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# Holden Knight Healthcare Ltd

## Safeguarding and Promoting the Welfare of Children



# Safeguarding and Promoting the Welfare of Children

## 1. Introduction

Safeguarding is everyone's responsibility. Holden Knight acknowledges the duty to safeguard and promote the welfare of Children and Adults at Risk; as a Company we are committed to ensuring safeguarding practice that reflects our statutory responsibilities, government guidance and complies with best practice requirements. All Children and Adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse.

Safeguarding relates to the action taken to promote the welfare of children and protect them from harm. Safeguarding is everyone's responsibility. Safeguarding is defined in the statutory guidance Working Together to Safeguard Children (DfE) as:

- Protecting children from maltreatment, whether the risk of harm comes from within the child's family and/or outside (from the wider community), including online;
- Preventing impairment of children's mental and physical health and 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.

The Senior Management Team takes seriously its responsibility under the Education Act 2014 and the Keeping Children Safe in Education (KCSiE) September 2025: statutory guidance for schools and colleges, to safeguard and promote the welfare of children and young people and (in line with the Information Sharing Guidance 2008) to work together with other agencies to ensure adequate arrangements within the organisation to identify, assess, and support those young people and adults who are suffering harm.

### 1.1 Significant Harm

The Children Act 1989 introduced the concept of 'Significant Harm' and 'the likelihood of Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children; the Act places a duty on local authorities to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or is likely to suffer Significant Harm.

Harm is defined as the ill-treatment or impairment of health and development. This definition was clarified in section 120 of the Adoption and Children Act 2002 (implemented on 31 January 2005) so that it may include, "... impairment suffered from seeing or hearing the ill-treatment of another" (for example in the case of a child who witnesses domestic abuse).

Under the Domestic Abuse Act 2021, children are recognised as victims of domestic abuse in their own right, if they see, hear, or experience the effects of the abuse, and are related to the perpetrator of the abuse or the victim of the abuse. Abuse directed towards the child is defined as child abuse.

Physical Abuse, Sexual Abuse, Emotional Abuse, and Neglect are all categories of Significant Harm.

There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single violent episode may constitute significant harm but more often it is an accumulation of significant events, both acute and longstanding, which interrupt, damage or change the child's development.

## 1.2 Safeguarding Definitions

### Young Person

Holden Knight uses definitions of the term 'safeguarding' from statutory guidance. The definition of a child or young person is anyone under the age of 18 whether living with their families, in state care, or living independently.

Safeguarding 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 are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

### Definition of an adult at risk:

An individual aged 18 years or over; who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Safeguarding adults at risk is defined as:

- Protecting the rights of adults to live in safety, free from abuse and neglect
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- People and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- Recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being.

Definitions of the ten categories of abuse, including signs and symptoms relevant to children and adults as per statutory guidance:

### 1. Physical abuse

Physical abuse is defined as any intentional act causing injury or trauma to another person through bodily contact. It is a deliberate act of force that results in harm, injury, or trauma to the victim's body. This can include a range of behaviours from hitting, slapping, and punching to more severe forms of violence.

### 2. Domestic violence or abuse

In the context of this policy, Domestic Abuse is included with reference to individuals who are considered to be adults at risk.

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

3. **Sexual abuse**

Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Any sexual relationship that develops between adults where one is in a position of trust, power or authority in relation to the other (for example, day centre worker /social worker/residential worker/health worker etc.) may also constitute Sexual Abuse.

4. **Psychological or emotional abuse**

This includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Psychological abuse is the denial of a person's human and civil rights including choice and opinion, privacy and dignity and being able to follow one's own spiritual and cultural beliefs or sexual orientation.

5. **Financial or material abuse**

Financial and material abuse includes theft, fraud, mail and internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

It includes the withholding of money or the unauthorised or improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs.

6. **Modern slavery**

Modern slavery, as defined by the Modern Slavery Act 2015, encompasses various forms of exploitation including slavery, servitude, forced or compulsory labour, and human trafficking. It involves situations where individuals are controlled, coerced, or deceived into situations of exploitation, often for the financial or personal gain of another.

Human trafficking involves acts of recruiting, transporting, transferring, harbouring or receiving a person through a use of force, coercion or other means, for the purpose of exploiting them.

7. **Discriminatory abuse**

This type of Abuse is motivated by discriminatory and oppressive attitudes towards people on the grounds of disability, gender reassignment, age, race, religion or belief, sex and sexual orientation, and political beliefs. It may be a feature of any form of Abuse of an Adult at Risk, and manifests itself as Physical Abuse / assault, Sexual Abuse / assault, Financial Abuse / theft and the like, Neglect and Psychological Abuse/harassment, including verbal abuse and racist, sexist, homophobic or ageist comments, jokes or any other form of harassment. It also includes not responding to dietary needs and not providing appropriate spiritual support.

## 8. **Organisational or institutional abuse**

Organisational abuse, also known as institutional abuse, refers to neglect and poor care practices within a specific care setting, such as a hospital, care home, or even within a person's own home if they receive care there. It can manifest as a single incident or as ongoing ill-treatment. This type of abuse is often linked to the structure, policies, processes, and practices of the organisation itself, rather than individual acts of malice.

## 9. **Neglect or acts of omission**

Neglect or acts of omission, in the context of adult safeguarding, refers to the failure of a person responsible for an adult's care to provide the necessary care and support, which can be either intentional or unintentional.

This can involve failing to meet basic needs like providing adequate food, shelter, clothing, and healthcare, or failing to ensure a safe environment. It can also encompass the withholding of necessities like medication or preventing access to healthcare and social services.

## 10. **Self-neglect**

Self-neglect in adults is characterised by a person's inability or unwillingness to care for their own basic needs, which can include personal hygiene, health, safety, and their living environment. This can manifest in various ways, such as neglecting personal hygiene, failing to maintain a safe and clean living space (including hoarding), or refusing necessary support services. It can also involve a lack of awareness of the risks associated with self-neglect and a reluctance to accept help.

Some common signs that there may be something concerning happening in a vulnerable adult or child's life include:

- Physical injuries (bruising, fractures, burns, bedsores)
- Fear
- Depression
- Unexplained weight loss
- Malnutrition
- Untreated medical problems
- Confusion
- Loss of sleep
- Unexpected or unexplained change in behaviour
- Unexplained shortage of money

These signs don't necessarily mean that someone is being abused, there could be other things happening in their life which are affecting their behaviour. There may also be some concerning behaviour from those with adults at risk or children in their care, which raises concerns for the service user's safety and wellbeing.

## 2. **Our Commitment to Safeguarding**

2.1 This policy is designed to meet the above principles by ensuring that:

- Holden Knight has robust safer recruitment processes in place that ensure those who are known to be at risk to Children or Adults do not gain access to them; those whose actions suggest that they are a risk are detected at the earliest opportunity and prevented from working with vulnerable adults or young people.

- Internal employees and temporary workers understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns
- There is an open and transparent culture which enables internal employees and temporary workers to raise concerns around children/adults at Risk and those that work with vulnerable groups.
- There is a clear process in place for staff and temporary workers to raise concerns without fear of repercussion and knowing they will be supported and those concerns acted upon.
- Holden Knight will stay up to date with developments in terms of safeguarding best practice ensuring policies and procedures are reviewed on a regular basis and in response to situations that may arise.
- Holden Knight will work in partnership with other services (including local authority Children's and adults social care) to ensure those that are identified as being at risk of abuse are protected.

## 2.2 **Communication of the Policy & Guidance**

Details of the Policy & Guidance will be made available to all staff and volunteers by means of induction and training or when the policy and procedure has been reviewed and amended. Staff will confirm they have read and understood the policy through completion of the induction and probation period. Following this, annual declarations will be collected from staff along with acknowledgment of having read part 1 of Keeping Children Safe in Education (KCSiE) September 2025. All staff will as a minimum be expected to undertake Safeguarding and Prevent training and update their training in line with this policy and guidance.

Learners will be made aware of the Policy and Guidelines by means of a summary published on the internet and elsewhere as appropriate. Sub-contracted partners will be made aware of the Policy & Guidelines by the Head of Partnerships & Engagement through the annual induction process and regular contract review meetings.

## 2.3 **Mandatory Training**

Holden Knight requires mandatory induction training for tutors, which includes online resources, face-to-face training, and support materials. The training aims to equip tutors with the necessary skills and knowledge to effectively support pupils and covers topics such as session management and safeguarding.

Key aspects of Holden Knight's mandatory induction training for tutors:

- Our mandatory training is Safeguarding Level 2 and Prevent training, our secure tutor platform ensures that these are refreshed when they are due to expire.
- Safeguarding level 2 covers appropriate professional boundaries, including how to recognise signs of abuse, understand different signs of abuse, and respond appropriately, which includes maintaining professional boundaries and creating a safe learning environment and reporting any concerns, which are all interconnected with professional conduct (avoiding inappropriate contact, maintaining professional demeanour).
- Online Resources and Platform Training:

- Holden Knight also provides face-to-face training sessions to ensure tutors are comfortable with the platform and their role.
- Tutors have access to support from Holden Knight consultants and can reach out with any questions or concerns.
- Safeguarding Training- Holden Knight emphasizes the importance of safeguarding and includes mandatory training on this topic as part of the induction process.
- We provide all of our tutors with a tutor handbook which details and promotes best practice for tuition.

### **3. Recognising Concerns**

Local authorities have a duty to promote and safeguard the welfare of children and to investigate and take necessary action to protect children and young people from abuse and/or harm.

Safeguarding and promoting the welfare of children and young people and, in particular protecting them from abuse and harm, is a shared responsibility and depends on effective joint working between all staff along with all the relevant agencies and professionals.

Children should be supported by staff to understand what abuse is and to manage the impact of any abuse or neglect they have suffered.

Children must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse among their peers. This should include being able to access in private, relevant websites or helplines such as Childline to seek advice and help.

All staff have a responsibility to report any suspicions or concerns that a child has or may be mistreated or harmed. Abuse or neglect is not always easy to identify staff are more than likely to have some information but not the whole picture.

The first indications that a child is being abused or neglected may be as a result of:

- Remarks made by the child or their parents or friends;
- Changes in a child's behaviour or demeanour that may indicate abuse or neglect;
- By a series of events or indicators which, whilst not necessarily of concern in themselves, are of concern when considered together.

Initially, the situation may not seem serious but it should be remembered that intervening early can prevent minor abuse from becoming more serious.

### **4. Reporting Concerns**

For any stakeholder to report a safeguarding concern, we have a clear process in place. For tutors, as soon after you have recognised a safeguarding concern, and if possible, write down your concerns/events/conversation where a disclosure has been made and the specific reasons for your concern (context).

We understand that a learner, their representatives, parents, or carers may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform a member of the Senior Management Team and/or DSL. Holden Knight has clear processes in place including a Managing Allegations Against Staff policy.

The Designated Safeguarding Lead on all such occasions will discuss the content of the allegation with the local authority designated officer (LADO) for children or the Designated Adult Safeguarding Manager (DASM) for adults.

Holden Knight encourages service users, their representatives, parents, or carers to report their concerns immediately to the Designated Safeguarding Lead. All reports of suspected abuse or neglect will be taken seriously and handled confidentially, with the individual's safety and well-being as the top priority.

By proactively informing service users and their support networks about safeguarding awareness and establishing clear reporting procedures, Holden Knight can create a safer and more secure environment for vulnerable individuals and facilitate timely intervention in case of any safeguarding concerns.

For any stakeholder to report a safeguarding concern, we have a clear process in place. Our Holden Knight Designated Safeguarding Lead is Jane Higgins (Level 3 Qualified) and our deputy DSL is Courtney Taylor. We have a dedicated email address is [safeguarding@holdenknight.com](mailto:safeguarding@holdenknight.com) this email address is constantly monitored.

In the first instance you should contact your dedicated Holden Knight Account Manager, via telephone on 0800 0472313 and/or email your concern to [intervention@holdenknight.com](mailto:intervention@holdenknight.com) in the first instance and we will contact you to discuss, support and escalate further via our Holden Knight Designated Safeguarding Lead (DSL).

We will ask staff to provide a clear and factual written statement, as soon as possible after recognising a concern. Please send your written statement to our DSL [safeguarding@holdenknight.com](mailto:safeguarding@holdenknight.com) and copy in [intervention@holdenknight.com](mailto:intervention@holdenknight.com). Our DSL can also be reached on 07717068035.

The Holden Knight DSL will respond to you to confirm, discuss further the context of the safeguarding issue that you have raised. The DSL will investigate and record the incident and refer the concern to appropriate agencies, i.e. For children under 18, Children's Social Services, for vulnerable young adults over 18, Adult Social Services.

All information throughout our Safeguarding reporting a concern is strictly shared on a "need to know" basis.

## **5. Abuse**

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts 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.

A person can abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children can be abused in a family or in an institution or community setting; by those known to them or, more rarely, by a stranger. They can be abused by an adult or adults or another child or children.

## **6. Neglect**

Neglect is a form of Significant Harm which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur/involve:

- During pregnancy as a result of maternal substance abuse;

- Parent/carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment;
- Failing to protect a child from physical and emotional harm or danger;
- Failure to ensure adequate supervision including the use of inappropriate carers;
- Failure to ensure access to appropriate medical care or treatment;
- May also include neglect of, or unresponsiveness to a child's basic emotional needs.

Warning signs include:

- Non-organic failure to thrive, i.e. where there is poor growth for which no medical cause is found, especially with a dramatic improvement in growth on a nutritious diet away from home;
- A consistently unkempt, dirty appearance;
- Unmet medical needs, e.g. failure to seek medical advice or attend appointments for illness, severe untreated nappy rash, missed immunisations where they have not been refused on other grounds;
- Developmental delay without any other clear cause;
- Lack of social responsiveness;
- Self-stimulating behaviours such as head banging or rocking (note that some children with special needs may exhibit this behaviour due to their disability but this should also be evaluated for context);
- Repeated failure by parents/carers to prevent injury;
- Consistently inappropriately clothed for the weather;
- Hazardous living conditions.

## **7. Physical Abuse**

Physical abuse is a form of Significant Harm that may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child, including fabricating the symptoms of, or deliberately causing, ill health, to a child.

Harm may be caused to children both by the abuse itself and by the abuse taking place in a wider family or institutional context of conflict and aggression, including inappropriate or inexperienced use of physical restraint. Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural problems, and educational difficulties. Violence is pervasive and the physical abuse of children frequently coexists with domestic abuse. It may involve hitting, shaking, scolding, suffocating, or poisoning and it may cause the following injuries:

### **7.1 Bruises**

Symmetrically bruised eyes are rarely accidental, although they may occur where there is a fracture of the head or nose and blood seeps from the injury site to settle in the loose tissue around the eye. A single bruised eye may be the result of an accident or abuse. Careful consideration is required whenever there is an injury around the eye. It should be noted whether the lids are swollen and tender and if there is damage to the eye itself.

- Bruising in or around the mouth (especially in small babies);
- Grasp marks on legs and arms or chest of a small child;
- Finger marks (e.g. you may see three or four small bruises on one side of the face and one on the other);
- Symmetrical bruising (especially on the ears);
- Bruising behind the ears;
- Outline bruising (e.g. belt marks, handprints);
- Linear bruising (particularly on the buttocks or back);
- Bruising on soft tissue with no obvious explanation, e.g. inner aspect of the thigh;
- Bruising of different ages.

The following are uncommon sites for accidental bruising:

- Back of legs, buttocks, except occasionally along the bony protuberances of the spine
- Mouth, cheeks, behind the ear;
- Stomach, chest;
- Under the arm;
- Genital, rectal area;
- Neck.

Babies or others who are not yet mobile, i.e. are developmentally unable to move on their own, should not get bruises or other injuries. If they have bruises or other injuries, these must be adequately explained before they are accepted as accidental.

### **Note**

Seemingly trivial injuries should not be ignored. Abuse can and does sometimes escalate against a child if it goes unchecked. All injuries should be noted and collated in the child/ren's records.

Most falls or accidents produce one bruise on a single surface - usually on a bony area. A child who falls downstairs generally has only one or two bruises. Children usually fall forwards and therefore, bruising is most often found on the front of the body. In addition, there may be marks on their hands if they have tried to break their fall.

Bruising may be difficult to see on child who is black. Blue-grey spots are natural pigmentation on the skin which may be mistaken for bruising. These purplish-blue skin markings are most commonly found on the backs of children.

### 7.2 Scars

Children may have scars, but notice should be taken if a child has a large number of scars of different ages (especially if coupled with current bruising), unusually shaped scars (e.g., round ones from possible cigarette burns), or large scars that are from burns or lacerations that did not receive medical treatment.

### 7.3 Fractures

These should be suspected if there is pain, swelling, and discolouration over a bone or joint. Fractures should be suspected if the child is not using a limb, especially in younger children. The most common non-accidental fractures are to the long bones in the arms and legs, and to the ribs. It is very rare for a child under one year to sustain a fracture accidentally. Fractures also cause pain, and it is very difficult for a parent to be unaware that a child has been hurt.

### 7.4 Burns/Scalds

It can be very difficult to distinguish between accidental and non-accidental burns; however, burns or scalds with clear outlines are suspicious as are burns of uniform depth over a larger area.

### 7.5 Bites

These can leave clear impressions of the teeth. Human bites are oval or crescent-shaped. If the impression of the bites is more than 3 cm across its width, they must have been caused by an adult or older child with permanent teeth.

Other injuries which may be deliberately caused

- Poisoning;
- Ingestion or other application of damaging substances, e.g. bleach;
- Administration of drugs to children where they are not medically indicated or prescribed;

- Injuries may also be caused as a result of a parent fabricating or inducing illness in a child.

## 7.6 Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long lasting, harmful consequences.

Possible indicators that a child has already been subjected to FGM, and factors that suggest that a child may be at risk, are provided below. Typical identifiers / triggers are:

- Family comes from a community known to practice FGM
- Family/child talks about a long holiday
- Family/child may have asked to be excused PE/swimming on return
- Family/child may confide that she is going to a 'special ceremony' when on holiday
- Female child is known to have a mother that has been subject to FGM
- Female child is known to have a sister that has already undergone FGM
- Family are socially isolated or less well integrated into UK society
- Family withdraws female child from PSHE/SRE – to keep child less informed about their body.

If any member of staff receives a disclosure or is aware that a FGM is about to happen this must be disclosed to the Designated Safeguarding Lead at the school as appropriate and within Holden Knight without delay (see para 4 above).. This is so that the appropriate referrals may be made and/or protective measures may be put in place, especially as the child/ren may be taken out of the country.

Under s74 of the Serious Crime Act 2015 where a child has disclosed that they have undergone FGM the education professional (teacher, support staff) has a duty placed on them, by law, to report this to the Police via the 101 line.

## 8. 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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse often takes place online and can be in many forms including grooming, sexting (including sharing explicit photos/images) and social media. Creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

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

However, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action is not in the public interest. With effect from 29 June 2021, section 69 Domestic Abuse Act 2021 expanded so-called 'revenge porn' to include threats to disclose private sexual photographs and films with intent to cause distress. Technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse can have a long-term impact on emotional, social and educational development and is linked to the development of mental health issues in later life.

Most child victims are sexually abused by someone they know - either a member of their family or someone well known to them or their family. It can be the most secretive and difficult type of abuse for children and young people to disclose. Children of all ages are abused and the abuse may carry on for many years before it comes to light.

Initially, children and young people may not recognise themselves as victims of sexual abuse - a child may not understand what is happening and may not even understand that it is wrong especially as the perpetrator will seek to reduce the risk of disclosure by threatening them, telling them they will not be believed or holding them responsible for their own abuse.

Recognition of sexual abuse generally follows either a direct statement from the child (or very occasionally from the abuser), or more often, as a result of concerns about the child's behaviour, or because of physical symptoms or signs.

Indicators that a child has been sexually abused include:

- Changes in behaviour, including becoming more aggressive, withdrawn, clingy;
- Problems in school, difficulty concentrating, drop off in academic performance;
- Sleep problems or regressed behaviours such as bed wetting / soiling when previously dry;
- Frightened of or seeking to avoid spending time with a particular person;
- Knowledge of sexual behaviour/language that seems inappropriate for their age;
- Physical symptoms including pregnancy in adolescents where the identity of the father is vague or secret, STIs, discharge or unexplained bleeding;
- Poor hygiene, which often leads to social isolation in school;
- Injuries and bruises on parts of the body where other explanations are not available, especially bruises, bite marks or other injuries to breasts, buttocks, lower abdomen or thighs; and
- Injuries to the mouth, which may be noted by dental practitioners.

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

## **9. Emotional Abuse**

Emotional abuse is a form of Significant Harm which involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including online/Cyberbullying\*) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

- \* Cyberbullying means when the internet, mobile phones, or other devices are used to hurt or bully another person, this can include text messaging, emails, instant messaging, and use of social networking sites such as Facebook. It is not usually indicated by a specific incident but is observed in the interaction with the child. One child may be scapegoated or treated completely differently to their siblings.

### 9.1 Behaviours associated with Emotional Abuse

The following may identify behaviours which, if persistent, may be emotionally abusive. What is inappropriate will often depend on the child's developmental stage:

- A persistently negative view of the child, particularly as inherently bad, often combined with "deserved" harsh punishment;
- Inconsistent and unpredictable responses particularly where there is threat to or rejection of the child;
- Expectations which are inappropriate for the developmental stage of the child, either too high or too low, over protective or under protective;
- A lack of emotional availability or responsiveness to the child;
- No respect for personal boundaries of the child; not seeing the child as an individual;
- Promoting mis-socialisation or poor social adaptation;
- Contradictory, confusing or misleading messages in communicating with the child which seriously distort reality for the child or promote confusion;
- Serious physical or psychiatric illness of a parent including periods of hospitalisation;
- Induction of a child into bizarre parental beliefs;
- Breakdown in parental relationship with chronic, bitter conflict over contact or residence (this would also include situations where there is domestic abuse);
- Major emotional rejection of the child and parental inability to perceive their needs with any objectivity;
- Major and repeated familial change, e.g. separations, reconstitution of families;
- Parental drug and/or alcohol misuse;
- Entrenched offending behaviour which may be criminal and which might also lead to a term of imprisonment.

### 9.2 Behavioural signs in children

Behaviour in a child which may indicate emotional abuse includes:

- Very low self-esteem, often with an inability to accept praise or to trust;
- Lack of any sense of fun, over-serious or apathetic;
- Excessive clingy or attention seeking behaviour;
- Over-anxiety, either watchful and constantly checking or over-anxious to please;
- Developmental delay, especially in speech;
- Substantial failure to reach potential in learning, linked with lack of confidence, poor concentration and lack of pride in achievement;
- Self-harming; compulsive rituals; stereotypical repetitive behaviour;
- Unusual pattern of response to others showing emotions.

## 10. Bullying (including Online/Cyberbullying)

Bullying is defined as 'behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group either physically or emotionally' (DfE definition). Repeated bullying usually has a significant emotional component, where the anticipation and fear of being bullied seriously affects the behaviour of the victim.

It can be inflicted on a child by another child or an adult. Bullying can take many forms (for instance, cyberbullying or online bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or can be because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

It can take many forms, but the three main types are:

**Physical** - for example, hitting, kicking, pushing, theft;

**Verbal** - for example, threats, name calling, racist or sexual/homophobic remarks;

**Emotional** - for example, isolating an individual from activities/games and the social acceptance of their peer group.

An Ofsted thematic review (Review of Sexual Abuse in Schools and Colleges (Ofsted)) identified substantial levels of sexual harassment for both girls (90%) and boys (nearly 50%) – usually in unsupervised settings. Sexual harassment and sexual violence exist on a continuum and may overlap. Where the latter occurs, there could be a criminal offence committed.

Cyberbullying is bullying that takes place using technology. Whether on social media sites, through a mobile phone, or gaming sites, the effects can be devastating for the young person involved. There are ways to help prevent a child from being cyberbullied and to help them cope and stop the bullying if it does happen. It is another form of bullying which can happen at all times of the day, with a potentially bigger audience.

By its very nature, cyberbullying tends to involve a number of online bystanders and can quickly spiral out of control. Children and young people who bully others online do not need to be physically stronger and their methods can often be hidden and subtle.

Bullying often starts with apparently trivial events such as teasing and name-calling which nevertheless rely on an abuse of power. Such abuses of power, if left unchallenged, can lead to more serious forms of abuse, such as domestic violence and abuse, racial attacks, sexual offences and self-harm or suicide.

Bullying is a type of behaviour which needs to be defined by the impact on the child being bullied rather than by the intention of the perpetrator.

## **11. Technology Assisted Abuse**

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline.

Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. Children can also be groomed online and through social media by people coercing or manipulating them to sexually or criminally exploit them or seeking to radicalise them.

## **12. Child on Child Sexual Violence and Sexual Harassment**

Keeping Children Safe in Education (KCSiE) (September 2025) Part five: Child on Child Sexual Violence and Sexual Harassment sets out how schools and colleges should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and/or online.

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

## Sexual Violence

Child on child sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: they intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**NOTE:** Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

## Sexual Harassment

Child on child sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual 'jokes' or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim;
- Displaying pictures, photos or drawings of a sexual nature;
- Upskirting (this is a criminal offence); and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - Consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of under 18s is a criminal offence. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges;
  - Sharing of unwanted explicit content;
  - Sexualised online bullying;

- Unwanted sexual comments and messages, including, on social media;
- Sexual exploitation; coercion and threats; and
- Coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

See also: Addressing Child-on-child Abuse: a Resource for Schools and Colleges (Farrer and Co.) which is intended to be used as a resource and reference document for practitioners.

### **13. Child criminal exploitation**

Child criminal exploitation is a form of child abuse where children and young people are manipulated and coerced into committing crimes. County Lines is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns – using dedicated mobile phone lines or “deal lines.”

Children as young as 12 years old have been exploited into carrying drugs for gangs. This can involve children being trafficked away from their home area, staying in accommodation and selling and manufacturing drugs. This can include:

- Airbnb and short term private rental properties
- Budget hotels
- The home of a drug user, or other vulnerable person, that is taken over by a criminal gang- this may be referred to as cuckooing.

There are some signs to look out for if you're worried a child or young person has joined a gang, or is being criminally exploited:

- Frequently absent from school and doing badly at school
- Being angry and aggressive
- Having unexplained money and buying new things
- Wearing clothes or accessories related to gang colours or getting tattoos
- Using new slang words
- Making more calls or sending texts, possibly on a new phone
- Spending more time on social media, being secretive about time online

If you suspect a child is a victim of child criminal exploitation this should be treated as a safeguarding concern and appropriate reporting measures should be followed.

### **14. Prevention**

Holden Knight employs various strategies to control the risk of abuse, radicalisation and extremism and target the causes and opportunities for abuse and neglect. These include:

- Acknowledgement of this policy for all Holden Knight employees and temporary workers.
- Embedding a rigorous Recruitment, Selection and Vetting policy for all workers.
- Embedding the principles of safeguarding into operational, management expectations and professional practice.
- On-going Safeguarding Awareness training for all Holden Knight employees and temporary workers.
- Holden Knight has a designated Safeguarding Lead and deputy to support on all areas concerned to safeguarding.

## **15. Extra-Familial Harm**

Children may be at risk of or experiencing physical, sexual, or emotional abuse and exploitation in contexts outside their families.

Extra-familial contexts include a range of environments outside the family home in which harm can occur. These can include peer groups, school, and community/public spaces, including known places in the community where there are concerns about risks to children (for example, parks, housing estates, shopping centres, takeaway restaurants, or transport hubs), as well as online, including social media or gaming platforms.

Working Together to Safeguard Children recognises that, whilst there is no legal definition for the term extra-familial harm, it is widely used to describe different forms of harm that occur outside the home. Children can be vulnerable to multiple forms of extra-familial harm from both adults and/or other children. Examples of extra-familial harm may include (but are not limited to): criminal exploitation (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, child-on-child (nonfamilial) sexual abuse and other forms of harmful sexual behaviour displayed by children towards their peers, abuse, and/or coercive control, children may experience in their own intimate relationships (sometimes called teenage relationship abuse), and the influences of extremism which could lead to radicalisation.

## **16. Informed Consent**

Safeguarding decisions regarding vulnerable individuals must always consider the individual's ability to provide informed consent. The Mental Capacity Act 2005 (MCA) must be upheld and complied with in all safeguarding situations involving individuals who may lack capacity to make certain decisions.

All employees are responsible for understanding and adhering to this policy in all safeguarding situations. Managers and supervisors are responsible for ensuring that safeguarding decisions within their areas of responsibility are in keeping with this policy.

Safeguarding decisions should always start with the person having the capacity to understand the situation and make a decision for themselves. This means they need to understand the information provided, retain it, weigh the potential benefits and drawbacks, and communicate their choice. If they have the capacity, their decision is respected and should be followed. If there's any doubt about a person's capacity to make a specific decision, the MCA applies. The Act provides a framework for assessing capacity and for making decisions on behalf of someone who lacks capacity.

Where a competent child refuses to allow information to be shared with their parent(s)/carers, there should be evidence that the risks of not sharing the information have been considered. Where it is thought to be in the child's best interests to share information, there should be evidence of attempts to seek a compromise.

When someone lacks capacity, decisions must be made in their best interests. This means considering their wishes, feelings, beliefs, and values, as well as weighing the potential risks and benefits of any action.

The Partnerships and Engagement team are responsible for reviewing this policy annually to ensure its effectiveness and relevance. Failure to comply with this policy may result in disciplinary action being taken.

## **17. Further Information**

This policy should be read in conjunction with our other relevant policies, which include:

- Managing Allegations against Staff Policy
- Complaints Policy
- Online Safety Policy
- Safer Recruitment Policy
- Temporary Worker Code of Conduct
- Whistleblowing Policy

Legislation, Statutory Guidance and Government Non-Statutory Guidance:

Promoting the Education of Looked After Children and Previously Looked After Children (DfE)

Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension

Keeping Children Safe in Education (KCSiE) September 2025

Designated Teacher for Looked-after and Previously Looked-after Children (DfE)

Addressing Child-on-child Abuse: a Resource for Schools and Colleges (Farrer and Co.):  
<https://www.farrer.co.uk/globalassets/brochures/addressing-child-on-child-abuse->