

HARMFUL SEXUAL ABUSE POLICY

2021/22

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Approved by	Senior Leadership Team
Contact	Director of Learner Services, Marketing & Communication
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1. Overview

Waltham Forest College recognises that it has a moral and statutory duty to safeguard and promote the welfare and wellbeing of those receiving education and training through the College and we believe that all children and vulnerable adults have a right to be safe and should be protected from all forms of abuse and neglect.

This policy is in line with the safeguarding requirements in [Keeping Children Safe in Education](#) (Department for Education ('DfE'), 2021), which we must work to; Part 5 of the Keeping Children Safe in Education statutory guidance sets out how schools and colleges should manage reports of child-on-child sexual violence and harassment. This policy also links to the guidance updated by the DfE in 2021: [Sexual violence and sexual harassment between children in schools and colleges](#).

The purpose of this policy named Harmful Sexual Abuse Policy is to provide a clear set of guidance to staff that creates a culture where sexual harassment and online sexual abuse are not tolerated at Waltham Forest College. Where staff have identified concerns, appropriate referrals and intervention will enable the College to better protect young people and vulnerable adults.

2. Definition of Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

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

“The sexual abuse of children by other children is a specific safeguarding issue in education.” (Keeping children safe in education, DfE, 2021)

3. Harmful Sexual Behaviour

Harmful sexual behaviour can manifest itself in many ways. This may include:

- Inappropriate or unwanted sexualised touching
- Sexual violence and sexual harassment
- Up-skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- Pressurising, forcing, or coercing someone to share nude images (known as sexting or youth produced sexual imagery)
- Sharing sexual images of a person without their consent
- Bullying of a sexual nature online or offline, for example sexual or sexist name-calling

Waltham Forest College also understands the different gender issues that can be prevalent when dealing with harmful sexual behaviour. Young people can experience harmful sexual behaviour in various settings. This includes at college, at home (or at another home), in public places, and online. At college, issues can occur in places which are supervised and unsupervised. For example, abuse may occur in toilets, corridors, changing areas, common rooms, outside spaces, and when young people to and from College.

The following model (Hackett, S, 2010) is used to explain the continuum of sexual behaviours presented by young people from normal to violent. The table is used as a guide for staff to help them better understand when to respond to sexual abuse and harmful sexual behaviours.

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • Problematic and concerning behaviour • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure compliance • Intrusive • Informed consent lacking or not able to be freely given • May include elements of expressive violence 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour • Sadism

4. Peer-on-peer Abuse

Waltham Forest College may be the only stable, secure and safe element in the lives of children and adults at risk of, or who have suffered harm. Nevertheless, whilst at College, their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other young people. Waltham Forest College recognises that some young people and adults may abuse their peers and any incidents of peer-on-peer abuse will be managed in the same way as any other child protection concern and will follow the same procedures. Advice and support from other agencies will be sought, as appropriate.

Peer on peer abuse can manifest itself in many ways. This may include bullying (including cyberbullying), physical abuse or initiation / hazing type violence and rituals. Waltham Forest College do not tolerate any harmful behaviour in College and will take swift action to intervene where this occurs.

We take particular note of sexual violence/harm or harassment that may take place in college ensuring that all disclosures are taken seriously. Making sure that all disclosures are supported and considered when making plans for the next steps. This is to maintain that support for the victim is executed whilst acknowledging the disciplinary action that may be required. Where possible, support to the victim and disciplinary action will be maintained at

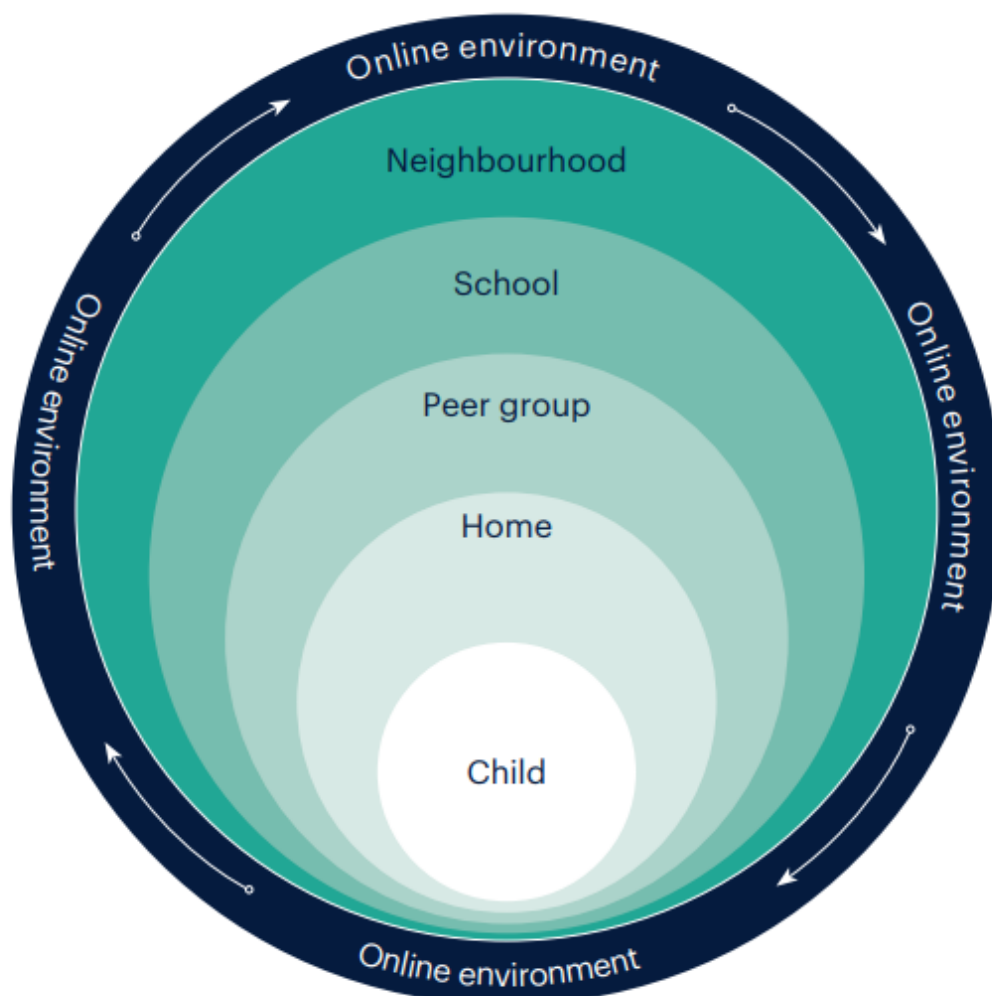
the same time as appropriate and on a case by case basis. This will be determined by risk assessment, liaison with the local authority, family and with consideration of the victim's needs.

5. Contextual Safeguarding

Safeguarding incidents and behaviours can be associated with factors outside Waltham Forest College. All staff are aware of contextual safeguarding and the fact they should consider whether wider environmental factors presented in a young person's or vulnerable adults' life are a threat to their safety and/or welfare.

To this end, we will consider relevant information when assessing any risk to a child or vulnerable adult and share it with other agencies to support a better understanding of the individual and their family.

Waltham Forest College encapsulates a Contextual Safeguarding approach, which is about changing the way that professionals approach child protection cases when risks occur outside of the family, thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children's social care, to create safe spaces in which children may have encountered peer-on-peer abuse.



6. Minimise the Risk of Harmful Sexual Behaviour

Waltham Forest College aims to build a culture of zero tolerance on sexual harassment and sexual violence and our principal aim is to foster the conditions in which our learners can aspire to and develop their understanding of the cause and effects that will strengthen our learner's confidence in reporting. The voice of our young people is central, where learners feel able to share their concerns openly, knowing that they will be listened to, and that they will not be judged.

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to harmful sexual behaviours and violence.

6.1 Young learners and vulnerable adults

Waltham Forest College uses the tutorial framework that underpins relationships, sex and health education to help our learners understand, in an age-appropriate way, what harmful sexual behaviour is, including by peers. We teach learners the knowledge they need to recognise and report all forms of abuse and empower learners about the importance of making sensible decisions to stay safe (including online), whilst being clear that if a young person is abused, it is never their fault.

We help our learners to develop the skills to understand:

- What constitutes harmful sexual behaviour
- That such behaviour is not acceptable
- The possible reasons for such behaviour, and vulnerability of perpetrators;
- If someone is behaving in a way that makes them feel uncomfortable or if they witness such behaviour towards others, to report such incidents

Waltham Forest College understands our learners may not always feel able to talk to adults about peer-on-peer sexual abuse. To help them, we will encourage them to share their thoughts and opinions, respond to their concerns, and respect and listen to them. We want our learners to feel confident that any concerns they raise will be responded to appropriately.

6.2 Parents and carers

It is important that parents and carers understand what is meant by harmful sexual behaviour and reinforce key messages from college at home. We work in partnership with parents and carers to support our learners and want to help them keep their child/ren safe. Parents and carers should understand:

- The nature of harmful sexual behaviour
- The effects of harmful sexual behaviour on the young person
- The likely indicators that such behaviour may be taking place
- What to do if it is suspected that peer on peer sexual abuse has occurred

Further information to support parents and carers in relation to harmful sexual behaviour is available online, including on the [NSPCC](#) and [Lucy Faithfull Foundation](#) websites.

6.3 All Staff

All Waltham Forest College staff, volunteers and governors undertake annual safeguarding training where the different types of abuse and neglect are discussed; this includes information about harmful sexual behaviour and our expectations for staff vigilance about this and other potential types of abuse.

All staff, volunteers and governors also receive updates on safeguarding issues throughout the academic year, including about the nature and prevalence of harmful sexual behaviour, where appropriate. Importantly, the training also ensures that our staff, volunteers and governors know what to do if they receive a report that harmful sexual behaviour may have occurred, including how to make appropriate referrals.

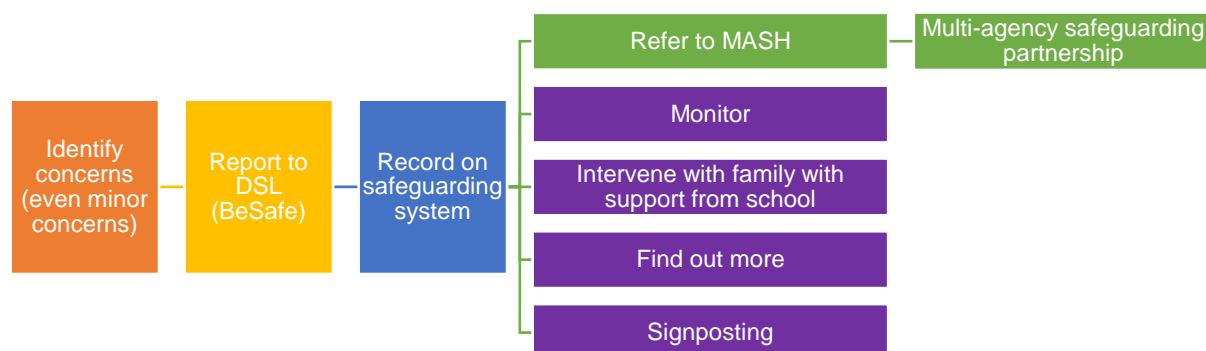
7. Safeguarding Reporting Procedure

The welfare and wellbeing of our learners is always central to our response to an allegation or incident of harmful sexual behaviour. Any young person reporting a concern will be treated respectfully. We will reassure them that they are being taken seriously and that they will be supported and kept safe; no young person will be given the impression that they are creating a problem by reporting abuse or made to feel ashamed. Our staff will never promise confidentiality to the young person as the concern will need to be shared further.

The Designated Safeguarding Lead will need to be informed as soon as possible of any incident and the details may also need to be shared with Children's Social Care / the police and other specialist agencies. We have in place effective working relationships with our safeguarding partners, which are essential to ensuring that concerns are appropriately managed.

We will explain next steps to the young person or vulnerable adult so they understand what will happen, including who will be informed. Where the young person or vulnerable adult already has Social Care involvement, such as a Looked After Child, a Child In Need or a child with a Child Protection Plan, care leaver or past social care involvement we will inform the young person's Social Worker and work in partnership with multi-agencies where deemed as appropriate. Whilst we establish the facts of the case and start the process of liaising with other agencies as appropriate, we will consider how best to keep the victim and alleged perpetrator a reasonable distance apart on the college premises, and where applicable, on transport to and from the college. Where an incident includes an online element, we will always work in accordance with appropriate guidance, taking advice from other partners as necessary. Our staff will not view an indecent image of a young person unless absolutely necessary, nor forward it for any reason.

Actions where there are concerns about a child or vulnerable adult:



All members of staff must develop their understanding of the signs and indicators of abuse and their responsibility for reporting any concerns in a timely manner. All staff are expected to do the following:

- **LISTEN** carefully, stay calm; do not express shock or embarrassment
- **DO NOT** guarantee confidentiality, but be clear that you will act sensitively and explain what will happen next
- **GIVE REASSURANCE** that you are taking the information seriously
- **DO NOT** ask leading questions
- **DO NOT** examine any physical injuries
- **DO NOT** attempt to investigate the allegations yourself
- **NEVER JUDGE** even if the allegation is against a colleague
- **RECORD** what was said, also time, date and place.
- **CONTACT** a member of the BeSafe team as soon as reasonably possible

If the staff member suspects that the young person is in immediate danger, they must contact the Police straight away by dialling 999. All incidents and actions taken need to be reported back to the BeSafe Team in a timely manner.

8. Investigation

The Designated Safeguarding Lead will be responsible for leading investigations, and for liaising with other agencies as appropriate, for example Children's Social Care and the police. They will also be the main point of contact for parents and carers. The Designated Lead will ensure there are accurate records of each stage of the investigation and that any supporting information is included in the Child Protection files.

9. Risk Assessment

Waltham Forest College will complete a risk assessment following a report of harmful sexual behaviour, considering all young people involved in an incident. We will also consider all other learners at our college and any actions that may be appropriate to protect them. Risk assessments will be regularly reviewed to ensure they remain relevant and fit for purpose. Where appropriate, the affected young person and their parents and carers will be invited to contribute to the completion and review of the risk assessment.

10. Notifying Parents or Carers

Waltham Forest College will normally seek to discuss any concerns about a learner with their parents and or carers. This must be handled sensitively, and the DSL will make usually contact with the parent/carer in the event of a concern, suspicion or disclosure. Our focus is the safety and wellbeing of the learner. Therefore, if the College believes that notifying parents/carer could increase the risk to the learner or exacerbate the problem, advice will be sought first from Children's Social Care.

11. Reporting to the Police

Where a report of rape, assault by penetration or sexual assault is made, the College will report it to the police. Waltham Forest College will generally inform parents or carers about reports of sexual abuse, unless to do so may place the young person at additional risk. The College will seek advice from other partners in individual cases. In circumstances where parents or carers have not been informed, we will ensure that we can support the young person in any decision undertaken. This is likely to be with the support of Children's Social Care and any appropriate specialist agencies.

Where a case has been reported to the Police, the College will consult with them and agree what information can be disclosed to staff and others, in particular the alleged perpetrator and their parents or carers. The College will also discuss the best way to protect the victim and their anonymity. Where there is a criminal investigation, we will work closely with the police and other agencies as appropriate to support all young people involved (including potential witnesses). This will help to ensure that any actions undertaken do not jeopardise a police investigation. Sometimes the Police will decide that further action is not required. In these circumstances we will continue to engage with other agencies to support young person involved.

12. Review

All child protection concerns are reviewed regularly, to ensure that everything has been fully addressed, that actions are completed, and to consider whether the young person involved requires any further support. We will continue to work with parents and carers and other agencies as appropriate, and risk assessments will be reviewed and updated as required.

APPENDIX A: USEFUL CONTACTS IN WALTHAM FOREST

Multi-Agency Safeguarding Hub (MASH) Single point of referral for Early Help, Child Protection and Adults' Safeguarding in Waltham Forest	Phone: 020 8496 2310 Mon-Thurs, 9am-5.15pm and Fri, 9am-5pm Out of Hours: 020 8496 3000 Email: MASHrequests@walthamforest.gov.uk N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a same-day phone response during normal business hours
LADO Team Allegations against staff and volunteers (ASV)	Phone: 020 8496 3646 Email: lado@walthamforest.gov.uk N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a same-day phone response during normal business hours
Safeguarding in Education Team Consultations / Training / Support (traded service)	Phone: 020 8496 3646 Email: safeguardingineducation@walthamforest.gov.uk N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a phone response within 24 hours during normal business hours
Early Help	Phone: 020 8496 1517 Email: earlyhelp@walthamforest.gov.uk
Virtual School	Phone: 020 8496 1741 Email: virtual.school@walthamforest.gov.uk Head of Virtual School: fay.blyth@walthamforestgov.uk
Special Educational Needs & Disability (SEND) Service	Phone: 020 8496 6503 Email: senteam@walthamforest.gov.uk
Local Safeguarding Children Board (LSCB) Local Safeguarding Partners (LSPs)	Email: Strategicpartnerships@walthamforest.gov.uk
Adolescent Safeguarding Lead Children's Social Care	Refer via MASH . Email: Reanne.Turner@walthamforest.gov.uk
Harmful Sexual Behaviour Lead Children's Social Care	Refer via MASH . Email: tracey.goddard@walthamforest.gov.uk Tel: 020 8496 5027 Mob: 0797 476 8433
MARAC / DRM queries	Refer via MASH . laura.butterworth@walthamforest.gov.uk
Mental Health First Aid / Public Health	Catherine.Hutchinson@walthamforest.gov.uk
Violence against women and girls (VAWG) & Domestic Abuse one-stop-shop	Refer via MASH . Email: yawg@walthamforest.gov.uk ; domesticabuseadvice@walthamforest.gov.uk

Other useful contacts and resources

- NSPCC Helpline 0808 800 5000 NSPCC Harmful Sexual Behaviour
- Rape Crisis
- The UK Safer Internet Centre
- Internet Watch Foundation
- UKCIS Sharing nudes and semi nudes advice
- ThinkUKnow
- NICE guidance
- The Lucy Faithful Foundation
- Contextual Safeguarding Network
- Stopitnow
- Anti-Bullying Alliance www.antibullyingalliance.org
- Bullying UK www.bullyinguk.org.uk
- Brook Sexual Behaviours Traffic Light Tool