

Safeguarding Policy

In compliance with KCSIE - Keeping Children Safe in Education (Sept 2024)

Key to this document.

OUR SAFEGUARDING TEAM

**Designated Safeguarding Lead(s): Chitinder Tahli, Bhavinder Tahli,
Ian Allen, Rose Parveen**

The Proprietor Bhavinder Tahli is also DSL Trained

Looked After and Previously Looked After

Children Lead: Chitinder Tahli

Safer Recruitment Trained: Bhavinder Tahli

Mental Health Lead: Chitinder Tahli

Background to Work'n'Learn as an Organisation:

Work'n'Learn is a private company working closely with Local Authorities, Local Authority Schools, Academies, Free Schools, Independent Schools, Special Schools, Pupil Referral Units, Alternative Providers, Charities, Community Interest Groups, Businesses, and Parents and Students, including other contractual partners in a combined partnership whose aim is to provide bespoke programmes to meet the educational needs of school students. The services provided by Work'n'Learn vary greatly and encompass the following – Mental Health (counselling, mentoring, therapy, coaching) – Work Placements (block work experience, extended work experience) – Qualifications (accredited and non-accredited) – Information, Advice and Guidance – Workshops (awareness programmes for SEN students) – Resources.

The programmes the company offers differ greatly from delivering in-school GCSE Qualifications to off-site learning on Extended Work Experience Placements. The nature of the company's business activities therefore make it necessary to work closely with young people. With this in mind, the Director of Work'n'Learn, Bhavinder Singh Tahli, understands his responsibilities under current Legislation and Statutory Guidance concerning the Health, Safety,

Welfare, and Safeguarding of all young people placed under the care of Work'n'Learn on any of the above mentioned educational programmes.

School Child Protection and Safeguarding Policy Framework

This policy has been developed in accordance with the principles established by: the Children's Acts 1989 and 2004; the Education Act 2002, It also keys into government publications: "Working Together to Safeguard Children" 2023, "KCSIE" 2022/23/24 "The Education and Training (Welfare of Children) Act " 2021, "Sexual Violence and Sexual Harassment Between Children in Schools and Colleges" (2018)

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make their approach child-centred. This means that they should consider, at all times, what is in the best interests of the child. (Keeping Children Safe in Education 2018 including 2019, 2020, 2021 and 2022 updates).

The purpose of this policy is to:

1. Outline clear protocols regarding action, and a framework for responsibilities and legal duties, in relation to each student's welfare.
2. Comply with all the latest relevant legislation and guidance from the DfE, Ofsted, and the Safeguarding Children's Boards for all Local Authorities with whom we work.

Work'n'Learn Ethos

This Safeguarding and Child Protection policy cannot be separated from the general ethos of Work'n'Learn, which should ensure that students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to. Safeguarding issues will be addressed through all the educational experiences that Work'n'Learn offer. There will be a whole organisation approach to addressing all the aspects and issues associated with safeguarding, Child Protection and positive outcomes for students.






Overall Policy Aims

This document is the Safeguarding Policy and Working Procedures Work'n'Learn will adhere to when working with young people. The Director, employees, contracted in organisations, and any contractual partner, will endeavour to protect young people whilst undertaking any activity for or on behalf of Work'n'Learn.

The objectives of this policy are:

1. To provide protection for children who engage with Work'n'Learn as a result of being referred by one of our contractual partners.
2. To provide employees and stakeholders with a sound understanding and knowledge about how we actively engage in Safeguarding and Child Protection.
3. To embed a clear and structured Safeguarding process that can be effectively and efficiently related to in the occurrence of a safeguarding scenario.

The Department for Education, the DFE, defines safeguarding and promoting the welfare of children as:

-  Protecting children from maltreatment, inside or outside the home, including online
-  Preventing impairment of children's health or development
-  Ensuring children are growing up in circumstances consistent with the provision of safe and effective care
-  Taking action to enable all children to have the best outcomes
-  Providing help and support to meet the needs of children as soon as problems emerge

Bhavinder Singh Tahli, the Director of Work'n'Learn, will ensure that the above values are embedded into every company activity that involves working with young people. Those values will be integral to the Policy and Procedures that follow.

Impact of Covid-19

Even though educational provision has returned to normal since the Covid-19 outbreak, at Work'n'Learn we are fully aware that some children who were not previously "at risk" became more at risk in the context of this disease. Children will potentially have suffered increased harm through domestic violence, neglect, abuse, child criminal or sexual exploitation. Therefore, at Work'n'Learn we are even more committed to everyone being observant and listening to what children say about their experiences during that time.

Negative experiences and distressing life events associated with Covid-19 can affect the mental health of students and their parents and we have to be well prepared to offer the right help at the right time.

Our Safeguarding Expectations

Our main aim is to provide young people with a safe and secure opportunity to rekindle their enthusiasm for learning through motivational work placements. The welfare of the young person has to be of paramount importance to all adults who work with the students with whom we work. To achieve this aim Work'n'learn will ensure that we provide an environment where young people feel safe to learn and develop and one where they are encouraged to talk knowing that they will be listened to. Consequently we expect:

- All staff to read and sign that they understand Part 1 of Keeping Children Safe in Education 2023. Their understanding will be enhanced, and underpinned, by training at the beginning of the academic year 2023/24, and at induction for any new staff who come on board during the academic year.
- An awareness of Safeguarding / Child Protection issues for staff, parents/carers and children to be raised via regular meetings, effective training sessions and related curriculum content.
- Effective communication between staff on Safeguarding matters via the weekly daily briefings, weekly whole staff meetings, monthly safeguarding meetings and the Designated Safeguarding Team Meetings.
- All staff to receive annual safeguarding refresher training to raise awareness and define their roles and responsibilities in reporting abuse.
- Students to be taught and sensitised to the skills needed to keep themselves safe.
- Regular updating, development, and review of policies and procedures in relation to Safeguarding.
- To train and raise awareness of all staff, defining their role and responsibilities in regard to Safeguarding and Child Protection.
- To be able to identify children who are suffering or likely to suffer significant harm and respond appropriately.
- To understand when to report cases or suspected cases of abuse, neglect or exploitation, to First Contact, Social Care.
- To work in partnership with parents/carers and other professionals to provide coordinated support and help to protect children who are subject to a protection plan.
- To work in partnership with Social Care when undertaking Section 17 & Section 45 assessments.
- To provide a activities and an ethos of vigilance which aims to prevent children from being drawn into radicalisation, extreme behaviour or acts of terrorism.
- To work in partnership with the LA Virtual Head-teacher with regard to Looked After Children.
- To Help children to understand what is and is not acceptable behaviour towards others and themselves.
- In the case of a Safeguarding issue involving a young person who is on roll at another school or provision, it will remain the responsibility of any school or agency that places a student with us to take the lead in reporting the case with Work'n'Learn giving full support. The DSL of the referring organisation should give advice and guidance on the

case and should be the lead person. **However, if the young person is in immediate danger, we will immediately contact the relevant agency (police/social services).**

- To engage with the Channel panel set up by the Local Authority to prevent radicalisation.

Legislation

Worknlearn fulfils its local and national responsibilities as laid out in this policy which has been created with due regard to all relevant legislation including, but not limited to, the following:

- Working Together to Safeguard Children (DfE Dec 2023)
 - Keeping Children Safe in Education (2019, 2022,23,24)
 - West Midlands Safeguarding Children Procedures
 - The Education Act 2002 *S175*
 - General Data Protection Legislation (2018)
 - Mental Health & Behaviour in Schools
 - Criminal Exploitation & Gang Affiliation Practice Guidance (2018)
 - Safeguarding Children Partnership threshold guidance Right Help Right Time
 - Multi-agency Statutory Guidance on Female Genital Mutilation,
 - Protecting Children from Radicalisation: The Prevent Duty, 2015
 - Relationships Education, Relationships and Sex Education (RSE) and Health Education
 - RSE Primary Offer
 - Sharing nudes and semi-nudes: advice for education settings working with children and young people
 - Voyeurism Offences Act 2019
 - [DfE statutory guidance on Children Missing Education](#)
 - Human Rights Act 1988
 - The Equality Act 2010: Government advice for schools
 - Harmful online challenges and online hoaxes (www.gov.uk)
 - Searching, screening and confiscation at school (www.gov.uk)
 - Public Sector Equality Duty Guidance for Schools
- Other relevant policies include:**
- Attendance and Children Missing Education Policy
 - Behavioural Policy
 - Staff Code of Conduct
 - Data Protection Policy

- Whistleblowing Policy
- Anti-Bullying Policy
- Exclusion Policy

Purpose of this Safeguarding Policy

This policy will contribute to the protection and safeguarding of our students and promote their welfare by:

- Clarifying standards of behaviour for staff and students
- Contributing to the establishment of a safe, resilient and robust ethos in our educational placements, built on mutual respect and shared values
- Introducing appropriate work and tasks within the educational experience that Work'n'Learn provide
- Encouraging students and parents to participate
- Alerting staff to the signs and indicators that all may not be well
- Developing staff awareness of the causes of abuse
- Developing staff awareness of the risks and vulnerabilities that students face
- Addressing concerns at the earliest possible stage
- Reducing the potential risk of being exposed to violence, extremism, exploitation, discrimination or victimisation
- Recognising risk and supporting online safety including student's home usage

These actions will be achieved by:

- i) Identifying and protecting our vulnerable children
- ii) Identifying individual needs as early as possible
- iii) Working in partnership with students, parents/carers, referrers and other agencies to design plans to address these needs

Guiding Principles

Work'n'Learn will follow the following 7 guiding principles of safeguarding in their work with students:

1. Have conversations with, and listen to children and their families as early as possible
2. Understand the child's lived experience
3. Work collaboratively to improve children's life experience
4. Be open, honest and transparent with families in our approach
5. Empower families by working with them
6. Work in a way that builds on a family's strengths
7. Help to build resilience in students and families so that they are better equipped to overcome difficulties

Expectations of Staff and Visitors

- a) Be familiar with this safeguarding and Child Protection Policy

- b) Understand their role in relation to safeguarding
- c) Be alert to signs and indicators of possible abuse
- d) Record concerns and give the record to the DSL or Deputy DSL
- e) Deal with a disclosure of abuse from a child in line with the procedures outlined below:

Dealing with Disclosure

● Only involve those who need to know!!!!!!

Any company employee, or contracted in personnel, working with children for and on behalf of Work'n'Learn, may at some point be approached by a child who actually discloses that he or she has been, or is being abused. The employee or Work'n'Learn representative must follow the guidelines listed below

When a child tells a staff member about abuse s/he has suffered, what must they remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that she/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let her/him know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse, but she/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you.
- Communicate that she/he has a right to be safe and protected.
- Do not tell the child that what she/he experienced is dirty, naughty or bad.
- Do not make any comments about the alleged offender.
- Be aware that the child may retract what she/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

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- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible.

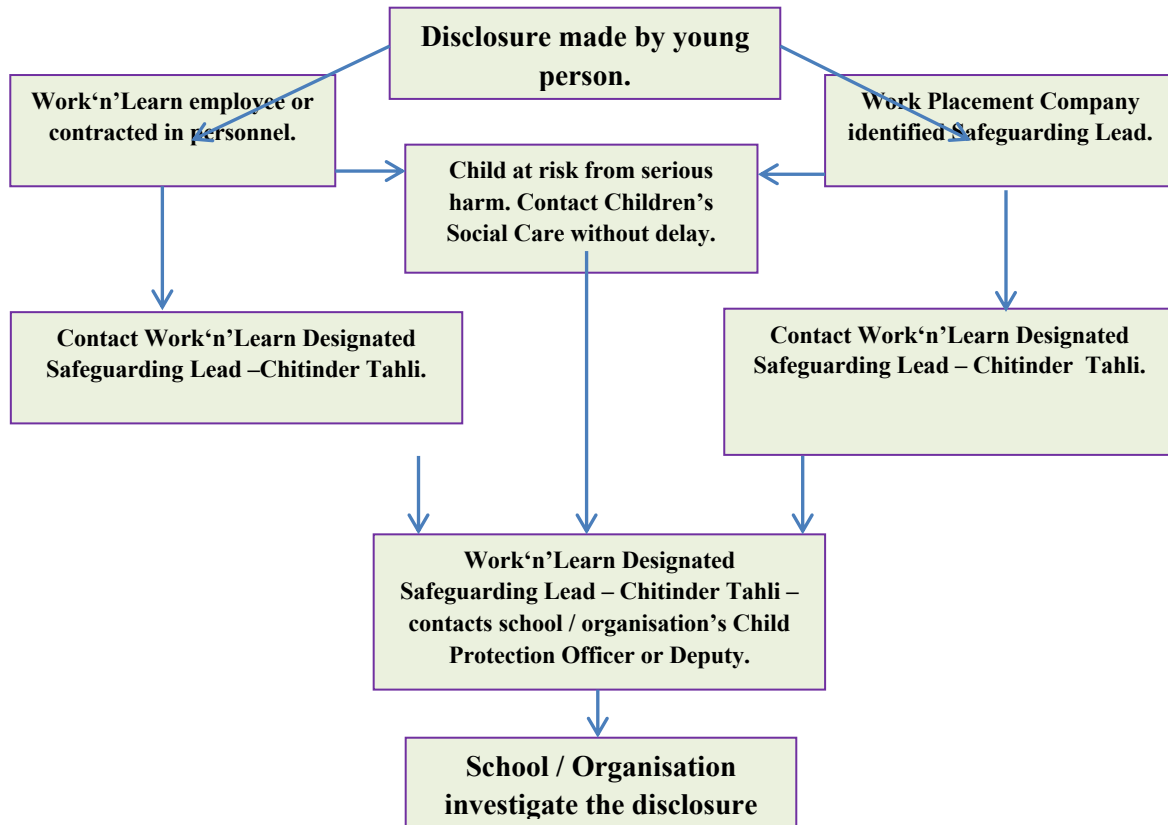
NB, It is not the role of staff to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately following a disclosure

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to the Local Authority Children's Trust without delay, by the DSL.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child who has been abused can be traumatic for the adults involved. Support for you is available from your DSL.

- Once you are satisfied that the child has suffered or is suffering abuse, immediately contact Chitinder Tahli who is the Designated Safeguarding Lead for Work'n'Learn. Pass on the relevant information.
- Chitinder Tahli will then immediately contact the school's designated Child Protection Officer and explain the disclosure to them. From that point, the school, or other organisation that has overall responsibility for the child's welfare, will investigate further.
- If you believe the child to be at risk from serious harm, Children's Social Care should be contacted immediately. **Anybody can make a referral.**
- Once the appropriate person has been informed, the school will pursue the matter further, liaising with other childcare organisations and parents / guardians of the child.
- In line with the new advice in KCSIE 2024 our DSL(s) will log all discussions and the rationale for decisions made regarding individual students including those for whom no future referral was made and cross reference this with the student's referrers/mainstream providers



In order to facilitate this process all our staff will receive annual Safeguarding Training and update briefings as appropriate.

Responsibility for the Student

When any of the following, *Local Authority Schools, Academies, Free Schools, Independent Schools, Special Schools, Pupil Referral Units, Alternative Providers*, place a young person or persons on any Work'n'Learn educational programme, the overall responsibility regarding The Duty of Care in Safeguarding and Child Protection remains with the above. Nonetheless, in accepting a young person on any educational programme, Work'n'Learn also accepts it too has a responsibility for the young person's Health, Safety, Welfare, and Safeguarding. Every person employed by, or contracted in by Work'n'Learn, has a legal duty under UK Law to prevent harm or abuse happening to any young person, and will undertake their roles and responsibilities with this in mind.

To protect young people on work placement programmes, the above mentioned schools, academies, etc. must issue Work'n'Learn with as much information as possible about individual students so the individual student is not placed in an environment that is not suitable or indeed unsafe. Students with specific needs have to be carefully placed with a work placement company to ensure the student's safety, welfare and child protection issues are met.

CHILDREN WHO ARE ABSENT FROM EDUCATION

It is important that Work'n'Learn's response to students persistently absent from our sessions, whether absences are explained or unexplainable, supports identifying and dealing with such absences before they escalate into becoming children missing from education in the future. We have our own robust procedures for monitoring attendance and communicating concerns to our educational partners quickly and effectively.

If a child is absent from education on a regular or sporadic basis, it is a potential indicator of risk, abuse or neglect for any of the following reasons:

Sexual exploitation, criminal exploitation, mental Health issues, substance abuse, FGM, forced marriage or travel to conflict zones.

There is a rigorous system in place for monitoring attendance;

- Our online system captures attendance as present and on time, present but late, or absent, the latter being coded according to the nature of the absence, which is basically with or without a reason.
- If a young person does not appear at their work placement or alternative school placement by 10.00a.m. (or one hour from their start time), their referring agency and parent/carer will receive a phone call informing them of the absence and allowing them to contact the student to encourage the attendance. If no one answers the phone then a message will be left or an alternative message delivered via email or text.
- Referrers have access to their own student's attendance via an online dashboard which enables them to help address attendance issues if necessary
- We also provide weekly attendance reports to our referrers
- The nature of our provision means that we can pause learning or work experience programmes if we need to and be flexible according to the changing needs of the individual students concerned.
- Three consecutive non-attendance reports automatically trigger a support meeting to establish reasons and ways forward.

We hold two emergency contact numbers for all our students so that student absence can be communicated to parents/carers and referrers promptly. Concerns about attendance can also be referred directly to the DSL.

All actions taken to follow up a student who is absent from our sessions are logged.

Work'n'Learn keeps records to demonstrate that it has made reasonable enquiries to ascertain the whereabouts of children that would be considered *missing*.

Further guidance with regard to addressing attendance issues and working with the Local Authority's Children's Services when absence from educational sessions indicates safeguarding concerns can be found in:

“Working together to improve school attendance”

Our Designated Safeguarding Lead Practitioners

There are four qualified Designated Safeguarding Leads at Work'n'Learn. They are Chitinder Tahli, Rowzia Parveen, Ian Allen and the Proprietor Bhavinder Singh Tahli. This ensures that we have a DSL on duty at all times during the school week. They will have the appropriate authority; have the appropriate training and resources, (especially regarding those with Special Educational Needs (SEN) in respect of bullying, grooming, and radicalisation) and sufficient time to carry out their duties. They will support and provide advice to other staff members and contracted-in organisations on child welfare and child protection matters. Any of them is qualified to take part in strategy discussions and contribute to the assessment of children. All employees of the company will be informed about who the DSL is, and what their responsibilities are, on commencement of employment with the company.

The Proprietor, Bhavinder Singh Tahli, is well versed in technology and so he will also have responsibility for commissioning, oversight and accountability for our online child protection and understanding of the filtering and monitoring systems. This enables Work'n'Learn to oversee and implement its safeguarding strategies. This is defined as a specific role for a senior manager within any educational organisation in KCSIE 2023.

The Designated Safeguarding Lead will liaise with the schools and other contractual organisations in line with *Working Together to Safeguard Children 2023* and *KCSIE 2022/23 and 2023/24*. Our DSL's will remain in compliance with the Law by undergoing updated child protection training (at least every 2 years) and will attend seminars, guidance sessions, and best practice sharing with other organisations.

Other Staff

All other personnel, whether employed by Work'n'Learn or are contracted in to undertake duties for and on behalf of Work'n'Learn, will have sufficient training and knowledge on Child Protection matters. KCSIE (2022) specifically requires that everyone working in an educational setting understands his or her safeguarding responsibilities. Reading KCSIE is therefore not enough, they must be trained in understanding its implications for them. This represents a shift in emphasis whereby, Proprietors, Head Teachers and Governing Bodies now have responsibility for ensuring this understanding that they will undergo refresher training on Child Protection (at least every 3 years) or sooner if Legislation dictates otherwise. All personnel involved in working with children will have Enhanced DBS checks to ensure, as far as reasonably practicable, the safety of children.

Supervising adults at Work Placement companies will be given information packs - “*Safeguarding Advice for Work Placement Companies*” and “*Disclosure and Barring Service Checks*” so they are fully aware of their responsibilities when taking on a young person on a work experience placement programme. As the majority of work experience programmes will be for

extended work experience (one or more days a week over several school terms), all companies will be asked to submit an identified person(s) for Barred list checks by the DBS. Failure to nominate or submit name(s) for DBS checks may result in the work experience placement being terminated.

Both documents, “*Safeguarding Advice for Work Placement Companies*” and “*Disclosure and Barring Service Checks*” can be found in the company’s policy and procedure file.

Governance

The Proprietors Bhavinder and Chitinder Tahli have strategic responsibility for Work‘n’Learn’s safeguarding arrangements and together with Anthony McGuire, their Educational and Health and Safety Consultant, they ensure that there are policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote the welfare of the students referred to Work‘n’Learn. To this end both Proprietors have received DSL Training.

This governing team ensure that:

- Their own safeguarding and child protection training is updated every two years as is that of their staff.
- This training will give them the skills and knowledge to review all policies/procedures annually.
- Bhavinder Singh Tahli is the nominated member of the Governance Team who specialises in the understanding of online education, its delivery and monitoring and filtering systems necessary to ensure online safety for all young people with whom we work.
- He reviews our filtering and monitoring as and when necessary but at least once annually as well as discussing with IT staff and service providers the best methods to support us in achieving the highest standards in our filtering and monitoring systems.
- Ian Allen, another member of staff who is DSL trained, is the nominated person to liaise with Local Authority Safeguarding team should an allegation of abuse be made against either of the Proprietors.
- This greater emphasis on training for those with governance responsibility in KCSIE 2023 is recognised by Work‘n’Learn and we comply by ensuring that we have much more than the minimum safeguarding requirements in place.
- The Work‘n’Learn governing Team also ensure that they are aware of, and understand their obligations under The Human Rights Act 1988, the Equality Act 2010, (including the Public Sector Equality Duty)

Safer Recruitment and Selection

Bhavinder Singh Tahli, Director of Work‘n’Learn, will have sole responsibility for the recruitment of staff, irrespective of if they are company employees, or contracted personnel working on behalf of the company.

He will ensure that full regard is paid to “Safer Recruitment” practice including scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that the candidate has the health and physical capacity for the job as well as the right to work in the UK

Before any candidates are invited for interview a thorough online search will be conducted as part of our “due diligence” process. Information obtained by this process can highlight incidents or issues in the public domain, which we might want to explore with the candidate at interview. However we will only be concerned with information as it appertains to a candidate’s suitability to work with children. Candidates who are interviewed will be subject to appropriate checks including enhanced DBS, barred list checks and prohibition checks and they will be informed that an online search has been conducted prior to their invitation to interview. If appointed this information will be recorded on the Single Central Record.

Bhavinder Singh Tahli will also manage and maintain the **Single Centre Record (SCR)** to satisfy all contractual partners who choose to work with Work‘n’Learn on educational programmes for young people.

He will also ensure that all employees, contracted in or otherwise, receive the appropriate induction, training and guidance for working with children, and training will be updated at least every two years in accordance with current guidelines.

Staff will also be made aware of the need to understand the expectations, applicable roles and responsibilities in relation to the filtering and monitoring software used to safeguard our IT operations and the company’s rules concerning the use of technology.

In addition, he will ensure that there is a policy and procedure in place for dealing with any allegations against members of staff, visitors, volunteers or Governors and that they comply with Local authority guidelines for dealing with such matters.

Reasonable force

Within the KCSIE 2019 guidelines, clarification was given to the term ‘Reasonable Force’. It may be necessary when the protection of a child becomes a factor that intervention by the adult is required. Reasonable means ‘using no more force than is needed’. It is hoped that the situation never arises, but it may. Careful clarification with the DSL is needed by all staff employed by the company to ensure the term and requirement is fully understood by all. Careful consideration must be taken on board when the use of reasonable force towards children with SEND or medical conditions is considered. The risk must be considered before reasonable force intervention takes place. The nature of our work means that Work ‘n’ Learn staff will hardly ever need to use this strategy but they may on occasion be witness to reasonable force being used by other adults in other organisations who work with children. If they consider the force used is beyond reasonable it should be reported to the appropriate person.

Early Help Response

Early Help can be extremely effective in curbing the influence of Safeguarding risks, but it does require the vigilance and expertise of staff members who should monitor a child. KCSIE (2022) further emphasises and empowers the use of Early Help through the Early Help Assessment. It emphasises that “low level concerns” that do not meet the defined harm threshold still need to be noted, monitored and investigated. These changes indicate a closer focus on record keeping around low level concerns. At Work‘n’Learn we will ensure that our induction training at the beginning of the year increases staff awareness on this closer focus on early intervention, particularly through greater vigilance concerning a student who:

- Is disabled and has specific additional needs
- Has Special Educational Needs (whether or not they have an EHCP)
- Has a Mental Health need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing or goes missing from education, care or home
- Is at risk of modern slavery or trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in family circumstances presenting challenges for the child, such as drug and alcohol use, adult mental health issues and domestic abuse
- Has experienced multiple suspensions, is at risk of being permanently excluded from school or college, and is placed in Alternative Provision or Pupil Referral Unit
- Has apparent or carer in custody, or is affected by parental offending
- Is miss-using alcohol and other drugs themselves
- Is at risk of so called “honour-based” abuse such as FGM or FM
- Is a privately fostered child

Where there is evidence of a student having unmet needs but there is no danger of an immediate risk to that student Work‘n’Learn will use the “Right Help Right Time” (RHRT) model to initiate an “Early Help Assessment” response. This will be overseen by our DSL in coordination with the DSL from the parent school.

- Such evidence will emanate from a member or members of staff who observe and listen to our students in an educated but unobtrusive manner. If sufficient concern is raised they will put their concerns in writing to the DSL.
- The DSL will then collate the information and liaise with the DSL from the parent school. Should an Early Help Assessment (EHA) be the agreed route the two DSL’s will work together to produce a plan for that specific student.
- It is important that the student is closely involved and heard in the plan’s construction.
- The plan will be reviewed and assessed at regular intervals.

- If liaising with other agencies to complete an interagency assessment becomes appropriate our DSL will be party to that process.
- Should the student's problems persist or deteriorate the DSL's will need to determine whether the next line of action is along the "Think Family" route or by referral to the Children's Advice and Support Service (CASS) at the local authority.
- In either situation the DSL will be the key person responsible for the liaison with other agencies in creating an "Our Family Plan" or in direct communication with Local Authority Child Protection Officers.
- The DSL will then be responsible for oversight of any agreed interventions which are part of the multi-agency response and apply to the student's placement with Work'n'Learn.

Mental Health

KCSIE (2021) recognises the growing impact of Mental Health issues on the performance of children in educational settings.

Mental Health problems in students can be an indicator that they have suffered or are at risk of suffering abuse, neglect or exploitation and this is something that all staff need to be aware of especially if involved in the education of students online

Alerting staff to this and what signs to look for will be part of our training and induction programmes. They will be made aware of how the experiences of students with these issues can impact on their mental health, behaviour, attendance and progress in the learning environment.

Staff must voice their concerns to a DSL if they have a mental health concern about a student with current safeguarding concerns.

We have a four-phase process for promoting and supporting mental wellbeing:

- **PREVENTION.** This is about creating an environment where mental health problems are less likely. We emphasise a calm and safe environment, free from shouting and stress related relationships. We work hard to establish good, positive relationships and teach students about stress management as part of their curriculum. This contributes to the wellbeing of the whole organisation and hopefully carries over into their lives outside by alleviating some of the stresses they face in day-to-day life.
- **IDENTIFICATION.** We educate our staff to recognise emerging mental health issues in their early stages.

▪ EARLY SUPPORT. This is about helping students to examine the evidence of their own behaviour and access support and intervention strategies that help them adjust and overcome their damaging behaviours.

▪ ACCESS TO SPECIALIST SUPPORT. At Work'n'Learn we have access to specialist Mental Health support both inside and outside the organisation. This provides us with a range of skilled practitioners that can be accessed quickly to provide a wide variety of support mechanisms.

▪ Our internal Mental Health specialists is: Chitinder Tahli

The kind of training re staff awareness and the structures that we have invested in fully meet the extra requirements for mental health considerations laid out in KCSIE (2021).

Additional information can now be accessed at:

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

<https://www.go.uk/government/publications/mental-health-and-behaviour-in-schools--2>

Young People with SEND

Work'n'Learn recognises that pupils with SEN can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of pupils.

Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Students with SEN can be disproportionately impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.

When managing a safeguarding issue relating to a pupil with SEND, the **DSL** will liaise the student's family where appropriate, to ensure that their needs are effectively met.

The Special Education Needs and Disabilities Information and Support Services (SENDIASSS) offer information, advice and support for parents, carers of children and young people with SEND. If necessary we will direct parents and carers to, or liaise with: Birminghamcitycouncilfordisabledchildren.org.uk

Online safety

We know that with students increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. Our Designated Safeguarding Leads take lead responsibility for online safety in our organisation.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation, sexual predators: technology often provides the platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **CONTENT:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views.
- **CONTACT:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- **CONDUCT:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- **COMMERCE:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Where children are being asked to learn online at home the DfE has provided advice to support schools and colleges do so safely:

All our staff have read the DfE document “Teaching Online safety in School” and received appropriate training to go with it.

When our students use our network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, many pupils are able to access the internet using their own data plan. To minimise inappropriate use we use RM SafetyNet as our

filtering system to block any access to information or web sites that might be harmful to our students.

We also run On-line courses for some of our students who find school attendance difficult for whatever reason. Covid-19 has also led us to invest more in on-line learning as many of our students have been unable to attend for reasons of isolation or risk to their families. All such students are supplied with a computer which is protected with same RM SafetyNet system that we use in school and parents are made aware of this.

(For further information on the above points please visit our On-line Safety Policy and On-line Risk Assessment)

Safeguarding information for employees or contracted-in persons

The definition of a “Child” refers to anyone under the age of 18 years old. Everyone has a responsibility to keep children and young people safe. Every child, regardless of their age, gender, religion or ethnicity, has the right under UK Law to be protected at all times from harm.

Safeguarding means implementing the four principles laid out by the DfE in a pro-active way through informed observation, education and training, mutual cooperation and sharing with partner agencies, and the ability to form meaningful relationships with those students who fall under the umbrella of any educational provision that Work’n’Learn initiates or provides. In so doing Work’n’Learn will make a positive contribution to the prevention of abuse, victimisation, bullying (including homophobic, bi-phobic, trans-phobic and cyber bullying) exploitation, extreme behaviours, discriminatory views and risk taking behaviours.

The term Safeguarding casts a wide net and covers many areas under Child Protection issues. Some types of abuse and neglect are commonly known, others are not. Below are listed the types of abuse and neglect a child may be forced to endure and of which all Work’n’Learn staff are made aware.

Abuse, Neglect and Exploitation

Abuse: is a form of maltreatment of a child. It may not necessarily be an adult who inflicts harm on a child, it could be a group of adults, or another child or children. Inflicting harm, or failing to act to prevent harm, are both acts of abuse. Abuse can come in many forms and the vehicle most increasingly used for abuse is online technology.

Below are the detailed descriptions of different forms of abuse that a child may experience:

Neglect: This is a persistent failure to meet either a child’s physical or psychological needs, or both. This can result in the impairment of a child’s health and natural development. Neglect is wide-ranging, and can encompass the lack of food, shelter, clothing, exclusion, abandonment, lack of supervision, emotional neglect, and the neglect of providing medical care. It can also encompass unresponsiveness to a child’s emotional needs.

What to look out for regarding 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. Once a child is born, neglect may involve a parent or carer failing to:

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

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

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

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention-seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example, growth, weight
- Failure to develop intellectually or socially

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Physical abuse: is a form of abuse that actually involves physical or non-physical contact, such as, hitting, shaking, burning, scalding, throwing, drowning, suffocating, or poisoning. A parent or guardian/carer can also induce or allow a child to fabricate illness in a child, and this is also classed as physical harm.

What to look out for regarding physical abuse

It is never going to be an easy decision when determining if injuries are caused by physical abuse or youthful falls and rough game play. However, it is wise to remember that the child's physical and psychological wellbeing is the overriding factor when making a judgement.

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

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- The unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted

- Fear of medical help
- Fear of changing for PE/other activities
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying; or
- Isolation from peers.
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- Violence or aggression towards others including bullying; or
- Isolation from peers.

Emotional abuse:

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

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

- Self-description in very negative ways; for example, stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia

- Soiling, smearing faeces, enuresis.

What to look out for regarding psychological abuse

- The child shows aggressive behaviour, signs of depression, and periods of extreme anxiety, mood changes, and symptoms of withdrawal.
- The child may develop obsession or even phobias not seen before.
- There is a sudden change in achievement and concentration levels in class or the workplace.
- Withdraws from mixing with children and seeks the company of adults.
- The child's speech may undergo changes or sleepless nights become the norm.
- Begins to look upon their self in a negative way.
- Acts of cruelty accompanied by aggression towards others.
- Becomes withdrawn and shy and does not want to interact in any activity.
- May revert to lying and stealing, or even running away.
- Fear of parents being contacted
- Self-harming, drug or solvent abuse
- Appetite disorders such as anorexia or bulimia
- Symptoms of neurosis-rocking, banging head, tics or twitches
- Soiling

Again, the short-term and long-term effects on the child can be extreme, ultimately preventing them leading a normal life.

Child on Child Abuse: Staff will be made aware of the change in terminology from Peer on Peer to Child on Child abuse made in KCSIE 2022. The reason for this change is that the former suggests abuse between children of a similar age group whereas current information suggests that there may be a wide age gap between those who abuse and those who are abused. Our staff will be made fully aware and trained to recognise that safeguarding issues can manifest themselves via Child on Child abuse. This is done at Training sessions at the start of each academic year, during the induction of new staff, and during the year when new information arises or circumstances demand it.

At Work'n'Learn there is zero tolerance of Child on Child Abuse

This is most likely to include, but not limited to:

- Cyberbullying occurs on computers, tablets, phones, and other devices and can range from micky-taking to death threats. All have serious consequences for young people.
- Physical abuse involves hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
- Sexual harassment involves comments, remarks, inappropriate jokes or online contact involving material of a sexual nature.
- Sexual violence, which includes assault and rape.

- Sharing nude or semi-nude images.
- Initiation rituals, sometimes called hazing, which involves activities or ceremonies of a bullying or bestial nature being inflicted upon a child in order to ordain them into a group or gang.
- Upskirting. This involves the taking of a picture under a person's clothing without them knowing. This is usually perpetrated through the use of a mobile phone or computer tablet. The intention is to view the genitals or buttocks for the purposes of sexual gratification, to aid bullying by causing the victim to feel humiliated or distressed.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”.

Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found:

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil.
- is of a serious nature, possibly including a criminal offence.
- raises risk factors for other pupils in the school.
- indicates that other pupils may have been affected by this student.
- indicates that young people outside the school may be affected by this student.

HARMFUL SEXUAL BEHAVIOUR

Harmful Sexual Behaviour (HSB) is a term that used to describe children or young people aged 18 and under who sexually abuse other children, young people or adults. It is usual for children to display some sort of sexualised behaviour as they mature, however, sometimes a child might display sexualised behaviour that is harmful to themselves and others.

All Work'n'Learn staff who work directly with our students have a responsibility to keep them safe. This will include taking appropriate action to not only prevent this type of behaviour but to respond to HSB. We will offer support to any pupil who has displayed HSB in our work or educational placements or online and protect those who may have been impacted by it.

We aim for our students to be educated about this subject and cooperate with our educational partners in their delivery of such support through Employability, Citizenship and PSE sessions.

It is important that all victims are taken seriously and offered appropriate support.

Staff should be aware that some groups are potentially more at risk. Evidence suggests that, boys are more likely to be known as the perpetrator, children with SEND and LGBT children are at greater risk.

In December 2017 the DfE released advice for schools and colleges on how to prevent and respond to reports of sexual violence and harassment between children. Our staff and volunteers understand the guidance and our school's responses to such abuse, and that children can abuse their peers in this way.

In assessing and responding to any harmful sexualised behaviour our DSL will ensure that we follow the local Good Practice Guidance: Responding to Sexual Behaviour in Children and Young People-A Whole School Approach-2021

Sexual violence refers to offences under the Sexual Offences Act 2003 and can include rape, assault by penetration and sexual assault and that it is important that children and young people are familiar with issues of 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 has the freedom and capacity to make that choice.

- **Sexual harassment** means ‘unwanted conduct of a sexual nature’ that can occur online and offline. Child on child sexual harassment is likely to violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (when considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying nude or semi-nude photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. (this may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages on social media and sexual exploitation, coercion and threats.

With regard to any online threats, educational institutions can call upon assistance from the National Crime Agency’s CEOP Safety Centre. Its aim is to keep young people safe from online sexual abuse. Such abuse can be reported on their website and a report made to one of its Child Protection Advisors.

We will coordinate with our educational partners to ensure that:

1. children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within our educational community through a multi-agency risk assessment.
2. the needs of children and young people who abuse others will be considered separately from the needs of their victims.

We will utilise the Children who Pose a Risk to Children school safety plan produced by the local authority when dealing with such incidents.

https://www.birmingham.gov.uk/download/downloads/id/9504/children_who_pose_a_risk_to_childr_en.doc

- **Upskirting.** The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. We understand that anyone of any gender, can be a victim. All staff are aware that all incidents are to be taken very seriously and an immediate report provided to the Designated Safeguarding Lead. The Designated Safeguarding Lead will contact other statutory partners for support and assessment.
- **Sexting** is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as ‘youth produced sexual imagery’ (‘Sexting’ does not include the sharing of sexual photos and videos of under-18-year olds with or by adults. This is a form of child sexual abuse and must be referred to the police)

In cases of ‘sexting’ we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: ‘Sexting in schools and colleges, responding to incidents, and safeguarding young people’.

Our procedures for dealing with the sexual imagery concerns are: -

- We will **never** view, download, or share such imagery, or ask a child to do so – **this is illegal.**
- If we have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), we will report this to the Designated Safeguarding Lead (or their deputies).
- We will **not** delete the imagery or ask the young person to delete it.
- We will **not** ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the Designated Safeguarding Lead and/or our statutory partners.

•We will **not** share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers unless advised by the •Designated Safeguarding Lead and/or our statutory partners to do so.

•We will **not** say or do anything to blame or shame any young people involved.

•We **will** explain to them the need to report it and reassure them that they will receive support and help from the Designated Safeguarding Lead.

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>
<https://www.gov.uk/government/publications/searching-screening-and-confiscation>

Honour Based Abuse (HBA) including Female Genital Mutilation and Forced Marriage

Work‘n’Learn keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.

Work‘n’Learn works and engages with families and local communities to talk about such issues

The DSL is aware of how and where to seek advice as necessary.

If necessary, Work‘n’Learn has access to external expertise and specialist resources to supplement and support our work in this area.

Honour Based Abuse (HBA) including Female Genital Mutilation (FGM)

KCSIE 2021 redefines a set of criminal abusive actions committed against girls as Honour Based Abuse (HBA). This includes Forced Marriage, Breast Ironing and FGM. These kinds of abuse are committed in the context of preserving family honour and often involve a wider network of family or community perpetrators. With effect from October 2015, all schools are subject to mandatory reporting requirements in respect of all these forms of abuse. When a teacher discovers that any such act is suspected to be or has been carried out on a girl aged under 18, **the teacher is legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence. Failure to report such cases will result in disciplinary sanctions.

NB. The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, BSCB’s procedures will be followed.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a ‘special’ procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an ‘at-risk’ country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl’s return
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.

- Talking about pain or discomfort between her legs

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf

When one of our staff has reasons to suspect that an act of HBA has been carried out on a pupil, she/he discusses the situation with the DSL who may consult children's social care before a decision is made as to whether the mandatory reporting duty applies.

If we are concerned that a child may be being taken out of one of our activities for Female Genital Mutilation (FGM) procedures, the Proprietor meets with the parent to explain the law and the organisation's role in protecting its students.

Female Genital Mutilation (FGM) – risk assessment protocol and procedure.

If we discover that a student is going on holiday and we fear that they may be at risk or a victim of FGM during this holiday, our DSL makes a referral to the parent school DSL. If they deduce that there is a significant risk then an FGM risk assessment tool is completed.

Forced Marriage

A forced marriage is one entered 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 to coerce a person into marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence threats or other forms of coercion are not used. As with existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages

We can play an important role in safeguarding children from forced marriage, our staff have been briefed on the indicators of possible forced marriage and honour-based abuse and will refer any concerns to the Designated Safeguarding Lead immediately

Radicalisation: The Prevent Duty – is Guidance taken from the **Counter Terrorism and Security Act 2015** and is for all those working with children who may be coerced, enticed, groomed, or even brainwashed into adopting radical beliefs and extremism views. Guidance taken from Department of Education states *“This is departmental advice from the Department for Education. This advice is non-statutory, and has been produced to help recipients understand the implications of the Prevent duty. The Prevent duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.”* .

KCSIE (2020) describes terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interrupts 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.

What to look for regarding Radicalisation

- Being in contact with extremist recruiters
- Family members convicted of a terrorism act or subject to a Channel Intervention
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis

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

At Work‘n’Learn we value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society’s values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is

not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or inactivity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. At Work'n'Learn we are clear that this exploitation and radicalisation is viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of our safeguarding duty.

We employ a '**One Chance rule**'. This means that if a young person decides to disclose anything to do with safeguarding and radicalisation, in particular, the adult they are disclosing to has to drop everything and in line with our protocol get as much information as possible. This is because it may be the only time the young person is freely sharing this information and may never be able to do that again due to various circumstances. Staff are encouraged to be attentive and accurately record everything as well as giving the young person all the time to share the information.

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

How we try to Reduce Risk

The Proprietor and the DSLs assess the level of risk within the organisation and put actions in place to reduce that risk. Risk assessment may include consideration of the schools' SEND policy, integration of pupils by gender and SEN, the anti-bullying policy and other issues specific to the school's personal profile, local community and ethos.

How we Respond To Concerns

1. With effect from 1st July 2015, all schools are subject to a duty to have *due regard to the need to prevent people being drawn into terrorism* (Section 26, Counterterrorism and Security Act 2015). This is known as The Prevent Duty.
2. In KCSIE 2023, the term "radicalisation" was redefined, which required a rewording of the prevent duty as being the need to prevent young people from being drawn into extreme ideology and radicalisation and this definition is now apparent in KCSIE 2024.
3. There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and these are often combined with specific needs for which an extremist group may appear to

provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people.

4. Bhavinder Tahli is Worknlearn's Prevent Single Point of Contact (SPOC) who is the leader within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.
5. Work'n'Learn monitors online activity within the organisation to ensure that inappropriate sites are not accessed by students or staff.
6. When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they speak with the SPOC/DSL who may contact CASS for further advice (0121 303 1888).
7. Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example, they may address mental health, relationship or drug/alcohol issues.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist-related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to:

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

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

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

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

18.1 Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputy and team, will always consider the context of incidents – this is known as contextual safeguarding.

18.2 Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CASS.

The following sections define, outline and indicate the signs of activities outside the school environment that require our constant vigilance in order to protect and support our students.

Children Involved in Criminal Activity

Child Criminal Exploitation (CCE)

This occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any kind of criminal activity. The relationship involves:

- an exchange for Something the victim needs or wants
- The financial or other advantage of the perpetrator or facilitator
- Coercion through violence or threat of violence against the child or their family

It is an extremely difficult area to understand because it may appear that the child's actions are consensual, no physical contact or harm may be observable, or it can be conducted without any physical contact at all between perpetrator and victim through the use of technology.

It can involve:

- Forced labour in cannabis factories
- Moving drugs or money around the country (see the next section on County Lines)
- Being forced to shoplift, pickpocket, or extort from others

Some of the indicators for CCE that we look for are:

- ✓ Students who suddenly appear with unexplained or expensive possessions
- ✓ A student's association with younger children known to be involved in exploitation
- ✓ Changes in emotional well being caused by the stress or fear of the perpetrator(s)
- ✓ Students displaying a greater misuse of drugs or alcohol
- ✓ Students who go missing from their homes or school for unexplained periods of time or who start returning home very late in the evening or night

- ✓ Students who suddenly start to “opt out” of their education

Domestic Abuse

Awareness of an increase in domestic abuse and its consequences for children was heightened following the Covid-19 pandemic when DA help organisations noted a large increase in demand.

- Domestic abuse can be psychological, physical, sexual, financial or emotional
- Children can be victims through:
 1. Observing, hearing or experiencing acts of abuse and the ill treatment of others within their own home
 2. Being direct victim of such abuse
 3. Experiencing such abuse within their own intimate relationships
 4. Experiencing abuse in a range of other settings either institutionally or communally by those known to them, or rarely by others.

All of these experiences can have a detrimental and long-term on a young person’s health, well-being, development and ability to learn.

County Lines

This is the term used to describe gangs and organised criminal networks involved in exporting illegal drugs (usually crack cocaine or heroin) into one or more importing areas within the UK using dedicated mobile phone lines or other form of “deal line”

Children and vulnerable adults are the two groups of people most often targeted for County Lines exploitation. Their primary function is to move or store drugs and money for the gangs who use many extreme forms of exploitative techniques to coerce the victims to comply. These can include:

Violence, threats, intimidation, sexual violence and use of weapons.

Furthermore, these gangs are extremely skilful at recognising vulnerable children who might be easy recruits and often target Children’s Homes, SEN Schools and Pupil Referral Units.

Because of this we are extremely vigilant particularly with regard to travel arrangements to and from work placements. We encourage parents or carers to pick up their children if possible and local authority placements to provide taxis.

It is important that our staff are made aware of local safeguarding issues that may be impacting on our children, families lives and our local area.

Staff members who suspect a pupil may be vulnerable to or involved in, this activity will immediately report all concerns to the DSL. The DSL will consider referral on a case-by-case basis and use the risk assessment-screening tool to make referrals to CASS where appropriate.

- Indicators that a pupil may be involved in county lines active include the following:
- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in schoolwork standards
- Becoming isolated from peers or social networks
- Self-harm or significant change in mental state
- Parental reports of concern

Child Sexual Exploitation (CSE)

This situation arises when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. This relationship is based upon the perpetrator supplying the victim with;

- Something that they want or need.
- Or
- The perpetrator/facilitator receiving financial reward or improved status from within the circle of other perpetrators.
- As with CCE it can be extremely difficult to identify and flush out because of the level of threats and intimidation used as well as the victim's apparent compliance.
- CSE can affect any child (male or female) up to the age of 18 even though consent for sexual activity can be given by 16/17-year olds.
- Physical contact is not always necessary as certain kinds of sexual activity can be conducted through technological links and there is also technology which allows images posted by children to be copied and engineered into a sexual context.

The indicators for CSE are similar to those of CCE with the addition of:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and /or emotional abuse and/or gang activity)
- Entering and/or leaving vehicles driven by unknown adults
- Possessing unexplained amounts of money, expensive clothes or other items
- Frequenting areas known for risky activities
- Being groomed or abused via the internet and mobile technology
- Having unexplained contact with hotels, taxi companies or fast food outlets
- Missing for periods of time (CSE and County Lines)
- Student suffering from sexually transmitted disease
- Girls who become pregnant

Procedures for dealing with Criminal activity involving children

The most effective weapon that we have as a school to combat these forms of criminal behaviour is vigilance. So, all staff are trained to look for the indicators outlined above.

They are also educated to listen carefully to conversations between students, not as eavesdroppers, but as observant, concerned, supporters.

The first point of contact for information giving rise to suspicion is the DSL. They are aware of the agencies to contact in all such cases and will proceed accordingly

- **Modern day slavery, trafficking or exploitation:** There seems to be an increased surge in this type of child exploitation. Any indication of this must be reported immediately to the appropriate person or authority.
- **Anti-social or criminal behaviour and Serious Violence:** Most of this activity occurs when children are persuaded to commit criminal activity in connection with gang involvement. This may often involve the distribution of drugs or money across a “county lines” arrangement. The defence of such territories will often demand that children involved will be required to handle, pass on and use offensive weapons. Any signs that a child is being drawn into anti-social or criminal behaviour must be reported immediately and the following signs, or combination of them, need to be noted by staff:
 - An increase in school absenteeism particularly for specific episodes of time
 - A change in friendship circles particularly if gravitating to an older age group
 - A drop off in school performance
 - A change in appearance or well-being, which can include self-harm.
 - Unexplained injuries
 - New, unexplained gifts or possessions

It should be noted that even when such activity may appear to be consensual it is still a form of exploitation whereby the balance of power lies with those instructing the child to perpetrate such acts.

Another “knock-on” effect of these activities is to force children not involved in such activities to see the carrying of a weapon as a form of protection. Whilst seemingly innocent in itself it is illegal and can result in unexpected confrontations leading to injury or death. Staff need to be watchful and if necessary implement safety procedures such as ‘wanding’ on arrival at an educational institution.

- **Privately fostered children:** Children who fall into this category will need early help if any of the above categories apply to the individual. Early intervention is essential to prevent escalation of the situation becoming extremely serious.

Safeguarding information for Work Placement Companies

For companies agreeing to take on a school student on a Work Experience Programme, a separate document “**Safeguarding Advice for Work Placement Companies**” will be given to the nominated person at the company. Along with the document, the company’s nominated person will be advised on Child Protection issues. Hand-in-hand with the safeguarding information, the company will also be given a guidance document “**Disclosure and Barring Service Checks**” explaining the requirement under current guidance for nominated person(s) at the company to be subject to a DBS check. These documents are available in the Work‘n’Learn Policy and Procedure File.

Student medication

On occasion, the school will nominate students for work experience learning programmes that require medication during the day. In all cases, Work‘n’Learn will follow the school’s procedures regarding students requiring medication. Prior to any work placement commencing, all the relevant information will be passed on to the work placement company with regard to health, safety and welfare of the student.

Allegations against and/ or concerns raised in relation to Work‘n’Learn Representatives or any other adult we contract to work with our organisation

KCSIE 2022 emphasises the difference between concerns and an allegation. Allegations have been adequately covered in previous editions of KCSIE, but now attention is drawn to a lower level of issue categorised as concerns. This reflects a theme that permeates the whole of the new version whereby the safeguarding procedures are meant to enable the uncovering of issues at an earlier stage as an element of prevention. Observed behaviour that should give rise to low level concerns in the relationship between an adult and a student include:

- Over friendly behaviour

- Having favourites
- Taking photographs of children on a mobile phone contrary to regulations
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating students

The means and personnel for the reporting of low level concerns is left very much to the individual organisation, but at Work‘n’Learn all such concerns should be reported the Proprietor Bhavinder Tahli.

For higher level concerns, should a suspected incident be reported immediate reference will be made to the Local Authorities’ Safeguarding and Children’s Partnership: “allegations against staff and volunteers”

Their procedures will be followed where an allegation that a member of staff, visiting professional or volunteer has:

- Behaved in a way that has harmed a young person or may have harmed them
- Possibly committed a criminal offence against or related to a young person
- Behaved in a way that indicates that s/he may not be suitable to work with young people
- Behaved in a manner towards a young person/s that indicated that s/he may pose a risk of harm to children
- The new provision as set out in part 4 of KCSIE (2021) should apply to anyone working in the school who has behaved, or may have behaved, in a way that indicates that they may not be suitable to work with children.

Although it is an uncomfortable thought, the management at Work‘n’Learn acknowledges that there is the potential for staff, Governors or visitors to abuse children in school.

All staff must report any potential safeguarding concerns about an individual’s behaviour towards children immediately. Allegations or concerns about **staff, colleagues and visitors** will be reported directly to the company Director, Bhavinder Singh Tahli, who has the responsibility for managing allegations against persons in his employ. The person receiving the allegation does not have make any enquiries or discuss the allegation with any other person other than Bhavinder Singh Tahli. They should make a written record of the allegation using the informant’s words – including time, date and place where the alleged incident took place, including brief details of what happened. This record must be signed and dated and passed on to Bhavinder Singh Tahli without delay. The informant should not be asked to make a written record or sign any documentation.

He will liaise with the Designated Officer Team in Children’s Social Care and Health, who will decide on any action to be taken. He will also inform the student’s parent school.

If the concern relates to a member of the Governing Body or the Proprietor then the concern must be made directly to the LADO team who will decide on any action required.

The Local Authority will then carry out the investigation and make a judgement on the next step to take once the investigation has reached

Where an allegation is substantiated, and the individual is dismissed or resigns, the school will refer it to the DBS.

If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to CASS.

The school will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry in question.

All records will be preserved at least until the accused has reached normal pensionable age or for a period of 10 years from the date of the allegation if that is longer.

Also, see the RE Whistleblowing Policy

Record keeping

● Please refer to the Company General Data Protection Regulation Policy (GDPR)

Bhavinder Singh Tahli, the Director of Work'n'Learn, will have the responsibility for keeping information regarding young people involved in Work'n'Learn educational programmes. Personal information regarding young people is sensitive and confidential, but in order to determine the most suited programme for the young person, regarding work placement, qualification type and grade, that information needs to be made available for the continued wellbeing and educational progress of the child.

Bhavinder Singh Tahli, the Director, Chitinder Tahli and Ian Allen, The DSL's, will be the only people to have access to the young person's sensitive and confidential information. The only time information will be shared with others is when it becomes necessary for the continued wellbeing and educational progress of the young person.

Hard copy information concerning the young person will be kept under lock and key, information on the company's computerised Management System will be password protected. Both of the above will only be accessible by Bhavinder Singh Tahli.

QUALITY ASSURANCE

Quality Assurance with regard to Safeguarding is about:

- Assessing the quality of what we do at Work‘n’Learn and how we do it.
- Analysing the impact of our work and how effective it is in making our students feel safe

We encourage audits from any organisation that refers students to us and we furnish them with all our data with reference to safeguarding and behaviour. All feedback is welcomed and utilised to improve areas of our safeguarding performance.

The DSL’s and Safeguarding Team regularly assess, review and adapt our plans and procedures based on the Quality Assurance Framework. Their analysis is based upon the following:

1. Numerical data concerning how much work was done.
2. Qualitative data from our own audits, QA’s from partner organisations, and feedback from parents and students.
3. How does this information help us to improve and make progress? We do this by asking ourselves the following questions:

Are there any glaring gaps that we need to fill which might be highlighted by complaints or other levels of dissatisfaction?

What worked well and gave desired results for the students and Worknlearn?

How can we adapt to suggestions from partner agencies or Local Authority Reviews with regard to areas in need of improvement?

We assess how much our safeguarding performance has impacted positively on feeling and staying safe whilst on our programmes or placements.

In order to achieve the above we have a strong data collection system.

1. **Safeguarding** is a permanent agenda item for all our staff and governing oversight meetings as we realise its importance and our legal obligations to review and improve its effectiveness.

2. Child Safeguarding Practice Reviews, Domestic Homicide Reviews and Lessons Learnt Reviews.

- 2.1** Where a case is relevant to one of our students, we will ensure that we fully support Child Safeguarding Practice Reviews, Domestic Homicide reviews, and Lessons Learnt Reviews, by providing any required information and in the implementation of resulting actions and learning. **4.2.1**The Safeguarding Team led by the DSL(s) will update staff with any
- 2.2** The Senior Leadership Team will scrutinise any data and practice outcomes emanating from reports of this nature when they occur.
- 2.3** relevant outcomes and findings of such reviews.

Listed below are some useful websites offering advice and guidance on Safeguarding and Child Protection in the United Kingdom. Each site has useful links to other sites on Safeguarding and Child Protection issues.

https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf

<http://www.sandwelllscb.org.uk>

<http://safeguarding.dudley.gov.uk>

<http://www.lscbbirmingham.org.uk>

<http://wlscb.org.uk>

<https://www.wolverhamptonsafeguarding.org.uk/safeguarding-children-and-young-people/safeguarding-children-board>

<https://www.nspcc.org.uk>



Bhavinder Singh Tahli: Director

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