

# TOP Mark Tuition

## SAFEGUARDING POLICY

Contents:

Section 1 - Introduction

Section 2 - Prevention

Section 3 - Protection

Centre manager's role and responsibilities

Designated safeguarding Officer's roles and responsibilities

Teacher's/staff role

Record keeping

Transfer of records

Confidentiality and information sharing

Section 4 - Support to pupils and staff

Section 5 - Working with parents/carers

Section 6 - Allegations of abuse made against staff

Section 7 - Allegations of abuse by pupils against other pupils

Section 8 - Safeguarding against radicalisation and extremism

Section 9 - Safer recruitment

Section 10 - Other relevant policies

Section 11 - Contact details

## 1. Introduction:

1.1 Top Mark Tuition Centre fully recognises the contribution it can make to protect children. The aim of the policy is to safeguard and promote our pupils' welfare, safety and health by fostering an honest, open, caring and supportive climate. The pupils' welfare is of paramount importance.

1.2 This policy is consistent with:

- The legal duty to safeguard and promote the welfare of children, described in section 175 of the Education Act 2002 and the Dfe Keeping Children Safe in Education (September 2020)
- The local safeguarding partnership procedures, which contain procedures and guidance on safeguarding children
- Working Together to Safeguard Children July 2018

1.3. There are four main elements to our child protection policy:

- Prevention (e.g. positive centre atmosphere, teaching and pastoral support to pupils, preventing unsuitable people working with children).
- Protection (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to child protection concerns).
- Support (to pupils and centre staff and to children who may have been abused).
- Working with external agencies & parents (to ensure appropriate communications and actions are undertaken)

1.4. This policy applies to all staff (all adults working with children paid or unpaid), volunteers and visitors to the centre. We recognise that child protection is the responsibility of all staff within our centre. We will ensure that all parents and other working partners and visitors are aware of our child protection safeguarding policy by making it available on the centre website, by making a hard copy of the policy available on request to the Centre manager. We have a robust safeguarding policy in place which is reviewed annually.

### Contextual Safeguarding:

All staff should be aware that safeguarding incidents and/or behaviour can be associated with factors outside the centre and/or can be occur between children outside of these environments. All staff, but especially the designated safeguarding Officer and deputies should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

### Safety and security in centre

Entry to centre premises is controlled by secure doors, constant staff supervision or video surveillance. Authorized visitors are logged in and out of the premises. Unidentified visitors will be challenged by staff or reported to the Centre manager or Centre Office. The presence of intruders and suspicious strangers loitering near the centre will be reported to the Police and the LA so that other centres can be alerted.

No internal doors to classrooms will be locked while pupils are present. All teaching rooms will have clear, unobstructed glass panels in the doors or the doors will be left open.

Members of staff who work with children on a one to one basis are made particularly aware of policies and procedures with regard to safeguarding as the nature of their work means they are more vulnerable to

allegations made against them or a pupil may see their individual lesson time as a private opportunity to make a disclosure.

Safeguarding Definition: Safeguarding and promoting the welfare of children is defined for the purpose of the guidance as:

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

Definitions, signs and symptoms of the four kinds of abuse and neglect:

1. Definition of Physical Abuse: Actual or attempted physical injury to a child under the age of 16, where there is definite knowledge, or reasonable suspicion that the injury was inflicted or knowingly not prevented. Female Genital Mutilation (FGM) or risk of should also be treated as a child protection issue.

Possible Signs of Physical Abuse: unexplained injuries or burns particularly if they are recurrent, improbable excuses given to explain injuries, refusal to discuss injuries, untreated injuries, admission of punishment which appears excessive, fear of parents being contacted, bald patches, withdrawal from physical contact, arms and legs kept covered in hot weather, fear of returning home, fear of medical help, self-destructive tendencies, aggression toward others and chronic running away.

2. Definition of Sexual Abuse: Any child below the age of 18 may be deemed to have been sexually abused when any person(s), by design or neglect, exploits the child, directly or indirectly, in any activity intended to lead to the sexual arousal or other forms of gratification of that person or any other person(s), (including organised networks). This definition holds whether or not there has been genital contact and whether or not the child is said to have initiated the behaviour.

Possible Signs of Sexual Abuse: be chronically depressed, use drugs or drink to excess, self-mutilate, show self-hatred, become anorexia or bulimic, run away frequently, be inappropriately seductive, be fearful about certain people like relatives or friends, not be allowed to go out on dates or have friends round, have soreness/bleeding in the genital or anal areas or in throat, find excuses not to go home or to a particular place, have recurrent nightmares/be afraid of the dark, be unable to concentrate, seem to be in a world of their own, have a 'friend with a problem' and then tell about the abuse of the friend, sexually abuse a child, sibling or friend, exhibit a sudden change in centre/work habits, become a truant, be withdrawn, isolated, or excessively worried, have outbursts of anger or irritability and have unexplained sums of money.

3. Definition of Emotional Abuse: Failure to provide for the Child's basic emotional needs such as to have a severe effect on the behaviour and development of the child

Possible Signs of Emotional Abuse: physical, mental and emotional development lags, admission of punishment which appears excessive, over-reaction to mistakes, sudden speech disorders, fear of new situations, inappropriate emotional response to painful situations, neurotic behaviour (eg rocking; hair twisting; thumb sucking), self-mutilation, fear of parents being contacted, extremes of passivity or aggression, drug/solvent abuse, chronic running away and compulsive stealing/scavenging

4. Definition of Physical Neglect: Physical neglect occurs when a child's essential needs are not met and this is likely to cause impairment to physical health and development. Such needs include

food, clothes, cleanliness, shelter and warmth. A lack of appropriate care results in persistent or severe exposure, through negligence, to circumstances which endanger the child.

Possible Signs of Physical Neglect: constant hunger, poor personal hygiene, constant tiredness, poor state of clothing, emaciation, frequent lateness or non-attendance at centre, untreated medical problems, destructive tendencies, low self-esteem, neurotic behaviour (eg rocking; hair twisting; thumb sucking), no social relationships, chronic running away and compulsive stealing or scavenging.

## **2. Prevention:**

2.1 The centre will adopt an open and accepting attitude towards children as part of its responsibility for pastoral care. Staff should work to ensure that children and parents will feel free to talk about any concerns and will see centre as a safe place when there are difficulties. Children's worries and fears will be taken seriously and children are encouraged to seek help from members of staff.

2.2 Our centre will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to.
- Ensure that children know that there are adults in the centre whom they can approach if they are worried or are in difficulty.
- Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies.
- Operate safe recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children, including references and Disclosure and Barring Service (DBS; DBS website: [www.homeoffice.gov.uk/agencies-public-bodies/dbs](http://www.homeoffice.gov.uk/agencies-public-bodies/dbs)).
- Ensure that all staff and volunteers are aware of the need to maintain appropriate and professional boundaries in their relationships with pupils and parents and follow the codes of conduct in the Guidance Safe Working Practice for the Protection of Children and Staff in Education Settings, July 2015.

Children with special educational needs and disabilities

Children with Special Educational Needs and disabilities (SEND) can provide additional safeguarding challenges. The Centre manager will ensure their overarching safeguarding and child protection policies reflect the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicator of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

The child's wishes

Where there is a safeguarding concern the Centre manager should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback.

The Centre manager should ensure that staff members do not agree confidentiality and always act in the best interests of the child

## **3. Protection:**

All adults working with or on behalf of children have a responsibility to safeguard and promote the welfare of children. This includes responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within centre. Staff and volunteers will follow in all instances of suspected child abuse the Havering Education Child Protection Procedures, which are fully compliant Local Safeguarding Children Board Procedures.

### **3.1. Role and responsibilities of the Centre manager:**

The Centre manager of the centre will ensure that:

- The policies and procedures adopted by the board of trustee are fully implemented, and followed by all staff.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner.
- All staff is made aware that they have an individual responsibility for referring child protection concerns, promptly and using the proper channels.
- All pupils are confident to raise any concern they may have with a member of staff of their choice, and know how to keep themselves and others safe.
- All staff is made aware of their right to whistle blow.

### **3.2. Roles and responsibilities of the Designated Safeguarding Officer:**

The role of the designated safeguarding lead carries a significant level of responsibility and they should be given the additional time, funding, training, resources and appropriate supervision support they need to carry out the role effectively. Designated Safeguarding Officer should help promote educational outcomes by; sharing the information about the welfare, safeguarding and child protection issues that children, including children with social worker, are experiencing, or have experienced, with teachers and centre leadership team.

The designated safeguarding lead and deputies should liaise with the three safeguarding partners and work with other agencies in line with Working together to safeguard children. At KCSIE September 2020 added a link to National Police Chiefs' Council (NPCC ) guidance When to call the police. It should help designated safeguarding officers to understand when they should consider calling the police and what to expect when they do.

The responsibilities of the Designated Safeguarding Officer encompass three broad areas:

#### **Managing Referrals**

- To be responsible for referring cases of suspected abuse or allegations to the local authority children's social care within 24 hours. This includes dealing with allegations about members of staff. Referrals will be confirmed in writing
- To notify the DfE within 14 days of any actual abuse or allegation of abuse on the premises against any staff members.
- To inform the Disclosure and Barring Services in cases where a person is dismissed or left due to risk/harm to a child; and, where relevant, inform the Secretary of State

- To report to the DBS, and if required to the National College for Teaching and Leadership (NCTL), within one month of leaving the centre any person whose services are no longer used because they are considered to be unsuitable to work with pupils.
- To inform the police in cases where a crime may have been committed; this includes reporting cases where FGM (female genital mutilation) appears to have been carried out on girls under the age of 18.
- To act as a source of support, advice and expertise to staff within Top Mark on matters of safety and safeguarding and when deciding whether and when to make a referral by liaising with relevant agencies. Where there is doubt, advice will be sought from the Deputy Designated officer, the Lead Officer for Education Services or the Children's Social Care Duty Manager. Alternatively anonymous advice can be obtained from the NSPCC helpline (0808 800 5000)
- To keep detailed, accurate, secure written records of concerns and referrals; to maintain and monitor child protection records
- To make referrals to the Channel program, as appropriate (see our Preventing Radicalization and Extremism policy)
- To liaise with the Centre manager to inform him of any issues and ongoing enquiries

#### Training

- To refresh Designated Safeguarding Officer formal training (**every two years**) in identifying and referring suspected cases of abuse and pass new information to staff, Centre manager, and Management Committee; and to keep their knowledge up to date **at least once a year** through e-bulletins, conferences, network meetings, etc.
- To understand the assessment process for providing early help and intervention
- To ensure each staff member has received appropriate training (including induction) to be refreshed at least once a year; is able to recognize and record any concerns immediately they arise and accurately
- To keep a record of staff attendance at Safeguarding training

#### Raising Awareness

- To be familiar with and understand the DfE guidance 'Keeping Children Safe in Education' (2020), 'Working Together to Safeguard Children' (2018), local safeguarding partnership procedures and DfE advice 'What to do if you're worried a child is being abused' (2015)
- To ensure that all staff and support teams (permanent, temporary) sign to say they have read and understood the Safeguarding Policy and Part 1 of Keeping Children Safe in Education (2020)
- To promote in all staff the attitude concerning safeguarding that 'it could happen here'
- To ensure that all volunteers working in Centre are aware of the Centre's Safeguarding Procedures
- To ensure each staff member is aware of and has access to the Centre's Safeguarding Policy
- To ensure the Centre's safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly
- To ensure the Safeguarding Policy is available publicly

### 3.3. The role of all teachers/satff

- To be aware of the contents of the Safeguarding Children policy and procedures and the identity of the Designated Safeguarding Officer
- To set a good example by following staff code of conduct.
- To undertake training to identify and be alert to possible causes or symptoms of abuse
- To identify children at risk of being drawn into terrorism and to challenge extremist ideas which can be used to legitimize terrorism and are shared by terrorist groups
- To build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.
- To be aware of and act upon the mandatory duty to report cases of FGM to the police
- To be alert of persistent absenteeism of any pupils and report concerns to the Designated Safeguarding Officer should it be felt there may be safeguarding concerns
- To be open, accepting and ready to listen to a pupil and to follow the procedures outlined in this policy in the event of a disclosure.
- To recognise what is child sexual exploitation and trafficking and know that they should seek advice and how to report any issues / incidents:
- To recognise a child may be criminally exploited or involved in gang culture and should seek advice and report any issues /incidents.

### **3.4 Liaison with other agencies: contributing to child protection work with families the centre will:**

- Work to develop effective links with relevant agencies and co-operate with enquiries regarding child protection matters.

### **3.5. Record keeping:**

- The centre will keep detailed written child protection records including when there are concerns about children that do not reach the threshold for referral to Children's Social Care.
- All child protection records will be kept securely and confidentially and will be separate from the pupil file.
- The Designated Safeguarding Officer is responsible for maintaining and monitoring the child protection records.

### **Dealing with a disclosure**

- When listening to a pupil making a disclosure, the member of staff must record the child's own words and not ask any leading questions or interrogate the child.
- Make clear to the child that confidentiality cannot be promised as the centre has a duty to inform the MASH to safeguard the child.
- All staff members should follow the centre's Safeguarding Child Protection procedures
- Report orally to the Designated Safeguarding Officer as soon as possible but certainly on the same day. If the Designated Safeguarding Officer is not available, report to the deputy Designated Safeguarding Officer or Centre manager.
- Make a written note of the discussion as soon as possible and at least within 24 hours to give to the Designated Safeguarding Officer. Note time, date, place, people present and what was said. Records should be verbatim; the notes may be needed in subsequent court proceedings. All notes should be signed.
- Teachers are not required to investigate further, but may be required to support or monitor the pupil in the future.

- Members of staff have the right to contact the child protection agencies independently if it is felt that the centre has not responded appropriately to concerns.

### **3.6. Transfer of records:**

The DSL will ensure that when children move centre the child protection records are transferred in accordance with the Waltham Forest Council Education Child Protection Procedures.

### **3.7. Confidentiality and Information sharing:**

The centre will refer to DfE guidance on Information Sharing, Advice to practitioners, July 2018

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in centres. The centre will ensure confidentiality protocols are adhered to and information shared on a need to know basis.

- All staff in centres, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children’s Services: Safeguarding and Specialist Services and the Police).
- If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child in a manner appropriate to the child’s age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- Staff/volunteers should note that the Data Protection Act 2018 does not prohibit the collection and sharing of personal information. It does, however, provide a framework to ensure that personal information about a living individual is shared appropriately. Paragraph 77 sets out the “Special Category Personal Data” which allows sharing information without consent in some circumstances.
- Information sharing: Centre should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This should include:
  - Confidence in processing conditions and the implications of safeguarding of children and individuals at risk.
  - Examples when centres do not provide pupil personal data when the serious harm test under legislation is met.
- A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult.

### **3.8 Referrals**

Normally, when there are Safeguarding concerns, the Designated Safeguarding Officer will contact parents before making a referral to Children’s Social Care. However, there are some exceptions; see below.

Physical injury, emotional abuse or neglect

1. The Designated Safeguarding Officer will contact Children's Social Care. If there has been a deliberate injury or where there are concerns about the child's safety, the child's parents should not be contacted before first consulting with social services.
2. Where emergency medical attention is necessary it will be sought immediately. The Designated Safeguarding Officer should inform the doctor of any suspicion of abuse.
3. If a referral is being made without the parent's knowledge and non-urgent medical treatment is required, social services should be informed. Otherwise, speak to the parent and suggest medical attention should be sought for the child.
4. If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during lessons at the centre, for example, urgent Police intervention should be requested.
5. If a pupil is known to be or become a victim of FGM (Female Genital Mutilation) or there are signs that a pupil may be victim of forced marriage, the Designated Safeguarding Officer should be consulted, whom will contact the Social Services and the police if necessary.
6. If a pupil shows signs of radicalisation and seems to be attracted to extremism the Designated Safeguarding Officer should be consulted, who will contact the Local Prevent team or refer to the Channel programme if necessary.

### Sexual abuse

1. The Designated Safeguarding Officer will contact the Multi-Agency Safeguarding Hub Team or Police Child Protection Team.
2. The Designated Safeguarding Officer will not speak to the parents.
3. Under no circumstances should the Designated Safeguarding Officer or any other member of the centre, attempt to carry out any investigation into the allegations or suspicions of sexual abuse.

The role of the Designated Safeguarding Officer is to collect the exact details of the allegations or suspicion and to provide this information to the relevant agencies.

## **4. Support to pupils and centre staff.**

### 4.1. Support to pupils:

This centre recognises that children, who are abused, neglected, bullied or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children, centre may be one of the few stable, secure and predictable components of their lives. Other children may be vulnerable because, for instance, they have a disability, are in care, or living away from home. The centre will seek to provide such children with the necessary support. This centre recognises that some children display abusive behaviour and that these children must be referred on for appropriate support and intervention. Complaints or concerns raised by pupils will be taken seriously and followed up in accordance with the centre's complaints process.

### 4.2. Support for Staff:

As part of their duty to safeguard and promote the welfare of children and young people staff may hear information that will be upsetting. Where a member of staff is distressed as a result of this, he should in the first instance speak to the Designated Safeguarding Officer about the support he requires. The Designated Safeguarding Officer will seek to arrange the necessary support.

### 4.3. Mental health:

All staff should also be aware that mental health problems can, be an indicator that a child has suffered or at risk of suffering abuse, neglect or exploitation. Only appropriate trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those behaviour suggests that they may be experiencing a mental health problem or be at

risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood.

At Top Mark we take it seriously in supporting mental health and welfare of the pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Board of trustee as a proprietor will ensure that centre have a clear system and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Centre have access a range of advice to identify children in need of extra mental health support, this includes working with external agencies.

#### **5. Working with parents/carers; the centre will:**

- Ensure that parents/carers have an understanding of the responsibility placed on the centre and staff for child protection by setting out its obligations in the centre brochure.
- Undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this.
- Work to develop productive, supportive relationships with parents/carers whenever it is in the child's interest to do so.

#### **6. Allegations of abuse made against members of staff**

- All centre staff members including supply teachers and volunteers should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children, or parents, to be conducted in view of other adults or rooms with windows or cameras.
- All staff members including supply teachers and volunteers are aware of the centres behaviour/discipline policy and implement it carefully. Staff members are trained on induction and at least annually on its implementation.
- The centre understands that a pupil may make an allegation against a member of staff and this is dealt with very quickly in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of allegation.
- If such an allegation is made, no suggestions should be made to a pupil for alternative explanations for their worries; he/she must be listened to and heard. A written dated record should be immediately made of the allegations or as soon as practicable and within 24 hours. The pupil should be informed that the person listening is not able to promise confidentiality and has a responsibility to report any such allegations to the Designated Safeguarding Officer. Consideration should also be given to others who may have suffered or are potentially at risk of significant harm.
- The member of staff receiving the allegation will immediately inform the Designated Safeguarding Officer, or the deputy Designated Safeguarding Officer if the Designated Safeguarding Officer is not present, or the Centre manager. It is not the duty of any member of staff to investigate a child protection allegation.
- The Designated Safeguarding Officer, deputy Designated Safeguarding Officer and Centre manager on all such occasions will give initial urgent consideration of whether or not there is sufficient substance in an allegation to warrant an investigation and discuss the content of the allegation with CPAL and if necessary the Local Authority Designated Officer (LADO), who will assist in the initial consideration and provide advice as to the process of any potential investigation. After careful consideration the Designated Safeguarding Officer may decide to make an immediate child protection referral to the LADO. Consideration will also be given to the possibility of an internal discipline enquiry once any police investigation has been concluded.

- If the allegation made to a member of staff concerns the Center manager, the person receiving the allegation will immediately inform the Centre Designated Safeguarding Officer who will consult with the pupil and a written dated record should be immediately made of the allegations or as soon as practicable and within 24 hours. The pupil should be informed that the person listening is not able to promise confidentiality and has a responsibility to report any such allegations to the designated member of staff. Consideration should also be given to others who may have suffered or are potentially at risk of significant harm. Without notifying the Centre manager first.
- Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult in making this decision.
- In all cases the local authority regulation will be adhered to, suspension will not be an automatic response to any allegation but necessary local authority procedures will be adhered to.
- Centre takes seriously transferable risk, such as incident of domestic abuse. Centre also understands that “incident outside of centre which did not involve children but could have an impact on their suitability to work with children.”
- For supply teachers, whilst centre is not the employer of supply teachers, but have a duty to ensure allegations are dealt with properly. Centre will take the lead of any investigation, because agencies do not have direct access to children or other centre staff, so they will not be able to collect the facts or liaise with the LADO.

## **7. Allegations of abuse by pupils against other pupils**

The centre recognises that some children abuse other children or their peers; therefore, the reasons for this are complex and are often multi-faceted. The centre understands that we need as a centre to have clear mechanisms and procedures in place to identify and report incidents or concerns. We aim to reduce this behaviour and any related incidents with an expectation to eliminate this conduct in the centre.

Peer on peer abuse is a Safeguarding concern and will require a discussion with the Designated Safeguarding Officer who will seek advice from the MASH. The centre will consider and may apply the disciplinary procedure. The centre will offer support to a victim.

We will pay adherence to the guidance- Sexual Violence and Sexual Harassment in Centres between children (May 2018) and have a strategy in the centre to identify, report and respond to any issues/incidents raised.

## **8. Safeguarding against radicalisation and extremism**

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

Terrorism:

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 of 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.

“Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm” Home office – Prevent strategy

8.1 Protection from radicalisation and extremism is a whole centre safeguarding issue.

8.2 A young person may become involved in violent extremism for a number of reasons. Below is a list suggested by the London Borough of Waltham Forest

- May begin with a search for answers to questions about identity, faith and belonging
- May be driven by the desire for “adventure” and excitement
- May be driven by a desire to enhance the self-esteem of the individual and promote their “street cred”
- Is likely to involve identification with a charismatic individual and attraction to a group which can offer identity, social network and support
- Is likely to be fuelled by a sense of grievance that can be triggered by personal experiences of racism or discrimination

8.3 According to London Borough of Waltham Forest, the following early indicators are suggested to look out for:

- Showing sympathy for extremist causes.
- Glorifying violence.
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations such as “Muslim Against Crusades” or other non – proscribed extremist groups such as the English Defence League
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent)

8.4 At Top Mark, we will use our existing monitoring and reporting systems to safeguard our students, staff and parents from any form of radicalisation and extremism. To further enhance and support the existing reporting framework, we will do the following:

- All staff will be trained at least once a year on safeguarding with a particular focus on radicalisation and extremism.
- Our Designated Safeguarding Officer will work closely with the local Prevent officer.
- We will work closely with the Local Safeguarding Children Board to access training and support
- We will share the referral route for safeguarding concerns related to radicalisation or extremism with all the staff
- The referral route will be displayed on the staff notice board.
- We will record all concerns related to radicalisation and extremism in our safeguarding log book
- If the concerns persist and the TAC approach does not work, we will refer the case to the MASH using the MASH referral form
- Appropriate vetting checks will be made of any outside agencies and groups who will use the centre premises and the facilities.

## 9. Safer Recruitment:

Routine procedure for checks

1. Two written references from the last two employers (Prior to interview) which are detailed enough to help recruiters make decisions about the candidate’s suitability for the post. These are in addition to other reference procedures such as verbal references and follow up telephone calls. The centre must take care to obtain references directly from the referees who will always be asked about:
  - the candidate’s suitability for working with children and young people ;

- any disciplinary warnings, including time-expired warnings, that relate to the safeguarding of children (these should not include any allegations proven to be false, unsubstantiated or malicious );
- any extremist view of being radicalization and extremism
- the candidate's suitability for this post.

2. A personal interview (at least of which should be in front of two interviewers and at least one person has safer recruitment & safeguarding training) with a written record and assessment by the interviewer(s).

3. An explanation of any gaps in the job application form/personal history (recorded in writing by an interviewer). Responses must be kept on file.

4. A verification of relevant qualifications at interview. Originals of all recent and relevant as well as degree or similar professional qualifications must be seen.

5. A verification of identity at interview (passport or driving license with a photo card, Identity checking Guidance GOV.UK).

6. Disclosure and Barring Service (DBS) checks (Enhanced) with barred list information for those engaged in regulated activity. Refer to KCSIE 2020 p36 for types of DBS checks. In cases where a person is due to start working before the DBS certificate is obtained, a barred list check & Risks assessment must be made before the person's starts working at the Centre. There is no requirement to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the applicant has worked:

- in a School in England in a post which brought them into regular contact with children or young persons in any post in a School since 12 May 2006; or
- in an institution within the further education sector in England or in a 16-19 Academy, in a post which involved the provision of education which brought the person regularly into contact with children or young persons.

7. Barred List Check, obtained separately if an individual will start work in regulated activity before the DBS certificate is available

8. Prohibition from teaching check ( KCSIE 2020).

9. Prohibition from GTCE Sanction & restriction Check (KCSIE 2020)

10. Check Child care disqualification under the child care act 2006. (KCSIE 2020)

11. Prohibition from management check (S. 128 direction, Paragraph 144-147) (KCSIE 2020; DfE letter to centres August 2015)
12. Overseas criminal Check (If required). These further checks should include a check for information about any teacher sanction or restriction that an EEA professional regulating authority has imposed, using the Dfe online Service, Teacher Services-Employer Access-Centre' system. Although restrictions imposed by another EEA regulating authority do not prevent a person from taking up teaching positions in England, Centre should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment.
13. Criminal Conviction Declaration and must be completed prior to employment.
14. Right to work in the UK (Valid Visa/ Resident Permit)
15. Safeguarding, Prevent, Health & Safety & E Safety training must be provided prior to start/during induction periods.

### **The Interview Process**

Interviews where possible will be conducted by at least one individual who has attended Safer Recruitment Training. Candidates will be asked both technical/ competency based questions as well as questions that attest to the match of the Person Specification in the Job Description. The interview team will ensure that candidates with a disability or special needs are fully provided for an interview, provided notification has been made in advance.

### **Post Interview recruitment checks and medical fitness check**

Offers of appointment are subject to the receipt of satisfactory recruitment checks as listed above in this policy. No employee will be able to work alone and will be supervised until DBS clearance has been received. All appointments are subject to the continued declaration of any charges, arrest or convictions, including serious driving offences, disqualification from child care under the child care act 2006. Failure to disclose as stated could lead to the termination of employment. Once an offer of employment is made, the candidate must complete a self-declaration of medical fitness. No contract of employment will be issued until the successful candidate has provided proof of their ability to work in UK.

### **Agency and third-party staff**

Centre must obtain written notification from any agency, or third-party organization they use that the organization has carried out the checks (in respect of the enhanced DBS certificate that written notification has been received that confirms the certificate has been obtained by either the employment business or another such business), on an individual who will be working at the Centre that the Centre would otherwise perform. Where the position requires a barred list check this must be obtained, by the

agency or third-party prior to appointing that individual. Agency and third party is responsible for all the relevant safeguarding checks including overseas check (if required) and a written must be obtain from the agency. The Centre must also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Individuals who have lived or worked outside the UK**

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in Centre. In addition, Centre must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered.

#### Existing staff/referrals

If a centre has concerns about an existing staff member's suitability to work with children, the centre should carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the centre moves from a post that was not regulated activity, into work which is regulated activity, the relevant checks for the regulated activity must be carried out. Apart from these circumstances, the centre is not required to request a DBS check or barred list check.

Centres have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual. Guidance on referrals can be found on GOV.UK.

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

#### Volunteers

Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Refer to KCSIE 2020 p49 and 50 to find out more on what checks are required for volunteers according to their activity.

## Contractors

Centre should ensure that any contractor, or any employee of the contractor, who is to work at the Centre has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across a number of sites.

Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity. Centre is responsible for determining the appropriate level of supervision depending on the circumstances.

## Visitors

Centres do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's relatives or other visitors attending a sports day). The centre manager should use his professional judgment about the need to escort or supervise visitors.

## Maintenance of the Single Central Register (SCR)

All the required checks must be recorded in the SCR in the manner prescribed by the Independent Centre Standards, Part 4, and include:

- an identity check;
- a barred list check;
- an enhanced DBS check/certificate;
- a prohibition from teaching check;
- a section 128 check (for management positions as set out in paragraph 144-147 for independent centres;
- further checks on people who have lived or worked outside the UK Paragraph 172-1173; this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions described in paragraph 149;
- a check of professional qualifications; where required and
- a check to establish the person's right to work in the United Kingdom.
- Centre must record whether the person's position involves 'relevant activity' i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18.

The single central record must cover all staff (all staff who are employed to work in the Centre; all staff who are employed on a supply or casual basis, whether employed directly by the Centre or through an agency; all volunteers who have regular contact with children.

It is the responsibility of the Centre Manager that the SCR is kept up to date; that all the documentation relating to pre- and post-recruitment processes is kept on file.

#### **11. Contact details:**

- **Designated Safeguarding Officer:** Ibrahim Munir-Zubair. Email: [ibrahimmunir@gmail.com](mailto:ibrahimmunir@gmail.com)
- **Deputy Designated Safeguarding Officers:** Seema khan, Email: [seemakhan@hotmail.co.uk](mailto:seemakhan@hotmail.co.uk)  
& Aravind Retna Kumar, Email: [aravind.retnakumar@outlook.com](mailto:aravind.retnakumar@outlook.com)
- **Centre Manager:** Atif Najzb. Email: [atif@topmark-tuitioncentre.co.uk](mailto:atif@topmark-tuitioncentre.co.uk)
- **Waltham Forest Council Multi-Agency Safeguarding Hub (MASH):** 020 8496 2310 (Monday to Thursday 9am to 5.15pm, Friday 9am to 5pm) or 020 8496 3000 (out of hours). Email: [MASHrequests@walthamforest.gov.uk](mailto:MASHrequests@walthamforest.gov.uk)
- **Local Authority Designated Officer (LADO):** Tel: 020 8496 3646; Email: [lado@walthamforest.gov.uk](mailto:lado@walthamforest.gov.uk)
- **Waltham Forest Early Help Hub:** Tel 020 8496 5114, Email: [tess.glenday@walthamforest.gov.uk](mailto:tess.glenday@walthamforest.gov.uk)
- **Child line:** 0800 1111
- **NSPCC whistleblowing advice line:** 0800 028 0285; [help@nspcc.org.uk](http://help@nspcc.org.uk)

Date Policy Reviewed: 15/12/2020

Print Name: Atif Najab

Position: Centre Manager

Next Review Date: September 2021