



## Safeguarding and Prevent Policy

### 2018/19

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## Policy Statement

*Alacrity Group: for the purposes of clarity the term “Group” will mean Alacrity Capital Holdings Limited and any of its subsidiary companies which includes, but not limited to, Consultvia Limited, Interlearn Limited, Covestia Limited, Genexia Limited and Estvestia Limited.*

### 1.0 Scope

The company has a statutory and moral duty to ensure that it safeguards and promotes the welfare of all students, with particular reference to children, young people and vulnerable adults. Safeguarding is closely linked to the Prevent guidance in that it aims to keep students safe by preventing them from being radicalised, drawn into terrorism or any other forms of extremism.

This document represents the company’s commitment to Child Protection responsibilities, which is underpinned by the Department for Education statutory guidance, “Keeping Children Safe in Education’, (Sept 2016). The framework for working with agencies to promote the safety and wellbeing of young people is also reflective of the legislative framework ‘Working Together to Safeguard Children’ (2015).

This policy and its associated procedures apply to all staff, students and other users; including volunteers, external contractors, freelance staff, remote students, apprentices and employers. The policy and procedure will also apply to all subsidiaries and trading entities of the company, where appropriate.

### 2.0 Statement

The group recognises that:

- The welfare of all students is paramount, as enshrined in the Children Act 1989 and the Care Act 2014.
- We recognise that “safeguarding is everyone’s responsibility” to provide a safe and stimulating environment where students can learn and make progress.
- We will work with multi-agency teams to promote and protect the welfare of young children and adults regardless of their age, disability, gender, racial heritage, religious belief, sexual orientation or identify. All students have the right to equal protection from all types of harm or abuse. See **annex No 1**, for a list of referral and support agencies.

For the purposes of this policy, the term ‘children’ refers to everyone under the age of 18 years.

### 3.0 Aims

We will seek to safeguard and promote the welfare of children and vulnerable adults by: -

- Clarifying standards of behaviours for staff and students.
- Appointing Designated Safeguarding and Prevent Lead Officers (DSPLOs) to advise on and manage any concerns and referrals made.
- Equipping our staff with the knowledge of child protection and how to identify the possible sign and symptoms/indicators of abuse or concern, including how to deal with and refer through key agencies and support channels.
- By taking all suspicions and allegations of abuse and risks of radicalisation seriously and to respond to these concerns with due speed and consideration.

- By adopting rigorous safeguarding practices throughout the company along with a code of conduct for staff and volunteers.
- By recruiting staff and volunteer's safely, ensuring that all pre-recruitment checks are in place prior to new staff starting their employment.
- By working with multi agencies through data sharing agreements about any safeguarding or prevent concerns through the agreed referrals arrangements.
- By fostering positive relationships with the Police and other community partners to promote British values and to enable students to engage successfully within their communities and to engage with, rather than marginalise extreme political views.
- Providing effective management for staff, contractors and volunteers through regular support, training and supervision.
- Developing and encouraging learners' resilience and critical thinking skills so that they can challenge and debate in an informed way, through the wide range of teaching, learning and assessment strategies used throughout our training programmes and courses.
- To facilitate CPD opportunities for staff to develop and share teaching, learning and assessment strategies especially in relation to building resilience, e-safety and critical thinking skills.

#### **4.0 General Data Protection Regulation (GDPR).**

We will ensure that all personal data will be processed in accordance with the requirements of the GDPR. All personal information is confidential and should only be shared with the permission of the individual concerned (and/or those with parental responsibility), unless the disclosure of confidential information is necessary in order to protect a child or adult at risk from serious harm. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child or adult at risk and on a strict "need to know" basis. We will also comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance and any amendments.

#### **5.0 Safe Recruitment of Staff**

The Company adheres to its "Safer Recruitment and Selection Policy and Procedure".

#### **6.0 Reporting arrangements to the ESFA**

The need to refer allegations or concerns about possible risk posed by staff, volunteers, subcontractors or partners to the Designated Local Authority Person (formerly LADO) is a requirement, as detailed in the government guidance, *'Working Together to Safeguard Children (2015)*.

#### **ESFA Clause**

The ESFA has included a new safeguarding clause in the funding agreements and contracts for 2017/18. Whilst the local authority and institution have primary duties in respect of safeguarding, the Secretary of State (SoS) has a general duty to promote the wellbeing of children in England under section 7 of the Children and Young Persons Act 2008. The ESFA's role therefore, is to provide assurance to the Secretary of State in meeting their general duty, that the right organisations are taking action to keep all young people and adults safe.

We **must** therefore inform the ESFA if we are subject of an investigation by the local authority or the police relating to funded learners. In such circumstances the Chief Executive (or senior designated safeguarding lead) will need to email enquiries. [EFA@education.gov.uk](mailto:EFA@education.gov.uk).

The ESFA will need to know the name of the institution, the nature of the incident and confirmation that it is, or is scheduled to be investigated by the local authority and/or the police. If a referral has been made to the Disclosure and Barring Service, we are required to inform the ESFA.

## 7.0 Monitoring and Review

The implementation of this policy will be monitored by the following key staff: -

- The Senior Leadership Team – via reports to meetings.
- Board of Directors – via quarterly reports.
- Group Director of Operations – via operational meetings.
- Safeguarding Leads – via operational meetings and the Safeguarding Steering Group.

## 8.0 Related Policies

The following policies demonstrate and support our shared commitment to safeguarding and prevent by promoting the welfare of its stakeholders: -

Anti-Bullying and Harassment policy	Public Interest Disclosure (Whistleblowing) policy
E-Safety policy	Safer Recruitment and Selection policy
Equality and Diversity policy	Disciplinary and Grievance Code of Conduct policy
Data Protection and IT Security and Information Policies	Admission policy
Health and Safety including risk assessment policy	Lone Working policy
Children and Vulnerable Adults policy	Complaints Policy
External Guest Speakers and Visitors Policy.	Student Confidentiality policy
Educational visits and trips including guest speakers policy	Code of conduct for contractors /supply chain

We will review and update all of our policies on an annual basis.

**9.0 Named Staff with designated responsibility for Safeguarding and Prevent lead officer's (DSPLO's)**

If you have any concerns or require advice, please contact the officers listed below. All students and apprentices must also be made aware of the names and contact details of all available DSPLO's.

**Out of hours & weekends Safeguarding contact: 07950 858 084**

Name	Role	Telephone No	Email Address
Craig Hughes	Board member with responsibility for Safeguarding and Prevent.	01527407140	craig.hughes@alacrity-group.co.uk
Michael Bradshaw	Named Senior Officer for Safeguarding and Prevent	01527407140	michael.bradshaw@interlearn.co.uk

**Lead Designated Safeguarding and Prevent Officers: -**

Name	Role	Telephone No	Email Address
Michael Bradshaw	Lead Designated Safeguarding and Prevent Officer	01527407140	michael.bradshaw@interlearn.co.uk
Julie Duckett	Deputy Lead Designated Safeguarding and Prevent Officer	01527407140	<a href="mailto:Julie.duckett@interlearn.co.uk">Julie.duckett@interlearn.co.uk</a>

**Allegations against the CEO's /Senior Team or Staff**

Name	Designation	Telephone No	Email Address
Craig Hughes	Board member with Safeguarding responsibilities	01527407140	craig.hughes@alacrity-group.co.uk

## **10.0 Section One: Safeguarding roles and responsibilities**

**All staff, including volunteers, contractors and visitors must: -**

- Be familiar and be aware of the safeguarding procedures and referrals arrangements.
- Know who the Designated Safeguarding leads and Prevent Officers are and how to contact them.
- Know how to refer and report any concerns to the relevant Designated Safeguarding and Prevent Lead Officers, if they think a student may be at risk of radicalisation or involvement in terrorism.
- Report concerns about the disclosure immediately or as soon as it is practically possible on the day that the disclosure is made.
- Be aware of the procedures in order to identify those students in need of early intervention or help and to take appropriate action where there are concerns for the welfare and protection of students/staff.
- Be familiar with the signs and symptoms of the different types of abuse.
- Understand the whistleblowing procedures.

### **Staff Induction**

All staff will undergo an induction programme which will be co-ordinated centrally through the Human Resource division. All new starters must complete the following on-line courses within 2 weeks of commencing their employment: -

- Safeguarding training
- Prevent Training
- Equality and Diversity
- Health & Safety and Fire Safety
- Received and have read the latest available version of 'Part One: -  
Safeguarding Information for all Staff' as appearing in Keeping Children Safe in Education 2016, and will be asked to sign and date the electronic HR register to confirm that they have done so.

It is also **responsibility of the line manager** of every new member of staff, to confirm the completion of this training, prior to confirming their appointment, at the end of their probationary period. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action.

### **Staff Induction Handbook**

The staff induction handbook will also sign-post to all relevant policies and procedures and includes a copy of version of 'Part One: Safeguarding Information for all Staff' as appearing in Keeping Children Safe in Education 2016.

### **Existing Staff**

All existing staff must have completed their mandatory Safeguarding and Prevent training with refresher training attended annually, during the agreed CPD days. In addition, staff will also receive regular updates via email, meetings or bulletins to keep their skills and knowledge up to date.

### **Information sharing**

- Guidance is available on SharePoint to support tutors and assessors in understanding issues around sharing information about young people and vulnerable adults – Student Confidentiality Policy. It is also included in the staff induction handbook.
- All sharing of information must comply with the new General Data Protection Act (2018).

### **Delivery Training and assessment teams**

Operation Managers, IQA's, Assessors or Personal Tutors (if appropriate) are responsible for knowing their students and to identify if students are at risk from abuse. IQA's and Assessors will support the following responsibilities: -

- Students at risk of not completing their course or training programme are deemed to be 'at risk' – this does not infer a risk of physical danger but relates to being at risk of dropping out of their course/training programme or not succeeding in a timely way.
- Assessors should ensure that all functional skill staff in contact with the students knows that they are 'at risk' and the operational managers and the welfare support officer is also informed.
- Appropriate support and intervention strategies can therefore be put in place to maximise their opportunity for success.

Where staff are not clear of strategies for managing 'at risk' learners it is their responsibility to seek support and to undertake appropriate training to address their skills need through the Group Director of Operations and or the Head of Quality.

### **Tutors and Assessors**

#### **Pastoral care and assessor tutorial support responsibility**

All staff are responsible for ensuring the safety and wellbeing of all students. All assessors have a specific responsibility for the safeguarding of their students/apprentices within their case loading cohort which is in line with their job role and as such they should ensure that: -

#### **Tutors and Assessors know their students/apprentices through:**

- Examination of application, recruitment and enrolment documentation i.e. Support requirements, EHCP, prior achievement etc.
- Understand the impact of the initial assessment results and how to support and plan learning based upon their students or apprentices starting points.
- Recognise behaviour and individual character traits through the assessment of the occupational skill scans, trade tests, learning styles and sector specific core behaviours to help plan and support learning.

#### **Tutors and Assessors to ensure that the following is in place in response to the above: -**

- Recommendation for change of course/training programme, if appropriate.
- Additional Learning Support (Language, literacy or numeracy, English and maths).
- Referral to the Student Support and Welfare officer, where appropriate.

#### **Tutors and Assessors to ensure that students and apprentices are fully supported by: -**

- Informing all teaching and assessment staff of the support needs within the learning environment or work place environment.
- Ensuring that support mechanisms are effectively supporting learning and assessment.
- Using one to one tutorials effectively to support achievement on course and within the workplace to help overcome any barriers to learning.

### **Student Induction**

All students and apprentices must have Safeguarding and Prevent training included in their Induction Programme and is made aware of: -

- Training policies related to safeguarding and Prevent.
- Their responsibility for their own and others' safety.
- The requirement to wear ID at all times when on training sites.

- How to report any instances related to Safeguarding, Child Protection or radicalisation or contact with extremist groups.

### **Managing late enrolment or student's starting late**

All students and apprentices starting their course or training late **must be** provided with a detailed induction which must include Safeguarding and Prevent.

### **Safeguarding Apprentices within the workplace**

- Employers will be required to confirm that they have all of the Health and Safety requirements in place including up to date risk assessments. Whilst it is the employers legal duty to comply with the most up to date HSE guidance. Our sector industry specialist assessor will also carry out a Health and Safety audit and/or inspection as well as a risk assessment. This is especially so in relation to high risk learning environments such as engineering, rail or construction sector.
- Employers will be provided with the contact details of the Designated Safeguarding and Prevent Lead officer in case referrals are made to the employer.
- Employers will be provided with the Designated Safeguarding and Prevent Lead officer details, along with the relevant policies and procedures and agree that they have understood them.
- Apprentices will be given an induction where staying safe and Prevent are included during their work and training inductions.
- Apprentices will be given the contact details of the designated safeguarding and Prevent Lead Officers and the student welfare team.
- Assessors and tutors **must only use** company phones and email addresses to contact apprentices or students.
- **Staff Personal Contact details**
- No member of staff should give a student their personal phone numbers, email address, home address or make contact with students via social media.

### **Educational Trips and Visits**

The Educational trips and visits procedure outlines the requirements for all off site visits and trips. This must be included in the induction for all delivery staff.

### **Contractors, including freelance staff working at training sites:**

Contractors/freelance staff undertaking work are required to: -

- Comply with to the Company's Health and Safety, Safeguarding and Prevent requirements.
- Agree to comply with the Safeguarding and Prevent requirements.
- Contractors/freelance staff to be given a different coloured lanyard from company staff. Which must be worn at all times.

### **Contractors/Freelance/ Guest Speakers and Volunteers:**

The company will (in the case of these groups) make judgements of risk when offering contracts/services/work. The individual making these arrangements is responsible for ensuring that in the case of: -

- All Contractors have undertaken appropriate safeguarding and prevent checks on its own staff and that they are fully aware of the Code of Conduct for Contractors.

- Visiting Speakers/Tutors/Trainers/Volunteers are accompanied from the reception area to the place of the activity. Visiting staff should not be left unaccompanied with students at any time, unless in the areas of the training site open to the general public.
- For the purposes of safeguarding, volunteers should be treated as employees and must be DBS checked and an employment reference obtained.

### **The role of the Designated Safeguarding and Prevent Lead Officers (DSPLO's)**

All Designated Safeguarding and Prevent Lead Officers will undertake training on inter-agency working and refresher training at least **every two years**, in order to keep their knowledge and skills up to date.

The deputy Designated Safeguarding and Prevent Lead Officers will support the lead Designated Safeguarding and Prevent Lead Officers within their role and will deputise when the Designated Safeguarding and Prevent Lead Officers are not on site.

The safeguarding arrangements are overseen by the **Group Operations Director** supported by the Student Support advisor and the Safeguarding and Prevent lead officers who manage the day to day operational delivery.

### **Key responsibilities**

Designated Safeguarding and Prevent Lead Officers will act as the source of support, advice and expertise on safeguarding and prevent issues, and are responsible for dealing with allegations or suspicions of abuse. They have all attend the designated safeguarding lead training and will be responsible to for liaising with senior staff and other colleagues where necessary and will also be responsible for making referrals to external agencies.

### **Other aspects of their role include:**

- obtaining information from staff, volunteers, students, employers or contractors who have expressed concerns relating to safeguarding and prevent matters and will record this information.
- For assessing the information promptly and carefully and for requesting further information, where appropriate.
- For consulting with the relevant local safeguarding children boards and adult safeguarding teams, to clarify doubts or any concerns that they have and to ensure consistency and integrity of the safeguarding and Prevent processes and systems.
- For making referrals to statutory child protection agencies i.e. Through the Multi Agency Safeguarding Hub (MASH) or the Police without delay and working in full cooperation with external agencies as and when required to do so.
- For maintaining appropriate records of any safeguarding or prevent referrals, complaints or concerns (even if that concern does not lead to a referral) and for reporting on these matters.
- For ensuring that employers/parents are aware of the Safeguarding and Prevent Policy.
- For working with external agencies and organisations to ensure students and staff are kept safe.
- For working with Human Resources division to ensure that staff receive appropriate safeguarding and prevent training along with regular updates and that all staff are aware of the safeguarding and prevent procedures.

### **Additionally, the Designated Safeguarding and Prevent Leads Officers will:**

- convene regular operational meetings to ensure coherence, integrity and the monitoring of the safeguarding and prevent processes.

- work closely with the Human Resources and the Operational teams to ensure that policies and procedures comply with legislation and are up to date.
- work with the local Youth Offending Services and the Probation Services (where appropriate) to ensure that applications from offender learners are risk assessed, prior to starting their training.
- ensure that the Safeguarding and Prevent Policy is submitted to the Board of Directors for approval and sign off on an annual basis.
- provide an annual report to the Board of Directors, setting out how the Company is discharging its safeguarding and prevent duties.
- alert the CEO's and the Board of Directors to any identified deficiencies in procedure or policy at the earliest opportunity.

The **Group Operations Director** will retain ultimate lead responsibility for the arrangements and the procedures for handling individual cases.

### **Governance responsibilities**

The CEO's of the group have overall shared responsibility for ensuring that:

- the Safeguarding and prevent policy and procedures are fully implemented and followed by all staff within the group.
- Designated Safeguarding and Prevent Lead Officers have sufficient time and resources to carry out their roles.
- all staff feel able to raise concerns about the safety of students, staff, volunteers and contractors and that such concerns are dealt with sensitively, effectively and in a timely manner.
- Board of Directors and staff receive regular safeguarding and prevent training and updates.

As set out in Keeping Children Safe in Education 2016, company governance /CEO's are responsible for ensuring that: -

- The Company complies with its duties under the legislation.
- An appropriately senior safeguarding lead is appointed.
- Appropriate policies and procedures are in place and that the Safeguarding Policy is updated annually and is available to the public.
- Arrangements are in place for children who go missing from education (if appropriate).
- The Company contributes and promotes inter-agency working in line with the statutory guidance identified in the 'Working Together to Safeguard Children 2016)' document.
- Safeguarding arrangements take into account the best practice and the practice of the relevant local authorities.
- Information sharing between agencies is appropriately facilitated.
- all members of staff have enhanced DBS checks and have undertaken safeguarding training at induction and attended updated events on a regular basis thereafter.
- Enable staff to contribute to and shape the safeguarding and prevent arrangements.
- appropriate filters and monitoring systems for online safety are in place, including sexting.
- students are taught about safeguarding, including whilst online, through teaching and learning opportunities, as part of a broad and balanced learning programme.
- there are processes in place for ensuring the safe recruitment of staff and for dealing with allegations of abuse against members of staff.
- the student's wishes and feelings are taken into account in determining action and support.
- there is an External Guest Speaker and Visitors Policy in place.

## **Safeguarding students who are vulnerable to radicalisation**

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There has been several occasions, both locally and nationally, in which, extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views, including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The company values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Both students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activities in support of terrorism. The normalisation of extreme views may also make young people and adults vulnerable to future manipulation and exploitation.

The company is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the company's safeguarding duty.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are contained in **appendix 5**.

The company seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

### **Risk Reduction**

The CEOS', the senior Operations Director and the Designated Safeguarding Lead will assess the level of risk within the company and put actions in place to reduce that risk. Risk assessment may include consideration of the curriculum, the use of premises by external agencies, anti-bullying policy and other issues specific to the company's profile.

There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people.

More information on these factors are contained in Appendix 5.

Our company, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this is the Designated Safeguarding Leads detailed on page 7 of this policy document.

We will monitor online activity with the company to ensure that inappropriate sites are not accessed by students or of staff. When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the Designated Safeguarding and Prevent Lead.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug /alcohol issues.

### **Channel**

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It aims to: -

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity;
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

An individual's participation in the programme is entirely voluntary at all stages.

We have a duty to cooperate with the Channel programme in the carrying out of its functions and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Further guidance about duties relating to the risk of radicalisation is available in the Advice for Schools and FE Colleges on the [Prevent Duty](#).

## 11.0 Section Two: Reporting Procedures

### Reporting Concerns

Safeguarding and Prevent concerns should be reported to a Designated Safeguarding and Prevent Lead Officer. In cases of serious safeguarding issues or concerns about radicalisation, it may be appropriate to report these directly to the **Group Director for Operations**.

### Managing a disclosure

**If a student says they want to discuss something serious with you but seeks your assurance that you will keep it confidential:**

You should explain that you **cannot promise** to keep it confidential as you may need to seek further support and guidance and have a duty to report it to others who will be able to help and support. However, it will be on a need to know basis.

### **If the student then decides they do not wish to tell you:**

If the student does not wish to continue, they should be encouraged to access support. This could be from a member of the Safeguarding team or via student welfare or referral to an external counsellor. **See annex No 1** for a list of referral agencies.

If you are left feeling worried or seriously concerned about the student, you should report these concerns to a member of the Safeguarding and Prevent Team.

### Making a referral

**You should: -**

- Ensure that the student is not in any immediate danger. Staff will seek medical attention if the student is suffering from a serious injury; medical support must be sought as a first priority.
- Write down what the student told you as soon as you can, using the student's own words, including the time, the setting and names of those present and give this immediately to a member of the Safeguarding and Prevent Team. This should include the basic facts of the allegation, information about any visible injuries, the student's preferred course of action and their contact details. (Please use the safeguarding proforma which can be found in annex No 2 and can also be located on SharePoint under safeguarding).
- You must sign, time and date the account.
- Inform the student that you must pass the information on, but that, only those who need to know, will be informed.
- Assure them that they will be kept informed of all of the developments.
- Inform the student that a member of the Safeguarding Team will make contact with them.

### **Disclosure made by a parent or an employer:**

If the disclosure is made by a parent/guardian/carer or employer, you should follow the same procedure and refer them to a member of the Safeguarding and Prevent Team.

Individual staff should **never** deal with disclosures in isolation and should always refer to a member of the Safeguarding and Prevent Team who has responsibility to lead on the issue.

### **Referrals:**

The Designated Safeguarding and Prevent Lead Officer will usually decide whether to make a referral to Social Services or the Police, but it is important to note, that **any member of staff can refer their**

**concerns directly** to either Social Services or the Police, especially if the Safeguarding Team are unavailable.

**Please note:** should any member of staff refer directly, they **MUST** at the earliest opportunity discuss the referral with the Designated Safeguarding and Prevent Lead Officer.

**Once a referral is made to a member of the Safeguarding and Prevent Team they will undertake the following: -**

- The member of the Safeguarding and Prevent Team will make an initial assessment of the allegation; consult with the staff involved and the Designated Safeguarding Lead as appropriate. This will usually involve speaking to the student at the earliest opportunity.
- The student will be asked to repeat the disclosure that they have made. A written account will be made of the disclosure and context and the student will be asked to sign and date it.
- If the student wishes to take the allegation forward, the Designated Safeguarding and Prevent Lead will support the student in contacting Social Services, the Police, Child Abuse Investigation Team, the Forced Marriage Unit, the NSPCC and or any other appropriate, agencies as necessary.
- When a student is not sure about taking the allegation forward, the Designated Safeguarding and Prevent Lead can, without necessarily identifying the person in question, discuss concerns with Social Services or the Police, so that an informed decision can be reached.

Following consultation, the Designated Safeguarding and Prevent Lead will ask for the student's views, to check if it is clear that they can understand the significance and consequences of a referral to an external agency. However, it remains the responsibility of the Designated Safeguarding and Prevent Lead to take whatever action is necessary to ensure the student is safe and is not at risk.

This may on occasions involve a **referral against** the wishes of the student involved.

If appropriate, concerns may need to be discussed with a parent or guardian unless it places the student at risk of further harm. The student's view will also be considered in deciding whether to contact their parent/guardian.

A written record will be made of any discussion with parents or guardians.

In the event of a referral, the Designated Safeguarding and Prevent Lead should inform the student of the proposed action and the reasons for the decision. Ideally this should happen before the appropriate agency is informed, unless doing so would place the student at greater risk of further harm.

#### **Contacting Social Services or the Police**

- The Designated Safeguarding and Prevent Lead will contact the Social Services Department of the appropriate local authority by telephone and record the date and time that this takes place.
- The Designated Safeguarding and Prevent Lead will agree with the recipient of the referral what the student and parents will be told, by whom and when. The Designated Safeguarding and Prevent Lead will make a confirmation of the referral in writing within **48 hours**.
- All concerns, discussions, decisions made and reasons for those decisions will be recorded.
- Written records will be kept confidential in a securely locked location and in accordance with the Data Protection Act. However, where the police are involved, then such records may need to be disclosed.
- A Designated Safeguarding and Prevent Lead will be the contact if Social Services or the Police require further information about the student, and if necessary, represent the Company at multi-agency strategy discussions or child protection conferences.

There may be instances where more than one member of the Safeguarding and Prevent Team may be involved in a particular disclosure. On occasions they may be required to work collaboratively to deal with a case, (if required to do so).

**Fig No 1: If you have concerns about a safeguarding matter**

If a young person/adult is in immediate risk call the Police	POLICE 999
To raise concerns and ask for advice about extremism	PREVENT DUTY 112 or 020 7340 7264 Email <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>
For information advice and guidance in relation to safeguarding or Prevent	DESIGNATED SAFEGUARDING AND PREVENT LEADS (DSPL's) BROMSGROVE OR LONDON

**Fig No 2: London Southwark Safeguarding Team**

<b>Southwark Safeguarding Childrens Board</b>	<b>Making a referral</b> <b>Multi-Agency Safeguarding Hub (MASH)</b>
160 Tooley Street PO Box 64529 London SE1P 5LX	To make a referral call 020 7525 1921. For an out of hour's social worker, phone 020 7525 5000.
<b>Email Address</b>	SSCB at <a href="mailto:sscb@southwark.gov.uk">sscb@southwark.gov.uk</a> or <a href="mailto:ssab@southwark.gov.uk">ssab@southwark.gov.uk</a> .
<b>Prevent Co-ordinator</b>	<b>Telephone No</b>
<b>Ben Taylor</b>	<b>0207 625 1378</b>
<b>Adult Safeguarding Referral Team</b>	<a href="mailto:oppdcontactteam@southwark.gov.uk">oppdcontactteam@southwark.gov.uk</a>

**West Midlands Safeguarding Team**

<b>Safeguarding Team:</b>	<b>West Midlands Police Service</b>
Birmingham Safeguarding Children's Board PO Box 17340 BIRMINGHAM B2 2DR 0121 464 2612	0845 113 5000 <b>Telephone: <a href="tel:01905768053">01905 768053</a></b>
<b>Bromsgrove District Council</b> <b>Prevent Co-ordinator</b>	<b>Council Telephone No</b> <b>01527881288</b>
Bev Houghton.	Direct 1527 534187
Email address is	<a href="mailto:bev.houghton@bromsgroveandredditch.gov.uk">bev.houghton@bromsgroveandredditch.gov.uk</a>

### **Procedure for managing allegations against a member of staff**

All allegations must be reported to the Senior Safeguarding and Prevent Lead Officer as soon as a member of staff is aware of an allegation. We have a legal duty to report concerns within **one** working day to the Local Authority Designated Officer/Person. The member of staff may be suspended if it is considered that they or anyone else is at risk, or if there is a good reason to believe the continued attendance of the member of staff cannot be permitted.

The staff code of conduct will provide full details of the standards and expectations laid down for staff, some specific safeguarding expectations and standards can also be found in **annex No 2** (attached).

### **Receiving and recording allegations**

The allegation should be reported immediately to the Group Director of HR, or to the named safeguarding CEO's, unless the Director of HR or the named safeguarding CEO is the person against whom the allegation is made, in which case the report should be made to one of the other CEO's and referred to social services and/or the Police.

The Director of HR or CEO may delegate responsibility to a Designated Safeguarding and Prevent Lead Officer who should: -

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Designated Safeguarding and Prevent Lead Officer.
- Record key information such as times, dates, locations and names of potential witnesses.
- Carry out an initial assessment of the allegation (after consulting with the appropriate Safeguarding Children Board and or Local Authority Designated Officer (LADO or Person).
- Where the allegation is considered to be either a potential criminal act or indicates that the person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the relevant Safeguarding Children and Adults Board and the Police.

It is important that the Head of HR or the CEO **does not** investigate the allegation. The initial assessment should be made on the basis of the information received and should result in a decision whether or not the allegation warrants further investigation.

In certain cases the allegation may represent inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the student or employee. In such cases the matter should be addressed in accordance with the Staff Disciplinary Procedures. In other cases the allegation may be able to be shown to be false because the facts alleged could not possibly be true.

### **Enquiries and Investigations**

Any internal enquiries shall comply with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example, the police, the CEO's or senior Designated Safeguarding and Prevent Lead will normally be involved in and contribute to, the inter-agency planning discussions. The CEO's or senior Designated Safeguarding and Prevent Lead is responsible for ensuring that the company assists with all the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

The member of staff will be advised of their right to consult with a representative, (eg trade union representative etc).

### **Suspension of Staff**

Suspension should not be automatic and may be considered at any stage of the investigation. Any decision to suspend a member of staff will be carried out in line with the Staff Disciplinary Policy. The CEO's shall consider carefully who is informed of the suspension and investigation. The Safeguarding Children Board and external investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension should remain under review in accordance with the Staff Disciplinary procedures.

The person making the allegation (and if under 18, their parents) should be informed of the outcome of the investigation and proceedings.

### **The Disciplinary Investigation**

The disciplinary investigation should be conducted in accordance with Staff Disciplinary Policy.

### **Unsubstantiated, malicious or false allegations**

False, malicious or unsubstantiated allegations may be indicative of problems of abuse elsewhere.

A record should be kept and consideration given to a referral to the Safeguarding Children Board in order that other agencies may act upon the information.

In consultation with the Director of Human Resources and the CEO's shall: -

- inform the member of staff against whom the allegation is made orally and in writing that no further action will be taken, give consideration to offering counselling and support.
- inform the parents or carers of the alleged victim of the outcome, (where the victim is under the age of 18).
- prepare a report outlining the allegation and outcome of the investigation and the actions to be taken.

### **Resignations**

If, during the course of an investigation relating to safeguarding, an employee tenders his or her resignation, the allegations will still be investigated in accordance with the procedures.

### **Duty to refer to the Disclosure and Barring Service**

If it is believed that a person has "caused harm or poses a future risk of harm to vulnerable groups, including children" a referral about the person should be made to the Disclosure and Barring Service (DBS).

The Home Office further states that "an employer or volunteer manager is breaking the law if they knowingly employ someone in a regulated activity with a group from which they are barred from working".

In addition, a "barred person" is breaking the law if they seek, offer or engage in regulated activity with a group from which they are barred from working, whether paid or voluntary.

There is an additional responsibility for the Company if they are referring a teacher/tutor to the Disclosure and Barring Service. It should also be considered, (if appropriate) to refer the case to the Teaching Agency, who are responsible for regulating teachers in cases of "serious misconduct".

### **Support for staff**

We are aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with one of the Designated Safeguarding and Prevent Lead Officers or with a trained counsellor.

Staff wishing to be referred for counselling should contact Human Resources for welfare support.

## **12.0 Section Three: Definitions and Indicators of Abuse:**

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

### **Abuse**

A form of maltreatment of a child.

Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Working Together to Safeguard Children 2015 defines four main types of abuse: -

- Physical,
- Emotional,
- Sexual and
- Neglect

Children and adults could also be subjected to: -

- Financial abuse
- Peer on Peer abuse
- Abuse of Trust
- Discriminatory and institutional abuse

Some signs and symptoms can be found in **annex No 3** (attached).

### **Physical abuse**

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

### **Emotional abuse**

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

### **Sexual abuse**

Involves forcing or enticing a child or adult 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 (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.

### **Neglect**

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

### **Other specific forms of abuse**

#### **Abuse of Trust**

All staff need to know that inappropriate behaviour with or towards children is unacceptable. In particular, under the Sexual Offences Act 2003, it is an offence for a person over 18 (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if he/she does not teach the child.

#### **Peer on Peer Abuse**

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not be limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should also be aware that behaviour linked to such as drug taking, alcohol abuse, truanting and sexting put children in danger.

#### **Forced Marriage**

A forced marriage takes place when the bride, groom or both do not want to get married but are forced to by others, usually their families. People forced into marriage may be tricked into going abroad, physically threatened and/or emotionally blackmailed to do so.

#### **Female Genital Mutilation (FGM)**

Female genital mutilation comprises of all procedures involving the partial or total removal of the female external genitalia or other injury to the female genital organs for non-medical reasons. There are different types of FGM, ranging from a symbolic prick to the vagina to the fairly extensive removal and narrowing of the vagina opening.

#### **Cyber-Bullying**

"Cyber-bullying" is when a person is tormented, threatened, harassed, humiliated, embarrassed or otherwise targeted by another person using the Internet, interactive and digital technologies or mobile phones.

**Radicalisation**

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology.

**Honour based violence**

Honour based violence, including 'honour killings', is a type of abuse that is carried out in communities that have strong perceptions of 'honour' and 'shame'. Individuals may be seen to bring shame onto the family if they behave, or it is rumoured that they have behaved, in a way which the family or community disapproves of. This may include having a 'non-arranged' relationship, having a relationship with someone of a different faith, dressing inappropriately, refusing an arranged marriage, leaving a marriage or being gay.

The concept of honour and shame leads families to perpetrate honour based violence such as keeping victims locked in the house, sending them abroad, forced marriage, assaults and ultimately murdering them – resulting in honour based killing. Speaking out against honour based violence is extremely difficult as the perpetrators are more often than not the victim's extended family and loved ones, who they do not wish to feel the force of the law.

**Financial abuse**

Financial abuse can also be when the perpetrator is spending money needed to maintain the home on themselves and may continue after a relationship has ended.

Money can be a very powerful method for a perpetrator to exert control. Financial abuse may include: - Taking money from the person; not allowing them access to shared money; making them account for everything spent; making them beg for money; causing them to lose, or forcing them to give up, employment; forcing them to commit crimes for money; not allowing them to buy necessities, for themselves or their children, including sufficient food.

## Appendices

### Appendix No 1- Referral Agencies and Support

Police	999
The Police-None-emergency No	101
Anti-Terrorism Hotline	0800789321
Crime stoppers	0800555111
Child Exploitation and Online Protection Centre (CEOP)	<a href="http://www.thinkuknow.co.uk/">http://www.thinkuknow.co.uk/</a> 0870 000 3344
Child and Family Consultation Service	<a href="http://www.there4u.info/index.html">http://www.there4u.info/index.html</a>
NSPCC Helpline	<a href="https://www.nspcc.org.uk/">https://www.nspcc.org.uk/</a> 0808 800 5000
NSPCC Whistleblowing Helpline	help@nspcc.org.ok 0800 028 0285
Internet Watch Foundation	<a href="https://www.iwf.org.uk/">https://www.iwf.org.uk/</a>
Social Care link for Safeguarding Concerns	<a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a>

### London Southwark Safeguarding Team

<b>Southwark Safeguarding Childrens Board</b>	<b>Making a referral</b> <b>Multi-Agency Safeguarding Hub (MASH)</b>
160 Tooley Street PO Box 64529 London SE1P 5LX	To make a referral call 020 7525 1921. For an out of hour's social worker, phone 020 7525 5000.
<b>Email Address</b>	SSCB at <a href="mailto:sscb@southwark.gov.uk">sscb@southwark.gov.uk</a> or <a href="mailto:ssab@southwark.gov.uk">ssab@southwark.gov.uk</a> .
<b>Prevent Co-ordinator</b>	<b>Telephone No</b>
<b>Ben Taylor</b>	<b>0207 625 1378</b>

### West Midlands Safeguarding Team

<b>Safeguarding Team:</b>	<b>West Midlands Police Service</b>
Birmingham Safeguarding Children's Board PO Box 17340 BIRMINGHAM B2 2DR 0121 464 2612	0845 113 5000 <b>Telephone: <a href="tel:01905768053">01905 768053</a></b>
<b>Bromsgrove District Council</b> <b>Prevent Co-ordinator</b>	<b>Council Telephone No</b> <b>01527881288</b>
Bev Houghton.	Direct 1527 534187
Email address is	<a href="mailto:bev.houghton@bromsgroveandredditch.gov.uk">bev.houghton@bromsgroveandredditch.gov.uk</a>

Section One: For Staff use

<b>Person Name:</b>	<b>Date of Birth:</b>
<b>Date &amp; Time of Incident:</b>	<b>Date &amp; Time of writing the report:</b>
<p><b>Record the details</b>                  Record the following factually: What are you worried about? Who, What (if recording a verbal disclosure by a person, use their words) Where? When (date and time of incidence) How has this been discovered? Any witnesses?</p>	
<p><b>What is the person's account/perspective?</b></p>	
<p><b>Any other relevant information? (Distinguish between fact and opinions). Previous concerns, etc.</b></p>	
<p><b>Is the risk to this person or is the risk to another person? Please give details.</b></p>	
<p><b>What needs to happen? Note actions, including names of anyone to whom your information was passed and when.</b></p>	

Signature:.....

Date: ...../...../.....

**Part 2 To be used by the Designated Safeguarding and Prevent Lead Officer**

Questions	Responses
Date and Time of information received and from whom.	
Any advice sought-if required (date, time, name, role, organisation and advice given).	
Action taken (referral to safeguarding board, Channel, etc.) with rationale. Please note time, date, names and what information has been shared with whom and when etc.	
Parents' informed? Yes/No.	
Outcome Record names of individuals/agencies who have given information regarding the outcome of the referral (if made).	
<b>Any other comments</b>	
Signature	
Date:...../...../.....	
Print Name	

**Designated Safeguarding and Prevent Lead Officer's log**

**Part 3**

<b>Full Name:</b>	<b>DOB:</b>	<b>Gender:</b>	<b>Ethnicity:</b>
<b>Site :</b>	<b>Any Additional Needs:</b>		
<b>Home Address:</b>		<b>Telephone:</b>	
		<b>Alternative Contact No:</b>	
		<b>Email Address:</b>	
<b>Any other safeguarding records held in relation to this person or a person closely connected to him/her?</b>		<b>Yes or No? If yes, please provide details.</b>	
<b>What are the risks to the person or to others?</b>			
<b>Members of the household:</b>			
<b>Name</b>	<b>Relationship</b>	<b>DOB/Age</b>	<b>Tel No</b>
<b>Are there any significant others (relatives, carers, friends, etc).</b>			
<b>Name</b>	<b>Relationship to the person</b>	<b>Tel No:</b>	<b>Address:</b>





### **Appendix 3 - Safeguarding conduct of Staff**

We recognise that it is not practical to provide definitive instructions that would apply to all situations at all times when staff come into contact with children or vulnerable adults and to guarantee the protection of all involved.

Set out below are the standards of behaviour required of staff in order to fulfil their roles.

This code should assist in the protection of children, vulnerable adults and members of staff.

These guidelines also apply to volunteers who work in an unpaid capacity, visitors, and contractors and so on.

#### **Staff must: -**

- implement this protocol at all times.
- be aware of the potential risks at all times.
- take all reasonable protective measures when interviewing students (such as, ask another person to be present and sit in a room where it is possible to be observed).

#### **Staff must never:**

- engage in a personal relationship with a student, beyond that appropriate for a normal student relationship.
- allow or engage in inappropriate touching of any kind. The main principles of touch are: touch should always be in response to the student's need, i.e. Crying etc, touch should always be appropriate to the age and stage of development of the student; touch should always be with a student's permission.
- engage in rough, physical games including horseplay with students.
- do things of a personal nature for student's that they can do for themselves or that their parent can do for them.
- physically restrain a student unless the restraint is to prevent physical injury of the student/other young people/visitors/staff or yourself. In all circumstances physical restraint must be appropriate and reasonable, otherwise the action can be defined as assault.
- make sexually suggestive comments to, or within earshot of, a student.
- have a student on their own in a vehicle. Where circumstances require the transportation of a student in a vehicle, another member of staff or volunteer must travel in the vehicle.
- It is also essential that there is adequate insurance for the vehicle to cover transporting students as part of the business of your work.
- In extreme emergencies (for medical purposes) where it is required to transport a student on their own, it is essential that another teacher and the parent are notified immediately.
- take a student to the toilet unless another adult is present, or has been made aware, or as set out in the student's personal support plan.
- spend time alone with a student on his/her own outside of the normal learning situation. If you find you are in a situation where you are alone with a student, make sure that you can be clearly observed by others.
- Engage with a student by personal electronic means, e.g. Facebook, e-mail, text. Where such contact is professionally necessary, Company systems should be used.

## **Appendix 4 - Definitions and indicators of abuse.**

### **Possible Signs & Symptoms of Abuse**

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered. This is not an exclusive list and many of the signs and symptoms could fall into more than one category.

Guidance on recognising signs and symptoms of can be found in Part A, Chapter 1, Section 1.1 of London Child Protection Procedures (2016). Also Students with learning difficulties often exhibit some of these signs (e.g. Reluctance to get undressed for physical activities, constant tiredness), which are not necessarily signs of abuse but symptoms of their condition. However, it must also be remembered that disabled young people are 3 times more likely to experience abuse or neglect than non-disabled peers.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: -

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

The following may be indicators of neglect (this is not designed to be used as a checklist).

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example, growth, weight.
- Failure to develop intellectually or socially,
- Responsibility for activity that is not age appropriate, such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school.
- The child is left at home alone or with inappropriate carers.

### **Physical abuse**

Physical abuse 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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist).

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for sports.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying.
- Isolation from peers.
- Self-destructive tendencies.
- Aggression towards others.
- Fear of physical contact - shrinking back if touched.
- Admitting that they are punished, but the punishment is excessive.
- Fear of suspected abuser being contacted.

### **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 (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 following may be indicators of sexual abuse (this is not designed to be used as a checklist).

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example, anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.

- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for sports or swimming.
- Bruises or scratches in the genital area.

### **Sexual exploitation**

Child sexual exploitation occurs when a child or young person, or another person, receives “something” (for example, food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children’s social care.

The significant indicators are: -

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity).
- Entering and/or leaving vehicles driven by unknown adults.
- Possessing unexplained amounts of money, expensive clothes or other items.
- Frequenting areas known for risky activities.
- Being groomed or abused via the Internet and mobile technology.
- Having unexplained contact with hotels, taxi companies or fast food outlets.

### **Emotional abuse**

Emotional abuse is 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 insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist).

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug or solvent abuse.

- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia.
- Soiling, smearing faeces, enuresis.

## **Appendix No 5 Indictors of vulnerability to radicalisation**

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as: -  
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as: -  
The demonstration of unacceptable behaviour by using any means or medium to express views which: -
  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs.
  - Seek to provoke others to terrorist acts.
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts.
  - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include: -
  - Identity Crisis – the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
  - Personal Crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
  - Personal Circumstances – migration; local community tensions; and events affecting the student country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
  - Unmet Aspirations – the student may have perceptions of injustice, a feeling of failure; rejection of civic life.

- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
  - Special Educational Needs – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include: -
- Being in contact with extremist recruiters.
  - Family members convicted of a terrorism act or subject to a Channel intervention.
  - Accessing violent extremist websites, especially those with a social networking element.
  - Possessing or accessing violent extremist literature.
  - Using extremist narratives and a global ideology to explain personal disadvantage.
  - Justifying the use of violence to solve societal issues.
  - Joining or seeking to join extremist organisations.
  - Significant changes to appearance and/or behaviour.
  - Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

## **Prevent Violent Extremism**

### **Roles and responsibilities**

- Ensuring that staff are aware that you are the Designated safeguarding and prevent lead officer in relation to protecting students from radicalisation and involvement in terrorism.
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism.
- Raising awareness about the role and responsibilities of the company in relation to protecting students from radicalisation and involvement in terrorism.
- Monitoring the effect in practice of the curriculum or training to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs.
- Raising awareness within the company about the safeguarding processes relating to protecting students from radicalisation and involvement in terrorism.
- Acting as the first point of contact within the company for case discussions relating to students who may be at risk of radicalisation or involved in terrorism.
- Collating relevant information from in relation to referrals of vulnerable students into the Channel process.
- Attending Channel meetings as necessary and carrying out any actions as agreed.
- Reporting progress on actions to the regional Channel Co-ordinator; and sharing any relevant additional information in a timely manner.