



SAFEGUARDING CHILDREN POLICY

Version 13

MARCH 2026

To be reviewed MARCH 2027

This policy outlines the organisation's policy in relation to:

- The safeguarding and promotion of the welfare of children
- What to do if a disclosure of abuse is made and appropriate steps to take
- The prevention of child abuse.

	Document Control	
Version	Date	Reason, Author, Agreed by including date
1		New policy
2	Jun 2016	Changing guidance
3	Feb 2017	Update with name change EF (amends only)
4	Aug 2017	Annual Review LZ & DC By email 13/11/17
5	Oct 2018	Annual Review LZ & DMc
6	May 2020	Annual Review CT & DMc
7	Nov 2021	Annual Review CT & LZ
8	Dec 2022	Expert Review JP & Leethen Bartholomew
9	June 2023	Annual update, JP and LZ
10	June 2024	Review by TR, board approval (discussed at board meeting on 29/06/24) <u>subject to JP's approval</u> - approved by JP on 10/07/24.
11	Nov 2024	Review, following guidelines update, LZ, HC and JF

12	Sept 2025	Review, TR - approved by board (subject to Barnado's review) on 27/09/2025 - Approved by Barnados on 08/10/2025
13	Mar 2026	Review, HC - following an update to WTSC statutory guidance. Approved by the Board on 07/05/2026.

SECTION 1 – Policy Statement

1.1. Context

1.1.1. Integrate UK is committed to safeguarding and promoting the welfare of all children and expects all employees and volunteers to share this commitment. We uphold an inclusive, anti-racist and anti-discriminatory approach in all aspects of our safeguarding practice, in line with national guidance.

1.1.2. Integrate UK is an organisation that works with children and young people principally from disadvantaged and minoritised backgrounds aged 11 – 24 to combat Violence Against Women and Girls (VAWG) and to work towards a society based on gender and racial equality, respect and cohesion.

1.1.3. The young people of Integrate UK travel to schools around the country to facilitate workshops and disseminate information to front line staff, children and young people about Female Genital Mutilation (FGM) within the context of VAWG, grooming, radicalisation, "honour" based abuse (HBA), child sexual exploitation (CSE), sexual harassment and assault, racism and Islamophobia and different forms of extremism.

1.1.4. A robust child safeguarding policy is vital not only for the safety of young people within our organisation but to ensure policies and processes are in place to act if there is a disclosure during a workshop and dissemination events delivered by our young people.

1.1.5. Integrate UK recognises the legal obligation and duty for organisations to protect and safeguard children by working in partnership with statutory organisations and sharing information for the purpose of safeguarding children. We are committed to working collaboratively with other agencies to promote the welfare and safety of children.

1.1.6. Our organisation aligns with the statutory guidance set out in [Working Together to Safeguard Children \(2026\)](#). We recognise our responsibilities as part of the wider safeguarding system and commit to inclusive, anti-discriminatory practice. We work collaboratively with schools, local authorities and safeguarding partners to identify needs early, share information appropriately, and ensure a child-centred approach. Our safeguarding procedures apply to all children and young people, including those in kinship care, adoption, looked-after arrangements and unborn children where concerns exist.

We ensure our staff understand their role within the wider multi-agency safeguarding system, including how to identify concerns early, share information appropriately and follow school-based safeguarding procedures when delivering work in educational settings.

1.1.7. This policy should be read alongside our Complaints, Health & Safety, Lone Working, Code of Conduct and Data Protection policies. The policy is divided into the following four sections:

SECTION 1 – Policy Statement

SECTION 2 – Particular types of abuse tackled by Integrate UK

SECTION 3 – Process to report concerns about abuse

SECTION 4 – Reporting Forms

1.2 Statement of Purpose

1.2.1. Our child safeguarding policy outlines how we will fulfil our duty of care to safeguard those we work with and those that work on our behalf. The policy applies to all employees, self-employed staff, media partners and volunteers (including Trustees) (hereafter called ESEMVS).

¹Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection (Working Together to Safeguard Children 2026).

²All our work with children is informed by the Children Act 1989 and Children Act 2004. Other relevant documents which are accessible online include Children and Families Act 2014, Children and Young Person's Act 2008, Working Together to Safeguard Children 2026

1.2.2. This policy provides clear standards and processes for all our staff, volunteers and partners. This ensures that everyone is clear about the organisational responsibilities, their individual roles and the procedures to follow in order to safeguard children.

1.2.3. The Board of Trustees of Integrate UK is ultimately accountable for ensuring that Integrate UK upholds its statutory safeguarding obligations.

1.2.4. Commitment to Safeguarding

Integrate UK is committed to fulfilling its responsibilities in safeguarding and promoting the welfare of children and young people.

- All children whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/ or sexual identity have the right to be protected from harm.
- Young people must be listened to, valued and empowered to inform and shape our work, including decision-making and review of our safeguarding practices.
- Our recruitment, training and supervision procedures must ensure that staff and volunteers are capable and supported to apply safeguarding good practice. This is done by creating a safe space for all employees and beneficiaries and by adopting a non-judgemental, anti-discriminatory and anti- racist approach.
- We hold clear policies and procedures to act upon and report any safeguarding issues.

1.2.5. Terminology

- For the purpose of this policy and procedures we have defined safeguarding, child protection and different types of child abuse in [section 2](#).

1.3. Roles and Responsibilities

1.3.1. All those who work for Integrate UK in any capacity have a duty to safeguard and promote the welfare of children, regardless of whether their role involves direct contact with children.

Role	Name	Contact Details
CEO and Designated Safeguarding Lead	Lisa Zimmermann	Telephone: (07808) 523 982 Email: lisa.zimmermann@integrateuk.org
Dedicated Safeguarding Trustee	Henry Chan	henry.chan@integrateuk.org

1.3.2. All concerns should be reported to Lisa Zimmermann, CEO of Integrate UK, who is identified as the Lead for Child Protection/Safeguarding. If the concern is about the Designated Safeguarding Lead it should be reported to the Dedicated Safeguarding Trustee, Henry Chan, who will be the Safeguarding Lead for the Board, or Rhianna Thomas, Deputy Safeguarding Lead.

1.3.3. The DSL will ensure:

- Arrangements are in place to safeguard and promote the welfare of children and young people
- Appropriate decisions are made in respect of reported incidents
- Procedures as dictated by the policy are adhered to and that all staff read and understand this policy
- Ensure that any information about a child is kept confidentially and securely
- Ensure ESEMV's are fully trained and aware of their responsibilities around safeguarding children
- Safeguarding concerns are escalated appropriately to statutory services, including First Response in Bristol or to relevant 'front door' in other cities. Information will be shared in a timely and proportionate way.
- The organisation contributes to multi-agency safeguarding processes when required, including attending meetings or providing relevant information.

1.4. Reporting concerns

Everyone (employees, self-employed staff, Outreach Workers, media and creative professionals and volunteers (including Trustees) at Integrate UK have a responsibility to report any safeguarding concerns to the designated safeguarding lead. If the designated safeguarding lead is not available, you must inform the deputy designated safeguarding leads as outlined in section 1.3.

Processes are set out for reporting concerns in [SECTION 3](#).

If someone is at immediate risk of harm it is important to phone 999 for the police. You must inform the designated safeguarding lead/deputy designated safeguarding lead as soon as possible after this.

Where concerns relate to a child's welfare but do not indicate immediate harm, staff should still report promptly so that early help or other support can be considered.

1.4.1 Local authority designated officer (LADO)

Integrate UK takes any safeguarding allegations or concerns against staff or volunteers very seriously. The local authority designated officer will be informed when there has been a concern or allegation against a member of staff or volunteer and is responsible for coordinating the response.

The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offense against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicated they may not be suitable to work with children

This includes concerns arising from online behaviour, personal relationships, or conduct in other settings.

1.5. Training

All ESEMVS who, through their role, are in contact with children and young people will complete safeguarding training at an appropriate level. Training will be refreshed every two years.

For young people who are trained as Outreach Workers:

- All Outreach Workers receive initial safeguarding training as part of their role, refreshed every two years.
- Integrate UK will provide ongoing opportunities for reflective practice that will cover safeguarding issues. This support provides an opportunity to identify any individual learning gaps and needs in relation to safeguarding practice.
- Training will include awareness of the Family Help model, contextual safeguarding, online harms and anti-discriminatory practice, in line with Working Together 2026.

1.6. Safer recruitment

Integrate UK is committed to Safer recruitment and ensuring all ESEMVs are recruited according to up to date guidelines. Safer practice in recruitment means that the safety and welfare of the child is paramount at every stage of the process. Key elements within this process include:

- Ensuring the job description & person specification for all posts/roles refers to the responsibility for safeguarding and promoting the welfare of children;
- Ensuring that the person specification for all posts/roles includes specific reference to suitability to work with children, as relevant;
- Obtaining and scrutinising information from applicants, including at interview, and taking up and satisfactorily resolving any gaps, discrepancies or anomalies prior to appointment;
- The team managing the recruitment process will include at least one member who has received current and appropriately accredited 'safer recruitment' training to ensure best practice is followed;
- Ensuring there is a diverse interview panel, an appropriate probationary period, job description with clear objectives and appropriate inductions;
- Obtaining references that answer specific questions to help assess an applicant's suitability to work with children and following up any concerns;

- Verifying the successful applicant's identity, employment history and Right to Work in the UK (where employed);
- Carrying out an Enhanced Disclosure and Barring (DBS) Check for roles in "regulated activity". DBS checks will be renewed every three years and are required for anyone aged 18 and above.
- Where adults do not have a specific role working with children but are likely to be in contact with children during the course of their work, the safer recruitment practices still apply.
- Recruiting in line with the Equality, Diversity and Inclusion Policy.
- Ensuring that any concerns arising during recruitment are recorded and, where appropriate, discussed with the LADO before appointment decisions are finalised.

1.7. Action to be taken if a representative of Integrate UK does not uphold this policy and/or stipulated procedures:

1.7.1. Integrate UK recognises that the decision to report can sometimes be difficult or potentially unsafe. Young people might feel scared about reporting in fear of local services, of not being listened to, or having their confidentiality breached, to name a few examples.

1.7.2. All staff should be supported to feel safe in disclosing any information regardless of how minor it appears. This is in line with the organisation's culture of learning and protecting others in order to prevent risk to children. It is therefore critical for the safety of all young people engaged with the activities of Integrate UK that the stipulated policy and procedure within this document are carefully followed whenever they apply.

1.7.3. If it is found or suspected that any representative of Integrate UK has not responded to a safeguarding concern in a manner that is consistent with the policy and procedure set out in this document, this should be reported without delay to the CEO of Integrate UK. The CEO will instigate a proportionate level of expeditious investigation into the circumstances and will also take any precautionary action decided to be necessary (e.g. suspending the person suspected from IntegrateUK activities involving children). The findings of that investigation will then be reported back to the trustees as soon as possible and consequential action agreed. This action would be likely to range from further training to ending Integrate UK's relationship with the individual. If the concerns are about the CEO, they will be reported directly to the Chair of Trustees who will consult other trustees and agree necessary action. Where concerns indicate potential harm to a child, the DSL will also consult with the LADO or statutory services as appropriate.

1.8. Whistleblowing

1.8.1. A Whistleblower is often described as an employee who reports wrongdoing within an organisation. Integrate UK is committed to high standards of practice and behaviour amongst all employees and volunteers. Integrate UK encourages openness and transparency throughout all the organisation. However, we do recognise that this may not always be the case and understand that speaking up within the organisation might be difficult. Any representative of Integrate UK, whether an employee or volunteer, who reports wrongdoing in one of the following areas will be protected by the trustees in line with the Public Interest Disclosure Act 1998 and the Enterprise and Regulatory Reform Act 2013:

- A criminal offence
- Someone's health and safety is in danger
- Risk or actual damage to the environment
- A miscarriage of justice
- Integrate UK (or any of its representatives) is breaking the law

- It is suspected that someone is covering up wrongdoing.

1.8.2. Only with the consent of the whistleblower, their identity may be disclosed to the Chair of Trustees who will take personal responsibility for implementing appropriate measures to ensure that the whistleblower does not receive unfavourable treatment as a result of their whistleblowing activity. If the whistleblower is not in agreement that the Chair of Trustees should perform their role, another trustee will be identified to do so.

1.8.3. Confidentiality:

Integrate UK will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Where safeguarding concerns relate to a child, confidentiality will never prevent information being shared with statutory services if this is necessary to protect a child from harm.

1.8.4. This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the organisation. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources.

The NSPCC provides more information and support around Whistleblowing should anyone require independent advice. You can reach them as follows:

Tel: 0800 028 0285

Email: help@nspcc.org.uk

Website: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>

Whistleblowing concerns relating to safeguarding will always be shared with the DSL or, where appropriate, the LADO or statutory services.

SECTION 2 – Definitions of child abuse and neglect

This section outlines the different types of child abuse, neglect, exploitation and the particular types of abuse tackled by Integrate UK so that all volunteers, staff and young people can refer to it when carrying out their role in the charity.

2.1 Definitions

In accordance to [Working Together to Safeguard Children 2026](#) safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
 - protecting children from maltreatment, whether that is within or outside the home, including online
 - 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
 - promoting the upbringing of children with their birth parents, or otherwise their family network or through a kinship care arrangement, whenever possible and where this is in the best interests of the children
 - taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework
- o Outcome 1: Children, young people and families stay together and get the help they need
 - o Outcome 2: Children and young people are safe in and outside their homes
 - o Outcome 3: Children and young people are supported by their family network
 - o Outcome 4: Children in care and care leavers have stable, loving homes

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online. Effective safeguarding is anti-discriminatory and antiracist. Practitioners should understand and be sensitive to factors, including economic and social circumstances, ethnicity and disability, which can impact children and families' lives.

Safeguarding practice must actively challenge discrimination, disproportionality and bias, and ensure that children's lived experiences are understood within the context of their identity, culture and circumstances.

2.2 What is Child Abuse?

[Working Together to Safeguard Children 2026](#) defines abuse as. "a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children." Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity.

Abuse may occur in person, online, within peer groups, within intimate relationships, or through extra-familial influences such as gangs, criminal networks or extremist groups. Children may also experience harm linked to identity-based discrimination, racism or cultural pressures.

2.2.1. Physical Abuse:

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

Physical abuse can also occur alongside other forms of harm, including domestic abuse, coercive control or situations where a child is forced to participate in violent or harmful acts.

Signs & Symptoms:

Bruised eyes, bruising, finger marks, grasp marks, slap marks, scalds and burns, outline marks of belts and buckles. Other indicators may include unexplained injuries, injuries in various stages of healing, fear of physical contact, flinching, or accounts of injuries that are inconsistent with the child's developmental stage.

2.2.2. Neglect:

A severe or persistent lack of attention to a child's basic needs resulting in significant harm to the health or emotional and/or physical development of the child. An avoidable exposure to serious danger, including cold and starvation. Neglect may occur during pregnancy as a result of maternal substance misuse, poor maternal mental health or domestic abuse. It can also include failure to provide adequate supervision, failure to ensure access to medical care or allowing a child to live in unsafe or unhygienic conditions. Neglect may be chronic, episodic or situational and can coexist with other forms of abuse.

Signs & Symptoms:

Poor growth and weight gain, frequent injuries, unkempt and dirty appearance (but be wary of jumping to conclusions), cold and puffy hands and feet, inadequate clothing for the weather conditions, young children left alone without care, failure to report medical conditions. Other indicators may include persistent hunger, tiredness, untreated health issues, missed medical appointments, poor school attendance, developmental delays or a child taking on inappropriate levels of responsibility for siblings or household tasks.

2.2.3. Sexual Abuse:

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. This may involve physical contact including assault by penetration, or acts such as kissing, rubbing and touching outside of clothing or the production of sexual images. Sexual abuse is the involvement of a child in sexual activity which is unlawful or, although not unlawful, is abusive and damaging to the child. This may be a breach of trust in a child / adult relationship. (Sexual intercourse with a child aged over 16 may be lawful, but if the adult is using his/her position to obtain consent, then this would be deemed abuse). Sexual abuse can also include non-contact activities such as involving children in looking at, producing or sharing sexual images, encouraging sexually inappropriate behaviour, sexually explicit language, exposing a child to sexual acts or grooming a child online or in person. Abuse may be perpetrated by adults or by other children (peer-on-peer/child-on-child abuse), and may occur within families, peer groups, intimate relationships, institutions or online environments.

Signs & Symptoms:

Inappropriate sexual play, use of sexually explicit words or gestures. Bruising to genital areas. Self-harm, substance abuse, eating disorders. Significant changes in behaviour. Sudden avoidance of certain people or places, sexually transmitted infections, pregnancy, excessive secrecy, fear of being

alone with particular individuals, withdrawal, anxiety, or knowledge of sexual behaviour that is not age-appropriate. Children may also show signs of grooming, such as receiving unexplained gifts, increased secrecy around devices, or changes in online behaviour.

2.2.4. Emotional Abuse:

Significant harm to the emotional or psychological well-being or development of the child. This could be caused by persistent emotional ill-treatment such as rejection from a parent or carer. It may involve the child developing a feeling of worthlessness or exposure to danger and threats. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say. It may feature age or developmentally inappropriate expectations being imposed, overprotection and limitation of exploration and learning or keeping the child from normal social interaction. Whichever form of abuse occurs, it is likely there will be emotional and psychological damage to the child. Emotional abuse can also include controlling or coercive behaviour, exposure to domestic abuse, persistent criticism, humiliation, scapegoating, or forcing a child to take on responsibilities inappropriate for their age. It may occur on its own or alongside other forms of abuse. Children may also experience emotional harm linked to discrimination, racism, bullying (including online bullying), or cultural pressures.

Signs & Symptoms:

Delayed growth and development. Abnormally passive, aggressive or attention seeking behaviour. Child may appear unused to praise. Self-harm, excessive anxiety, withdrawal, low self-esteem, difficulty forming relationships, sudden changes in behaviour, developmental regression or a child appearing overly eager to please. Children may also show signs of fearfulness, hypervigilance, or emotional instability.

Outlined below are the specific types of child abuse relevant to the work of Integrate UK:

2.3 Female Genital Mutilation (FGM)

FGM is a form of child abuse and as such is dealt with under the Integrate UK's Child Protection/Safeguarding policy. In England, Wales and Northern Ireland, all forms of FGM are illegal under the [Female Genital Mutilation Act 2003](#). FGM is recognised as a form of violence against women and girls (VAWG) and a violation of human rights. It can have severe physical, emotional and psychological consequences and may occur alongside other forms of abuse, including coercive control, forced marriage or honour-based abuse.

FGM is an offence which extends to acts performed outside of the UK and to any person who advises, helps or forces a girl to inflict FGM on herself. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 will be liable to a fine or imprisonment of up to 14 years, or both. FGM is a form of child abuse. Under the [Children Act 1989](#) Local Authorities can exercise their powers under [Section 47](#) and can apply to the Courts for various Orders to prevent a child being taken abroad for mutilation.

2.3.1. Definition of FGM:

"Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons."

(World Health Organisation-1997)

Important documents for reference:

[NSPCC – legislation, policy and guidance](#)

[The Government Home Office guidelines](#)

Professionals must also be aware of the mandatory reporting duty for regulated professionals, which requires them to report known cases of FGM in under-18s directly to the police.

2.3.2. Why is FGM carried out?

Parents who force their daughters to undergo FGM often justify their behaviour as protecting their children or preserving cultural or religious traditions. The young people typically do not see anything wrong with their actions. Many girls will have the expectation that they will experience FGM and may not be aware that they have a fundamental human right not to have this take place.

FGM is used as a means of controlling and de-sexualising women, repressing their sexual desire and to reduce the chance of their being sexual promiscuous. FGM is also carried out for reasons of aesthetics and hygiene and as a means of purification and ensuring that a woman is clean.

These motivations help us to understand why parents might force their daughters to undergo FGM, but they cannot be used as a justification for subjecting women and girls to such harmful practices.

FGM is not required by any religion. It is a harmful practice rooted in gender inequality, discrimination and social pressure.

2.3.3. What are the signs that a girl may be at risk of, or have already undergone FGM?

These indicators are not exhaustive and whilst the factors detailed below may be an indication that a child is facing FGM, it should not be assumed that is the case simply on the basis of someone presenting with one or more of these warning signs. These warning signs may indicate other young people of abuse such as forced marriage or sexual abuse that will also require a multi-agency response.

The following are some signs that the girl may be at risk of FGM:

- The family belongs to a community in which FGM is practiced
- The family makes preparations for the child to take a holiday, e.g., arranging vaccinations, planning an absence from school
- The child talks about a 'special procedure/ceremony' that is going to take place
- An awareness by a midwife or obstetrician that the procedure has already been carried out on a mother, prompting concern for any daughters, girls or young women in the family.
- A female sibling has already undergone FGM
- Parents expressing strong cultural or social pressure to conform to community expectations

The following are some signs that FGM may already have taken place:

- Prolonged absence from school and noticeable behaviour changes on return to school
- Avoidance of specific classes or activities such as PE or sports, giving reasons of bladder, menstrual or abdominal problems

- Girls finding it difficult to sit still in class or looking uncomfortable when sitting
- Girls complaining of pain between their legs, or talking about something someone did that they are not allowed to talk about, frequent urinary or menstrual problems, infections or difficulty walking
- Sudden withdrawal, anxiety or changes in mood following a trip abroad

2.4 Child Exploitation

Abuse might not just occur in the home, but it may also occur outside of the home environment, even online. Child exploitation can be sexual, criminal, financial or emotional. It often involves grooming, coercion, manipulation or threats. Exploitation may occur within peer groups, gangs, online spaces, intimate relationships or through adults seeking to abuse power or vulnerability.

2.4.1. Child Sexual Exploitation

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where the young person (or third person/s) receive 'something' (e.g., food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Children may not recognise they are being exploited and may believe they are in a consensual or loving relationship. Child Sexual Exploitation can occur online, in person, or through a combination of both.

Types of Child Sexual Exploitation

2.4.2. Boyfriend model

Here the offender befriends and grooms a young person into a 'relationship' and then coerces or forces them to have sex with friends or associates. The boyfriend may be significantly older than the victim, but not always. This model often involves emotional manipulation, gifts, flattery and isolation from peers or family.

2.4.3. Peer on peer exploitation

Young people can be exploited by their peers in a number of ways. In some cases, young women and young men who have been exploited themselves by adults or peers, will recruit other young people to be abused. In other instances, sexual bullying in schools and other social settings can result in the sexual exploitation of young people by their peers. Sexual exploitation also occurs within and between street gangs, where sex is used in exchange for safety, protection, drugs and simply belonging. For 16- and 17-year-olds who are in abusive relationships, what may appear to be a case of domestic violence may also involve sexual exploitation. Peer-on-peer exploitation may also involve online coercion, sharing of sexual images, or pressure within friendships or social groups.

2.4.4. Organised/networked sexual exploitation or trafficking

Young people (often connected) are passed through networks, possibly over geographical distances, between towns and cities where they may be forced/coerced into sexual activity with multiple men. This may involve criminal networks, transport between locations, and threats or violence to maintain control.

2.4.5. Inappropriate relationships

These usually involve one offender who has inappropriate power or control over a young person (physical, emotional or financial). One indicator may be a significant age gap. The young person may

believe they are in a loving relationship. The imbalance of power may relate to age, status, resources, emotional dependency or coercion.

2.4.6. Familial

Children can be exploited by their parents and/or other family members. Parents or family members may also arrange the abuse of the child and/or control and facilitate exploitation. Where one child is being exploited, siblings or other child relatives are at increased risk of suffering exploitation.

2.4.7. Opportunistic

This may occur quickly and without any form of grooming. Typically, older males identify vulnerable young people who may already have been groomed or sexually abused. The perpetrator will offer a young person a 'reward' or payment in exchange for sexual acts. The perpetrator is often linked with a network of abusive adults.

2.4.8. Online

New technologies and social networking tools and platforms, chat rooms, dating sites or online gaming, present further opportunities for social interaction. It is important to recognise that the misuse of technology plays a significant part in many safeguarding issues, such as peer-on-peer abuse, child sexual exploitation, child criminal exploitation, radicalisation, and sexual predation. Technology often provides the platform that facilitates harm. Online exploitation may involve grooming, coercion, blackmail, sharing of sexual images, livestreaming or manipulation through gaming or social media platforms. Children may be targeted by adults or peers and may be exploited without ever meeting the perpetrator in person.

Staying safe online includes a wide range of issues. The three main risk areas are:

- **Content:** Being exposed to illegal, inappropriate or harmful material; for example, pornography, racist or extremist views, glamorisation of drugs or gang lifestyles. This may also include self-harm content, misogynistic or incel-related material, pro-eating-disorder content, or misinformation designed to influence or manipulate children.
- **Contact:** Being subjected to harmful online interaction with other users; for example, adults posing as children or young adults. This may include grooming, coercion, online radicalisation, unwanted sexual contact, or pressure to share personal information or images.
- **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying. CSE can occur through the use of technology without the child realising it. For example, a child or young person is persuaded to post images of themselves on the internet and/or mobile phones and then these images are used as a bargaining tool by the perpetrators. Conduct risks also include sharing personal data, engaging in harmful challenges, participating in hate speech or behaving in ways that place themselves or others at risk.

Offenders may use technology to exploit children and young people in the following ways:

- Harassment and bullying through text messaging;
- Purchasing mobile phones for victims and sharing their numbers among group or gang members;
- Randomly contacting children via social networking sites;
- Using 'friends' lists on networking sites of known victims to target children and young people;
- Viewing extreme or violent pornography and discussing it during sexual assaults;

- Posting images of victims with rival gang members to invite a sexual assault as punishment;
- Filming and distributing incidents of rape and sexual violence;
- Distributing lists of children for the purpose of sexual exploitation.
- Using livestreaming platforms to coerce children into sexual activity or to capture images in real time
- Using gaming platforms, private messaging apps or encrypted channels to groom or communicate with children
- Threatening to share ("sextort") sexual images to control or manipulate a child

2.4.9. Honour Based Abuse (HBA)

HBA is described as "An incident or crime which has, or may have been, committed to protect or defend the honour of the family and or community." It can be distinguished from other forms of abuse, as is often committed with some degree of approval and/or collusion from family and/or community members. Victims will often have multiple perpetrators not only in the UK but maybe also abroad, HBA can be the trigger for a Forced Marriage. HBA may include threats, intimidation, physical violence, emotional abuse, coercive control, forced marriage, FGM, or restrictions on a child's freedom. Children may be targeted due to perceived "dishonour", such as forming relationships, rejecting cultural expectations or expressing their identity. HBA is a safeguarding and criminal concern and requires an immediate multi-agency response.

2.10. Preventing radicalisation and violent extremism of any form

In 2008, the Government published guidance and a toolkit to help schools tackle violent extremism.

Since July 2015, all schools and academies have been subject to the [Prevent Duty under Section 26 of the Counter-Terrorism and Security Act 2015](#), requiring them to have due regard to the need to prevent people from being drawn into terrorism. This duty is now guided by the [updated statutory Prevent Duty Guidance for England and Wales \(2023\)](#), which came into force on 31 December 2023 and outlines proportionate, safeguarding-led approaches for education settings.

Integrate UK offers peer education on grooming for radicalisation and workshops on extremism. All Lead Outreach Workers must undergo the Workshop to Raise Awareness of Prevent training and are expected to report any concerns relating to extremism to Lisa Zimmermann, CEO, and to the Safeguarding Lead in a school if the incident occurs in a school. Lisa Zimmermann will confirm with the school that the concern has been dealt with appropriately.

Radicalisation can occur online or offline and may involve exposure to extremist narratives, grooming by extremist individuals or groups, or pressure from peers. Children may be targeted because of vulnerabilities, identity-based discrimination, social isolation or online influences. Concerns about radicalisation should always be treated as safeguarding concerns and reported promptly.

2.11. Child on child abuse

Child on child abuse can be described as when a young person is bullied, exploited or harmed by their peers who are of a similar age. Everyone involved is under the age of 18. It is important not to minimise behaviours which may constitute child on child abuse as "kids being kids".

Examples of child on child abuse are wide and varied. These can include abuse in intimate personal relationships between peers, bullying (including cyberbullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing, physical harm, sexual violence, such as

rape and sexual assault, sexual harassment, such as sexual comments, remarks and jokes either in person or online, "sexting" (also known as sharing self-generated indecent images), initiation/hazing type violence and rituals, upskirting and criminal and sexual exploitation.

Child on child abuse may also include coercive control, controlling friendships, harmful sexual behaviour (HSB), online harassment, group-based bullying, or exploitation within peer groups. Children may not recognise their experiences as abuse, and harmful behaviours can escalate without intervention. All concerns must be taken seriously and responded to in line with safeguarding procedures.

2.12 Other concerns - Mental Health

Mental health problems and suicidal thoughts can affect anyone, of any age and of any background. Mental health problems are common among children and young people, but it can be difficult to identify as they often keep it to themselves. This can also be true with other forms of safeguarding issues. The signs and symptoms of mental health problems will differ from child to child, but some common signs include:

- Becoming withdrawn from friends and family
- Persistent low mood and unhappiness
- Tearfulness and irritability
- Sudden outbursts of anger
- Loss of interest in activities they once enjoyed, and
- Problems eating or sleeping
- Self harm

Children may also show signs such as difficulty concentrating, unexplained physical symptoms (e.g., headaches or stomach aches), increased risk-taking, or changes in school performance or attendance.

Children who are suffering from mental health problems may also be more vulnerable to harms such as exploitation, grooming and radicalisation. Mental health problems may also be indicators of, or seen in conjunction with, other forms of harm – such as abuse and neglect, peer-on-peer abuse, exploitation, grooming, or radicalisation.

Concerns about a child's mental health should always be treated as safeguarding concerns when they indicate that a child may be at risk of harm or when their mental health difficulties may be linked to abuse, trauma or unsafe environments. Staff should report concerns promptly so that appropriate support and early help can be considered.

SECTION 3 – PROCESS TO USE WHEN REPORTING CONCERNS

[Working Together to Safeguard Children \(HM Government, 2026\)](#) defines abuse, neglect and exploitation as forms of maltreatment of a child. "Someone may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or children." The guide defines

four types of abuse: Physical, Neglect, Sexual and Emotional. To better understand different forms of abuse, see SECTION 2.

This process sets out what to do if a child discloses abuse.

3.1. Listen

If a child discloses abuse, then upon receiving the information you should:

- React calmly and respond sensitively
- Reassure the child/young person that they were right to tell and that they are not to blame and take what the child says seriously
- Listen to concerns being expressed without passing judgement and use "open questions" when responding to concerns
- Not make assumptions about what they are being told
- Be careful not to be deemed as putting words into the child's/young person's mouth, the easiest way of doing this is by asking open ended questions for example tell me what happened?
- Do not promise confidentiality
- Explain that you may need to share the information with the Designated Safeguarding Lead to help keep them safe
- Ensure the child feels heard, believed and supported, avoiding any expression of shock or disbelief

The NSPCC has a video which is helpful about how to manage a disclosure.

<https://youtu.be/bvJ5uBlGYgE?si=dYWf1oIlORkH28hV>

3.2. Complete a Safeguarding Incident Form for recording concerns

This is in section 4 of this document.

- As soon as possible, make a full and written record of what has been said as soon as possible and don't delay in passing on the information. Recording as far as possible the actual words used by the child or young person indicating as such within the report form.
- The child's known details including name, date of birth, address, contact numbers including information about other children that you are concerned about
- Whether or not the person making the report is expressing their own concerns or those of someone else
- The nature of the allegation, including dates, times, specific factors and any other relevant information
- Make a clear distinction between what is fact, opinion or hearsay
- A description of any visible bruising or other injuries. Also, any indirect signs, such as behavioural changes
- Details of witnesses to the incidents. Accounts from others, including colleagues and parents
- The child's account if it can be given, of what has happened and how any bruising or other injuries occurred
- Any immediate actions taken to safeguard the child, including who was informed and when
- Any contextual information that may help assess risk, such as online activity, peer relationships or recent changes in behaviour
- Do not attempt to investigate an allegation, this is the responsibility of Children's Services and/or the police. Your role is to record, report and respond, not to question the child repeatedly or gather evidence.

3.3. Report immediately to CEO, Lisa Zimmermann, DSL

Forward this written report to the Designated Safeguarding Lead Identified in Section 1.3 of this document. If the designated safeguarding lead (DSL) is not available, forward it to the deputy designated safeguarding lead or the designated safeguarding trustee as outlined in section 1.3.

If you feel the child/young person is in immediate/imminent danger, call the police at 999.

If any of the young people have any safeguarding concerns when they are delivering workshops and disseminations to other young people, they must report their concerns in writing to Lisa Zimmermann and to the school Safeguarding Lead or the class teacher. This will normally be to a teacher as most sessions take place in a school. Lisa Zimmermann will confirm that the Safeguarding Lead in a school, or the responsible adult/designated Safeguarding lead in another organisation, has dealt with the concern by reporting to the police in the case of an emergency, or to children's services. All incidents will be recorded by Integrate UK following data protection policy.

Reports to safeguarding agencies will be managed in accordance with, ['Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers, 2024'](#).

It is not the organisation's responsibility to decide whether abuse has taken place or not, however, it will pass on information to the appropriate authority immediately subject to the above guidance.

Staff should ensure that concerns are reported without delay, even if only partial information is available. Information should be shared on a "need-to-know" basis and only with those responsible for safeguarding decisions. All records must be stored securely and in line with data protection legislation.

3.4. Action following report

3.4.1. Child

Based on the information provided, the Designated Safeguarding Lead and or Deputy Designated Safeguarding Lead will decide the next steps. In some cases, a child may need immediate protection; in these situations, the police will be called. The Police and Social Services are the only agencies with statutory powers for the immediate protection of children. Where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, the DSL will make a referral to Children's Social Care without delay. The DSL may also consult with the local MASH (Multi-Agency Safeguarding Hub) for advice if the level of risk is unclear.

3.4.2. Staff

In some cases, it may be that an Integrate UK member of staff, volunteer or young person may be asked to be interviewed by the police or other investigatory agency. The rights and responsibilities of those individuals will be the same as any other member of the public. In such cases, the CEO and lead Trustee for Safeguarding will coordinate activity to ensure that the member of staff, volunteer or young person is appropriately supported through any investigative process and subsequent proceedings to mitigate any risk of compromise to their physical and/or emotional welfare. Support may include access to supervision, signposting to wellbeing services, and ensuring that individuals

understand the process and their rights. This support will not interfere with or compromise any statutory investigation.

2.4.3. Media considerations

Investigations and/or possible subsequent criminal and/or civil proceedings may lead to Media and/or other community interest. Individuals and/or Integrate UK itself may be subject of community and/or Media comment, including criticism. In all cases where such a possibility exists, the Board of Trustees will formulate an appropriate communication/Media strategy to ensure that Integrate UK's actions and rationale are accurately represented. No member of staff, volunteer or young person should speak to the media directly. All media enquiries must be referred to the CEO or Chair of Trustees. Confidentiality and the safety of children will always take precedence in any public communication.

3.4. Further reporting requirements

In every case where there is a safeguarding report made to police or a children's social care department, specific consideration will be given by the CEO and Lead Trustee for Safeguarding in relation to whether either of the following bodies should be notified:

- The Charity Commission
- Those funding Integrate UK activities

Any such notification would not involve the sharing or personalised data unless the criteria within ['Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers, 2024'](#) is fulfilled. Should such a safeguarding report lead to further investigatory action and/or judicial proceedings, the need to notify or update the above bodies will be kept under constant review.

The CEO and Trustees will ensure that all regulatory reporting duties are met, including "serious incident reporting" to the Charity Commission where required. Decisions will be documented clearly, including the rationale for notifying or not notifying external bodies.

Further references:

- [Working Together to Safeguard Children- A Guide to multi -agency working to help, protect promote the welfare of children \(HM Government: 2026\)](#)
- [Safer Working Practice for Adults who work with Children and Young People \(DCSF 2007\)](#)
- [Keeping Children Safe in Education \(DfE 2026\)](#)
- [Keeping Bristol Safe Partnership \(KBSP\)](#)
- [Bristol Safeguarding in Education: Staying safe out of school - guidance for teenagers](#)

SECTION 4 – SAFEGUARDING - INCIDENT REPORT FORM

Person completing the form:	
Email & tel no:	

Person affected.

Name:
Gender:
DOB:
Address:

Details of the incident:
Other witnesses:

Name:	
Position	

Information on this form will be stored securely in line with Integrate UK's Data Protection policy and looked at in line with its Safeguarding Policy

APPENDIX

Section 5 - Organisations and further information and support

- The Local Children's Services in the area where the Child/Young person lives, e.g. Bristol Children's Services First Response

Bristol Children's Services - First Response (Children's Front Door)	Tel: 0117 903 6444 Emergency Duty Team: 01454 615165
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- NSPCC Child Protection Helpline (24 hours): To report or discuss concerns about a child's welfare. Tel: 0808 800 5000 or textphone: 0800 056 0566 or email: help@nspcc.org.uk

For other dedicated helplines see:

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/>

- NSPCC Cymru/Wales Child Protection Helpline: Contact the NSPCC Helpline on 0808 800 5000 or by emailing help@nspcc.org.uk.
- Childline Tel: 0800 1111
- The [Child Exploitation and Online Protection \(CEOP\) Centre](#) is part of the National Crime Agency (NCA) and can apply the full range of policing powers in tackling the sexual abuse of children. [Report sexual abuse to CEOP online.](#)

Other Local Authorities Contacts

Local Authority in which the child is resident	Contact details	Out of hours/ Weekend
South Gloucestershire	Access and Response Team T: 01454 866000 - Monday to Thursday 9.00 – 5.00, 4.30 on Friday E: accessandresponse@southglos.gov.uk W: Access and Response Teams (ART) South Gloucestershire Council (southglos.gov.uk)	Emergency Duty Team 01454 615165
North Somerset	Single Point of Access T: 01275 888 888 –Monday-Thursday 8.45am-5pm, Friday 8.45am-4.30pm W: Children, young people and families North Somerset Council (n-somerset.gov.uk)	
Bath and North East Somerset (BANES)	Children's Social Work Services T: 01225 396111 or 01225 477929 Mon-Thurs 8:30am to 5pm, Friday 08:30-4:30pm Contact the team at 01454 615165 during evenings,	

	weekends, and bank holidays. E: ChildCare_Duty@bathnes.gov.uk W: Report a concern about a child Bath and North East Somerset Council (bathnes.gov.uk)	
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If you feel the child/young person is in immediate danger, ring the police – 999.

Signed:

..... Date:

Henry Chan
Designated Safeguarding Trustee

..... Date:

Lisa Zimmermann
CEO
Designated Safeguarding Lead