead for children and vulnerable adults, a deputy and a lead trustee/board member for safeguarding.
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers.
- Developing and implementing an effective online safety policy and related procedures.
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently.
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made.
- Recording and storing and using information professionally and securely, in line with data protection legislation and guidance.
- Sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work and one-to-one discussions.
- Making sure that children, vulnerable adults and their families know where to go for help if they have a concern.
- Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, vulnerable adults, parents, families and carers appropriately.
- Using our procedures to manage any allegations against staff and volunteers appropriately.
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe physical environment for our children, vulnerable adults, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

- Building a safeguarding culture where staff and volunteers, children, vulnerable adults and their families, treat each other with respect and are comfortable about sharing concerns.

## **1e) Contact details**

### **Designated Safeguarding Lead**

Name: Nina Lemon

Phone: 07815 148413

Email: [nina@peerproductions.co.uk](mailto:nina@peerproductions.co.uk)

### **Deputy Safeguarding Leads**

Name: Suzanne Parke

Phone: 07913 289360

Email: [suzanne@peerproductions.co.uk](mailto:suzanne@peerproductions.co.uk)

Name: Hannah Newman

Phone: 07736 670902

Email: [hannah@peerproductions.co.uk](mailto:hannah@peerproductions.co.uk)

## **1f) Policy compliance, monitoring and review**

Peer Productions will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.



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## 2. Safeguarding Procedures

### 2a) Purpose and aim of the procedure

This policy guides behaviour when we are concerned that a child or vulnerable adult is at risk of harm or is being harmed. Staff, volunteers and learners at Peer Productions have the opportunity to meet 1000s of young people and vulnerable adults; we should be ready with what to do when we see or are told about abuse or harm or risk.

### 2b) Definition of safeguarding

In line with KCSIE 2023, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

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

In line with The Care Act 2014 'Adult safeguarding' is working with adults with care and support needs to keep them safe from abuse or neglect.

### 2c) Responsibilities

Safeguarding is **everyone's responsibility**.

All members of staff, volunteers and learners are required to report any suspected abuse and be aware of the appropriate reporting and support procedure for safeguarding. It is important that Staff are also aware of the

Government's PREVENT strategy. The aim of this is to stop people becoming terrorists or supporting violent extremism in all its forms. This can also be a safeguarding issue but has different reporting mechanisms.

Peer Productions has appointed Nina Lemon (Artistic Director/CEO), a member of the senior leadership team, as the Designated Safeguarding Lead (DSL).

The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) at Peer Productions. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

Peer Productions has also appointed Leaders of Learning Suzanne Parke and Hannah Newman as Deputy DSLs who will have delegated responsibilities and act in the DSL's absence.

The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.

The DSL's role includes but is not limited to:

- Acting as the central contact point for all staff to discuss any safeguarding concerns
- Maintaining a confidential recording system for safeguarding concerns.
- Coordinating safeguarding action.
- Liaising with other agencies and professionals.
- Representing, or ensuring Peer Productions is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
- Managing and monitoring Peer Productions' role in any multi-agency plan for a child.
- Being available for staff in the charity to discuss any safeguarding concerns.

- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs' training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

The Designated Safeguarding Lead and Deputy Safeguarding Leads will discharge their safeguarding functions in a way that ensures that children and vulnerable adults are safeguarded from harm, and promotes their welfare. They are responsible for following up any suspected reports of abuse and for informing the Police or other appropriate external bodies.

The Board of Trustees is responsible for safeguarding governance. This includes but is not limited to:

- Having a named trustee with responsibility for Safeguarding governance.
- Reviewing Safeguarding Policy at least annually.
- Discussing safeguarding as a standing agenda item at all trustee meetings.
- Ensuring appropriate filtering and monitoring systems are in place and reviewing filtering and monitoring systems at least annually.
- Ensuring all staff are appropriately trained and understand how to escalate a concern and what to do if they know or suspect inappropriate material has been accessed on site.

## **2d) Reporting of Safeguarding concerns**

If you are worried about a child or vulnerable adult, talk to the Peer Productions' Designated Safeguarding staff to discuss your concerns at the earliest opportunity, as long as it will not delay any potential referral or place someone at harm.

## **Designated Safeguarding Lead**

Name: Nina Lemon  
Phone: 07815 148413  
Email: [nina@peerproductions.co.uk](mailto:nina@peerproductions.co.uk)

## **Deputy Safeguarding Leads**

Name: Suzanne Parke  
Phone: 07913 289360  
Email: [suzanne@peerproductions.co.uk](mailto:suzanne@peerproductions.co.uk)

Name: Hannah Newman  
Phone: 07736 670902  
Email: [hannah@peerproductions.co.uk](mailto:hannah@peerproductions.co.uk)

## **2e) Documenting Concerns and Making Referrals**

The safety of children and vulnerable adults is our first priority. All staff, volunteers and learners should report any safeguarding concerns to the Designated Safeguarding Lead or Deputies **immediately**.

The Designated Safeguarding Lead or Deputies will document your concern and make a referral to the relevant agency if necessary.

If you do not agree with the action taken by Peer Productions's Designated Safeguarding Lead or Deputies, you must make the referral to the local authority safeguarding team yourself and then follow the Whistle Blowing procedure.

# 3. Peer Safeguarding Flow Chart

## Why are you concerned? For example:

- Something a child or vulnerable adult has said – for example, an allegation of harm.
- A child's or vulnerable adults' appearance – may include unexplained marks

## 1. RESPOND If you receive a direct disclosure:

- **Listen** to what the child/vulnerable adult is saying.
- **Reassure** child/vulnerable adult but do not make promises about keeping the information a secret.
- **Ask questions** only to clarify, take care not to put words in their mouth by asking leading questions.
- **Explain** to the child/vulnerable adult that they have done the right thing.
- **Record** what has been said using child/vulnerable adult's own words.

## 2. REPORT

- If you're concerned that the person is in immediate danger or risk of significant harm act immediately.
- Report your concerns directly to a member of the Peer Safeguarding Team, as soon as you are able.
- In the first instance report to Designated Safeguarding Lead or, if the DSL is unavailable, report to one of the Deputies. If no-one from your Safeguarding Team is available, speak to the most senior member of staff.
- If you are working in a school report your concern to the schools' Designated Safeguarding Lead as well as Peer's Designated Safeguarding Lead .

## 3. RECORD

- Record concerns using the Peer Productions online recording system CPOMS, as soon as possible.
- Record the date and time, location, your name and role. Keep your record as factual as possible.
- Use the person's own words where applicable and enclose any direct quotes in quotation marks.
- If marks or injuries have been observed, record these on the body map section of CPOMS.

## 4. REFER the Peer Designated Safeguarding Lead or deputy will decide what should happen next.

- If the child/vulnerable adult is in immediate risk of harm or is unsafe to go home - contact 999
- The incident/situation could be reported to the relevant adult or child safeguarding team. See contacts.
- If this is a school based incident and school are making their own referral then Peer will still make referral to ensure all information is captured and we, as a charity, have fulfilled our safeguarding responsibilities.

## 4. REVIEW

- If you are unhappy with the Designated Safeguarding Lead or Deputies response you should make the referral yourself and then follow Whistle Blowing procedures.
- The child/vulnerable adult should be monitored with all future incidents or disclosures referred to Peer Designated Safeguarding team and recorded on CPOMS. All decisions should be documented using CPOMS
- Peer staff should seek support from Peer Designated Safeguarding Team if the incident has impacted their mental health. They should also consider whether they would benefit from accessing Health Assured Employee Assist scheme for further mental health support.

## 4. Referral Contacts

|                                       |   |
|---------------------------------------|---|
| If a person is in immediate danger:   | <b>Call the police 999.</b>                                 |
| Designated Safeguarding Lead          | 07815 148413 (Nina Lemon)                                   |
| Deputy Safeguarding Leads             | 07913 289360 (Suzanne Parke)<br>07736670902 (Hannah Newman) |
| Surrey Children's Service (CSPA)      | 0300 470 9100,<br>or out of hours 01483 517 898             |
| Surrey Safeguarding Adults            | 0300 470 9100   |
| Surrey LADO                           | 0300 200 1006 (9am-5pm)                                     |
| For safeguarding concerns about staff |   |
| Hampshire Children's Service          | 0300 555 1384 / 1381,<br>or out of hours 0300 555 1373      |
| Hampshire Adult Service               | 0300 555 1386<br>or out of hours 0300 555 1373              |
| Hampshire LADO                        | 01962 876 364   |
| Buckingham Children's Services        | 01296 383962<br>or out of hours 0800 999 7677               |
| Buckingham Adults services            | 0800 137 915.<br>or out of hours 0800 999 7677.             |
| Reading Children's Service            | 0118 937 3641   |
| Reading Adult Services                | 0118 937 3747.  |
| Wokingham Children's Service          | 0118 908 8002   |
| Wokingham Adult Services              | 0300 365 1234   |
| Bracknell Forest Children's Service   | 01344 352005  |
| Bracknell Forest Adult Services       | 01344 351500.   |
| West Berkshire Children's Services    | 01635 503090  |

|                                  |  |
|----------------------------------|--|
| Sutton Children's Services (CFC) | 020 8770 6001.                                   |
| Sutton Adult Services            | 020 8770 6770.<br>or out of hours 020 8770 5000. |

|                              |                                   |
|------------------------------|-----------------------------------|
| Kingston children's Services | 0208 547 5008                     |
| Kingston Adult Services      | 020 8547 5005<br>or 020 8770 5000 |

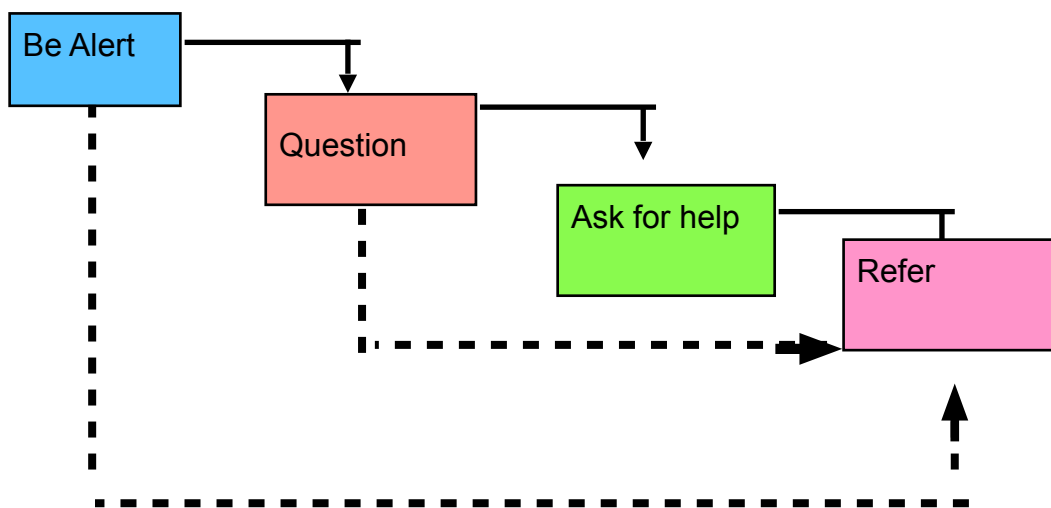
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| Essex Children's Services | 0345 603 7627                                  |
| Essex Adult Services      | 0345 603 7630<br>or out of hours 0345 606 1212 |

Peer Productions works with children and/or vulnerable adults from a range of local authorities. This list represents those authorities with whom we are currently working and will need to be updated annually.

## 5. Recognising indicators of abuse and neglect.

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child or vulnerable adult, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2022.
- Peer Productions recognise that when assessing whether a child or vulnerable adult may be suffering actual or potential harm there are four categories of abuse.
  - Physical abuse
  - Sexual abuse

- Emotional abuse
  - Neglect
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child or vulnerable adult and their family.
  - All members of staff are expected to be aware of and follow the below approach if they are concerned about a child or vulnerable adult.



- Peer Productions recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of abuse and neglect can vary from individual to individual. It is important to recognise that indicators of abuse and neglect do not automatically mean a person is being abused, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- Peer Productions recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.



- Parental or carer behaviours can indicate abuse or neglect, so staff will be alert to interactions between children, vulnerable adults and their parents or carers. This could include parents/carers who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children and vulnerable adults may report abuse happening to themselves, their peers, or their family members. All reports made to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside Peer Productions. Individuals can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children and vulnerable adults can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Peer Productions recognises that technology can be a significant component in many safeguarding and wellbeing issues; children and vulnerable adults are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- Peer Productions recognises that some children and vulnerable adults have additional or complex needs and may require access to intensive or specialist services to support them.

## **6. Types of Abuse and Neglect**

It is usually impossible for us to be certain that child abuse has taken place, but there are things or incidents that we may see, hear or think that may be signs of abuse and will help to recognise when there may be reason to report an incident to the Peer Designated Safeguarding Team and/or Local Authority Safeguarding Team for advice about a child or vulnerable adult at risk of harm.

People may be abused or neglected through the infliction of harm, or through the failure to act to prevent harm.

Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the person.

There are four broad categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

These categories overlap, and an abused person may frequently suffer more than one type of abuse.

## **6a) Physical Abuse**

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

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury;
- Several different explanations provided for an injury;
- Unexplained delay in seeking treatment;
- The parents / carers are uninterested or undisturbed by an accident or injury;
- Parents are absent without good reason when their child is presented for treatment;
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury);
- Family use of different doctors and A&E departments;
- Reluctance to give information or mention previous injuries.

- Bruising - People can have accidental bruising, but the following must be considered as non-accidental, unless there is evidence or an adequate explanation provided:
  - 
  - Bruising in or around the mouth, which may indicate force feeding;
  - Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be either accidental or abusive);
  - Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally;
  - Variation in colour, possibly indicating injuries caused at different times;
  - The outline of an object used (eg. belt marks, hand prints or a hair brush);
  - Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
  - Bruising around the face;
  - Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.
  
- Unexplained bruises or marks - All bruises or mark on a person's body that are unexplained must be recorded and reported. A bruise or mark on the body is unexplained when:
  - A bruise/mark is found on a person, and the mark has not been reported by the parent at the start of the session.
  - A bruise/mark is found on a person, and there is no incident at Peer Productions that is consistent with the bruise/mark.
  - An explanation is given by the person/parent/carer/staff, and it is inconsistent with the bruise/mark seen.
  
- Bite Marks - Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.
  
- Burns and Scalds - It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious. Examples of these include:
  - Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine).

- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of their own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns/scalds, which did not have appropriate treatment or adequate explanation.
- Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.
- Fractures - Fractures may cause pain, swelling and discolouration over a bone or joint. There are grounds for concern if:
  - The history provided is vague, non-existent or inconsistent with the fracture type;
  - There are associated old fractures
  - Medical attention is sought after a period of delay when the fracture has caused symptoms, such as swelling, pain or loss of movement;
  - There is an unexplained fracture in the first year of life.
- Scars - A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## **6b) Emotional Abuse**

Emotional abuse is a form of significant harm, which involves the persistent emotional maltreatment of a person, such as to cause severe and persistent adverse effects on the child's emotional development.

- It may involve conveying to people 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 or vulnerable adults. These may include interactions that are beyond an individual'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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, though it may occur alone.

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay.
- Abnormal attachment between a child/vulnerable adult and parent/carer (eg. anxious, indiscriminate or no attachment).
- Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others.
- Scapegoated within the family.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a 'loner' - difficulty relating to others.

## **6c) Sexual Abuse**

Sexual abuse is a form of significant harm which involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or vulnerable adult is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

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

People of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear.

Recognition can be difficult, unless the person discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexual conduct.
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including eating disorder), self mutilation and suicide attempts.
- Involvement in sexual exploitation or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes in appropriate circumstances (e.g. sports events, but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area.
- Blood on underclothes.
- Pregnancy in a younger girl, where the identity of the father is not disclosed.
- Physical symptoms, such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted infections, presence of semen on vagina, anus, external genitalia or clothing.

Cases of underage sexual activity which present cause for concern are likely to raise difficult issues and should be handled particularly sensitively.

A child under 13 years is not legally capable of consenting to sexual activity. Any offence under the Sexual Offences Act 2003 involving a child aged under 13 years is very serious and should be taken to indicate that the child is suffering, or is likely to suffer, Significant Harm. Cases involving children under 13 years old should always be discussed with a nominated child protection lead in the organisation.

Under the Sexual Offences Act 2003, penetrative sex with a child under 13 years old is classed as rape. Where the allegation concerns penetrative sex, or other intimate sexual activity occurs, there would always be reasonable cause to suspect that a child, whether girl or boy, is suffering, or is likely to suffer, significant harm. There should be a presumption that the case will be reported to Children's Social Care and that a Strategy Discussion will be held. All cases involving children under 13 should be fully documented, including detailed reasons where a decision is taken not to share information. These decisions should be exceptional and only made with the documented approval of a senior manager.

Sexual activity with a child aged under 16 years is also an offence. Where it is consensual, it may be less serious than if the child were aged under 13 years, but may, nevertheless, have serious consequences for the welfare of the young person.

Consideration should be given in every case of sexual activity involving a child aged 13-15 as to whether there should be a discussion with other agencies and whether a referral should be made to Children's Social Care.

The considerations in the following checklist should be taken into account when assessing the extent to which an individual is suffering, or is likely to suffer, significant harm.

- The age of the child. Sexual activity at a young age is a very strong indicator that there are risks to the welfare of the child (whether boy or girl) and, possibly, others.
- The level of maturity and understanding of the child.
- What is known about the child's living circumstances or background.
- Age imbalance, in particular where there is a significant age difference.
- Overt aggression or power imbalance.
- Coercion or bribery.

- Familial child sex offences.
- Behaviour of the child i.e. withdrawn, anxious.
- The misuse of substances as a dis-inhibitor.
- Whether the child's own behaviour, because of the misuse of substances places him/her at risk of suffering harm so that he/she is unable to make an informed choice about any activity.
- Whether any attempts to secure secrecy have been made by the sexual partner beyond what would be considered usual in a teenage relationship.
- Whether the child denies, minimises or accepts concerns.
- Whether the methods used are consistent with grooming.
- Whether the sexual partner/s is known by one of the agencies.

In cases of concern when sufficient information is known about the sexual partner/s, the agency concerned should check with other agencies, including the police, to establish whatever information is known about that person/s. In appropriate cases, the police may share the required information without beginning a full investigation if the agency making the check requests this.

Sexual activity involving a 16 or 17 year-old, even if it does not involve an offence, may still involve harm or the likelihood of harm being suffered.

Professionals should still bear in mind the considerations and processes outlined in this guidance in assessing whether harm is being suffered, and should share information as appropriate.

It is an offence for a person to have a sexual relationship with a 16 or 17 year old if they hold a position of trust or authority in relation to them.

Vulnerable adults, including those with disabilities, have the right to have sexual and intimate relationships as long as they are able to fully understand what is happening and are not being coerced or exploited in any way. Disabled adults are particularly vulnerable to sexual abuse and exploitation.

## **6d) Neglect**



Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child or vulnerable adult from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child or vulnerable adult's basic emotional needs.

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs (eg. adequate food, clothes, warmth, hygiene and medical care);
- A person seen to be listless, apathetic and unresponsive with no apparent medical cause;
- Failure of child to grow within normal expected pattern, with accompanying weight loss;
- Child or vulnerable adult thrives away from home environment;
- Child or vulnerable adult frequently absent from school, training, work or other planned activities;
- Child or vulnerable adult left with adults who are intoxicated or violent;
- Child or vulnerable adult abandoned or left alone for excessive periods.

## **7. Specific Safeguarding Issues**

Peer Productions is aware of the range of specific safeguarding issues and situations that can put children and vulnerable adults at greater risk of harm.

Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputies.

## **7a) Child-on-child or young person-on-young person abuse**

All members of staff at Peer Productions recognise that children and young people can abuse other children and young people (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of Peer Productions and online.

NB: Peer Productions recognise the the terminology has been changed from 'peer-on-peer' abuse to child-on-child abuse in Keeping Children Safe in Education. However, Peer Productions is a charity which specifically works with young people under 25 years and a significant number of our participants are young vulnerable adults with disabilities who could be vulnerable to this type of abuse. It is not appropriate for us to refer to these young adults as children. Above we therefore refer to Child-on-child or young person on young person abuse. From here on in we will use the term 'CYP-on-CYP Abuse.'

Peer Productions recognises that CYP-on-CYP Abuse can take many forms, including but not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships between children or young people
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals

Any allegations of CYP-on-CYP Abuse will be recorded, investigated, and dealt with in line with this safeguarding policy policy and KCSIE 2023.

Peer Productions adopts a zero-tolerance approach to CYP-on-CYP Abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children and young people from coming forward to report it.

All staff have a role to play in challenging inappropriate behaviours between children and young people. Staff recognise that some CYP-on-CYP Abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

Peer Productions recognises that even if there are no reported cases of CYP-on-CYP Abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding CYP-on-CYP Abuse.

In order to minimise the risk of CYP-on-CYP Abuse, Peer Productions will:

- Implementing a robust anti-bullying policy.
- Where appropriate to our learners, provide an age/ability appropriate PSHE and RSE curriculum
- Ensure all learners have opportunities to report their concerns about CYP-on-CYP Abuse.

Peer Productions want children and young people to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of CYP-on-CYP Abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated Peer Productions’ policies. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Concerns about learner's behaviour, including CYP-on-CYP Abuse taking place offsite will be responded to as part of a partnership approach with children and young people and their parents/carers.

Alleged victims, alleged perpetrators and any other child and young people affected by CYP-on-CYP Abuse will be supported by:

- All reports being taken seriously
- Children and young people having their voices heard
- Appropriate pastoral support implemented
- Working with parents/carers

## **7b) Child-on-child or young person-on-young person (CYP-on-CYP) sexual violence and sexual harassment**

Peer Productions recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.'

Peer Productions recognises sexual violence and sexual harassment can occur between two children or young people of any age and sex. It can occur through a group of children or young people sexually assaulting or sexually harassing a single child/young person or group of children/young people and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.

Abuse that occurs online or outside of Peer Productions will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.

Peer Productions recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to learners that avoids alarming or distressing them.

Peer Productions recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children/young people may not be able to recall all details or timeline of abuse. All staff will be aware certain children/young people may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.

The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children/young people involved/impacted.

The risk and needs assessment will be recorded in CPOMS and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students (if appropriate), and staff and any actions that are required to protect them.

Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.

Reports will initially be managed internally by Peer Productions and where necessary will be referred to local authority safeguarding teams and/or the police.

Important considerations which may influence this decision include:

- The wishes of the victim in terms of how they want to proceed.
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed.
- The ages of the people involved.

- The developmental stages of the people involved.
- Any power imbalance between the people involved.
- If the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children and young people
- Understanding intra familial harms and any necessary support for siblings following incidents.
- Whether there are any ongoing risks to the victim, other children, adult students, or staff.
- Any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Peer Productions will in some instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis.

The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk or where the young adults involved have capacity to make their own decisions and have chosen not to seek support from parents/carers.

If there is a lack of clarity regarding mental capacity Peer Productions will seek support from the local adult safeguarding team.

Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.

If at any stage the DSL is unsure how to proceed, advice will be sought from the Local Authority Safeguarding Service.

#### 4.3 Nude and/or semi-nude image sharing by children

Note: The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of eighteen. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing; it should be read and understood by all DSLs working with all age groups.

Peer Productions recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:

- to report any concerns to the DSL immediately.
- never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
- not to delete the imagery or ask the child to delete it.
- to avoid saying or doing anything to blame or shame any children involved.
- to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
- not to investigate or ask the child(ren) involved to disclose information regarding the imagery
- to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.

DSLs will respond to concerns in line with the non-statutory UKCIS guidance: 'Sharing nudes and semi-nudes: advice for education settings

working with children and young people' and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
- Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- All decisions and action taken will be recorded in line with our child protection procedures.

A referral will be made to ICS and/or the police immediately if:

- the incident involves an adult (over 18).
- there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
- the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.

If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

## **7c) Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) or Young Person Sexual Exploitation (YPSE) and Young Person Criminal Exploitation (YPCE)**

Peer Productions recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE



can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Peer Productions also recognises that vulnerable adults especially those with learning disabilities are also vulnerable to sexual and criminal exploitation.

NB: Peer Productions recognise the the terminology used in Keeping Children Safe in Education is Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE). However, Peer Productions is a charity which specifically works with young people under 25 years and a significant number of our participants are young vulnerable adults with disabilities who could be vulnerable to this type of abuse. It is not appropriate for us to refer to these young adults as children. Above we therefore refer to Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) or Young Person Sexual Exploitation (YPSE) and Young Person Criminal Exploitation (YPCE) From here on in we will use the terms CYPSE and CYPCE.'

Peer Productions recognises that children and young people can become trapped in CYPCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children and young people involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that people being criminally exploited may be at higher risk of child or young person sexual exploitation (CYPSE).

Peer Productions recognises that CYPSE can occur over time or be a one-off occurrence and may happen without the child or young person's immediate knowledge, for example through others sharing videos or images of them on social media. CYPSE can affect any child who has been coerced into engaging in sexual activities and includes 16- and 17-year-olds who can legally consent to have sex. Some children or young people may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.

If staff are concerned that a child or young person may be at risk of CYPSE or CYPCE, immediate action should be taken by speaking to the DSL or a deputy.

All staff are aware of the indicators which may signal children or young people are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from training provision, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children or vulnerable adults have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CYPCE.

Any concerns regarding serious violence will be reported and responded to in line with other safeguarding concerns by speaking with a DSL or deputies. The initial response to victims is important and staff will take any allegations seriously and work in ways that support children and young people and keep them safe.

## **7d) Modern Slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: Modern slavery: how to identify and support victims

If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputies and will be responded to in line with this policy.

## **7e) So-called Honour Based Abuse (HBA)**

So-called '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.

All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputies). If there is an immediate threat, the police will be contacted.

## **7f) Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

Peer Productions can play an important role in safeguarding children and vulnerable adults from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK ([www.gov.uk](http://www.gov.uk)) Peer Productions staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

In addition, Peer Productions staff should be aware that since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, threats or another form of

coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

## **7g) Preventing radicalisation**

Peer Productions recognises that children and vulnerable adults are vulnerable to extremist ideology and radicalisation. Peer Productions is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015) to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

All staff receive appropriate training to enable them to be alert to changes in children's behaviour which could indicate that they may need help or protection from radicalisation.

Staff will report any concerns to the DSL (or a deputies), who is aware of the local procedures to follow for making a Prevent referral. If there is an immediate threat, the police will be contacted via 999.

## **7h) Cybercrime**

Peer Productions recognises that children and young people with particular skills and interests in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

If staff are concerned that a child or young person may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputies will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection policy and other appropriate policies.

## **7i) Domestic abuse**

Peer Productions recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional abuse.

Children and vulnerable adults can be victims of domestic abuse and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

Domestic abuse can have a detrimental and long-term impact on children and young people's health, well-being, development, and ability to learn.

If staff are concerned that a child or young person may be at risk of seeing, hearing, or experiencing the effects of domestic abuse in their home, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

## **7j) Homelessness**

Peer Productions recognises that being homeless or being at risk of becoming homeless presents a real risk to a child or vulnerable adult's welfare.

The designated safeguarding lead and deputies are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household

debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

If staff are concerned that any children or vulnerable adults might be at risk of homelessness they should log their concerns on CPOMs and seek advice from the DSL or deputies.

## **7k) Mental health**

Peer Productions recognise that mental health problems can, in some cases, be an indicator that a child or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are aware that experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.

Staff are well placed to observe children and young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child or young person that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

## **8) Supporting Children and Young People Potentially at Greater Risk of Harm**

Whilst all children and young people should be protected, Peer Productions acknowledge that some groups are potentially at greater risk of harm. This can include the following groups:

### **8a) Safeguarding children and young adults with Special Educational Needs or Disabilities (SEND)**

Peer Productions acknowledges that children and adults with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.

Peer Productions recognises that children and adults with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children and adults with SEND will be supported to communicate and ensure that their voice is heard and acted upon.

All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children and adults with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

Members of staff are encouraged to be aware that children and adults with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.

To address these additional challenges, Peer Productions will always consider implementing extra pastoral support and attention for children and adults with SEND.

## **8b) Children and young adults requiring mental health support**

Peer Productions has an important role to play in supporting the mental health and wellbeing of our learners. Mental health problems can, in some cases, be an indicator that a child or young adult has suffered or is at risk of suffering abuse, neglect or exploitation.

Where there are concerns regarding possible mental health problems for learners, staff should:

- Provide information regarding any specific systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Age/ability appropriate education will be provided to our pupils/students to help promote positive health, wellbeing, and resilience.

## **8c) Children Absent from Education**

Peer Productions do not offer an educational provision for children but may become aware that a child is absent from Education when encountering them in our community programmes.

Children absent from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation - particularly county lines. A robust response to children missing from education will support the



identification of such abuse and may help prevent the risk of children going missing in the future.

Where possible, Peer Productions will hold more than one emergency contact number for each learner our participant so we have additional options to make contact with a responsible adult if a child missing education is also identified as being a welfare and/or safeguarding concern.

Where Peer Productions have concerns that a child could be absent from education, we will refer to local safeguarding teams.

### **8d) Children who need a social worker (child in need and child protection plans)**

Peer Productions do not offer an educational provision for children but may become aware that a child has a social worker when encountering them in our community programmes.

Peer Productions does work with young adults with learning disabilities who usually have social workers who support them as vulnerable adults.

The DSL will hold details of social workers working with children and young adults at Peer Productions so that decisions can be made in the best interests of the child or young person's safety, welfare, and educational outcomes.

### **8e) Looked after children, previously looked after children and care leavers**

Peer Productions recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.

Where a learner is looked after or has previously been looked after, the DSL will hold details of the social worker and/where possible the name of the virtual school head in the authority that looks after the child.

## **8f) Children and young people who are Lesbian, Gay, Bi, or Trans (LGBT)**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, but Peer Productions recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or young people or others within the wider community.

Peer Productions recognises risks can be compounded where children and young people who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

## **8g) Children or vulnerable adults who require personal care**

Peer Productions recognises that children and vulnerable adults who require support with their intimate care as a result of disability can be particularly vulnerable to abuse.

On extremely rare occasions, Peer Productions staff may provide personal care which requires staff to have 'intimate physical contact' with children, young people or vulnerable adults.

This might include:

- Changing nappies and pads;
- Washing and cleaning a child's body, including a child's genitalia;
- Feeding a child;
- Escorting a child to the toilet or changing area.

Staff engaged in personal care will be skilled and trained in this area, and personal care needs will be agreed with the child, young person or vulnerable adult and their carers in advance. A risk assessment will take place before any care of this nature is provided.

## 9. Online Safety

It is essential that children and vulnerable adults are safeguarded from potentially harmful and inappropriate material or behaviours online. Peer Productions will adopt a whole charity approach to online safety which will empower, protect, and educate our learners, participants and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Peer Productions will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

Peer Productions identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Peer Productions recognises that technology and the risks and harms related to it evolve and change rapidly. Peer Productions will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children and young people face online.

The DSL will report regularly online safety practice and incidents, including outcomes to the named trustee for safeguarding.

## **9a) Policies and procedures**

The DSL has overall responsibility for online safety within Peer Productions but will liaise with other members of staff as appropriate.

The DSL will respond to online safety concerns in line with our Safeguarding protection and other associated policies, Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

Peer Productions uses a wide range of technology. This includes:

- Computers
- Laptops
- Tablets and other digital devices
- The internet

All Peer Productions owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

Peer Productions recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. Peer Productions has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.

## **9b) Appropriate filtering and monitoring**

Peer Productions will do all we reasonably can to limit children and vulnerable adults' exposure to online risks through Peer Productions provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.

Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified. All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.

Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.

Any access to material believed to be illegal will be reported immediately to the relevant agencies, such as the Internet Watch Foundation and the police.

When implementing appropriate filtering and monitoring, Peer Productions will ensure that “over blocking” does not lead to unreasonable restrictions as to what learners can be taught with regards to online teaching and safeguarding.

Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of Peer Production’s approach to online safety. In addition:

- Learners will use appropriate search tools, apps and online resources as identified by staff.
- Internet use will be supervised by staff as appropriate to learner’s age and ability.
- Learners will be directed to use age/ability appropriate online resources and tools by staff.

## **9c) Information security and access management**

Peer Productions is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils/students.

Peer Productions will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

## **9d) Remote/Online learning**

Peer Productions will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.

All communication with learners will take place using Peer Productions provided or approved communication channels; for example, email accounts provided by Peer Productions or Google Classroom

Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our Safeguarding and other relevant policies.

# **10. Staff Engagement and Expectations**

## **10a) Staff awareness, induction and training**

All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' 2023 which covers safeguarding information for staff.

Designated Safeguarding Lead and Deputies will read KCSIE in its entirety.

All members of staff sign to confirm that they have read and understood the national guidance shared with them. This information is recorded in the CPOMS system.

All new staff and volunteers receive safeguarding and child protection training (including online safety and understanding responsibilities in regard to filtering and monitoring systems), including information to ensure they are aware of Peer Productions internal safeguarding processes, as part of their

induction. This training is regularly updated and is in line with advice from the safeguarding partners.

All governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole charity approach to safeguarding. This training is regularly updated.

All staff members will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues. This training will be updated at least annually

Online safety training for staff will be integrated, aligned and considered as part of the whole charity safeguarding approach and wider staff training and curriculum planning.

In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children and vulnerable adults effectively.

Peer Productions recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape Peer Productions' safeguarding arrangements and child protection policies.

The Designated Safeguarding Lead will provide an annual report to the board of trustees detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

## **10b) Safer working practice**

All members of staff are required to work within our clear guidelines on safer working practice as outlined in the code of conduct.

The DSL will ensure that all staff and volunteers have read our Safeguarding policy and are aware of the Peer Productions' expectations regarding safe and professional practice via the code of conduct.

Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all learners. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures, and national guidance.

All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking).

### **10c) Supervision and support**

The induction process will include familiarisation with safeguarding responsibilities and procedures to be followed if members of staff have any concerns about a child or vulnerable adult's safety or welfare.

Peer Productions will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and vulnerable adults.
- All staff are supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## **11. Safer Recruitment and Allegations Against Staff**



## **11a) Safer recruitment and safeguarding checks**

Peer Productions is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils/students and staff.

Peer Productions will follow relevant guidance in Keeping Children Safe in Education 2023 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)

The board of trustees and leadership team are responsible for ensuring that Peer Productions follows safe recruitment processes as outlined within guidance.

The board of trustees and leadership team will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

Peer Productions maintains an accurate Single Central Record (SCR) in line with statutory guidance.

Peer Productions is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

We advise all staff to disclose any reason that may affect their suitability to work with children or vulnerable adults including convictions, cautions, court orders, reprimands, and warnings.

Where Peer Productions organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE 2023.

## **11b) Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors**

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national. In depth information can be found within our 'Managing Allegations against Staff' and/or staff code of conduct policy.

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of Peer Productions from potential false allegations or misunderstandings.

Where Designated Safeguarding Lead is unsure if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.

In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Designated Safeguarding Lead (and, if they have been involved, the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

### **11c) Concerns that meet the 'harm threshold'**

Peer Productions recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children or vulnerable adults. This includes when someone has:

- Behaved in a way that has harmed a child or young person, or may have harmed a child or young person
- Possibly committed a criminal offence against or related to a child or young person.
- Behaved towards a child or young person in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or vulnerable adults.

Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Designated Safeguarding Lead who will contact the LADO to agree further action to be taken in respect of the child/young person and staff member.

In the event of allegations of abuse being made against the Designated Safeguarding Lead, staff are advised that allegations should be reported to the chair of trustees who will contact the LADO.

## **11d) Concerns that do not meet the ‘harm threshold’**

Peer Productions may also need to take action in response to ‘low-level’ concerns about staff.

Peer Productions has an open and transparent culture in which all concerns about all adults working in or on behalf of Peer Productions are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of Peer Productions are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.

A ‘low-level’ concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of Peer Productions may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work and does not meet the ‘harm threshold’ or is otherwise not serious enough to consider a referral to the LADO.

Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.

It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

Where low-level concerns are reported to Peer Productions the DSL will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.

The DSL will share concerns and liaise with the LADO enquiries officer via the LADO Enquiry Line.

If Peer Productions is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).

Where a pattern is identified, Peer Productions will implement appropriate action, for example consulting with the LADO enquiry line and following our disciplinary procedures.

## **11e) Safe Culture**

As part of our approach to safeguarding, Peer Productions has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff behaviour policy/code of conduct are constantly lived, monitored and reinforced by all staff and where all concerns are dealt with promptly and appropriately.

Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear

compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the charity's safeguarding regime. The leadership team at Peer Productions will take all concerns or allegations received seriously.

All members of staff are made aware of the Peer Productions' Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Peer Productions has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at Peer Productions, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

## **11f) Opportunities to Teach Safeguarding**

Peer Productions will ensure that children and vulnerable adults are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.

We recognise that Peer Productions plays an essential role in helping learners to understand and identify the parameters of what is appropriate

child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils/students have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.

Peer Productions recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole charity approach which prepares learners for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

Peer Productions recognise that a one size fits all approach will not be appropriate for all children and vulnerable adults, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and young people with SEND.

Peer Productions' systems support children to talk to a range of staff. All children and young people will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

## **12. Physical Safety**

### **12a) Use of 'reasonable force'**

There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children or vulnerable adults from harm. Further information regarding our approach and expectations can be found in our Reasonable Force policy

### **12b) The use of premises by other organisations**

Where services or activities are provided separately by another body using the Peer Productions facilities/premises, the Artistic Director/CEO will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and vulnerable adults, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.

## **12c) Site security**

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into our charity premises as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site.

Staff and visitors will be expected to adhere to any safety arrangements implemented in response to any Covid-19 restrictions.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

Peer Productions will not accept the behaviour of any individual (parent or other) that threatens charity security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the charity's site.

# **13. Appropriate Touch**

Peer Productions recognises that touch can be an important component of performing arts training and that touch which is safe, consensual and caring can help to make our learners feel safe.

All staff need to be mindful that touch could be misconstrued by learners, their families or the wider community and should endeavour to make professional boundaries clear. Staff will do this by:

- Actively teaching all learners about consent and making it clear that they always have the right to refuse physical contact from staff or other learners at Peer whether as part of a performance, training or during lunch times and breaks.
- Regularly checking in with learners to see if they are still comfortable with the level of physical connection in a performance or exercise.
- Avoiding seeking prolonged physical contact with children and vulnerable adults.
- If a learner asks for a hug, staff should aim to keep it brief. Where possible, learners should be redirected to a high five, fist bump etc.
- Where a learner's sensory needs profile suggest that touch can help them to focus or feel safe, methods should be discussed with an occupational therapist and documented as part of their individual learning plan.
- If staff fear that a situation in which they have touched a learner could be misconstrued they should document the incident on CPOMS and seek advice from the DSL.