



BROAD HORIZON
— TUITION CENTRE —

Safeguarding and Child Protection Policy

Date:	December 2022
Reviewed by:	M.K Alam
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Designated Safeguarding Lead (DSL)

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Reporting Procedure

A face to face conversation with the Designated Safeguarding Lead immediately, supported by a written report.

If the child or young person is not at risk of being significantly harmed, consider an Early help response on 0300 555 2866 (Option 1).

If you suspect that a child or young person is being, or is at risk of being significantly harmed as a result of abuse or neglect, you must report this immediately:

During office hours (Monday – Thursday, 8.45am – 5.15pm Friday, 8.45am – 4.45pm) call Multi Agency Safeguarding Hub: 0300 555 2866
Out of office hours (evenings, weekends, and bank holidays)
Emergency Response Team Telephone: 0300 555 2922

MASH contact details: Telephone: 0300 555 2866 option 2

Opening hours: Monday – Thursday 8.45-17.15 Friday 8.45-16.45
Address: Civic Centre, 2nd floor, Darwall Street Walsall WS1 1TP

Outside these hours, you should contact the Emergency Response Team Telephone: 0300 555 2922 or 0300 555 2836

Seona Baker – Safeguarding Coordinator (Education)

Telephone: 07951819648

Email: seona.baker@walsall.gov.uk

Tina Cooper - Local Authority Designated Officer (LADO) (Allegations against Staff) Telephone: 07432422205

Email: Tina.Cooper@walsall.gov.uk

If you believe a child is in immediate danger, call the police on 999.

If you are concerned about extremism in Broad Horizon Tuition, or if you think a child might be at risk of extremism, contact the helpline on 020 7340 7264 or counter.extremism@education.gov.uk

Introduction

Broad Horizon is absolutely committed to safeguarding and protecting the welfare of children and young people. We expect everyone who works in our tuition centre to share this commitment. Staff in our tuition centre take all welfare concerns seriously and we always act in the best interests of the child.

The protection of our pupils from suffering or the likelihood of suffering significant harm is the responsibility of all staff within the tuition centre, superseding any other considerations. Action should also be taken to promote the welfare of a student in need of additional support, even if they are not suffering harm or at immediate risk.

In this policy, we clearly outline the responsibilities of all adults working in the tuition centre to be aware of their duty and how to act upon any concerns with regard to child safeguarding. (Children includes everyone under the age of 18 and students who are over 18 but still attend school).

Definition of Safeguarding

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Protecting children from maltreatment by taking action to enable all children to have the best outcomes
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Broad Horizon tuition centre will aim:

- To protect our students and staff by recognising signs and symptoms of students suffering harm or likely to suffer harm at the earliest possible moment to prevent concerns from escalating
- To create a culture of vigilance by maintaining a 'child-centred' approach and always acting in the best interests of the child
- To ensure that students recognise when they are at risk and know how to get help when they need it

To achieve these aims Broad Horizon will:

- Appoint a Designated Safeguarding Lead (DSL)
- Delivers child protection training which is regularly updated for all staff
- Requires staff to attend safeguarding courses
- Provide INSET for the whole staff on the most current safeguarding issues

All staff working with children should maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. If staff have any concerns about a child's welfare, they should act on them immediately. They should follow this child protection policy and speak to the Designated Safeguarding Lead.

Types of Abuse and Neglect

It is important to remember 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly

relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse

May involve hitting, shaking, throwing, poisoning, suffocating, burning or scalding, drowning 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 whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy or Munchausen's Syndrome by proxy.

Emotional abuse

Is the persistent emotional ill-treatment of a child such as to cause severe and persistent 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 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 cyber bullying), causing children frequently to feel frightened or in danger, or the notion or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

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, or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not only perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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 of maternal substance abuse. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate care-givers) or the failure to ensure access to appropriate medical care treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding is not just about protecting children from deliberate harm.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug-taking or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk. Other safeguarding issues that all staff should be aware of include.

- Student's health and safety
- bullying, including cyber-bullying (by text message, on social networking sites, and soon)
- racist abuse

- homophobic and transphobic bullying
- harassment and discrimination
- domestic violence
- radicalisation and extremism
- child sexual exploitation (CSE) and child criminal exploitation (CCE)
- serious violence
- gender or honour-based violence (including FGM)
- teenage relationship abuse
- use of physical intervention
- meeting the needs of students with medical conditions
- providing first aid
- drug and substance misuse
- educational visits
- gangs and youth/serious violence
- internet or e-safety
- issues which may be specific to our local area or population, for example gang activity
- peer-on-peer abuse (child-on-child)
- sexual violence and sexual harassment
- impact of new technologies on sexual behaviour, e.g. sexting (youth produced imagery)
- private fostering
- children who go missing from education
- children's mental health
- children required to give evidence in criminal courts
- children with family members in prison

All staff should be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

This should not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding Lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people to facilitate communication.

Procedures in Response to Disclosures or Concerns

If any staff member suspects that a child may be a victim of abuse, they immediately inform the DSL of their concerns. Abuse can be of a sexual, emotional or physical nature. It can also be the result of neglect.

In most circumstances when a child alleges abuse the Designated Safeguarding Lead will notify the parents at the earliest opportunity. However, in certain circumstances (usually in response to an allegation of physical or sexual abuse within the family) referral to Children's Services (and thereby to the Police) may be made first.

All staff should have an awareness of any children who may benefit from 'Early Help' support to prevent concerns from escalating. Staff should discuss any concerns with the Designated Safeguarding Lead. The Designated Safeguarding Lead will log all concerns and work with the appropriate agencies e.g. Children's Services.

If a student personally confides an incident and only wishes to speak to you, you should:

- Inform them that you have a responsibility to report all incidents of abuse.
- Reassure them they have done the right thing.
- Leave questioning to the Police / Children's Services. If you contaminate evidence within correct questioning you may put the child at risk.
- Be honest about what happens next. If a child has told you about an incident, it is because they want help and look to you to give help.
- Contact the Designated Safeguarding Lead, personally and immediately
- Make detailed notes immediately (no later than one hour later) of what the child has said quoting the child's words verbatim.
- Be aware that if you are unable to speak to the Designated Safeguarding Lead (e.g. out of tuition hours), you have a duty to report your concerns to Children's Services.

All staff are aware that should a child disclose that they are a victim of female genital mutilation, a phone call to the Police, dialing 999, must be made immediately.

The member of staff **should not:**

- Investigate the matter independently, especially through questioning the pupil.

- Implement Child Protection procedures without first consulting the Designated Safeguarding Lead unless, and only in exceptional circumstances such as in emergency or when there is a genuine concern that appropriate action has not been taken, staff members can speak directly to Children's Services. If a referral is made, the Designated Safeguarding Lead should be informed as soon as possible.

- Discuss the disclosure with anyone unless instructed by DSL.

If a member of staff is concerned that a student is at risk according to any of the definitions, they should discuss the matter with the Designated Safeguarding Lead, who will:

- Collect any other relevant information from colleagues / other agencies.

- Decide whether or not there are sufficient grounds to refer the matter to the appropriate agencies.

The Designated Safeguarding Lead, will call Early Help meetings and when necessary, Multi-agency Professionals' Meetings in order to support early intervention for children and families in need. Children's Services will be consulted at every stage.

The tuition centre will also take into account extra-familial harm as we are aware that children can be at risk of abuse or exploitation in situations outside their families.

Safeguarding incidents and/or behaviours can be associated with factors outside the centre and/or can occur between children outside of these environments. All staff, but especially the DSL should

consider whether children are at risk of abuse or exploitation in situations outside their families.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

The Designated Safeguarding Lead will liaise with staff on matters of safety and safeguarding and act as a source of support, advice and expertise for staff. Safeguarding training will be completed as part of the new staff induction process.

The Designated Safeguarding Lead will ensure that children will have an 'appropriate adult' present if there is police involvement.

Internal Communication

All Child Safeguarding concerns/issues will be CONFIDENTIAL. Sharing of relevant information to staff will be strictly at the discretion of the Designated Safeguarding Lead following the guidance issued by HM Government July 2018 – 'Information Sharing : advice for practitioners providing safeguarding services' (DfE 2018)

Information in relation to a student should be kept "Confidential" if it is obtained through an external route. For example, a member of staff learnt of a concern through a social encounter with a parent.

External Communication

In line with 'Keeping Children Safe in Education September 2022', data protection is not a barrier to sharing information where failure to do so would result in a child being placed at risk of harm. The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent. (Keeping Children Safe in Education September 2022).

Safeguarding Concerns, Allegations Against Adults and Whistleblowing

Whistleblowing is the act of disclosing wrongdoing. Any allegations of abuse by a member of staff, supply teacher or volunteer should be reported **directly to the DSL**, who will implement locally agreed procedures. The first priority for the DSL will be to contact the LA appointed Designated Officer (LADO), before any other action is taken, including informing the adult concerned.

Safer recruitment

Broad Horizon tuition centre pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' (2021; Part 3). This includes 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 appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks (and overseas checks if appropriate), dependent on the role and duties performed, including regulated and non-regulated activity. All staff and volunteers must declare all criminal convictions, however long ago; these will be considered when deciding on their suitability for working with children or vulnerable adults. No-one will be permitted to undertake a role which involves regular contact with children or vulnerable adults without an enhanced DBS check.

Disclosure and Barring Service (DBS) check

All staff and volunteers require an enhanced DBS check to work for Broad Horizon in any other capacity: if that person is then asked to undertake tasks which will bring him/her into unsupervised contact with children or vulnerable adults, such as work experience placements, any record must be declared to the Centre Manager who will take appropriate advice where necessary and will decide whether this task should be allocated to another member of staff.

Further information regarding safeguarding

Childhood Mental Health

Mental illness and suicidal thoughts can affect anyone, of any age, of any background, at any time. Like with physical illnesses, people don't choose to have a mental health problem. It can be difficult to know if a child is suffering as they often keep it to themselves.

Some of the signs to be aware of may be:

- becoming withdrawn from family and friends
- persistent low moods and unhappiness
- tearfulness and irritability
- worries that stop them carrying out day to day tasks
- sudden outbursts of anger directed towards others or themselves
- loss of interest in activities that they used to enjoy
- problems eating or sleeping
- physical indicators, such as self-harm

Any member of staff who suspects a child or young person is suffering with their mental health should share their concerns with the

Designated Safeguarding Lead. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day to day and identify those whose behaviour suggests that they are experiencing a mental health problem or be at risk of developing one.

Further information to support young people and their mental health can be found using the following links:

<https://youngminds.org.uk>

<https://stem4.org.uk>

www.mind.org.uk

www.place2be.org.uk

www.mind.org.uk

www.nspcc.org.uk

www.actionforchildren.org.uk

Peer on Peer abuse (formerly Child on Child abuse)

All staff should be aware that children can abuse other children both inside and outside of the tuition centre, as well as online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to report. All staff should understand, that even if there are no reports in the tuition centre, it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse, they should speak to their Designated Safeguarding Lead.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff and pupils should understand that we have a zero-tolerance for peer-on-peer abuse and that we take such incidents very seriously, engaging with relevant external agencies where appropriate.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

-consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)

-up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

-initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Staff are clear as to the policy and procedures with regards to peer on peer / child on child abuse as defined in the Behaviour Policy, and the important role they must play in preventing it and responding where they believe a child may be at risk from it.

Staff will ensure that any disclosure of peer on peer abuse from a pupil, or indeed behaviours that have been witnessed are reported via a conversation held with the DSL as soon as possible to allow the incident to be investigated in the correct manner and by trained staff. Students who abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment. We ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

Child Criminal Exploitation

This is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim wants or needs and/or (b) for the financial or other advantage of the perpetrator or facilitator and or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears to be consensual. CCE does not always involve physical contact, it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

Some of the following signs may be indicators of child sexual exploitation and child criminal exploitation:

-children who appear with unexplained gifts/money or new possessions;

- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.
- Children with unexplained injuries
- Children in possession of multiple mobile phones

There are some indicators that will differ for male and female victims. Staff should be mindful of female students wearing inappropriate clothing, found to be carrying a large number of condoms on their person, or who fall pregnant. Male students who are found to have committed offences, become homeless or disclosed their sexuality are at greater risk of vulnerability and therefore greater risk of exploitation.

County Lines

County lines is the police term for gangs and organised criminal networks supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person under the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors, including

gender, cognitive ability, physical strength, status, and access to economic or other resources

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, children's homes and care homes.

The national picture on county lines continues to develop but there are recorded cases of the use of social media to make initial contact with children and young people

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless gender or sexuality. The abuse can encompass, but is not limited to:

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in KCSIE 2022. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors.

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Confidential specialist support and advice on HSB is available from the specialist sexual violence sector.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support

More details and information on sexual harassment and sexual violence is written below

‘Honour Based’ Abuse (HBA)

So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and treated as such. If in any doubts staff should speak to the Designated Safeguarding Lead.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

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

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Possible warning signs that FGM might be about to take place are:

- mention of a female relative coming to visit
- a girl becoming easily distressed, fearful or anxious
- referencing FGM (or its other alternative names)
- a child talking about a special procedure/ceremony that is going to take place
- the family making preparations to take the girl abroad ‘on holiday’ e.g. arranging vaccinations or requesting a prolonged absence from school

There is a range of symptoms of FGM that could consist of:

- severe and/or constant pain
- infections, such as tetanus, HIV and hepatitis B and C
- infertility
- bleeding, cysts and abscesses
- difficulties urinating or incontinence

Victims of FGM are likely to come from a community that is known to practise FGM. Staff must personally report to the police (dialling 999), after informing the Designated Safeguarding Lead, if they discover that FGM appears to have been carried out on a girl under the age of 18.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage.

Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Preventing Radicalisation

The Counter-Terrorism and Security Act places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Internet and use of social media have become major factors in the radicalisation of young people. All staff should be aware of the signs and symptoms of a young person being at risk of becoming radicalised:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the Swastika for far-right groups);
- attempts to recruit others to the group/cause/ideology;
- communications with others that suggest identification with a group, cause, ideology.

The examples above are not exhaustive and vulnerability may manifest itself in other ways.

Concerns may result in a referral to the Channel panel. The Channel panel is a voluntary process which supports people identified as being vulnerable to being drawn into terrorism. 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 have 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. Our tuition centre values freedom of speech and the expression of beliefs/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 activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The centre is clear that this exploitation and radicalisation should be viewed as a safeguarding concern. We seek 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 the Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk is part of our centre's safeguarding approach. Please refer to our 'Prevent' risk assessments for each school.

-Terrorism is an action that endangers or cause serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause

-If you have any concerns about any of the above, please report immediately to the Designated Safeguarding Lead.

Sexual Violence and Sexual Harassment

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

As set out in Part one Keeping Children Safe in Education 2022, all staff working with children in our tuition centre are advised to maintain an attitude of **'it could happen here'**.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are **never acceptable**.

It is important that **all** victims are taken seriously, offered appropriate support and reassured that we will work with agencies to keep them safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should they ever be made to feel ashamed for making a report. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is **not** acceptable, will **never be tolerated** and is **not** an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. **Dismissing or tolerating such behaviours risks normalising them.**

What is the difference between sexual violence and sexual harassment?

Sexual Violence

It is important that all staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way, **and that it can happen both inside and outside of the tuition centre**. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

Sexual Assault: A person (A) commits an offence of sexual assault if: 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, leading to a culture of unacceptable behaviour. It is **essential** that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should **never** be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

An example of what to say to a child if they disclose to a member of staff is given below:

“Thank you for sharing this with me. You have been very brave in telling me and I appreciate how difficult that will have been. You have done nothing wrong, and I am so proud of you for sharing this today. It is really important that I pass this information onto (DSL name) so that we can support you”

Causing someone to engage in sexual activity without consent:

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not

consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and had the freedom and capacity to make that choice.

Academy staff should be aware that:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of peer on peer sexual harassment. Sexual harassment is likely to; violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names;
- Sexual 'jokes' or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature;
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of sexual images and videos;
 - sharing of unwanted explicit content
 - up skirting (is a criminal offence)
 - sexualised online bullying;

- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

The response to a report of sexual violence or sexual harassment:

Responding to a report from a child is important. We are aware that how we respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. If we fail to recognise, acknowledge or understand the scale of harassment and abuse, or even downplay some of these behaviours, we are risking this leading to a culture of unacceptable behaviour. It is **essential** that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should **never** be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. An example of what to say to a child if they disclose to a member of staff is given below:

“Thank you for sharing this with me. You have been very brave in telling me and I appreciate how difficult that will have been. You have done nothing wrong, and I am so proud of you for sharing this today. It is really important that I pass this information onto (DSL name) so that we can support you”

Confidentiality and Anonymity

Any staff taking a report should never promise confidentiality as it is very likely it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. They should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the staff member not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes are to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.

Advice should be sought from the Designated Safeguarding Lead, who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and rape, assault by penetration and sexual assaults are crimes.

Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases. Ultimately, the Designated Safeguarding Lead will have to balance the victim's wishes against their duty to protect the victim and other children. If the designated safeguarding lead decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

Additional information on confidentiality and information sharing is available at Safeguarding Practitioners Information Sharing Advice and NSPCC: Information sharing and confidentiality for practitioners.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the tuition centre should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

As a matter of effective safeguarding practice, the tuition centre should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

Procedures in Relation to Visitors to the tuition centre

- Visitors are required to report **directly** to Kasum by the main entrance.
- Once inside the tuition centre, all visitors must sign the visitors' book.

- Any unaccompanied visitors on site who are not recognised must be politely approached, questioned about their business in school and escorted **immediately** to the main entrance.
- The tuition centre reserve the right to refuse entry or terminate a visit at any time.

Classification of Visitors

- Visitors can be classified according to their degree of access to children:

People working with children

- Unless the visit is expected or the visitor is well known to the person admitting them, authority must be obtained from the DSL before allowing access to the tuition centre
- The identity of the visitor must be confirmed.
- All such visitors will have enhanced DBS clearance.
- If the clearance is not held by us, we will require confirmation that appropriate clearance has been obtained and the visitor will wear a badge issued by the organisation holding their DBS clearance.

People not working with children

- Unless the visit is expected or the visitor is well known to the person admitting them, their identity should be confirmed and the authority of the DSL must be obtained before allowing access to the Academy.
- They are to be **supervised while students are on the premises**. The amount of supervision required is dependent on the visitors' actual or potential proximity to pupils and the DSL's knowledge of them.

Escorted visitors

Examples: parents/carers, prospective parents, job candidates.

- These people **must be accompanied at all times**.