

Procedure 5.5a Caspian School of Academics Safeguarding Policy and Procedures including the Prevention of Radicalisation and Extremism

Introduction

At the Caspian School of Academics (CSA) we feel that it is our duty to help keep all of our learners/students/staff safe during the time they are training/studying with us, regardless of their age and or how vulnerable or not they may be. Unlike many safeguarding policies that restrict themselves to cover only vulnerable adults and those below 18 years of age, as dictated by legislation, the School believes that all learners/students, not just those classified as vulnerable should be protected. The School acknowledges that learners/students who are categorised as vulnerable may also be referred to social services for support. However, we believe we have a 'duty of care' for every learner enrolled on our programmes, whether studying face-to-face or online, or training through one of our subcontractors. The School Safeguarding Duty also includes the need to raise awareness of the risks of radicalisation and extremism, and to take action where potential dangers are identified. This is particularly important as London, Birmingham and Bradford are identified by the Government as high-risk areas.

As an education institution, CSA is aware that it needs to comply with all relevant legislation and keep staff updated on any changes. The main aim of this policy is to make it as clear as possible to our staff and learners/students what we will do, and what we expect of them, to ensure that we are all as safe as possible. References to current legislation with regards to Safeguarding and Prevent Duty will be provided to staff and students as part of induction and through training, as well as through email updates and through appendices to this policy.

Aims

- a. **Safeguarding.** Our main focus is ensuring that all the key aspects of safeguarding are promoted by us to everyone who comes into contact with the School, at an appropriate level, and in language that is understandable. If there are any changes in legislation within the one-year life of this policy, it will be updated as necessary, and staff and learners/students will be informed of the changes and their importance. We believe that:
 - a. all our students/learners/staff should be happy and secure in their working and learning environments and safe from any form of abuse;
 - b. our safeguards not only protect and promote the welfare of our learners/students and staff but helps to improve their confidence both at work and in their everyday life;
 - c. our safeguards also help to protect all visitors to the School.
- b. **Prevent Duty.** The School recognises its duty to protect students and staff from the risks associated with radicalisation and extremism. The Prevent Duty as has three specific objectives:
 - a. To tackle the causes of radicalisation and respond to the ideological challenges of terrorism.
 - b. To Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support.
 - c. To enable those who have already be radicalised or engaged in terrorism to disengage and to be rehabilitated.

We recognise that there could be individuals who may wish to harm our learners/students and that it is our duty to put in place safeguards to protect any people that we work with. The School also wishes to avoid placing our employees in positions where accusations of abuse might be alleged. We seek to ensure that everyone knows what the reporting structure for Safeguarding and Prevent within CSA is, should any abuse, harm or attempt at radicalisation ever be suspected. We will seek to protect and to actively promote the welfare of the learners/students that we come in contact with. As a result, we have drawn up this safeguarding policy that embeds a set of learner-focused procedures to put what is intended by the School, into practice. In addition, we have a Low Levels Concerns Guidance and Policy document which related to concerns that do not reach the harm threshold.

In addition, this policy reflects the statutory framework Keeping Children Safe in Education (KCSIE) September 2024, and in particular the responsibility for the School to have due regards to the filtering and monitoring of online sites and materials. It is the responsibility of the senior management team and the Board of Governors to ensure that children, vulnerable adults and others are not exposed to harmful online content as part of the School's safeguarding and welfare duty and strategy. Any breaches must be reported to the Safeguarding Officer or the Designated Safeguarding Lead (DSL) – Lucia Mihaela [email: l.mihaela@caspianschool.ac.uk]

Our approach to safeguarding is the same as our approach to learning and training, based upon respect for all and a commitment to equality of opportunity. We work with our staff and any external employers to provide a safe and secure environment within which all learners/students can work and learn. We will make every effort to identify any learner at risk of suffering harm during their involvement with our programmes, and once identified we will take appropriate action to keep them safe. As you read through this policy it will raise your awareness of the different ways people may be abused, harmed or placed in danger, including while online and through radicalisation.

The Safeguarding provision has been updated to reflect the new Department of Education guidance on **Keeping children safe in education (KCSIE) 2024**¹ which is effective from 1st September 2024. This includes:

- Rolling out safeguarding training for all governors
- Checking the School has appropriate online safety training and filtering and monitoring systems
- Ensuring the School has a safe procedure for recruitment of staff and students
- Ensuring that the Designated Safeguarding Lead (DSL) has appropriate allocation of time to undertake their role
- Ensuring that safeguards are in place for the filtering and monitoring of online sites and materials
- That there is appropriate guidance on raising low level concerns.

The guidance places clear emphasis on disclosures and highlights the problems young people face when speaking about abuse, and the need to provide support to enable children and

¹https://assets.publishing.service.gov.uk/media/66ce094e8e33f28aae7e1f6d/Keeping_children_safe_in_education_2024_part_one.pdf

young people or vulnerable adults to come forward. The wording also includes a change in wording from 'child-on-child' abuse to 'peer-on-peer' abuse to provide greater clarity.

Paragraph 12 of KCSIE 2024:

'All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see paragraph 140 of KCSIE for further information) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.'

The KCSIE the guidance makes clear the importance of building trusted relationships with young people and vulnerable adults to facilitate communication, and highlights the need for professional curiosity and speaking to the DSL about any concerns.

As part of our commitment to safeguarding and wellbeing, all staff are mandated to familiarise themselves with Annex A of Keeping Children Safe in Education and subsequent iterations.

'All staff should be aware that children may not feel ready or know how to tell someone that 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 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 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 which facilitate communication.'

Specific aims relating to Prevent

To raise awareness of the Prevent strategy to enable the institution to better safeguard its students and staff and stop people from becoming terrorists or supporting terrorism. This risk assessment and action plan aims to ensure the following:

- To inform about activities and resources available for use and raise awareness of the Prevent agenda the key 3 objectives of Prevent are to tackle the ideological causes of terrorism; intervene early to support people susceptible to radicalisation; enable people who have already engaged with terrorism to disengage and rehabilitate.
- To link Prevent with safety, security, vulnerability and safeguarding
- To assist in understanding and identifying vulnerability to radicalisation
- To outline the role that CSA can play

Scope

This policy applies to all CSA employees. We will check that any subcontractors we work with have similarly comprehensive policies and procedures, as part of our due diligence in selection as partners, or that they adopt ours. There are four main elements to the policy:

1. **raising awareness of safeguarding, radicalisation and safety issues and equipping learners/students with the skills needed to keep them safe** – this will include in their working and their everyday lives (including an understanding of British values and e-safety)
2. **developing and then implementing safeguarding procedures that support learners/students who have been, or are in danger of being abused or radicalised** - for identifying and reporting cases, or suspected cases, of abuse or radicalisation so that we can help minimise the negative impact on their lives
3. **ensuring that we practice safer recruitment**- in checking the suitability of staff to work with our learners/students (this will include any temporary or agency staff)
4. **establishing a safe learning environment that meets our legal responsibilities** - in which learners/students can learn and develop and feel confident in being able to raise any concerns about themselves or others

CSA recognises that because of the day-to-day contact with learners/students and those that they work with, our teaching staff, assessors and managers are best placed to observe the outward signs of possible abuse related changes in behaviour that might also be signs of radicalisation. **We will also ensure that promoting an understanding of safeguarding is included in our Staff Handbook.**

As part of our approach to keeping all students and staff safe whilst on campus, as set out in the CSA Visible Identification Policy and Procedures, all staff and students are required to wear their ID lanyards when in School. Anyone seen on campus without a lanyard should be reported to security.

The School will have regard to the procedures and guidance issued by the London Safeguarding Children Board, the London Safeguarding Adults Board and the Department for Education, including the September 2024 updated guidance to:

- ensure that we have a designated senior staff member to oversee the safeguarding of our learners/students, leading a safeguarding team and acting as the 'nominated person' to act as Lead Safeguarding Officer (with appropriate initial training, annual updating and support for the role)
- ensure that all members of our staff have appropriate knowledge to carry out their roles, developed through different forms of training for safeguarding (not just completing online training, which is not as effective at checking an understanding of the most important concepts as there is no chance to ask questions to confirm understanding). Training will cover traditional 'safeguarding', online safety (including the emerging risks associated with AI, i.e, Deepfakes etc., Prevent, signs of radicalisation and the importance of British values, with training updates every year). Our staff will subsequently be able to raise the awareness of our learners/students. The School also provides students with an introduction to Safeguarding and Prevent policies as part of induction.



- ensure that CSA undertakes an annual review of the policy and procedures, so that it reflects any changes that might impact from changes in legislation, guidance or incidents of abuse or terrorism in England and other countries (but reacting to any urgent need for change within the lifespan of the policy and procedures)
- ensure that CSA safeguarding arrangements are widely known amongst staff, learners/students and subcontracting partners
- keep written records of concerns about learners/students, even where there is no need to refer the matter immediately and ensure that all records are kept securely, separate from the main learner file and in secure locations
- include procedures where an allegation is made against a member of staff in line with GDPR
- ensure that safer recruitment practices are always followed, including carrying out appropriate checks on new staff.

1. Raising awareness of safeguarding, radicalisation and safety issues and equipping learners / students with the skills needed to keep them safe for identifying and reporting cases, or suspected cases, of abuse or radicalisation

Learners/students, and in some cases staff, could be the subject of abuse, exploitation or attempted radicalisation. As a training and higher education provider the School wants our learners/students and staff to understand the different ways abuse and exploitation are categorised, and how people might become radicalised. Sadly, these topics are constantly in the news because they are not spotted at an early enough stage, and are highlighted when harm has been done. By raising awareness through reading this policy and CSA Safeguarding Procedures, together with further training and reinforcement at induction and during reviews, we hope to be able to identify any problems at an early stage in order to minimise the potential negative impact and to protect our learners/students and staff. **If you are personally subject to anything in this section, or know of anyone else who is, please tell a member of staff, or go straight to a member of the safeguarding team.**

The main categories of abuse and exploitation

Abuse is defined as any action that intentionally harms or injures another person – here we outline how different abuse is broken down into different ‘types’ along with indicators it is happening.

- **Physical abuse.** There are many different ways that people may be abused physically, examples include: hitting, slapping, pushing, kicking, shaking, throwing, rough handling, twisting of limbs, poisoning, burning or scalding, drowning, suffocating, misuse of medication, inappropriate sanctions or restraint, unnecessary physical force either deliberate or unintentional. Domestic violence by men or women on their partners is a form of physical abuse.
- **Physical abuse indicators include** bruising or other injuries for which explanations do not seem to fit, or recurring injuries. For example, if a female learner living with a partner has bruises on their face and says they walked into a door, especially if it happens more than once, you may start to suspect they are being subjected to physical abuse. Our students/learners who work in care settings need to be aware of the signs of physical abuse on their clients.

- **Sexual abuse.** This is defined as forcing or enticing a person to take part in sexual activities when they are under age, frightened or do not understand what is happening. Examples include: rape and sexual assault, or sexual acts to which the person has not consented, could not consent or was pressured into consenting (including penetrative or non-penetrative acts). Our students/learners who work or have placements in care settings need to be aware of the signs of sexual abuse on their clients. It would be seen as a betrayal of that trust, and therefore abusive, that any member of staff should have a sexual relationship with a person they are caring for. Sexual abuse can also be non-contact abuse such as voyeurism, involvement in pornography or sexting (pressuring someone to send indecent images using phones, but also computers). Sexual abuse can occur between people of the same sex and it can also occur within marriage or any long term relationship. Although such acts are mainly carried out by men, there have been many examples where women have been involved.
- **Sexual abuse indicators** include bruising (particularly to the thighs, buttocks and upper arms and marks on the neck), unusual difficulty in walking or sitting, changes in sexual behaviour or attitude, self-harming, poor concentration and becoming withdrawn. We have included a brief description of **child sexual exploitation** at the end of this section of the policy and procedures.
- **Emotional or psychological abuse.** This covers a range of behaviours including: emotional abuse involving persistent emotional ill-treatment, verbal assault or intimidation; psychological abuse which includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, intimidation, coercion, harassment, verbal abuse, cyber bullying (online or by text), controlling (overriding of consent) of choices or wishes, being made to feel worthless, frightened or unloved. Please note that psychological or emotional abuse will usually occur in conjunction with other forms of abuse.
- **Emotional or psychological abuse indicators** an air of silence when a particular person is present, becoming withdrawn, having low self-esteem, having a change of appetite with weight loss or gain, showing signs of distress such as tearfulness or anger.
- **Financial abuse (also referred to as material abuse).** A range of activities can constitute financial abuse including theft, fraud, exploitation, and pressure in connection with wills, property, enduring power of attorney, possessions or benefits. A person may be pressured by someone into handing over their wages and having none of their own money.
- **Possible indicators financial abuse include** sudden loss of personal possessions, unexplained lack of money or the inability to maintain a normal lifestyle (in the case of a learner walking everywhere rather than taking a bus, having no money for drinks or food, 'giving away' possessions), unexplained withdrawal of funds from bank accounts or running up credit card bills that can't be paid, rent arrears and eviction notices. Again, our learners and students who work in care settings need to be aware of the signs of financial abuse on their clients.
- **Neglect (and acts of omission).** This form of abuse includes ignoring medical or physical care needs, failure to provide access to educational services or the withholding of the necessities of life, such as medication, adequate food, shelter and heating. This type of abuse is most prevalent in care situations or with young children by parents. Again, our learners/students who work in care settings need to be

aware of the signs of this abuse on their clients. It is often part of stories that hit our news headlines combined with physical abuse of children and older people.

Signs of neglect may include weight loss, tiredness, acting as a carer for other family members, scavenging for food, being dressed in dirty clothes and general signs of ill health.

Discriminatory abuse. This form of abuse is usually motivated by discriminatory and oppressive attitudes towards people on the basis of their race, gender, culture background, religion, physical or sensory impairment, sexual orientation or age (the protected characteristics under the 2010 Equality Act). Verbal discriminatory abuse may include derogatory remarks or inappropriate use of language related to one of the protected characteristics listed above, for example subjecting someone to racist or sexist remarks, or harassment. It can be carried out in person or online. A 2016 report found that one in four teenagers is abused online over their sexual orientation, race, religion, gender or disability. The abuse may also include denying access to communication aids, not allowing access to an interpreter, signer or lip-reader or harassment or deliberate exclusion (for example, not being allowed into a club) on the grounds of someone having a protected characteristic.

Discrimination abuse signs may include changes in behaviour and a loss of self-esteem. Learners/students may be a victim of this when out shopping or using public transport. Although there may not be much that can be done after it has happened to stop it, it should be reported to the police with a description of who did it. They may be aware of other incidents and can examine CCTV footage from street or traffic cameras, or on public transport, to obtain evidence.

- **Domestic violence and abuse.** This form of abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of their gender or sexuality. It also includes so called 'honour'-based violence, female genital mutilation (FGM) and forced marriage (incidents are often in the news and all three are discussed below). Although the official definition uses the age of 16 and that will be the minimum age of our learners/students, there are many cases of FGM and forced marriage of children younger than this.
- **Domestic abuse indicators may include** having low self-esteem or worthlessness, feeling that the abuse is their fault when it is not, showing signs of physical violence such as cuts or bruises (and blaming it on 'walking into a door'), or a learner suddenly leaving their training as their partner does not like them mixing with members of the opposite sex or people who might notice the abuse and advise them to report it or to leave the relationship.

Honour Based Violence. Honour Based Violence (HBV) is a term used to describe **violence committed by members of extended families, motivated by a perceived need to restore 'standing' within the community**, which is presumed to have been lost through the behaviour of the victim that the violence is carried out on. The behaviour that triggers the violence may seem fairly normal to those outside of a particular culture and is therefore hard to understand. Most victims of HBV are usually women or girls, although men can also be at risk, for example, if they are gay. Loss of 'honour' is often for showing independence or wanting freedom, over the wishes of the family. Common triggers for HBV include:

- not wishing to practice a particular religion anymore
- refusing to take part in an arranged marriage (family expectations may be to marry a much older man who they may never have met, who may live in another country)
- having a relationship outside the approved group (having a boyfriend of a different religion or ethnicity, or for family to find out someone is gay, for either males or females)
- loss of virginity or being pregnant outside of marriage (family would expect a girl to be a virgin on being married)
- a married woman having a relationship outside of their marriage
- spending time without the supervision of a family member
- reporting domestic violence to the police, rather than putting up with it
- attempting to divorce a partner or pushing for custody of children after divorce
- refusing to divorce when ordered to do so by family members
- men may be targeted by the family of a woman who they are believed to have 'dishonoured'

It is important to take learner fears of HBV seriously, even when the cause of it seems trivial, and therefore unlikely. Victims of HBV are more likely to underestimate the risks to their safety than overstate them. HBV is often a collective crime with several family members involved and someone outside a family may be paid to kill or harm a victim (for example, acid attacks to disfigure faces).

Forced or arranged marriage. Forcing a person into a marriage against their will 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 are 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. It is not unusual for families to deny that forced marriage is intended, and once aware of outside concern, they may move the learner and bring forward both travel arrangements and the marriage. **For this reason, staff should not approach the family or family friends, or attempt to mediate between the learner and family, as this will alert them to official involvement.**

Female genital mutilation (FGM). FGM is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or 'cutting'. Religious, social or cultural reasons are sometimes given as reasons for FGM, however, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

FGM has been a criminal offence in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have FGM. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. Although you might think FGM is not common it is estimated that there are 137,000 women and girls with FGM in England and Wales. From July 2015, anyone can apply to the court for an FGM Protection Order if they are concerned that someone is at risk of FGM. Breaching an FGM Protection Order is a criminal offence with a maximum sentence of five years imprisonment. From October 2015, the FGM Act 2003 was amended to

introduce a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales. **We must make a report to the police, if, in the course of our duties:**

- we are informed by a girl under the age of 18 that she has undergone an act of FGM, **OR**
- we observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

The term FGM covers all harmful procedures to the female genitalia for non-medical purposes. There are four types - all are illegal and have serious health risks. FGM ranges from pricking or cauterizing the genital area, through to partial or total removal of the clitoris, cutting the lips (the labia) and narrowing the vaginal opening. Even partial removal or 'nipping' can risk serious health problems for girls and women. It is usually performed by someone with no medical training. Girls are given no anaesthetic, no antiseptic treatment and are often forcibly restrained. The cutting is made using instruments such as a knife, pair of scissors, scalpel, glass or razor blade. FGM is practised in 28 African countries as well as in parts of the Middle East and Asia.

A girl at immediate risk of FGM may not know what's going to happen to them. She might talk about being taken 'home' to visit family, or that a special occasion is being planned to 'become a woman' or that an older female relative is visiting the UK. Although FGM is often carried out abroad it is also performed in the UK. A female learner may ask a trainer or assessor for help if she suspects FGM is going to happen to her, or a younger sister. She may run away from home and miss work or training days, often without a reason being given. If FGM happens it can be extremely painful and dangerous, causing long term effects on health, complications during pregnancy and childbirth as well as emotional and mental health problems.

If you are worried or suspicious about FGM having happened or that someone is in danger of it happening, please tell us. The NSPCC have a free, 24/7 FGM helpline that can be phoned anonymously or an email address where concerns can be raised: Freephone 0800 028 3550 or email fgmhelp@nspcc.org.uk

Child sexual exploitation. Child sexual exploitation (CSE) is a type of sexual abuse partly categorised by age, but the same kind of abuse could occur with learners/students of any age. Young people who find themselves in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities, or for allowing others to perform sexual activities on them. Young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol so they are not fully aware of what is happening to them and what they are asked to be involved in. They may also be groomed online to do or say sexual things in front of a webcam or on a phone (Zoom, Facetime, etc.). Young people often trust their abuser and don't understand that they're being abused. They may depend on their abuser or be too scared to tell anyone what's happening. Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. A significant number of young people who are victims of sexual exploitation go missing from home, care and education at some point.

Victims can be male or female. Young people who have been in care are often specifically targeted to be victims of exploitation as their backgrounds can make them more susceptible. Some young people

are **'trafficked'** into or within the UK (illegally helped into the country and then forced to work for the traffickers) for the purpose of sexual exploitation. Young people who have been trafficked may have no access to their parents, have false identity documents and may not be registered with a GP. Sexual exploitation can also happen to young people who are in gangs. The majority of sexual exploitation within gangs is committed by teenage boys and men in their twenties. Girls and young women are frequently forced into sexual activity by gang members as part of an initiation new gang members and is also used to exert power and control over members.

Indicators of sexual exploitation include young people having unexplained gifts or new possessions, having older boyfriends or girlfriends, suffering from sexually transmitted infections or becoming pregnant, having changes in emotional well-being, misusing drugs and alcohol or going missing without explanation (to escape the situation that they are in).

Private Fostering. Although this may be a perfectly safe arrangement we need to be made aware of any private fostering arrangements for any of our learners/students, to ensure that they are not in potential danger. **The Definition of privately fostered learners/students are those young people under the age of 18 who are cared for by someone other than a parent or close relative** (e.g. step-parents, siblings, siblings of a parent and grandparents) for a period of 28 days or more. Staff should make a referral to the safeguarding team if they become aware of such an arrangement and if they feel that the fostering arrangement is not likely to have been notified to the local authority or if they have doubts about whether a young learner's carers are actually their parents, and there is evidence to support these doubts, including concerns about the young learner's welfare.

2. Safeguarding learners/students from radicalisation and the influences of extremism

What are extremism and terrorism?

Extremism is the vocal or active opposition to fundamental 'British' values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs of others. There are many types of extremists for many different causes, including animal rights, right and left-wing groups, religious groups and several others. Extremists may or may not be violent (for example hacking computers may not cause physical harm) but often violent action is taken alongside protests. For example, in the United States some groups that are anti-abortion simply protest while others have blown up clinics and attacked those who work there.

Terrorism is defined as action designed to influence the government, intimidate the public, and is carried out for the purpose of advancing a political, religious or ideological cause, that endangers or causes serious violence or harm to people, property, or seriously disrupts or interferes with an electronic system (computer hacking). Sadly there are examples around the world on a very regular basis of murders including the 9/11 attack on New York, the '7/7' attacks in London and the murder of Fusilier Lee Rigby in Greenwich. Nearby in France there have been several violent murderous incidents including the attacks on journalists of a magazine, a Jewish restaurant, slitting the throat of a Catholic priest in church, the attack on an audience of a rock concert, attempts to bomb a football match and the deliberate running over and killing scores of people watching fireworks on a seaside promenade in Nice.

The groups most commonly in the news when people think about extremism and terrorism have generally been Islamic ones, but there are groups with many different ideologies that are seen in the UK, including several from the far right, far left and animal rights. We should not stereotype those who support any one group such as Islamic State as being bearded males (IS) or the National Front as tattooed skinheads (NF), because they may not be anything like that. Extremists come from every background imaginable, they may be male or female, wealthy or poor, and of any intelligence level. People who become extremists and terrorists in the UK are not born as such, but become **radicalised**.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way. The Office for Students (OfS) has issued updates on six main categories which can provide extremist materials and whose members or sympathisers may seek to recruit and radicalise students. The UK Home Office recognises 9 categories in total, however, three categories are applied retrospectively. The main six main categories from which extremist threats may originate include:

- **Extreme right wing:** this is an umbrella term which encompasses all ideologies and narratives that seek to undermine fundamental values of democracy, tolerance, individual liberty and the rule of law, including nationalism and white supremacy. These groups span a range of extremist beliefs such as antisemitism, anti-Islam, neo-Nazi and anti-establishment sects.
- **Islamist:** This terrorism is defined as acts of terrorism perpetrated or inspired by politico-religiously motivate groups or individuals who support and use violence as a means to establish their interpretation of an Islamic society, which in the context of the UK mainly comes from Salafi-Jihadi movements which are inherently violent.
- **Incel:** This is an abbreviation of the term 'involuntary celibate' and encompasses misogynistic and violent views towards women as a result of feeling rejected or threatened by women.
- **School massacre:** This reflects those who are vulnerable due to being fixated with school massacre or extreme mass violence without targeting a particular group.
- **Conflicted:** This category involves a combination of elements from multiple ideologies and shifts between ideologies which are mixed and/or unstable, or where an individual does not adhere to a coherent ideology but may still be vulnerable to being radicalised and drawn into acts of terrorism.
- **Other:** This includes types of concerns that are not covered by the categories above such as:
 - Left-wing extremism
 - Northern Ireland-related extremism
 - Animal-rights extremism
 - Environmental extremism

- International separatist-related extremism
- International (other) extremism.

How do people become radicalised?

As young people grow and become more independent, it is not unusual for them to take risks, explore new things and push boundaries. Teenage years are often a time when young people will be searching for answers to questions about their sense of identity, faith and belonging, as well as looking for adventure and excitement. This can mean that they are particularly vulnerable to extremist groups, who may claim to offer answers, as well as giving identity and being part of a strong social network. Extremist groups often target young people for this very reason, using the internet and social media to spread their ideology. Although the radicalisation process is unique for each individual, in general terms, four key elements are usually present:

1. **a vulnerable person** will be introduced to an
2. **extremist ideology** by a
3. **radicalising influencer**, who, in the
4. **absence of protective factors** (such as a supportive network of family and friends, or a fulfilling job) draws the individual towards extremism.

There is no single path to radicalisation, otherwise it would be easier to block and stop. It can occur quickly in a matter of weeks, or over a much longer period of time. Sometimes there are clear warning signs, and in other cases the changes in personality or behaviour are less obvious or are attributed to 'normal' teenage behaviour.

Here is a guide to some possible warning signs of radicalisation that may be noticed by parents/guardians, friends, employers or our trainers and assessors, as changes to a learner's attitudes, opinions, character or behaviour:

- **being argumentative or aggressive**, with an unwillingness to listen to or consider other points of view which contradict their own
- **refusal to engage with, or being abusive to, peers** who are different to themselves. These differences could include race, religion, gender or sexuality
- **susceptibility to believe conspiracy theories** and having a feeling of persecution
- **changes in behaviour** and the peer group and friends associated with time-keeping, study, submission, punctuality, etc., which reflect a negative change of behaviour (grades suffer).
- **distancing themselves from friends**, both online and offline
- having a **recent and possibly sudden conversion** to a new religion
- having a **significant change of appearance**, clothing and/or behaviour
- **rejection of activities they previously enjoyed** (socialising in pubs, clubs, etc.)
- **excessive time spent online or on mobile phones, and secretiveness** or reluctance to discuss what they are doing (more so than previously seen, but typical of many young people)
- **changes in online identity**, including social media profile image or name. Some will even have two parallel online profiles, one their 'normal' or old self, the other for an extremist identity, often in another name

- **showing support for extremist ideologies and groups** (for example, giving expressions of sympathy with the ideology of extremist groups or justification of their extreme actions, perhaps after a major incident)
- **expressions of sympathy** for extreme behaviour including support for young people who have joined or attempted to join these groups (for example, travelling to Syria via Turkey)
- **accessing extremist material online**, including violent extremist websites (for example, beheadings), especially those with a social networking element (e.g. Facebook, Twitter)
- **possessing or accessing other forms of extremist literature**
- **being in contact with extremist recruiters**
- **joining or seeking to join extremist organisations.**

Whether you are a friend, employer, or indeed a training provider such as CSA, you will be well placed to recognise when changes to behaviour feel out of character for someone that you know. You should have confidence in your judgment and seek advice if something feels wrong. Use our safeguarding contact details to raise or discuss any concerns.

3. Prevent Duty

Since July 2015, all further and higher education institutions, including apprenticeship providers, have had a legal responsibility to have due regard to the need to prevent people from being drawn into terrorism by being radicalised under **Section 26 (1) of the Counter-terrorism and Security Act 2015**. This government initiative is known as the **‘Prevent Duty’** and is designed to not only stop people becoming radicalised, but also to avoid them from getting a criminal record. **‘Channel’** is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for us to make referrals if we become concerned that a learner might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages. Following a referral, a Channel panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary, consent is obtained, arrange for support to be provided to those individuals.

4. Promoting British values

Most people would be able to express their idea of what they felt British values were if asked, generally talking about a sense of fairness and democracy. Britain has a long history and some of the things that we now take for granted, such as ‘one person, one vote’ were hard won equal rights (only women who were householders over the age of 30 [6 million women] got the vote in 1918; women over 21 did not get the vote until 1928 despite all men over the age of 21 getting the right to vote in 1918).

The four British values and what they represent are discussed below:

- **Democracy** – this is the belief in freedom and equality between people in which power is held by elected representatives or directly by people themselves. Everyone has a role in influencing decision making, at national, local and community level. As a learner it means exercising your democratic influence through the feedback mechanisms we provide such as surveys. These could

have influence, for example on developing procedures to improve your experience whilst learning through CSA .

- **Rule of Law** – this is ensuring an understanding of the importance of having laws and the consequence of breaking laws, accepting that no one is above the law. It is about individuals having an understanding of their rights and responsibilities, as learners/students, employees, consumers, service users and citizens in society. This is about encouraging everyone to accept responsibility for their behaviour; distinguishing right from wrong, and to respect the civil and criminal law of Great Britain.
- **Individual Liberty** – this relates to our rights and responsibilities as citizens; the right to act believe and express oneself in a manner of one’s own choosing. This requires an understanding of the balance between freedom of speech and expression and the potential negative impact on others. This is about enabling learners/students to develop their self-knowledge, self-esteem and self-confidence, and to encourage you to become a responsible individual who actively participates in your own learning and development.
- **Mutual respect and tolerance for others** (such has people who hold different faiths) – this is about accepting that other people have different faiths or beliefs which should not be the cause of prejudicial or discriminatory behaviour. This aspect applies to people of all backgrounds, cultures, ages, sexual orientations, genders, and abilities. Each person has the right to be treated with dignity and respect with regard to any aspect of their identity. This is a fundamental element of The Equalities Act 2010 and one of the reasons why your development of a good understanding of equality and diversity while with CSA as a learner is so important.

A key part of any learning or training programme today is preparing people to live and work in modern Britain, and the world, as responsible citizens.

5. Developing and then implementing safeguarding procedures that support learners/students who have been, or are in danger of being abused or radicalised.

As has already been said in Section 1 of this policy, the School wants to actively protect all our learners/students and staff. The key message that we put across to our learners/students is to tell someone about any concerns they have, either for themselves or others. This second section looks at what is in place to help provide that protection, while meeting our statutory (legal) duties.

Any suspicion, allegation or disclosure of harm made by a learner concerning themselves or another learner (or a suspicion of someone else being radicalised), should be reported IMMEDIATELY to one of the safeguarding team, with a view to the concerns being passed onto the relevant statutory agency if necessary, or to seek advice and help, to allow the School to protect the learner or other person if they are in danger.

Clearly if a learner is in imminent danger from being abused or taking part in illegal activity, the matter should be urgently addressed and not left to a later time. Staff should alert the Lead Safeguarding Officer as soon as possible (in person or by phone), submitting a written record of their concern using the Safeguarding Concern Referral Form. This can be handwritten in order to save time. If a member of staff is at an employer and becomes aware of a safeguarding issue, they should contact a member of the safeguarding team by phone to confirm the most appropriate next steps.

When a learner discloses a safeguarding cause for concern, the member of staff should listen attentively to the learner and treat them with respect. The learner has a right to expect that their situation will be dealt with sensitively. Any allegations, disclosures or suspicions must be taken seriously. Staff who receive a disclosure must make an immediate verbal report in person or by phone followed as soon as possible by a written report. Staff should be aware that:

- **it is not their responsibility to investigate safeguarding cases** but to pass on what they are made aware of to our safeguarding team, regardless of how well they know a learner (some online training wrongly makes it sound as if staff should be investigating and taking protective action, when their role is to pass it to the safeguarding team or a manager if a member of the team were not available)
- any attempt to investigate by the member of staff could be construed as unjustified
- interference, which could jeopardise any police investigation and subsequent court case
- any questioning should be limited to the minimum necessary to seek clarification, avoiding any leading questions e.g. *'Did he do xxxx?'* Instead use non-leading or open questions like *'tell me what happened?'* Do not prompt what you think they might say if there is a silence, let them talk in their own time, and use their own language. It is important to not show by your body language or words that you are shocked by a disclosure, try to remain 'neutral' so the person is not put off talking. Do not ask why someone disclosing abuse did not try to avoid it, or infer they were somehow to blame, or try and explain to them why it might have happened
- the staff member should inform the learner of the role of a Safeguarding Officer, as although this will have been covered in induction and their handbook, they may have forgotten what they were told
- despite what they may request, the learner must be advised that this **information cannot be kept totally confidential** and will be passed on securely to a Safeguarding Officer in the first instance. Information is only shared on a 'need to know' basis and will not be widely known or gossiped about
- if the learner is distressed they should not be left alone, and if necessary staff should call for further assistance to help support the learner or to look after other learners/students that the member of staff may have been working with
- in the absence of any Safeguarding Officers, details of the suspicions or allegations of
- abuse or radicalisation should be reported to a director or any manager

6. Responsibility of the Safeguarding Officers

At CSA we have a Lead and a Deputy Lead Safeguarding Officer, who are there to ensure that we make the right decisions should there be any safeguarding concerns over a learner or member of staff. They will make decisions on whether a disclosure is a '**concern**' that might develop into something more serious, or if someone is in '**immediate danger**' or '**at risk of harm**'. Where someone is in immediate danger, the police would be the first point of contact to best ensure protection.

On receiving a disclosure, allegation or suspicion of self-harm, harm to others or from others, the Safeguarding Officer will respond and pass information to the appropriate agency as required by the London Safeguarding Boards' Procedures. The Safeguarding Officer must be familiar with these reporting requirements and contact details of the Safeguarding Boards, including the procedures to

be followed outside of normal office hours. We hold contact details for all the London Borough Boards. Where concerns are for a learner who is 18 years of age or older we have contacts for various support agencies who can offer expert advice and help, as well as police contacts if there is imminent danger to anyone or a crime has, or might be committed. Where concerns are about possible radicalisation, we hold details of who to discuss the next steps with, and then deciding whether entering further stages will be required.

Safeguarding Officers must keep a written record of the date and time of their report and include the name and position of the person to whom the matter is reported. This should be recorded on the Safeguarding Concern Referral Form started by the member of staff to whom an initial concern or disclosure was made, along with notes attached and referenced of follow up and the progress/outcomes made.

Initial reporting to external agencies may be over the telephone but must be confirmed in writing within 24 hours. Some Safeguarding Boards still use faxes in order to have written records of reports. The Safeguarding Officer will discuss with the relevant agency what action, if any, should be taken, making notes of the conversation on or attached to the Safeguarding Concern Referral Form, acting on their recommendations.

The Safeguarding Officer will provide the fully completed Safeguarding Concern Referral Form to the Lead Safeguarding Officer (or in their absence the Deputy Lead) within 24 hours of the initial concern arising. A flow chart for the procedures is shown below. The Lead Safeguarding Officer will ensure all further documents and monitoring updates are added to a log of concerns raised on a Central Safeguarding Register for each academic year.

The Lead or their Deputy will always be able to make themselves available to staff during centre opening hours. Both will have the same level of training and will know what actions will best support learners/students or staff for whom a safeguarding concern has been made:

- referring cases of suspected abuse to the relevant local Children's Services team
- referring allegations against professional staff and volunteers to the LADO
- referring cases to the Channel programme where there is a radicalisation concern.

The diagram below illustrates the process of dealing with a disclosure of possible abuse and ensuring the safety and welfare of the learner.

How we will deal with a disclosure from a learner (or someone else concerned for the welfare of a learner) around a learner's safety or welfare, including the possibility of them being radicalised

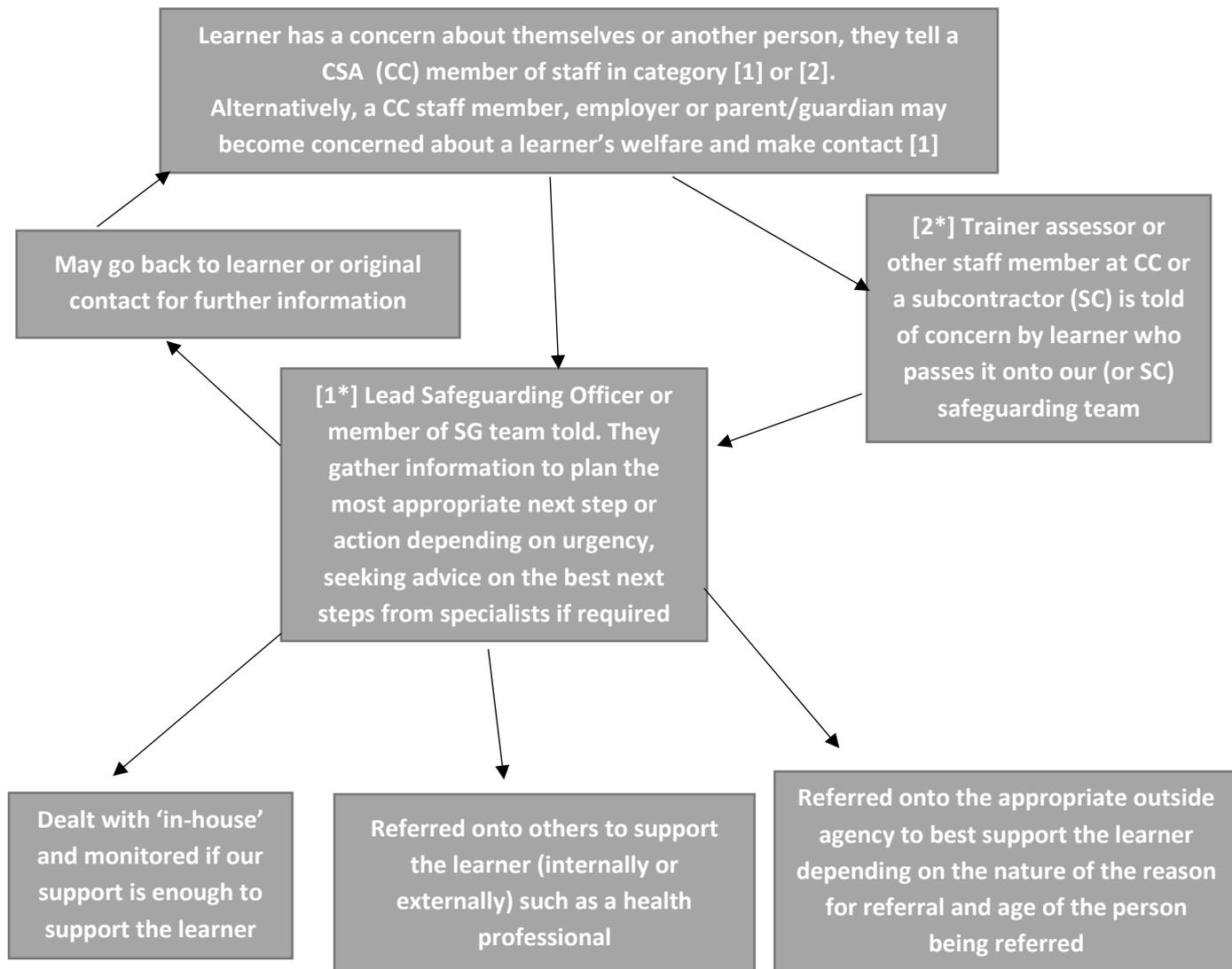


Figure 1. Safeguarding reporting procedure, including risks associated with radicalisation.

* Persons [1] or [2] MUST record what they are told and pass the records on to the Lead Safeguarding Officer so that appropriate records are maintained. Depending on the size and experience of a subcontractor, they may deal with any safeguarding issues that arise themselves, but keep CSA team informed in confidence, so that we can log the circumstances for an annual analysis of safeguarding at the end of every academic year.

7. Your personal physical safety – tips on staying safe

This section applies equally to all of our learners/students and staff, especially as many of us live and work in London, where just by the number of people and crowding of public transport, there are more issues around safety than elsewhere. Although everyone should have the right to go about their lives free from the fear or threat of violence, aggression and intimidation, we often read of violent incidents in areas that we know and would generally consider safe. London is also more likely to be subject to terrorist incidents, although these are few and far between and often prevented by the police and intelligence sources. By taking some simple precautions, you can improve your chances of staying safe and not being a victim of violence or crime:

1. **Plan the routes you are going to walk somewhere in advance.** Think about where the danger spots may be along your regular routes, and how you could avoid them (e.g. avoid walking through wasteland, down dark alley ways, underpasses, under bridges, or through deserted or poorly lit areas)
2. **Similarly, plan bus, tram, tube or train journeys so you know where you need to make changes, and know the times of the last services** – carry a little extra money or have your Oyster card topped up in case you get stranded and need to take another bus, tram, tube or train, or even a cab
3. **Use all your senses**, don't limit your ability to see or hear trouble by wearing hoods, listening to music through headphones, by talking on your mobile phone or by wearing sunglasses that block out too much light
4. **Cross roads at crossings**, walking rather than running (less likely to trip and fall) if the sign to cross is about to change
5. **Don't invite crime** by displaying the fact you have an expensive phone, iPod or headphones that make you a target for opportunist theft
6. **If you have to stay late at work** and are concerned about how you are going to get home safely, talk to your employer about how they can help you to keep safe – it is better to try and travel with someone and to plan your route home, and depending on circumstances, to even provide a taxi
7. If there is someone at home, **let them know that you are on your way** and what time to expect you (it will mean someone can alert help if you are late without an explanation such as a text)
8. **If you live alone** you could arrange a buddy system with a friend, where you text them to let them know you are home safely and they do the same with you if they are out late
9. Try to ensure you **always have enough money or a travel card (contactless payment cards can be used as a 'ticket' by a number of travel companies)** to get home (getting money from cash tills can be especially dangerous in the evenings or early mornings as streets are darker and less busy)
10. **Have your keys ready when you approach your home** so that you can enter through your entrance door quickly and not spend time fumbling in bags or pockets to find a key
11. **Remain alert**, until you are safely inside your home
12. **If you are out in the evening or early in the morning** try and stay safe by being with friends or stay near a group of people
13. **Although smart phones are great to find where you are going** if you don't know the way holding them out in front of you while you follow the map **impacts on your concentration** (more likely to be unaware of traffic) and **makes you vulnerable to crime** (theft of your phone). Better to look at

the map app in a safe place, note the route and road names in your head, walk for a few minutes and then check you are following the route.

14. Never accept a lift with a stranger or someone you don't know

15. Be mindful that **alcohol and drugs use will reduce your ability to keep yourself safe** and that some people may deliberately try to 'spike' your drink in pubs, bars or clubs (if in a group someone can keep an eye on your drinks while others dance or go to the toilet). If you suddenly feel unwell or dizzy, stay with friends and get them to look after you to get safely home
16. **If you cycle**, wear a protective helmet and use cycle paths whenever possible. Take care when passing lorries as they are less likely than other vehicles to see you. Be extra cautious at road junctions as this is where the majority of accidents involving cyclists occur. Wear reflective clothing and have lights on to make yourself as 'visible' as possible. Obey the rules of the road, especially at traffic lights.
17. If you are out in a pub or club remember that **thieves will be looking to see if bags are not being watched by their owners** (the busier a venue, the more likely thieves will be operating there)
18. **Don't pick up a cab on the street or from outside bars and clubs** unless you can be sure that they are licensed (black cab) and properly called by yourself or the bar/club (ask the driver who the cab has been booked for and the destination – if it was for you they should know this); check that the photo ID displayed is the person driving the cab and not someone else. It is useful to know the details of a minicab company (put as a contact on your mobile)
19. If possible, **wait for a bus or train in a well-lit place**, near other people if possible (use waiting areas with glass so you can be seen if they are available)
20. Once on board, **take note of where the emergency alarms are** and try to sit near to them. There are alarms on buses, train carriages, tubes, trams and rail platforms. If a bus is empty or it is after dark, **it is safer to stay on the lower deck near the driver**. On trains **sit with others** to avoid empty carriages or seats where there are few people
21. **Consider carrying a personal shriek/ attack alarm** to give you extra confidence and to shock and disorientate potential attackers, giving you time to get away
22. **Online, don't give away personal information** (pictures, address, telephone number, financial details, passwords, date of birth) **or arrange to meet anyone you have not physically met before by yourself**
23. **If you see a suspicious unattended package or bag** on public transport, in tube or railway stations or at an entertainment venue (pub, club, cinema, theatre, concert venue, etc.) **report it to someone**
24. **If there is any form of incident that may be linked to terrorism, such as a bomb, suspect bomb or an act of violence, do as you are instructed to by those in authority** (the police, transport officials or security personnel). It is important that you get away from danger but without panic, which itself can cause potential problems such as people falling or being crushed if too many people try and get through exits at the same time without being orderly. Use your common sense and go away rather than towards what you think may be an incident – put your own safety above curiosity of what may have happened.

8. Understanding the reasons for E-safety and how to stay safe online

'E' or online safety refers to the safe use of the internet and other electronic forms of communication such as e-mail, text messages or different forms of social media (for example Facebook), that can be used to put learners/students at risk. The following are three key ways in which these various forms of technology can be used in a harmful way, followed by some awareness raising safety pointers to keep you safe from possible online crime:

- **Internet grooming** - flattering someone into talking in a private chat room where they will be isolated or befriending someone on a social networking web page. Asking someone what problems they have to create the illusion of being a best friend and building up a sense of mutual love and trust, suggesting that they can discuss "anything". Convincing someone that you have similar interests with the intention of meeting and then subjecting them to abuse or even murder. Such grooming can also be used to radicalise people into involvement with extremist groups by changing their beliefs, leading to criminal activities
- **Sexting or sex talk** - engaging someone in explicit conversations or requesting sexually explicit pictures from them. Even if pictures were requested from someone you love and trusted there is no guarantee that in the future you may fallout and they may post pictures of you to hurt you (often called 'revenge porn')
- **AI and Deepfakes** – with AI continuing to become even more embedded in our everyday lives and activities, it is important to remember the associated risks with such artificial intelligence. Deepfakes are becomingly increasingly sophisticated and difficult to detect and it is important that learners, students and indeed staff are aware of the risks associated with such technology.
- **Cyber-bullying** - using electronic forms of communication such as e-mail, texts and social media to send malicious or unkind messages to try and intimidate or threaten someone. You cannot just express your opinion of someone without possible repercussions (comeback) from the law. In October 2016 the Crown Prosecution Service made their intent to prosecute online offenders clearer in order to discourage online bullying.

The following safety information is particularly important for learners/students to understand, as there are dangers in terms of crime and theft, as well as grooming, with the aim of either abuse or radicalisation.

- a. **Social networking sites.** Many learners/students belong to sites such as Facebook, Twitter, Instagram, LinkedIn, Pinterest, Google Plus+, Tumblr, Flickr, Meetup, Grinder, Tinder or Tagged. No matter how well established a site is, your information can be accessed by others, so we all need to think about what we post and what could be done with it. Read the information below to keep safer online. A key tip for posting is would you want someone you care about to see what you have posted or if you are 'reacting' to something, do you think you could regret what you are about to post in a few days time?
- b. **Does everyone you meet online represent themselves honestly?** Knowing that many young people meet and make friends through social media, this is often where they are targeted by

fraudsters (to steal money), potential abusers or potential radicalisers (who groom you to gain your trust but ultimately want to cause you harm or draw you into terrorist causes). If you have an 'online friend' that you have never met, be careful if they request photos of you, personal information or phone numbers. There are numerous cases of people being 'groomed' or conned out of money by people they considered 'friends' and even murdered by someone of a similar age group when someone met their friend to play console games.

- c. **'My information is only visible to friends and I can delete anything embarrassing'** is a belief held by many young people— some companies pay for reports on applicants as part of recruitment that show deleted and private information. Everything that gets posted on the internet leaves a 'footprint' that can be seen by others who have the right skills to do so.
- d. **Identity theft.** This is where personal information that is readily available online about you can be used for building up a profile of you. Be wary of putting too much personal information in profiles online particularly on social networking sites, such as email addresses, dates of birth (DOB), employer details, and details of where you are training. For example, although some people say they would never make their date of birth public, they put messages or pictures on Facebook or Instagram about their '18th birthday party' – not difficult to know a date of birth from that!!
- e. **Why should passwords be kept safe?** Letting passwords become known can let hackers (someone who accesses other people's emails or websites) see your emails or even online banking. Don't write all your passwords down where you might lose them, or use the same password for everything or a password such as your date of birth. Losing passwords leaves you open to online crime. Change them if you think something is odd about anywhere you have used them (the same applies to PIN numbers on credit or debit cards). Some social networking sites will let you know if someone has tried to hack into your account but only ever change your password by going through the main website of a service, not using a link that may have been provided by a hacker even though it looks real.
- f. **Should you give information about yourself if requested in an email (or phone call)?** The simple answer is 'no'. There are many tricksters trying to make themselves look like real sites that many of us use; for example, PayPal, iTunes or major banks/building societies. If in doubt always go to your account through the main website and never by any link provided in an email, otherwise you will sign into the false website and they then have your details to use fraudulently. Fraudsters set up websites that look just like the real thing. Although this is about online safety, the same applies with phone calls that are supposedly from banks or credit card companies. Phone the numbers on your card or statements to check if there is a real problem following a call to alert you, but not one given by someone on the phone which will not be the real company (especially if they offer to connect you).
- g. **Using wireless networks safely** – is your home network secured with a password? The same goes for using a hotspot on mobile phones – otherwise information can be taken from you. The same can be true for 'free' wireless zones where thieves and fraudsters might get into your email if it is not secure. The same can apply to having your Bluetooth on, on a mobile phone. People have had all their information copied by people hacking into their phones through Bluetooth.
- h. **Opening your email on public computers in hotels/internet cafes and other public places.** Always make sure that you log out, never say 'yes' to saving your password, and ensure that you untick the box that says 'save my details.' Many of us will have seen a stranger's emails opened up on a public computer where the previous user had not logged out properly and had just walked off and left it. If you use our computers keep this in mind.

The deep web or dark net. Our learners/students (and even possibly some staff) may be attracted to a hidden part of the internet called the dark web or dark net, which is part of the deep web. According to researchers, only 4% of the internet is visible to the general public, the other 96% being the deep web. That deep web is used for secure communications networks and also to share or sell things, often illegally. There are sites that sell drugs, hacking software, counterfeit money and more. What might attract some people to browse what is there, is the prospect of free but illegal music or film sharing, or just general curiosity. However it can also be used to share child pornography or to spread propaganda for the purposes of radicalisation. It is important to remember that you may take part in criminal activity without even realising it, so beware of Tors and .onion domains that are part of the dark web. It is extremely easy to access the dark web, but even easier to be detected on it.

9. Ensuring that we practice safer recruitment

Safer recruitment of staff

CSA undertakes to ensure that its staff are fit to work in an education or training setting with learners/students of all ages. We also reserve the right to refuse to employ staff whom we have a reasonable belief may pose a risk to our learners/students. We will ensure that at least one member of staff has completed appropriate safer recruitment training, recognised by the Department for Education.

Our safer recruitment procedures aim to help deter, reject or identify people who are unsuited to working with young people and other learners/students. Key to this is having appropriate procedures for appointing staff that are strictly adhered to. We will ensure that when a post is advertised the advertisement makes clear our commitment to safeguarding and carrying out pre-employment checks:

- we will obtain two independent professional and character references, one of whom will be the last employer, that answer specific questions to help assess an applicant's suitability to work with young people and follow up any concerns
- we will conduct a face-to-face panel interview (with at least one panel member who has completed the safer recruitment training) to explore the candidate's suitability to work with young people as well as their suitability for the post
- we will verify that successful applicants have all the academic or vocational qualifications claimed on their application
- check the previous employment history and experience including the reasons for any employment gaps
- we will carry out an identify check including one source of photographic evidence such as a passport or driving licence
- we will verify the person's right to work in the UK
- if the person has lived or worked outside the UK, we will carry out any other checks deemed necessary.

We will maintain a **single central record** on all individuals we employ, or who have access to our learners / students, which will include and record, as appropriate:

- a disclosure criminal record check via the DBS. This checks for spent and unspent convictions, cautions, reprimands and final warnings and asks local police for any additional information that is reasonably considered relevant to the work being applied for;
- completion of an annual check for any staff whose DBS record has any offences on it (this is subject to consideration of the type of offence, i.e. driving, etc.);
- ensuring that new staff are familiarised with our safeguarding policy and procedures;
- ensuring that new staff undertake Safeguarding and Prevent training as part of their first term, if not previously completed within 2 years, along with awareness raising of the importance of British values;
- that annual updating around safeguarding and the prevention of radicalisation takes place.

Employees will only be confirmed as being permanently employed following the satisfactory completion of an agreed probationary period.

Where we use **agency staff**, it is now a requirement that we check that the person presenting at the centre, is the same person that the agency has provided us with vetting checks for. This is best done with an official form of photo ID such as a passport or driving licence. If ID documents are from another country we will use PRADO online to reference the authenticity of the documents.

10. Establishing a safe environment that meets our legal responsibilities

See section 5 on safer recruitment. Our procedures ensure that we take appropriate precautions in checking the suitability of all new staff who can come into contact with our learners/students (established staff will already have undergone the same checks).

Secure premises

CSA takes all practical steps to ensure that our education and training premises are as secure as circumstances permit. Everyone who enters our part of the building must come through the reception area where they are either known by the receptionist or they check-in who they are, and the purpose of their visit. Identify badges will be issued for visitors at reception.

Staff training

All staff members must undergo safeguarding training at induction and this training will be updated annually with refresher input. Staff will also receive regular updates on safeguarding as required, via for example email and during staff meetings.

The Lead Safeguarding Officer and deputy will undertake appropriate training for their role that is updated to meet statutory requirements, and will also undertake training on their duties under the government's anti-radicalisation strategy, Prevent. In addition to this formal training, the Lead Safeguarding Officer and deputy will refresh their knowledge and skills regularly, via for example e-bulletins, meeting other Lead Safeguarding Officers or spending time reading and digesting safeguarding developments.

Online safety

CSA have appropriate internet filters and monitoring systems in place, to protect learners/students from harmful and inappropriate content online. Access to the internet in the centre is only through CSA PCs, which are numbered, so that any misuse can be traced back to the apprentices who had been using them. We will promote online safety to our learners/students so that they know how to protect themselves and are aware of both how criminals and extremist organisations try to use it for their purposes.

Teaching learners/students about safeguarding

Learners/students will be taught about safeguarding, including staying safe online, as part of their training programme, including at induction, during reviews and in a Work Placement Induction Handbook issued to our learners/students and their employers.

Code of conduct and acceptable staff behaviour

Staff should seek to keep their personal contact with learners/students professional and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following are sensible precautions to avoid potential problems:

- if working with one learner try to work in a room where there is a glass panel in the door or leave the door open
- make sure that others visit the room occasionally
- never give out personal mobile phone numbers or private e-mail addresses to your learners/students, use your work phone for making or receiving texts or calls, and your CSA email address for online contact to do with their training and assessment
- do not give learners/students lifts home or to events that need to be attended in your car (unless this has been specifically agreed by senior management)
- do not arrange to meet learners/students outside of training activities
- never 'befriend' or chat to your learners/students on social networking sites.

Allegations of abuse against staff

The correct handling of allegations against staff can be a difficult area to get right as allegations must be treated seriously and learners/students protected until investigations are completed. We may need to consider suspension of an accused member of staff from duties that involve contact with learners/students where there are allegations of inappropriate behaviour involving learners/students. The allegations will be investigated by senior staff in conjunction with the safeguarding lead so they can then decide on an appropriate course of action.

One of the following terms will always be used when determining the outcome of an investigation of an allegation:

- substantiated
- malicious
- false
- unsubstantiated (or 'unfounded')

We will inform the person accused about the allegation as soon as possible after it has been made, unless a strategy discussion is needed or other agencies need to be involved, in which the manager should wait until these parties have been consulted before informing the accused. This also applies to informing guardians if a learner is aged below 18. We will maintain confidentiality throughout the investigation and have a duty of care to our employees, and will support the accused to manage and minimise the stress resulting from the allegation, for example, by being given access to welfare counselling or medical advice where available.

If an accused member of staff resigns, this will not prevent an allegation being followed up. We must refer the accused to the DBS if the member of staff needs to be identified as a risk to learners/students and it is an offence not to do so. Depending on the particular circumstances, there may be a criminal investigation or prosecution. Also, on the conclusion of a case, and where a malicious or unsubstantiated allegation has been made, an accuser may face prosecution.

Reminder that females and younger people can also groom and abuse.

Until recently, the perpetrators of sexual offences have typically been 'stereotyped' by being thought of as men. It is now appreciated that women can also groom and abuse young people because of such cases being reported (for example, female teachers in schools and childcare workers taking indecent images of children). It is therefore important to recognise that suspicions about the behaviour of any member of staff, raised by staff or learners/students, could have foundations regardless of their gender, or how unlikely you may feel an accusation is. No member of staff should get too close to their learners/students, but should maintain a professional relationship at all times, while supporting their learners/students.

Similarly to this, there is a perception that abusers are generally older men. We should also heighten the awareness of learners/students that even if someone they meet online is of a similar age to themselves, it does not mean they are 'safe' to meet. Lewis Daynes, a 19 year old, was jailed for life for murdering 14-year-old Breck Bednar who he groomed and met to play computer games in 2014.



INCIDENT REPORT FORM			
Name of young person/vulnerable adult (first name and surname):			
Nature of allegation or concern - What was seen, said or alleged to have taken place:			
When was this alleged to have happened? Please record information as accurately as possible.	<u>Date(s):</u>	<u>Time(s):</u>	<u>Location(s):</u>
Names of those persons alleged to be involved. (Note how they were alleged to be involved next to their name i.e. perpetrator, bystander)	<u>Names</u> 1. 2. 3. 4. 5. 6.		<u>How involved</u>
Other relevant information.			
Name of person (s) reporting the incident			
Signature:			
Date:			

Legislation and Guidance

In England the law states that people who work with children or vulnerable adults have to keep them safe. This safeguarding legislation is set out in The Children Act (1989) and (2004). It also features in the United Nations Convention on the Rights of the Child (to which the UK is a signatory) and sets out the rights of children to be free from abuse.

The Government also provides guidance in their document Working Together to Safeguard Children 2013 and the Children and Social Work Act 2017, as well as the Safeguarding Vulnerable Groups Act 2006, the Care Act 2014, and Working Together 2015 and the Keeping children safe in education (KCSIE) 2024.