SAFEGUARDING POLICY

Version 11 – September 2019 TJ

CSR Board Sign off: **Date: 12/09/19**

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SAFEGUARDING POLICY

Version number 10 – March 2019

1.0   INTRODUCTION

Safeguarding and promoting the welfare of learners is defined as – • Protecting children from maltreatment; • Preventing impairment of children's health or development; • Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and • Taking action to enable all children to have the best outcomes. • Children include everyone under the age of 18	*This means that CSR is committed to safeguarding and promoting the welfare of all its learners. We believe that:* • *Our young people have the right to be protected from harm, abuse and neglect* • *That every child has the right to an education and young people need to be safe and to feel safe in learning* • *Young people need support that matches their individual needs, including those who may have experienced abuse* • *Our young people have the right to express their views, feelings and wishes and voice their own values and beliefs* • *Our young people should be encouraged to respect each other's values and support each other* • *Our young people have the right to be supported to meet their emotional and social needs as well as their educational needs* • *CSR will contribute to the prevention of abuse, victimisation, bullying (including homophobic, bi-phobic, trans-phobic and cyber-bullying), exploitation, extreme behaviours, discriminatory views and risk taking behaviours* *All staff and visitors have an important role to play in safeguarding young people and protecting them from abuse.*
CSR will fulfil our local and national responsibilities as laid out in the following documents: • *The most recent version of [Working Together to Safeguard Children] (DfE)* • *The most recent version of [Keeping Children Safe in Education: Statutory guidance for schools and colleges (DfE Sept 2019)*	*At CSR, the following people will take the lead in these areas:* Our Designated Safeguarding Person is: Name: Trudy Jukes Our Data Protection officer is: Name: Simon Jukes

• _West Midlands Safeguarding Children Procedures_ • _The Education Act 2002_ s175 • _Sexting in Schools & Colleges – responding to incidents and safeguarding young people_ (UKCCIS) 2016 • _General Data Protection Legislation (2018)_ _https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en_ • _Mental Health & Behaviour in Schools._ _https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2_ • Birmingham Criminal Exploitation & Gang Affiliation Practice Guidance (2018) _https://www.birmingham.gov.uk/downloads/file/11545/birmingham_criminal_exploitation_and_gang_affiliation_practice_guidance_2018_	Our lead for Mental Health is: Name: Dani Walch

2.0   OVERALL AIMS

This policy will contribute to the protection and safeguarding of our learners and promote their welfare by: • Clarifying standards of behaviour for staff and learners • Contributing to the establishment of a safe, resilient and robust ethos in CSR, built on mutual respect and shared values • Introducing appropriate work within the curriculum • Encouraging learners to participate; • Alerting staff to the signs and indicators that all may not be well • Developing staff awareness of the causes of abuse • Developing staff awareness of the risks and vulnerabilities their learners face • Addressing concerns at the earliest possible stage; and • Reducing the potential risks learners face of being exposed to violence, extremism, exploitation, discrimination or victimisation.	_This means that CSR will:_ • _Identify and protect our vulnerable learners_ • _Identify individual needs as early as possible; and_ • _Design plans to address those needs_ • _Work in partnership with learners and other agencies._ _Our policy extends to any establishment we commission to deliver education to our learners on our behalf._ _Our Board will ensure that any commissioned agency will reflect the values, philosophy and standards of CSR. Confirmation should be sought from them that appropriate risk assessments are completed and ongoing monitoring is undertaken._

3.0   GUIDING PRINCIPLES

These are the 7 guiding principles of safeguarding, as stated by Birmingham Safeguarding Children Board (found in Right Help Right time);

- Have conversations and listen to learners as **early** as possible.
- Understand the learner's lived experience.
- Work **collaboratively** to improve the learner's life experience.
- Be **open**, honest and transparent in our approach.
- **Empower** the learner by working with them.
- Work in a way that builds on the learner's **strengths.**
- Build **resilience** in our learners to overcome difficulties.

4.0   EXPECTATIONS

All staff will:	This means that in CSR:
- Be familiar with this Safeguarding Policy - Understand their role in relation to safeguarding - Be alert to signs and indicators of possible abuse (See Appendix 1 for current definitions and indicators) - Record concerns and give the record to the DSL, or deputy DSL, and - Deal with a disclosure of abuse from a child in line with the guidance in Appendix 2 - you must inform the DSL immediately, and provide a written account as soon as possible. - Be involved, where appropriate, in the implementation of individual interventions, Early Help assessments and inter-agency Child Protection Plans	All our staff will receive annual safeguarding training and update briefings as appropriate. Key staff will undertake more specialist safeguarding training as agreed by the Board. Our Board will be subjected to an enhanced DBS check. We will follow Safer Recruitment processes and checks for all staff.

5.0 THE DESIGNATED SAFEGUARDING LEAD (DSL)

At CSR, the DSL will be a member of the Senior Leadership Team. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding remains with the DSL. This responsibility should not be delegated. The Board should ensure that the DSL role is explicit in the role-holder's job description and appropriate time is made available to the DSL and deputy DSL(s) to allow them to undertake their duties. - Safeguarding information will be dealt with in a confidential manner. - Safeguarding records will be stored securely in a central place separate from academic records. Individual files will be kept for each learner. Files will be kept for at least the	This means the DSL team in CSR: Lead: Trudy Jukes Deputies: Lydia Gibson, Sally Williams, Lottie Morgan Any steps taken to support a young person who has a safeguarding vulnerability must be reported to the lead DSL Because we store our records electronically we do not hold paper files. **We will not disclose to a parent any information held on a young person if this**

period during which the learner is with CSR, and beyond that in line with current data legislation and guidance.	**would put the learner at risk of significant harm**
If a learner moves from CSR, Safeguarding records will be forwarded on to the DSL at the new training provider, with due regard to their confidential nature and in line with current government guidance on the transfer of such records.	We will record where and to whom the records have been passed and the date. This will allow the new setting to continue supporting victims of abuse and have that support in place for when the young person arrives

6.0   THE BOARD

The Board should ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard our learners' welfare; • CSR operates "Safer Recruitment" procedures and ensures that appropriate checks are carried out on all new staff and associates • The Board and all other staff who work with learners undertake safeguarding training on an annual basis with additional updates as necessary within a 2-year framework and a training record maintained • Temporary staff and associates are made aware of CSR's arrangements for safeguarding and their responsibilities • CSR remedies any deficiencies or weaknesses brought to its attention without delay; and • The Board have a written policy and procedures for dealing with allegations of abuse against members of staff, visitors, volunteers or board members that complies with all BSCB procedures and detailed in the Harassment and Bullying policy. • The Nominated Governor is responsible for liaising with the Directors and DSL over all matters regarding safeguarding. The role is strategic rather than operational – they will not be involved in concerns about individual learners.	At CSR, this means that: Our nominated Governor for Safeguarding and Child Protection is: Name: Paul Edgerton This Governor will receive safeguarding training relevant to the governance role and this will be updated every 2 years. ALL Staff will receive the following: • Safeguarding induction • E-learning Safeguarding certificated training every 3 years • Face to face Safeguarding training from the DSL or guest speakers at least annually. • Quarterly Safeguarding updates from the Safeguarding Team The Board will review all policies/procedures that relate to safeguarding annually.

7.0   SAFER RECRUITMENT AND SELECTION

CSR should pay full regard to 'Safer Recruitment' practice including scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including disclosure & barring check, barred list checks and prohibition checks. Evidence of these checks must be recorded on our Single Central Record. All recruitment materials will include reference to CSR's commitment to safeguarding and promoting the wellbeing of learners.	This means that in CSR: The following staff have undertaken Safer Recruitment training: 1 Sally Williams 2 Lottie Morgan One of these will be involved in all staff recruitment processes and sit on the recruitment panel.

7.1 Induction All staff must be aware of systems within their setting which support safeguarding and these should be explained to them as part of staff induction. **7.2 Staff Support** Regular support will be offered to the Lead DSL, and may be extended to other members of staff as deemed appropriate by CSR.	Our staff induction process will cover: • The Safeguarding policy; • The Staff Code of Conduct; • The role of the DSL (including the identity of the DSL and any deputies). We recognise the stressful and traumatic nature of safeguarding work. We will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

8.0   SAFEGUARDING LEARNERS VULNERABLE TO RADICALISATION (PREVENT)

With effect from 1st July 2015, all educational establishments are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty. The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 4.	This means that CSR: Values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Learners and teachers 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.

8.1 Risk Reduction

The Board, Directors and the DSL will assess the level of risk within CSR and put actions in place to reduce that risk. Risk assessment may include consideration of our anti-bullying policy and other issues specific to the CSR's profile, community and philosophy. To this end, open source due diligence checks will be undertaken on all external speakers invited to CSR. An example of this can be found at:

https://www.birmingham.gov.uk/downloads/download/773/the_prevent_duty

CSR 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 will normally be the DSL. The responsibilities of the SPOC are described in Appendix 5

CSR will monitor online activity on our premises, to ensure that inappropriate sites are not accessed by learners or staff.

CSR has 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).

8.2 Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and 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; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Further guidance about duties relating to the risk of radicalisation is available in The Prevent Duty.

We are clear that exploitation and radicalisation must be viewed as a safeguarding concern and that protecting young people from the risk of radicalisation from any group (including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements) is part of our safeguarding duty.

The SPOC for CSR is:
Name: Trudy Jukes

All staff within CSR will be alert to changes in a learner's behaviour or attitude which could indicate that they are in need of help or protection.

CSR will make referrals to Channel if we are concerned that an individual might be vulnerable to radicalisation

9.0 SAFEGUARDING LEARNERS WHO ARE VULNERABLE TO EXPLOITATION, FORCED MARRIAGE, FEMALE GENITAL MUTILATION OR TRAFFICKING

With effect from October 2015, all educational establishments are subject to a mandatory reporting requirement in respect of female genital mutilation (FGM). When a member of staff suspects or discovers that an act of FGM is going to be or has been carried out on a girl aged under 18, that teacher has a statutory duty to report it to the Police. Failure to report such cases will result in disciplinary sanctions. The member of staff will also discuss the situation with the DSL who will consult Birmingham Children's Trust before a decision is made as to whether the mandatory reporting duty applies.	This means that at CSR we ensure: Our staff are supported to talk to learners and to find ways to address the issues together wherever possible. All staff are up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation around; • Forced Marriage • FGM • Trafficking • Criminal Exploitation & Gang Affiliation Our staff will be supported to recognise warning signs and symptoms in relation to each specific issue.

10.0 PEER ON PEER ABUSE

It is important that schools, colleges and training providers such as CSR, can recognise that children and young people are capable of abusing their peers, and that this abuse can include physical abuse, sexting, initiation/ hazing, sexual violence and harassment. CSR's values, ethos and behaviour policies provide the platform for staff and students to clearly recognise that abuse is abuse and it should never be tolerated or diminished in significance. It should be recognised that there is a gendered nature to peer on peer abuse i.e. that it is more likely that girls will be victims and boys perpetrators. Schools, colleges and training providers should recognise the impact of sexual violence and the fact young people can, and sometimes do, abuse their peers in this way. When referring to sexual violence this policy is referring to sexual offences under the Sexual Offences Act 2003 as described below: • **Rape:** A person (A) commits an offence of rape if: there is intentional penetration of 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, anus or mouth of another person (B) with a part of her/his body or	This means that at CSR: We will not tolerate instances of peer on peer abuse and will not pass it off as "banter", "just having a laugh" or "part of growing up". We will follow both national and local guidance and policies to support any young people subject to peer on peer abuse, including sexting (also known as youth produced sexual imagery) and gang violence. Our DSL will follow local guidance to enable provision of effective support to any young person affected by this type of abuse.

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: s/he 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.

11.0   CRIMINAL EXPLOITATION AND GANG AFFILIATION

Criminal exploitation interlinks with a number of multiple vulnerabilities and offences including a young person being exposed to and/or the victim of physical and emotional violence, neglect, poor attendance, sexual abuse and exploitation, modern slavery, human trafficking and missing episodes. It is important that young people who are criminally exploited are seen as victims and not treated as criminals, and treated through safeguarding procedure. Work to address criminal exploitation is covered by relevant legislation including: • Crime & Disorder Act – 1998 • Children Act – 2004 • Serious Crime Act – 2015 • Modern Slavery Act – 2015 • Criminal Finances Act – 2017 • Children & Social Work Act - 2017 And the new Working Together (2018) requires agencies to support vulnerable people within the context of the wider safeguarding agenda.	This means that in CSR we will follow the Criminal Exploitation & Gang Affiliation Practice Guidance issued in 2019 (see link below) and use the risk assessment screening tool to support our referrals to CASS for any young people that we are concerned about. https://www.birmingham.gov.uk/downloads/file/11545/birmingham_criminal_exploitation_and_gang_affiliation_practice_guidance_2018

PART TWO – THE KEY PROCEDURES
RESPONDING TO CONCERNS ABOUT A LEARNER

12.0   MULTI-AGENCY WORK

12.1   We work in partnership with other agencies to promote the best interests of our learners as a top priority in all decisions and actions that affect them. CSR will, where necessary, liaise with these agencies and make requests for support from Birmingham Children's Trust. These requests will be made by the DSL to the Children's Advice and Support Service (CASS) - 0121 303 1888.

12.2   We will co-operate with any Child Protection enquiries conducted by relevant agencies: CSR will ensure representation at appropriate inter-agency meetings such as Our Family Plan, Children In Need, Initial and Review Child Protection Conferences, and Core Group meetings.

12.3   We will provide reports as required for these meetings.

13.0   OUR ROLE IN SUPPORTING LEARNERS

13.1   CSR staff will offer appropriate support to individual learners who have experienced abuse, who have abused others (peer on peer abuse) or who act as Young Carers in their home situation.

13.2   A safeguarding action plan will be devised, implemented and reviewed regularly for these learners. This plan will detail areas of support, who will be involved, and the learner's wishes and feelings. A copy of the plan will be kept in the learner's safeguarding record.

13.3   Specific mention will be given to the support of learners aged 16 to 18 and the particular vulnerabilities of this age group.

14.0   RESPONDING TO AN ALLEGATION ABOUT A MEMBER OF STAFF

14.1   This procedure must be used in any case in which it is alleged that a member of staff, Governor, employer or peer has:

- Behaved in a way that has harmed a learner or may have harmed a learner;
- Possibly committed a criminal offence against or related to a learner; or
- Behaved in a way that indicates s/he is unsuitable to work with children or young people.

14.2   Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in an educational establishment to abuse learners.

14.3   All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards learners immediately.

14.3.1 Allegations or concerns about <u>staff, colleagues and visitors</u> must be reported directly to the Directors who will liaise with the Birmingham Children's Trust Designated Officer (LADO) Team who will decide on any action required. Concerns raised regarding a Director should be directed to the DSL who will refer them directly to the LADO Team or to the LADO team themselves (contact details appendix 7).

15.0   Links to additional information about safeguarding issues and forms of abuse

15.1   Relevant additional information can be found on the following links.

Issue	Guidance	Source
Abuse	http://westmidlands.procedures.org.uk/pkphz/regional-safeguarding-guidance/abuse-linked-to-faith-or-belief http://westmidlands.procedures.org.uk/pkost/regional-safeguarding-guidance/domestic-violence-and-abuse http://westmidlands.procedures.org.uk/pkphl/regional-safeguarding-guidance/neglect	West Midlands Safeguarding Children Procedures
Bullying	http://westmidlands.procedures.org.uk/pkphh/regional-safeguarding-guidance/bullying#	West Midlands Safeguarding Children Procedures
Children and the courts	https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds	MoJ advice
Missing from Education, Home or Care	http://westmidlands.procedures.org.uk/pkpls/regional-safeguarding-guidance/children-missing-from-care-home-and-education http://westmidlands.procedures.org.uk/pkotx/regional-safeguarding-guidance/children-missing-education-cme	West Midlands Safeguarding Children Procedures
Family Members in prison	https://www.nicco.org.uk/	Barnardos in partnership with Her Majesty's Prison and Probation service (HMPPS) advice
Drugs	http://policeandschools.org.uk/KNOWLEDGE%20BASE/Psychoactive%20Substances.html http://policeandschools.org.uk/KNOWLEDGE%20BASE/alcohol.html	Birmingham Police and Schools panels

Domestic Abuse	http://westmidlands.procedures.org.uk/pkost/regional-safeguarding-guidance/domestic-violence-and-abuse	West Midlands Safeguarding Children Procedures
Child Exploitation	http://westmidlands.procedures.org.uk/pkpll/regional-safeguarding-guidance/child-sexual-exploitation http://westmidlands.procedures.org.uk/pkpsx/regional-safeguarding-guidance/trafficked-children	West Midlands Safeguarding Children Procedures
Homelessness	https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets	HCLG
Health & wellbeing	http://westmidlands.procedures.org.uk/pkpht/regional-safeguarding-guidance/self-harm-and-suicidal-behaviour https://www.birmingham.gov.uk/downloads/file/9462/medicine_in_schools_feb_2018	West Midlands Safeguarding Children Procedures BCC Education Safeguarding
On-line	https://www.birmingham.gov.uk/downloads/file/8446/sexting_flow_chart_feb_2017 http://policeandschools.org.uk/onewebmedia/Searching%20Screening%20&%20Confiscation%20Jan%202018.pdf	BCC Education Safeguarding Birmingham Police and Schools panels
Radicalisation	http://westmidlands.procedures.org.uk/pkpzt/regional-safeguarding-guidance/safeguarding-children-and-young-people-against-radicalisation-and-violent-extremism	West Midlands Safeguarding Children Procedures
Violence	http://westmidlands.procedures.org.uk/pkplh/regional-safeguarding-guidance/sexually-active-children-and-young-people-including-under-age-sexual-activity https://www.birmingham.gov.uk/downloads/file/8321/responding_to_hsb_-_school_guidance https://www.birmingham.gov.uk/downloads/file/9504/children_who_pose_a_risk_to_children http://policeandschools.org.uk/KNOWLEDGE%20BASE/secondary_menu.html http://westmidlands.procedures.org.uk/pkpzs/regional-safeguarding-guidance/children-affected-by-gang-activity-and-youth-violence https://www.gov.uk/government/policies/violence-against-women-and-girls	West Midlands Safeguarding Children Procedures BCC Education Safeguarding Birmingham Police and Schools panels West Midlands Safeguarding Children Procedures BCC Education Safeguarding

APPENDICES

DEFINITIONS AND INDICATORS OF ABUSE

1. PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a person.

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;
- Conspicuous covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

2. SEXUAL ABUSE

Sexual abuse involves forcing or enticing young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person 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 learners in looking at, or in the production of, sexual images, watching sexual activities, encouraging learners 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 peers.

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

- 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;
- Depression, withdrawal, isolation from peer group;

3. 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 Birmingham Children's Trust. The significant indicators are:

- Having a relationship of concern with a controlling adult or peer (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; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.
- Missing for periods of time (CSE and County Lines)

4. EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person's emotional development. It may involve conveying 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 young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. These may include overprotection or preventing the young person 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 an individual frequently to feel frightened or in danger, or the exploitation or corruption of young people. 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 young person 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;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia; or

DEALING WITH A DISCLOSURE OF A SAFEGUARDING ISSUE

When a learner tells me about a safeguarding issue, what should I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure them. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the young person. Assure her/him that you will try to help but let the young person know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. People very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the learner that it is not her/his fault.
- Encourage them to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the learner is trying to tell you.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the learner may retract what s/he has told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure.
- At the end of the conversation, tell the learner again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the learner's own language. Include any questions you may have asked. Do not add any opinions or interpretations.
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible.

NB, it is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards:

You should not deal with this yourself. Disclosure of a safeguarding issue must be reported to the DSL without delay.

Learners making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a young person who has suffered a safeguarding issue can be traumatic for the tutor involved. Support for you will be available from your DSL or Director.

ALLEGATIONS ABOUT A MEMBER OF STAFF, GOVERNOR DIRECTOR OR CONTRACTOR

1. Inappropriate behaviour by staff could take the following forms:

    - **Physical**
      For example, hitting, slapping, use of objects to hit with, throwing objects, or rough physical handling.
    - **Emotional**
      For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for learner's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
    - **Sexual**
      For example, sexualised behaviour towards learners, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault and rape.
    - **Neglect**
      For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.
    - **Spiritual Abuse**
      For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

2. If a learner makes an allegation about a member of staff, Governor, visitor or contractor the Directors must be informed immediately. The Directors must carry out an urgent initial consideration in order to establish whether there is substance to the allegation.

3. The Directors should exercise and be accountable for their professional judgement on the action to be taken as follows:

    - If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the Head Teacher/Principal will notify the Children's Trust Designated Officer (LADO) Team[1] (Tel: 0121 675 1669). The LADO Team will liaise with the Chair of Governors and advise about action to be taken, and may initiate internal referrals within Birmingham Children's Trust to address the needs of children likely to have been affected.
    - If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil. These should be addressed through CSR's own internal procedures.
- If the Directors decide that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the learner safeguarding file. The

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[1] In other authorities the LADO service is referred to as the Position of Trust Team (POT)

<u>allegation should be removed from personnel records.</u>

4. **If a learner, member of staff or employer makes an allegation about a Director the concern should be made directly to the LADO Team, this may be done through the DSL or directly on Tel: 0121 675 1669.**

INDICATORS 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; or
      • 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.   Learners 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 learner is distanced from their cultural/religious heritage and experiences discomfort about their place in society;
      • Personal Crisis – the learner 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 learner's 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 learner 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 Need – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. 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; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

PREVENTING VIOLENT EXTREMISM -
ROLES AND RESPONSIBILITIES OF THE SINGLE POINT OF CONTACT (SPOC)

The SPOC for CSR is Trudy Jukes, who is responsible for:

- Ensuring that staff of CSR are aware that you are the SPOC in relation to protecting learners from radicalisation and involvement in terrorism;

- Maintaining and applying a good understanding of the relevant guidance in relation to preventing learners 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 CSR in relation to protecting learners from radicalisation and involvement in terrorism;

- Raising awareness within CSR about the safeguarding processes relating to protecting learners from radicalisation and involvement in terrorism;

- Acting as the first point of contact within CSR for case discussions relating to learners who may be at risk of radicalisation or involved in terrorism;

- Collating relevant information from in relation to referrals of vulnerable learners into the Channel[2] process;

- Attending Channel meetings as necessary and carrying out any actions as agreed;

- Reporting progress on actions to the Channel Co-ordinator; and sharing any relevant additional information in a timely manner.

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[2] Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and 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; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

CSR SCIENTIFIC TRAINING LTD STAFF CODE OF CONDUCT   **APPENDIX 6**

The purpose of this appendix of CSR Scientific Training Ltd Safeguarding Policy is to provide a clear set of principles to guide staff in how they are expected to conduct themselves in their day to day work. How members of staff carry out their duties is a key factor in the performance of any organisation. This code relates to all CSR Scientific Training Ltd employees, academic or support, full time, part time, permanent and fixed term and at all levels.

CSR Scientific Training Ltd has high standards supported by its extremely professional and well qualified staff. It is important that all staff enhance CSR Scientific Training Ltd's good reputation and reflect its commitment to its students and the community. It is not possible to write an exhaustive list of rules governing staff conduct. Staff should be trusted in the discharge of their responsibilities, which implies allowing room for initiative and judgement. This document, however, provides a consistent framework and guidelines.

Staff should seek advice from the Directors and the Designated Safeguarding Lead in the first instance if they have any queries about the content of this document, or if they require advice on how any aspect of conduct may be regarded.

Policies and Procedures

CSR Scientific Training Ltd has in place a range of policies and procedures, which apply to staff. These are available on Sharepoint. All staff should read these policies and comply with their terms. The failure of any employee to do so may result in disciplinary action being taken against them under CSR Scientific Training Ltd's disciplinary procedure.

Background

The purpose of this Code of Conduct is to provide guidance and clarification of the requirements of staff and how they conduct themselves.

CSR Scientific Training Ltd expects all staff to conduct themselves in a reasonable and responsible manner when undertaking their duties and fulfilling their responsibilities, and to comply with lawful and reasonable instructions from managers. It is expected that staff will display integrity, honesty and impartiality in all dealings and work within the spirit of CSR Scientific Training Ltd's mission statement.

Certain types of conduct are unacceptable and could result in disciplinary action (which may include dismissal) being taken. Each case would be judged within the context of the circumstances.

The following list is indicative of unacceptable conduct but is neither exhaustive or exclusive.

1.   Refusal to carry out a lawful and reasonable instruction from a line manager
2.   Disregard for the health and safety of oneself or other persons
3.   Dishonesty - including unauthorised removal of property, falsification of timesheets and other documentation
4.   Absence from duty without approval, including persistent lateness. Staff should arrive in good time to begin work at their normal start time, as stipulated in their contract of employment
5.   Rudeness or abusive behaviour to colleagues, students or CSR Scientific Training Ltd clients/ customers

6. Assault, threatening behaviour, harassment at work
7. Wilful damage to CSR Scientific Training Ltd property
8. Inappropriate use of CSR Scientific Training Ltd's computer facilities.
9. Taking of alcohol before or during working hours.
10. Use of CSR Scientific Training Ltd's premises, property, equipment, information or processes for illicit or immoral practices or personal financial gain or other benefit.
11. Breach of CSR's Data Protection or GDPR rules.
12. Conviction or accusation of any illegal activity including those of possession or use of illegal substances.

In their dealings with learners, CSR Scientific Training Ltd expects that all staff will:

- Always act in the best interests of learners
- Promote Fundamental British Values
- Promote high standards of learner behaviour
- Undertake their responsibilities in respect to the safeguarding of learners and act appropriately if they have concerns of a safeguarding nature, always notifying the DSL team of any such concerns.

Appearance and Manner

All staff represent CSR Scientific Training Ltd's standards and professional status, at all times, whether in the office, in the classroom, at external training and meetings, with clients and at presentations. Therefore, staff are expected to present an appropriate professional image of CSR Scientific Training Ltd, ensuring that they are dressed for the work they are undertaking and the area in which they work and that their dress and general appearance is as smart and as tidy as is practicable in the circumstances. Dress that reflects different cultural backgrounds is welcomed.

1. Staff should be polite, courteous and respectful in their dealing with colleagues, students and clients.
2. Staff should refrain from rude, coarse, profane or abusive language.
3. Staff should refrain from any conduct whether inside or outside CSR Scientific Training Ltd which could bring CSR Scientific Training Ltd into disrepute, at all times.
4. Staff should exercise care and sensitivity in dealing with students, to be approachable, understanding and discreet.

Students

Information relating to students is confidential to the student (and to his/her parent or carer if he/she is under eighteen years of age) but staff are referred to CSR Scientific Training Ltd Data Protection Policy and Safeguarding Policy concerning matters which may affect or potentially affect the safety of that student. If a Safeguarding issue has been flagged, employees must consult the Designated Safeguarding Lead on the matter.

Members of staff should maintain a professional relationship with students. While this does not preclude social contact, friendship between a member of the teaching staff and a student may affect impartial judgement of his/her work or be seen to affect judgement and lead to accusations of favouritism and therefore should be avoided.

Sexual relationships between staff and students are unacceptable. In the case of students under eighteen years of age, such relationships would be deemed to constitute gross misconduct, may lead to a DBS disclosure against that member of staff as well as potential criminal prosecution.

Attendance

Staff lateness and unauthorised absence are both instances of poor attendance which cause serious operational problems to CSR Scientific Training Ltd and which place extra burdens on colleagues and will be dealt with in line with CSR Scientific Training Ltd's Attendance Policy.

Unauthorised absence is defined as any absence from work without informing your line manager (although informing your manager does not necessarily 'authorise' the absence). This is regarded as serious misconduct and may result in disciplinary action being taken against the member of staff. A salary deduction may be made for unauthorised absence.

Conflict of Interest

If staff find themselves in a situation where there might be a conflict of interest, they should report this to the Directors, who have the right to veto the arrangement. Please refer to CSR Scientific Training Ltd's Conflict of Interest Policy. No private work must be done in CSR Scientific Training Ltd time.

Children

For health and safety reasons, staff should presume against bringing their children into CSR Scientific Training Ltd unless express permission has been granted by their Line Manager. Children visiting staff during working hours, for a short period must be closely supervised at all times.

Security

CSR Scientific Training Ltd will not be held liable for any loss or damage to such possessions and does not carry insurance for this. All staff are responsible for the safety of their own belongings and should take reasonable precautions for the safety of the belongings of students, colleagues and clients.

Possessions left in class rooms, offices or employer site will not be CSR Scientific Training Ltd's responsibility should they go missing for any reason.

Probity

No fee or reward should be accepted from an outside organisation, except for small gifts such as advertisement materials, calendars, pencils etc. If an offer or receipt of a gift or hospitality value in excess of £10 is accepted, it should be reported to your Line Manager. Details of date, name of body providing hospitality or gift, description, venue or other relevant details will be held on file. Any gifts or hospitality in excess of £50 shall not be accepted without the prior approval of the Directors.

Invitations to working meals, or to social functions are generally acceptable. However, offers of holidays, hotel accommodation, theatre or match tickets etc. should be refused. If there is any doubt, the advice of the line manager, or a Director should be sought.

If a member of staff has any doubt about the propriety of any aspect of his/her behaviour, he/she should always consult his/her line manager, Director or the HR Manager.

SAFEGUARDING CONTACTS AND REFERRALS   **APPENDIX 7**

Contact	Detail	Subject	Number
CASS	Children's Advice and Support Service	Referral re abuse/neglect	0121 308 1888
BSAT	Birmingham Safeguarding Adults Team	Referral re abuse/ neglect	0121 303 1157
LADO	Local Authority Designated Officers (Position of Trust - Child Safeguarding Concerns)	Referral for allegations against a person in a position of trust	0121 675 1669
Forward Thinking Birmingham	Bham NHS Trust – mental health crisis team	Referral for mental health crisis	0300 300 0099
Police		Immediate Prevent concern where there is an imminent danger	999
Hifsa Haroon-Iqbal	Department for Education – Prevent Officer	Queries concerning a potential Prevent issue	07785 654148
Waqar Ahmed	BCC Prevent Manager	Queries concerning a potential Prevent issue	0121 303 7682
Colvin White	BCC Prevent Lead	Channel referrals	0121 303 9905 07920088512
Maria Jardine	BCC Head of Service Early Help and Family Support	Channel referrals	07768025323