

## Safeguarding Policy and Procedures



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### DOCUMENT CONTROL

Version	Name	Comment	Date
0.1	A Dann	First edition	01/10/2017
0.2	A Dann	Safeguarding Children & Safeguarding vulnerable adults amalgamated into one policy/ procedure taking into full account legislative changes September 2018	01/10/2018
0.3	A Dann	Policy-Referring concerns outside of the organisation- LADO, Care leavers Appendix 3- signs and symptoms of FGM	01/04/19

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0.4	A.Dann	<p>Updates provided- Dfe Keeping Children Safe September 2019</p> <ul style="list-style-type: none"> <li>• 2<sup>nd</sup> September /1 October 2019- the keeping children safe in education guidance is now in force and replaces previous versions.</li> <li>• Up skirting is now a form of peer-on-peer abuse</li> <li>• The response to a report of sexual violence or sexual harassment</li> </ul> <p>Inclusion of CONTEST Objectives 2018.</p> <ul style="list-style-type: none"> <li>• Updated Prevent Regions linked to devolved contracts- Appendix 7</li> </ul> <p>Updated Prevent Regions linked to devolved contracts- Appendix 7</p>	01/10/20 19
0.5	A.Dann	<p>September 2020 review of <a href="https://www.publishing.service.gov.uk">Keeping children safe in education (publishing.service.gov.uk)</a></p> <p>Review of publications</p> <ul style="list-style-type: none"> <li>• Children in Need Review 2019.</li> <li>• Mental health and behaviour in schools <a href="https://www.gov.uk">Mental health and behaviour in schools - GOV.UK (www.gov.uk)</a></li> <li>• Rise Above <a href="#">Mental wellbeing   Overview   PHE School Zone</a></li> </ul> <p>The inclusion of the definition of 'upskirting' has also been amended to include a reference to The Voyeurism (Offences) Act 2019.</p> <p>Annex A updated with further information, for example surrounding county lines.</p> <p>Online Safety included (Appendix 1) as a result of the Covid Pandemic and the increase of online learning.</p>	01/10/2020

## Safeguarding Policy and Procedures

### Safeguarding Policy and Procedures Part 1: Policy

#### Safeguarding Statement

- B2W Group recognises our moral and statutory responsibility to safeguard and promote the welfare of children, young people and adults at risk of harm in our care. We endeavour to provide a safe and welcoming environment where learners are respected and valued. We are alert to the signs of abuse and neglect and the Safeguarding Policy and Procedures will incorporate a wide range of risks we need to safeguard against. This includes the prevention of radicalisation which is listed as a specific safeguarding issue and is addressed by the Government PREVENT strategy.

#### Terminology

- **Safeguarding and promoting the welfare of children is defined as:** protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children are growing up in circumstances constant with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. This definition for safeguarding is further strengthened in Keeping Children Safe in Education (KCSiE 2020) to explicitly state that safeguarding includes "**preventing impairment to children's mental and physical health or development**". This is recognition of the impact of the Covid pandemic on a child's mental health and wellbeing.
- **Abuse:** could mean neglect, physical, emotional, sexual or a combination of these. Further explanations can be found in **(Appendix 1)**
- **A child:** is defined as under the age of 18 years
- **For B2W this relates to our Apprenticeship learners that are aged between 16-18**
- **An Adult at Risk** is defined as someone 18 years of age or over who is or may need to receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation
- **For B2W this relates to any learner who meets the criteria above on either our Apprenticeship programmes and/or Adult provision (Online and Pre - Employment Training)**

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- The Prevent duty is seen as part of B2Ws safeguarding strategy, in line with our Prevent Strategy and action plan (both documents must be read alongside this policy and procedure) the safeguarding policy and procedure takes into account this as a key safeguarding concern.

### CONTEST Objectives are:

- This updated and strengthened CONTEST strategy reflects the findings of a fundamental review of all aspects of counterterrorism, to ensure we have the best response to the heightened threat in coming years.

**Prevent:** to stop people becoming terrorists or supporting terrorism. **Pursue:** to stop terrorist attacks.

**Protect:** to strengthen our protection against a terrorist attack.

**Prepare:** to mitigate the impact of a terrorist attack.

**Learners:** For the purpose of this policy and in the context of a post 16 environment, young people and adults at risk will be referred to as learners with appropriate adaptations applied to the procedure

**Staff:** Applies to all those working for or on behalf of the B2W Group, full, part time or on a freelance basis in either a paid or voluntary capacity including, for example, members of the Governing Body, visitors, contractors and partners to whom B2W have subcontracting agreements with.

**The Safeguarding Policy and Procedures apply to all learners and staff.**

## Safeguarding Policy and Procedures

### Introduction

- This policy has been developed in accordance with the principles and guidance of the; Children Acts 1989 and 2004; Education Act 2002/ 11; Working Together to Safeguard Children 2018; Keeping Children Safe in Education 2020; Children in Need Review 2019; Manchester Safeguarding Children Board and MSCB Child Protection Procedures; Safeguarding Vulnerable Groups Act 2006; The Care Act 2014; Manchester Adult Safeguarding Board; Counter-Terrorism and Security Act 2015; Prevent Duty Guidance 2015; Guidance for safer working practice for those working in education settings 2015. Safe working in education, childcare and children's social care 2020.
- B2W Group takes seriously its responsibility to safeguard and promote the welfare of learners and to work together with other agencies to ensure that adequate arrangements are in place within our B2W Group to identify, assess, and support learners who are suffering harm.
- This policy has been written with reference to Manchester Safeguarding Board and the guidance contained in the following key documents:

**DfE Revised Working together to safeguard children & Local Safeguarding- Transitional Arrangement (2020) [Keeping children safe in education \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)**

### Sets out new requirements for:

1. Mental health guidance
2. Children with social workers
3. Allegations of abuse against staff
4. Teaching safeguarding
5. Further safeguarding information
6. Training and responsibilities of DSLs (Annex B)

### **B2W Additional responsibilities- Working Closely with Local Authorities- Serious Incidents (2018) Updated February 2019**

- B2W must work with Local Authorities in England must notify the national **Child Safeguarding Practice Review Panel** within 5 working days of becoming aware of a serious incident.
- B2W Safeguarding team should report incidents where the local authority knows or suspects that a child has been abused or neglected and:
- The child dies (including suspected suicide) or is seriously harmed in the local authority's area;

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- while normally resident in the local authority's area, the child dies or is seriously harmed outside England.
- reporting process: [www.gov.uk/report-a-serious-child-safeguarding-incident](http://www.gov.uk/report-a-serious-child-safeguarding-incident)

### Policy Aims

- To demonstrate the B2W Group commitment with regard to safeguarding to learners, parents, staff and other partners.
- To provide an environment in which learners feel safe, secure, valued, respected and feel confident to, and know how to, approach adults if they are experiencing difficulties, believing they will be effectively listened to.
- To raise the awareness of all staff, of the need to safeguard learners and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a structured framework and procedure which will be followed by all staff in cases of suspected abuse ensuring consistent good practice across the B2W Group.
- To provide a systematic means of monitoring learners known, or thought to be at risk of harm, and ensure we, the B2W Group, contribute to assessments of need and support packages for those learners.
- To develop and promote effective working relationships with other agencies.
- To ensure that all staff working within the B2W Group, have been checked for their suitability, including, verification of their identity and qualifications, a satisfactory DBS check and a single central record is kept for audit.

### Prevention/Protection

We recognise that the B2W Group plays a significant role in the prevention of harm to learners by providing learners with good lines of communication with trusted adults, supportive friends and an ethos of protection. The B2W Group community will therefore:

- Work to establish and maintain an ethos where learners feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with learners e.g. through learner surveys and Learner Voice.
- Ensure that learners know that there is an adult in the B2W Group whom they can approach if they are worried or in difficulty.
- Include safeguarding across the induction process and opportunities which equip learners with the skills they need to stay safe and know who to turn to for help.

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### **Safe B2W Group, Safe Staff, Safe learners, Safe Employers We will ensure that:**

- Everyone that comes into contact with B2W including learners, employers and other stakeholders, will be made aware of and supported to understand the safeguarding policy and procedures.
- Accessible formats will be made available on request to ensure this document is user friendly and accessible to all.
- Have information about the B2W Group safeguarding arrangements, safeguarding policy and procedures, the role and names of the Designated Safeguarding Lead and Deputies,
- All staff and learners will receive Safeguarding, Prevent and Online Safety Training at induction, which is regularly updated and will receive updates on safeguarding, online safety, Prevent as required but at least annually.
- Employers will be invited to induction or sent the material to view.
- All staff and governing board including directors have regular safeguarding awareness training, updated by the Safeguarding Team as appropriate, to maintain their understanding of the signs and indicators of abuse.
- Employers are invited to attend safeguarding training either face to face or online.
- The Safeguarding Policy and Procedures, which includes the names of the Safeguarding Team, will be made available via the B2W Group website and will be clearly advertised to learners, staff and parents/carers
- The B2W Group adopts recruitment, selection and pre-employment vetting procedures in line with legislation and best practice available.
- The B2W Group holds a single central register for all staff and volunteers which lists the checks that have been carried out and the date they were completed.

### **Roles and Responsibilities**

#### **All B2W Group Staff:**

- Understand that it everyone's responsibility to safeguard and promote the welfare of children and that they have a role to play in identifying concerns, sharing information and taking prompt action
- Be aware of indicators of abuse and specific safeguarding concerns (**Appendix 1**)
- Know how to respond to a learner who discloses abuse and maintain appropriate confidentiality
- Will never promise a learner that they will not tell anyone about a report of abuse

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- Will refer any safeguarding concern to the Safeguarding Team or if necessary, where there is immediate risk to the learner, to the police or Social Services.
- Should expect to support the Safeguarding Team, social workers and other agencies following a referral
- Consider at all times the best interest of the learner
- Have a responsibility to provide a safe environment in which learners can learn
- Will be aware of systems within the B2W Group which support safeguarding, which is explained as part of staff induction and attend update training offered during CPD
- Have read Keeping Children safe in education part one and the B2W Group Safeguarding Policy and Procedures

### Designated staff with responsibility for Safeguarding:

- The Designated Safeguarding Lead (DSL) is a senior member of staff from the B2W Group senior management team and takes lead responsibility for safeguarding.
- The B2W Group has two Deputy Designated Safeguarding Leads (DDSL's) who are trained to the same standard as the DSL. The DSL and DDSL's carries out those functions necessary to ensure the ongoing safety and protection of learners by ensuring that:
- The Safeguarding Policy and Procedures are implemented and followed by all staff
- They will be available (during B2W Group hours) for staff, learners and parents to discuss safeguarding concerns. Out of hours (10pm-6am) the safeguarding mailbox can be accessed and has an automatic reply set up with emergency details provided.

<b>Designated Safeguarding Lead</b>	Alison Dann Director of Quality and Performance	Telephone Number 07966 275725
<b>Deputy Designated Safeguarding Lead 1</b>	Gayle Dawkes HR Team Leader	Telephone Number 07917 721094
<b>Deputy Designated Safeguarding Lead 2</b>	Ben Waite Head of HR	Telephone Number 07970 756 220
<b>24 hour Safeguarding email.</b> <a href="mailto:safeguarding@b2wgroup.com">safeguarding@b2wgroup.com</a>		



**Safeguarding Policy and Procedures**

## Safeguarding Policy and Procedures

### Where there is a safeguarding concern-

- **Roles and Responsibilities of DSL/ DDSL's**
- The learners wishes and feelings will be taken into account, when determining what action to take and what services to provide.
- Any disclosures or suspicion of abuse are reported to the appropriate agency, including the police where a crime may have been committed
- They liaise with Local Authorities and work with other agencies and professionals in line with Working Together to Safeguard Children 2018.
- They, or another staff member, will attend case conferences, core groups, or other multiagency planning meetings, contribute to assessments, and provide a report where required.
- Has an understanding of locally agreed processes for providing early help and interventions and will support members of staff where early help is appropriate.
- There are detailed accurate records, either written or using appropriate online software, of all concerns about a learner, even if there is no need to make an immediate referral, which will be kept confidential, stored securely and are separate from learner records until a learner's 25th birthday.
- They organise Safeguarding and Prevent induction training, annual updates, keep a record of attendance and address any absences.
- Undergo training for the role which will be updated every two years and will keep up with any developments relevant to the role
- An annual report is provided to the board setting out how the B2W Group has discharged its duties.
- They have a working knowledge of the MSCB procedures and will if required annually submit the 'Audit of Statutory Duties and Associated Responsibilities' to the Education Safeguarding Team.

### Referring Concerns Outside of the Organisation

#### The Designated Safeguarding Lead has a legal duty to

- Make a referral to Children's Social Care, in accordance with Manchester Safeguarding Boards procedures whenever there is reason to suspect that a child is suffering or likely to suffer significant harm. Where a professional disagreement occurs between workers when working with children and families, the MSCB Escalation Policy should be referred to.

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**Parents/carers should be informed that a referral to Children's Social Care is going to be made, unless informing them may itself place the child, professionals or others at risk e.g.**

- Where sexual abuse is suspected or disclosed.
- Where fabricated or induced illness is suspected.
- Where there are fears for the safety of a child, or others when informing parents, carers or others.
- Where it is not possible to contact immediately the parents/carers and prompt
- Action is required to establish or ensure the child's safety.
- Young people under 16 can only consent to their own treatment if they are assessed as being competent to consent under the **Gillick or Fraser guidelines (Appendix 2)**. These guidelines can also be useful when working with 16- and 17-year olds.
- If young people under 18 years old are not competent to consent to their own treatment, consent should be sought from a person with "parental responsibility", although it is good practice to involve all those close to the young person in the decision-making process.
- Any decision not to inform parents/carers should be recorded on the Children's Social Care referral form with the reasons for such a decision and a copy should be kept in the safeguarding file for that learner, held by the Designated Safeguarding Lead/ Deputy dealing with the case.

### Child External links

**The Designated Safeguarding Lead / Deputy Designated Safeguarding Leads have a duty to seek advice from Children's Social Care if unsure as to whether a referral is appropriate.**

- The welfare of the child/children concerned, including the welfare of any other children who may be at risk, must always take precedence over confidentiality. Therefore, these procedures must be followed irrespective of any request to maintain confidentiality.
- The Designated Safeguarding Lead will make every effort to attend any strategy or professionals' meetings to which the Provider is invited or may ask an appropriate colleague to attend on their behalf.
- The Designated Safeguarding Lead/ Deputy Designated Leads are responsible for ensuring that any actions agreed at such meetings are progressed and followed up.

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### Early Help Assessment (EHA)

- B2W will consider the need for EHA (early help assessment) when it is identified that there are low level concerns or emerging needs. This process provides a way of recording support and interventions that have been provided by B2W to the young person and also supports a referral for additional support that may be needed from more targeted services where a single agency has been unable to meet that need.
- An EHA can be arranged to ensure that a multi-agency action plan can be developed. **(Appendix 3)** It is important that the child and parent's voice are captured as part of this assessment.

### Looked after Children

- Learners who are looked after children may have additional vulnerabilities and needs. It also needs to be acknowledged that learners may be a parent to a young child. In such cases B2W needs to consider safeguarding issues in relation to both the learner and their child as both can be considered a 'child in need' (threshold level 3b) or a child experiencing abuse (threshold level 4).
- B2W may have involvement with Manchester Gateway Services, Children Adults and Families Social Care Department. The Children's and Young Person Service (CYPS) should actively engage in any partnership work aiming to reduce the levels of presenting risk to the learner's child.
- The safeguarding team will take primary responsibility for looked after children by informing relevant trainers/ skills coaches where a learner is a looked after child. The safeguarding team will also engage as requested by local authorities to participate in personal education plans.

### Adults External Links

- The Designated safeguarding lead has a duty to make a referral to Adult Social Care, in accordance with Greater Manchester Multi Agency Procedure for Protecting Adults at Risk, whenever there is reason to suspect that a vulnerable adult is suffering or likely to suffer significant harm.
- The Designated safeguarding lead will make every effort to attend any strategy or professionals' meetings to which B2W is invited or may ask an appropriate colleague to attend on their behalf, taking along all relevant details known to B2W.

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- The Designated safeguarding lead is responsible for ensuring that any actions agreed at such meetings, as indicated on minutes which will be sent out by the chair, are progressed and followed up.
- If an adult with mental capacity discloses an allegation of abuse or neglect, they must be informed that confidentiality cannot be assured as the alleged abuser may be in a position of trust and maintaining confidentiality may place others at risk of abuse or neglect. If the incident solely relates to the individual and others are not at risk, the individual must give valid consent for the incident to be reported to the Local Authority.
- If an adult lacks mental capacity to understand the concerns raised a best interest decision (as per the Mental Capacity Act 2005) must be made to identify if the concern should be reported to the Local Authority.
- In cases where the allegedly abused person wishes to self-refer to Adult Social Care, the matter must still be referred to the Designated safeguarding lead, who should accordingly refer the matter to Social Care regardless of the individual's decision to self-refer.
- The Designated safeguarding lead has a duty to seek advice from Adult Social Care, if unsure as to whether a referral is appropriate.

### **Criminal Convictions:**

- The (D)DSL's will carry out risk assessments of learners who declare a prior criminal conviction as outlined in the Safeguarding Procedures. Having a conviction will not bar someone from studying, as this would be dependent upon the background to their offence(s) and if they pose a risk to children and vulnerable adults that access the site. If this is not declared, then potentially the B2W Group could withdraw any offer of enrolment.

### **The Governing Body**

- All members of the Governing Body understand and fulfil their responsibilities, namely, to ensure that:
- Reporting member and overall ownership of Safeguarding at B2W is Alison Dann, Director of Quality and Performance, 0161 474 7603.

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- They comply with their duties under legislation and guidance as outlined in Keeping Children Safe in Education 2018, to ensure that policies, procedures and training are effective and comply with the law at all times.
- There is a, safeguarding policy, staff behaviour policy, recruitment and managing allegation policy and procedures. These are consistent with Manchester Safeguarding Children's and Adult Board and statutory requirements and are reviewed annually, the safeguarding policy is publicly available.
- The B2W Group operates a safer recruitment procedure that includes statutory checks on staff suitability to work with learners and disqualification by association regulations, by ensuring that there is at least one person on every recruitment panel that has completed safer recruitment training.
- The B2W Group has procedures for dealing with allegations of abuse against staff (including the Board of Directors) and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have if had they not resigned.
- All staff are provided with the safeguarding and staff behaviour policy and have read Keeping Children Safe in Education part 2 and annex A. **(Appendix 1)**
- All staff have safeguarding and PREVENT training updated as appropriate.
- Appropriate online filtering and monitoring systems are in place.
- Any weakness in Safeguarding are remedied immediately.
- The board should put into place appropriate responses to children missing from education.
- The Managing Director will ensure that the above policies and procedures, adopted by the board, particularly concerning referrals of suspected abuse and neglect, are followed by all staff.

### Allegations against the DSL

- If a member of staff has an allegation against the DSL with regards to a safeguarding concern, the external safeguarding governor will investigate this fully, following the processes outlined above. The governor in charge of safeguarding is Michael Hunt and can be contacted confidentially via email at [Michael@eta-gms.com](mailto:Michael@eta-gms.com)

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### Multi-agency working

- B2W Group will work in line with statutory guidance Working Together to Safeguard Children by working with social care, police, health and other services to promote the welfare of learners and protect them from harm. This includes providing a coordinated offer of early help, contributing to inter-agency plans and providing additional help to children subject to child protection plans. The B2W Group will allow access to social care workers from the local authority, where appropriate, to conduct, or if considering conducting a, section 17 or section 47 assessment.

### Information sharing, GDPR and data protection

- GDPR/Data protection Act places duties on organisations and individuals to process information, fairly and lawfully, and to keep the information they hold safe and secure. However, this is not a barrier to sharing information, where to not do so, would result in a learner being placed at risk of harm.
- Information sharing is vital in identifying and tackling all forms of abuse
- All staff must be aware that they cannot promise to keep a learner's secrets which might compromise their safety or well-being
- Fears about sharing information cannot be allowed to stand in the way of promoting the welfare and protecting the safety of learners
- The B2W Group recognises that matters relating to safeguarding are personal and will respect confidentiality. The Safeguarding Team will only disclose information about a learner to other members of staff on a need to know basis.
- We will always undertake to share our intention to refer a learner to social care with their parents/carers unless to do so could put the learner at greater risk of harm.
- There are detailed accurate records, either written or using appropriate online software, of all concerns about a learner, even if there is no need to make an immediate referral, which will be kept confidential, stored securely and are separate from learner records until a learner's 25th birthday.

### Related B2W Group Documents

This policy should not be read in isolation reference should be made to:

- Prevent Strategy • Anti- bullying Policy • Staff Behaviour Policy • E-Safety Policy • Health and Safety policy and procedures • Staff Disciplinary Policy • Learner Disciplinary Policy • Recruitment and selection Policy

## **Safeguarding Policy and Procedures**

### **Part Two: Safeguarding Procedures**

- The aim of this procedure is to provide a robust framework, to ensure that all staff take appropriate action when they are worried that a learner is being abused. It is the responsibility of all staff working within the B2W Group, to record and refer safeguarding concerns, even if they are just suspicions or overheard rumours, but they should not discuss this with anyone other than a member of the Safeguarding Team.
- All staff must be alert to, and aware of the signs of abuse, these may include changes in behaviour or a failure to perform or develop as expected. However, recognising abuse may be difficult and staff need to take notice not only of major incidents but also other signs which may cause concerns.

### **Further information about the four categories of abuse: physical, emotional, sexual and neglect can be found in (Appendix 1).**

- Other signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is ill, or an accident has occurred. In these circumstances staff will try to give the learner the opportunity to talk. It is fine for staff to ask the learner if they are OK or if they can give help in any way

### **Allegations against staff / volunteers**

- If you have a safeguarding concern about a member of staff working with learners which indicates that they have;
- Behaved in a way that has harmed, or may have harmed a child;
- Possibly committed a criminal offence against, or related to, a child;
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- It is essential that any allegation of abuse made against a member of staff or volunteer in an education setting is dealt with quickly, fairly and consistently to provide effective protection for the child and at the same time support the person subject to the allegation.



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- Safeguarding Procedures **must be followed** whenever an allegation of abuse is made, or concern is expressed regarding the behaviour towards a child or young person by a member of staff/volunteer. It is important for staff to note that under the Sexual Offences Act 2003 it is a criminal offence for a person over the age of 18 in a position of trust to enter into a sexual relationship with any learner under 18 years of age, even if the relationship is consensual, or in the case of a learner over 18 years where the learner is vulnerable.
- The Local Authority Designated Officer (LADO) has responsibility for coordinating the process of investigations, providing advice and guidance to the employer, to ensure that cases are dealt with as quickly as possible and consistently with a fair and thorough process. The Director of Quality and Performance, or in their absence/where the allegation relates to them, the Directors, should consult the LADO directly. Manchester's LADO can be contacted by calling 0161 234 1214. Or by Email: [quality.assurance@manchester.gcsx.gov.uk](mailto:quality.assurance@manchester.gcsx.gov.uk)

### The LADO will determine:

- whether it is an allegation or a complaint,
- if there is a need to undertake preliminary enquiries and, if so, how the enquiries should be conducted or,
- if the allegation meets the threshold for a Strategy Meeting to be convened
- whether immediate action to protect a child is required.

In the instance of a safeguarding allegation against the Directors, the Designated safeguarding leads **must** liaise directly with the **LADO**.

Preliminary enquiries should be made by the Designated safeguarding lead, after consultation with the **LADO**.

- Any initial enquiries should be minimal to establish the facts of the allegation if these were not established or were unclear at the time the original concern was raised, i.e. date, time, place of any alleged incident, any witnesses and other relevant factors.
- In-depth questioning of children or professionals/professional carers should not take place.
- Careful records should be made regarding any concerns or allegations and actions taken in response to these.
- When an allegation is made a number of inter-related elements will exist (Safeguarding, Criminal Investigation, Disciplinary, Complaints).

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- Where a person has been dismissed as a result of the allegations, B2W is making a decision that they are unsuitable to continue in their role with the organisation.
- B2W must refer the person to the Disclosure and Barring Service. A copy of the referral will be forwarded to the LADO for their records and the confirmation letter issued by the DBS will also be shared with the LADO.
- Where the person resigns prior to the conclusion of the investigation, the LADO process will continue and a referral to the DBS will be made where appropriate by the B2W.
- The Local Authority, on behalf of the Local Safeguarding Children Board, will, therefore, have the key role in co-ordinating the relevant elements and ensuring that all subsequent stages of the Safeguarding Procedures are followed.

If any individual is unhappy that their concerns are not being taken seriously within B2W, they should raise their concerns with the Designated Safeguarding Lead and consultation with the LADO must take place.

### Whistleblowing

- The B2W Group operates in an ethical and committed way and has a Whistleblowing policy and procedure to provide employees with a means for raising genuine concerns. Staff can also use the NSPCC helpline number 0800 028 0285.

### How to make a referral to the Safeguarding Team?

- Use the dedicated email service: **safeguarding@B2Wgroup.com** which will automatically be sent to the Safeguarding Team, entitle the message **My Concern** outlining in the message the key points that a safeguarding concern has been raised

## Safeguarding Policy and Procedures

### What should be referred to the Safeguarding Team (Flowchart and Forms Appendix 5)

#### Specified Safeguarding Issues include: (Appendix 1)

Child sexual exploitation (CSE)	Breast Ironing	Bullying/ Cyberbullying	Contextual Safeguarding
Child Criminal Exploitation: County Lines	Drugs	Domestic Violence	Upskirting
Fabricated or induced illness	Faith abuse	Female genital mutilation (FGM) <b>(Appendix 4)</b>	Peer on Peer
Forced marriage	Gender based violence	Honour based violence	Sexual Violence
Homelessness	Initiation/ hazing type violence and rituals	Mental health	
Private fostering	Radicalisation	Sexting	
Teenage relationship abuse: peer on peer	Modern slavery and trafficking	Children with family members in prison	

#### Learners who are particularly Vulnerable

To ensure that all of our learners receive equal protection the safeguarding team will offer additional support and will give special consideration to those who are:

- Looked after children and previously looked after children
- On Child Protection Plans
- Children in Need
- Asylum seekers
- Young Carers
- Living away from home/private fostering
- Children in the court systems/YOT/ pending police investigations

If staff become aware of learners within these specific group, this information should be referred to the safeguarding team.

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### Safeguarding issues relating to individual learner needs/Wider safeguarding

#### Concerns:

**\*Staff should note that wider safeguarding concerns follow a different referral pathway and ensure they have read the related policies and procedures \***

Individual need	Related Policy	Procedure/ who to contact
<b>Bullying &amp; Harassment</b>	Anti-Bullying Policy	Refer to Head of Department (HoD), who will ensure that incidents are dealt with in a consistent manner.  If behaviour is extreme HoD will report to safeguarding team for advice about whether external agencies need to be involved. Behaviour – negatively effecting the learning and wellbeing of others
<b>Behaviour – negatively effecting the learning and wellbeing of others</b>	Disciplinary Policy	Will be dealt with by HOD under the B2W Group disciplinary policy  If behaviour is extreme HOD will report to safeguarding team for advice about whether external agencies need to be involved
<b>First Aid</b>	Health and Safety Policy	Named first aid representatives are available in the policy if intervention is available-Advice and guidance can be provided by HR.
<b>Mental Health</b>	HR Policies <a href="https://www.guidelines.co.uk/summaries/mental-health">https://www.guidelines.co.uk/summaries/mental-health</a>	If there is a safeguarding concern, staff are to follow safeguarding procedure
<b>Pregnancy</b>	Pregnancy Procedures	HOD to complete risk assessment with learner and submit to HR Executive, Ben Waite
<b>Violence/Aggressive Behaviour</b>  <b>Illegal/Dangerous Items. (e.g. drugs, including 'legal highs') or something dangerous (e.g. knife).</b>	Disciplinary Policy Learner code of conduct Staff behaviour policy	HOD to invoke disciplinary and suspend learner if necessary

## Safeguarding Policy and Procedures

### What to do if a learner makes a disclosure

- A learner who makes a disclosure may have to tell their story on a number of occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one. During their conversation with a learner staff will:
  - Listen to what the learner has to say and allow them to speak freely
  - Remain calm and not overact or act shocked or disgusted – the learner may stop talking if they feel they are upsetting the listener
  - Reassure the learner that it is not their fault and they have done the right thing in telling someone
  - Not be afraid of silences – staff must remember how difficult it is for the learner and allow them to talk
  - Take what the learner is disclosing seriously
  - Ask open questions and avoid leading questions
  - Avoid jumping to conclusions, speculation or make accusations
  - Not automatically offer any physical touch as comfort. It may be anything but comforting to a learner who is being abused
  - Avoid admonishing the learner for not disclosing sooner.
  - Tell the learner what will happen next
  - If the learner talks to any member of staff about any risks to their safety or wellbeing the staff member will let the learner know that they will have to pass the information on - staff are not allowed to keep secrets.

The member of staff should write up their conversation as soon as possible on the documents

### (Appendix 5)

#### Safeguarding Team

<b>Designated Safeguarding Lead</b>	Alison Dann Director of Quality and Performance	Telephone Number 07966 275725
<b>Deputy Designated Safeguarding Lead 1</b>	Gayle Dawkes HR Team Leader	Telephone Number 07917 721094
<b>Deputy Designated Safeguarding Lead 2</b>	Ben Waite Head of HR	Telephone Number 07970 756 220
<b>24 hour Safeguarding email- <a href="mailto:safeguarding@b2wgroup.com">safeguarding@b2wgroup.com</a></b>		
<b>Report all concerns via email immediately</b>		

## Safeguarding Policy and Procedures

### Appendices

<b>1</b>	Key Safeguarding Definitions/ Descriptions/ Further Guidance Annex A - Further safeguarding information
<b>2</b>	Gillick competency and Fraser guidelines
<b>3</b>	Early Health Assessment guidelines (EHA)
<b>4</b>	Signs and Symptoms of FGM
<b>5</b>	Safeguarding Flow Chart & Forms
<b>6</b>	Safeguarding Briefing Sheet
<b>7</b>	Prevent Concerns in Regions B2W teach in

## Safeguarding Policy and Procedures

### Appendix One- Annex A KCiES (2020)

#### Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17-year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

#### Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

#### Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

#### Child Criminal Exploitation (CCE)

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

## Safeguarding Policy and Procedures

contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE: • children who appear with unexplained gifts or new possessions;

- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

### Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

### County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be



## Safeguarding Policy and Procedures

targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

### Domestic abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

### Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

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### National Domestic Abuse

Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- <http://www.refuge.org.uk/get-help-now/what-is-domestic-violence/effects-of-domestic-violence-on-children/>
- <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>
- <http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

### Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties:

### Homeless Reduction Act Factsheets.

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through

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their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation

- [Homelessness Reduction Act: policy factsheets - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

### **So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### **Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers<sup>104</sup> that requires a different approach (see following section).

### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

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Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at:

- [Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/guidance/mandatory-reporting-of-female-genital-mutilation-procedural-information)

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

### Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

- <https://www.gov.uk/guidance/forced-marriage>
- [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG\\_MULTI\\_AGENCY\\_PRACTICE\\_GUIDELINES\\_v1\\_180614\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf)

### Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’ safeguarding approach

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

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This also includes calling for the death of members of the armed forces

- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/470088/51859\\_Cm9148\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470088/51859_Cm9148_Accessible.pdf)

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799\\_Revised\\_Prevent\\_Duty\\_Guidance\\_England\\_Wales\\_V2-Interactive.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)

### **Terrorism**

Is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.

Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent duty All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

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### Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at

- [Channel guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

### Peer on peer/ child on child abuse

#### Children can abuse other children.

This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

#### Sexual violence and sexual harassment between children in schools and colleges

Context Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff should be aware of the importance of:

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

Dismissing or tolerating such behaviours risks normalising them.

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### What is sexual violence and sexual harassment?

Sexual violence It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below: Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents. Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents. Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents

### What is consent?

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

### Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be 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 pictures, photos or drawings of a sexual nature; and online sexual harassment.

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This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- non-consensual sharing of sexual images and videos;

- sexualised online bullying; unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and upskirting.

### 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. Anyone of any gender, can be a victim. The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy).

### Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. 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.



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### Additional advice and support Abuse

- What to do if you're worried a child is being abused – DfE advice
- Domestic abuse: Various Information/Guidance - Home Office (HO)
- Faith based abuse: National Action Plan - DfE advice
- Relationship abuse: disrespect nobody - Home Office website Bullying
- Preventing bullying including cyberbullying - DfE advice
- Preventing and Tackling Bullying, DfE advice Children missing from education, home or care
- Children missing education - DfE statutory guidance
- Child missing from home or care - DfE statutory guidance
- Children and adults missing strategy - Home Office strategy Children with family members in prison
- National Information Centre on Children of Offenders - Barnardo's in partnership with HM Prison and Probation Service Child Exploitation
- Trafficking: safeguarding children - DfE and HO guidance Drugs
- Drugs: advice for schools - DfE advice
  - Drug strategy 2017 - Home Office strategy
- Information and advice on drugs - Talk to Frank website
  - ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention - Website by Mentor UK "Honour Based Abuse" (so called)
- Female genital mutilation: information and resources- Home Office guidance
- Female genital mutilation: multi agency statutory guidance - DfE, DH, and HO statutory guidance Health and Well-being
- Fabricated or induced illness: safeguarding children - DfE, DH, HO
- Rise Above: Free PSHE resources on health, wellbeing and resilience - Public Health England
- Medical-conditions: supporting pupils at school - DfE statutory guidance
- Mental health and behaviour - DfE advice Homelessness
- Homelessness: How local authorities should exercise their functions - Ministry of Housing, Communities & Local Government guidance

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### Appendix- 2 Gillick and Fraser guidelines

Gillick competency and Fraser guidelines refer to a legal case which looked specifically at whether doctors should be able to give contraceptive advice or treatment to under 16 year olds without parental consent. Since then, they have been more widely used to help assess whether a child has the maturity to make their own decisions and to understand the implications of those decisions.

- Young people under 16 have a right to confidential medical advice and treatment if the provider assesses that the young person:
  - Understands the advice and has the maturity to understand what is involved
  - Their physical/mental health will suffer if they do not have treatment
  - It is in their best interest to give such advice and treatment without parental consent
  - Will continue to put themselves at risk of harm if they do not have advice and treatment
  - Cannot be persuaded by the doctor or health professional to inform parental responsibility holders, nor allow the doctor to inform them.

The following should be used as guidance for practitioners in determining and recording their decision as to whether a young person is able to engage with services without the involvement and support from their parent(s) / carer(s).

#### Consider:

- Has the young person explicitly requested that you do not tell their parents/carers about their involvement with services?
- Have you done everything you can to support the young person to involve their parents/carers?
- Have you documented clearly why the young person does not want you to inform their parents/carers?

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- Can the young person understand the advice and information they have been given and have sufficient maturity to understand what is involved in their service provision and what the implications may be? Can they comprehend and retain information relating to the care they are being offered? Can the young person communicate their reasons for any decisions made, are these decisions rational?
- Are you confident that the young person is making the decision for them and not being coerced or influenced by another person?
- Are you confident that you are safeguarding and promoting the welfare of the young person?
- Without the service being provided would the young person's physical or emotional health be likely to suffer?
- Would the young persons' best interests require that support be provided without parental consent?

You should be able to answer YES to these questions to enable you to determine that you believe the young person is competent to make their own decisions about consenting to engage with services; limits to confidentiality; and receiving services without their parent's consent. You should record the details of your decision making.

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### Appendix 3

#### EHA (Early Help Assessment)

- All school and Learning Provider staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in an early help assessment
- This includes identifying emerging problems, liaising with the designated safeguarding officer, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment
- If early help is appropriate the designated safeguarding lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- Early Help will only be completed with the child's and/or parents' permission. The Early Help team can be contacted at the safeguarding hub on Central – 0161 234 1975 to establish whether Early Help or CAF does not already exist. Early Help forms can be accessed via: The forms and will have to be completed as on-line documents.
- If at any time during completing Early Help, staff are concerned a child has been harmed or abused or is at risk of being harmed or abused they must follow MSCB's procedures.

#### The 0-19 Startwell Team:

- Offer a targeted early intervention service to children, young people and families
- Work with families to reduce risk of statutory service involvement
- Undertake screening and assessment to identify, respond to and reduce risk factors.
- Provide systematic approach to offering interventions to children, young people and their families.
- Provide direct support on an individual or group basis to prevent escalation of need and improve outcomes.
- Provide support to manage risk.
- Practical help to deal with problems.

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### Appendix 4- Signs and Symptoms of FGM

#### Advice on identifying Cases of Female Genital Mutilation

There are 4 types of procedure:

- Type 1** Clitoridectomy – partial/total removal of clitoris
- Type 2** Excision – partial/total removal of clitoris and labia minora
- Type 3** Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4** All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

#### Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

## **Safeguarding Policy and Procedures**

### **Circumstances and occurrences that may point to FGM happening**

- Young person talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Young person's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the young person's sibling has undergone FGM
- Young person talks about going abroad to be 'cut' or to prepare for marriage

### **Signs that may indicate a child has undergone FGM:**

- Prolonged absence from learning and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

## Safeguarding Policy and Procedures

### Appendix 5 - Safeguarding Flowchart

What to do if you have concerns/suspicions of abuse

#### DISCLOSURE/SUSPICION

##### OF ABUSE

Ensure any discussions take place in a 'suitable' place.

Do not promise to keep the matter confidential, and adhere to the procedures in the Safeguarding Policy-

Contact the Designated Safeguarding Lead Protection or available member of the Safeguarding Team. Urgently call using the details provided in the Safeguarding Policy/ Procedure- App/ email- My Concern

A CP1 form should be completed and processed. SG team will provide this form.

The Designated Safeguarding Lead will take any necessary action.

#### CONCERN FOR SAFETY

##### OR WELFARE

Ensure any discussions take place in a 'suitable' place.

Do not promise to keep the matter confidential, and adhere to the procedures in the Safeguarding Policy

Where abuse is suspected or the concern becomes a disclosure

Where abuse is not evident but concerns remain, contact the Safeguarding Team for further advice via email/ App. Or follow wider Safeguarding issues guidance in Safeguarding Policy/ Procedure

You will be directed to the appropriate procedure to follow. This may include;

- \* completing a Cause for Concern form which will be sent to the Safeguarding Team.
- \* you may be referred to your line- manager, e.g. behavioural issues.
- \* or to the disciplinary procedure.

**Safeguarding Policy and Procedures****SG Priority Action Form- Abuse/ Neglect****Safeguarding Priority Action Statement Form****Details of person the allegation/ issues were reported to/heard by**

Staff Name

Job title,  
Department/Site

Telephone Number

Date allegation  
/ disclosure made :


**Details of person making the allegation/presenting issues**

Name

Learner

Department

Course

	AGE

**Details of person allegedly recipient of abuse if different from above**

Name

Learner

Department

Course




## Safeguarding Policy and Procedures

### Details of any other persons present

Name

Department

Course


Assigned to:  
Designated  
Safeguarding  
Lead (DSL)

Date Assigned


Place the incident  
occurred

Nature of the alleged  
abuse

(see safeguarding policies  
for guidance.)

Physical  Neglect  Emotional  Sexual   
Financial  Institutional

**ALLEGATION/DISCLOSURE DETAILS**

## Safeguarding Policy and Procedures

Continue Overleaf if necessary...

## Safeguarding Policy and Procedures

### ANY RELEVANT ADDITIONAL INFORMATION

**Signature of  
person making  
statement**

## Safeguarding Policy and Procedures

### Safeguarding – Cause for Concern

Confidential

<b>Member of staff making referral</b>		
<b>Position</b>		
<b>Date of referral</b>		
<b>Signature</b>		
<b>Name of child/vulnerable adult:</b>		
<b>Gender</b>	<b>Age</b>	
<b>D.O.B</b>	<b>Trainer/ Skills Coach/ Manager</b>	<b>Course &amp; Level/ Staff Dept.</b>
<b>Does the child/vulnerable adult know you will be speaking to the DSL ?</b> Yes _____ No_____		
<b>Summary of reason for concern</b>		
<b>To whom have you spoken and what was said?</b> (State what the child/vulnerable adult said or what you observed that caused concern/suspicion. Include date and time of event. Where reporting what someone has said to you, try to use as close to their words as you can remember.) Continue on another sheet if required.		
<b>Have you taken any actions?</b> – please state here		

## Safeguarding Policy and Procedures

**Category of abuse causing concern.**

Physical \_\_\_ Neglect \_\_\_ Emotional \_\_\_ Sexual \_\_\_ Financial \_\_\_ Institutional \_\_\_

Please return this form to the Safeguarding Team- [safeguarding@b2wgroup.com](mailto:safeguarding@b2wgroup.com)

<b>To be completed by a DSL</b>	
<b>Office Use Only</b>	
<b>Assigned to: (DSL)</b>	
<b>Date Assigned</b>	
<b>Date of initial meeting.</b>	
<b>Is this Safeguarding ?</b>	<b>YES</b> <input type="checkbox"/> <b>(transfer details to SG Priority form)</b>  <b>NO ...</b> <input type="checkbox"/> <b>(please complete this form fully)</b>
<b>Confirm Category of Abuse</b>	<b>Physical</b> <input type="checkbox"/> <b>Neglect</b> <input type="checkbox"/> <b>Emotional</b> <input type="checkbox"/> <b>Sexual</b> <input type="checkbox"/> <b>Financial</b> <input type="checkbox"/> <b>Institutional</b> <input type="checkbox"/>
<b>Action</b>	

## Safeguarding Policy and Procedures

### Appendix 6

#### Safeguarding Briefing Sheet

Whilst working in or on behalf of B2W Group, you have a duty of care towards our learners. This means that at all times you should act in a way that promotes their safety and welfare. If at any time you have a concern about a B2W learner, particularly if you think that they are at risk of abuse or neglect, it is your responsibility to share your concerns with the B2W Group Safeguarding Team.

#### This document is for:

- All staff with the inclusion of;
- Temporary and freelance staff
- Apprentices and their employers
- Partners

Everyone has a responsibility to: Recognise – Respond – Report – Record – Refer & PREVENT  
RECOGNISE What kind of abuse is there? Categories of Abuse (As defined by the Children Act 2004)

- Physical
- Emotional
- Sexual
- Neglect Other causes of concern
- Bullying
- Substance Abuse
- Sexual Exploitation
- Domestic Violence
- Radicalisation\* (PREVENT)

## Safeguarding Policy and Procedures

### **RESPOND How to talk to a learner who is disclosing abuse**

#### **What you should do**

- Listen non-judgmentally and stay calm
- Ask open-ended questions to clarify and re-assure, but do not investigate
- Do not put words in the learner's mouth
- Inform the learner that you must pass on the information but only to those who need to know

#### **What you should NOT do**

- Do not promise confidentiality, explain that you may need to discuss with someone else
- Do not investigate the matter yourself
- Do not convey a sense of judgement or shock
- Do not discuss with anyone other than B2W's Safeguarding Team
- Do not take matters into your own hands

#### **REPORT If you suspect abuse**

- Contact B2W Safeguarding Team:
- [safeguarding@B2Wgroup.com](mailto:safeguarding@B2Wgroup.com)
- RECORD Complete a written report for the Safeguarding Officer, recording the date, time, place and what was said
- REFER the Safeguarding Officer will contact the relevant agencies to ensure that support is given to the Learner. Support from the B2W Group's safeguarding team may be sufficient

#### **PREVENT**

PREVENT is a strand of the Government counter terrorism strategy – CONTEST. Everyone has a role to play in supporting the aim of CONTEST. You can do this by remaining vigilant and reporting any suspicious activity which can include someone who:

- Is behaving differently for no obvious reason
- Travels for long periods of time but is vague about where they are going
- Buying or storing large amounts of chemicals for no obvious reason
- Visits or sends out links to extremist internet sites
- Is recording and documenting information in a crowded location
- And includes activity at a property that doesn't fit day to day life

## **Safeguarding Policy and Procedures**

### **Apprentices**

All learners receive a safeguarding induction, details of support services offered and the Safeguarding Teams contact details. Skills coaches will check the apprentices understanding of all aspects of safeguarding and safe working practice at each review.

The B2W Group has arrangements in place to ensure that, prior to work related activity there are:

- Pre-placement Health and safety checks, including insurance checks
- Employers are made aware of relevant B2W Group policies

### **Off Site Venues**

The B2W Group has arrangements in place to ensure that:

- Health and Safety checks are completed for all training facilities
- Offsite premises are risk assessed
- Insurance documents are checked

The Safeguarding Policy and Procedures apply to all learners on or offsite. Where employer related concerns are raised the Safeguarding Team will liaise with the Head of the Apprenticeship Team: Further Information:

- B2W Group Safeguarding policy and procedures can be found at [www.B2Wgroup.com](http://www.B2Wgroup.com)



## Safeguarding Policy and Procedures

### Appendix 7

#### Prevent Concerns in the regions we teach Prevent Links

Established relaGreater Manchester- Nigel Lund (*North West*)

[nigel.lund@education.gov.uk](mailto:nigel.lund@education.gov.uk)

[07384 452146](tel:07384452146)

West Midlands- **Hifsa**

**Haroon-Iqbal**

[hifsa.haroon-](mailto:hifsa.haroon-iqbal@education.gov.uk)

[iqbal@education.gov.uk](mailto:iqbal@education.gov.uk)

07551 136132

Greater London- **Chris Rowell & Jake Butterworth**

[chris.rowell@education.gov.uk](mailto:chris.rowell@education.gov.uk)

[jake.butterworth@education.gov.uk](mailto:jake.butterworth@education.gov.uk) Chris – 07384

872518

Jake – 07795 454722

Cambridge/ Peterborough

**David Layton-Scott (East)**[david.layton-](mailto:david.layton-scott@education.gov.uk)

[scott@education.gov.uk](mailto:scott@education.gov.uk) 07384 452155

## Safeguarding Policy and Procedures

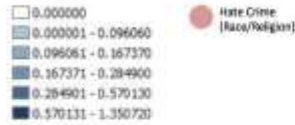
### Cambridge & Peterborough

#### Hate Crimes vs Prevent Referrals

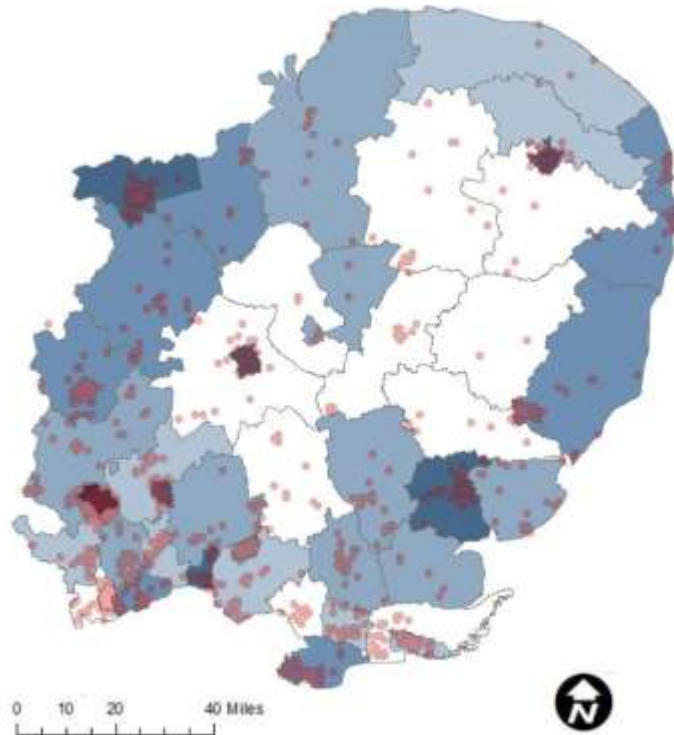
Local Authorities' Prevent Referral Rate (per 10,000 Population)

East Regional Local Authorities

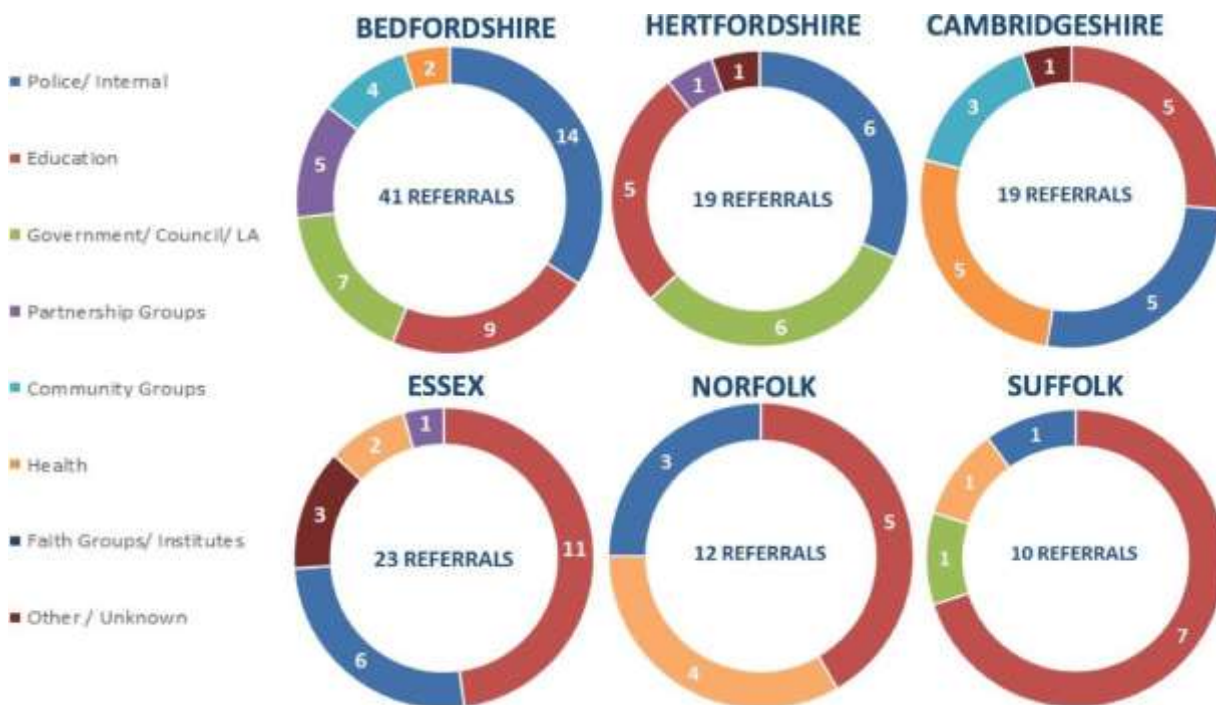
Prevent Referral Rate



**Summary:** The map overlays Race/Religion Hate Crime over the rate of Prevent Referrals (per 10,000 population within each Local Authority). Whilst we observe high rates of Prevent Referrals against Local Authorities with higher than average Hate Crimes, there are some discrepancies.



#### 2019-20 Force Prevent Referrals by Source



## Safeguarding Policy and Procedures

### London

- Current threat from terrorism – SEVERE (this encompasses all forms of terrorism – Extreme Far Right, Islamist, Northern Irish, etc.)
- Daesh-inspired attacks by 'lone actors' – low cost, low planning, low skill – highest risk for London and the UK
- Mental Health and learning disabilities – is a vulnerability that can be exploited. This is not to say that MH or LD means someone is more susceptible to being drawn into terrorism.
- Risk of travel to join Daesh highly unlikely; greater risk posed by those unable to travel but wanting to
- Returnees – largest proportion of those who travelled to Syria/Iraq were from London and so many will be looking to come back to London also
- [Al-Muhajiroun](#) (ALM) – less open; continue to attempt to radicalise and recruit – likely in East London. Concern this will increase with the [release of Anjem Choudhary](#).
- Unregulated spaces and home schooling – [Umar Haque](#)
- Online radicalisation, particular prevalent within the Extreme Right Wing (XRW)
- XRW - recruitment target age: 16-25. (e.g. [National Action](#)). Shifting image of the XRW to being young, intellectualised and focused on culture and Islam rather than race as it did historically (although these factions still obviously exist).

### Manchester

- The UK terrorist threat comes from two main areas: international terrorism and domestic extremism (motivated by a range of causes). International terrorism (most often linked to Islamist extremism) remains the highest threat. The UK threat level from international terrorism is currently 'SEVERE' (an attack is highly likely). There are examples in Greater Manchester that relate to different types of terrorism, and have been affected by the different threat areas. By a number of measures, the terrorism threat is high and unlikely to subside in the near future:
- Since March 2018 police and the security services have stopped 14 Islamist terrorist attack plots and 5 plots by XRW extremists. Nationally, there are just under 800 active investigations into terrorist related offenders.
- In the year ending 31 March 2019, there were 268 arrests for terrorist-related activity in the UK, a fall of 40% (175 arrests) compared with the 443 arrests the previous year. Whilst the 268 arrests made in the latest year saw the lowest number of arrests since the year ending March 2014, in each of the past seven years the number of arrests has been greater than the annual average of 247 arrests over the whole time series. 60% of the 268 CT related arrests were International. 218 persons were in custody for terrorist related offences as of 1 August 2019, a 4% decrease from the previous year.

## Safeguarding Policy and Procedures

### International counter terrorism (ITC)

The main threat is from Islamist extremist groups such as Islamic State/Daesh and Al Qaida (AQ), and individuals inspired by them.

- Within the UK, Islamist extremists make up the majority (81%) of the 218 people imprisoned for terrorism related offences. \Despite the collapse of its caliphate, IS/Daesh as a terrorist group has not been militarily defeated. Its ideology and support base is resilient, and its intent to carry out attacks in the UK and the West is undiminished. IS/Daesh continues to encourage its supporters to carry out attacks by any means at their disposal. The threat from AQ has not gone away.

There has been a trend towards low complexity attacks, often using bladed weapons and vehicles. This has made involvement in terrorism more straightforward and accessible. Firearms and explosive based attacks remain a possibility and terrorists have used, or explored the use of, non-conventional weapons (for example, poisons or chemical weapons). Terrorists will consider a variety of targets, including crowded public places, transport systems, national infrastructure, police and military personnel, and high profile or publicly significant sites.

Since the territorial defeat of the caliphate many countries that worked to defeat it are faced with a new challenge: whether to repatriate thousands of foreign ISIS fighters, as well as women and children affiliated with the group, who are being held in refugee camps and prisons across Syria and Iraq. They will either be looking to return to Europe or be redirected elsewhere.

Travel to, or return from, areas of conflict such as Syria can increase the threat as extremists may have joined terrorist groups(1), become further radicalised and gained terrorism related skills.

The online space is likely to remain crucial to the terrorist threat as it can be used for variety of purposes, from social networking to encouragement or planning of attacks.

An example includes, messaging apps such as Telegram provide strong encryption

### Domestic Extremism

Domestic extremists are motivated by a range of causes. Nationalist groups, extreme right- and left-wing extremists (XRW, XLW), animal rights extremists and other militant single-issue protesters may fall into this category.

- The threat from violent extreme right wing extremism (XRW) appears to be increasing. Within the UK, 18.35% of the 218 people imprisoned for terrorist related offences are Domestic extremists. The number of far-right terrorists imprisoned in Britain tripled between 2017-2018. There were 29 people in custody at the end of March 2018, up from nine the previous year. There are now 30 people in custody at the beginning of August 2019.

## Safeguarding Policy and Procedures

- Banned neo-Nazi group National Action (NA) remains a principal XRW threat to the UK but in the last few years has suffered disruptions (including arrests and prosecutions). As of August 2019, thirty individuals across the UK were in custody for XRW related offences, 12 of which were in prison for belonging to a proscribed organisation such as National Action. Most recently, a male from Lancashire admitted to preparing an act of terrorism as he wanted to 'replicate' the murder of Jo Cox when he plotted to murder MP Rosie Cooper with a 19 inch gladius knife. He admitted intending to kill her.

### Vulnerabilities in Prevent

Vulnerability has been placed at the centre of Prevent by the Home Office and Counter Terrorism Policing. A vulnerability can contribute, or indeed heighten, the threat and risk of an individual to radicalisation. Through analysis, the most common vulnerabilities in the North West Region during 2017/2018 are:

- *Violent Tendencies/Ideas and Behaviours*
- *Extremist Media*
- *Religious/Racial Hatred*
- *Mental Health*
- *Children in Care/Disrupted family*
- *Social Media*
- *Other Health Issues (i.e. disabilities, learning difficulties)*
- *Travel (both known and desired) to areas of conflict*
- *Criminal Background*
- *Extremist/radical friends*

### **Two or more of the above vulnerabilities are most commonly present in individual Prevent**

**cases.** This does not mean that anyone with, for example, a Mental Health concern, is automatically vulnerable to terrorism. A multi-agency approach is fundamental to the safeguarding of vulnerable people, with each partner agency holding responsibility to use their expertise to assist the individual and have due regard to the need to prevent people from being drawn into terrorism.