



The Complete Works

Safeguarding and Child Protection Policy

Updated May 2017

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Please Report Concerns to:

Designated Safeguarding Lead (DSL)

Sophie Bell 020 73770280 ext 926

Deputy Designated Safeguarding Lead and Headteacher

Adam Dalton - 020 7377 0280 ext 901 / 07964201678

The Chair of Trustees is Brigid Jackson-Dooley and the Trustee with responsibility for safeguarding is Sue Clark.

They can be contacted on 02073770280

students.

Please note that where the DSL is referenced, this stands for Designated Safeguarding Lead previously known as the Designated Safeguarding Officer. Where a member of staff is referenced, we refer to anyone who has been hired to carry out work on behalf of The Complete Works. Where TCW is mentioned, this means The Complete Works charity.

This policy applies to all staff, including senior managers, consultants and the board of Trustees, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of The Complete Works.

Any external staff members, volunteers, sessional workers or anyone working on behalf of The Complete Works in regulated activity with students will be required to provide an enhanced DBS certificate (including barred list information). Those who are not in regulated activity (close and unsupervised contact), but whose work provides them with an opportunity to come into contact with students, will be required to provide a DBS certificate (not including barred list information).

Legal framework

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- SEND code of practice: 0 to 25 years-statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities;HM Government 2015
- Information sharing HM Government 2015
- Working together to safeguard children HM Government 2015
- Keeping Children Safe In Education 2016
- Child Sexual Exploitation 2017

A child is anyone who has not yet reached their 18th birthday. The terms 'Child' and 'Children' refer to those under the age of 18 years.

Introduction

TCW believe that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to practise in a way that protects them.

We recognise that:

- The welfare of the child is paramount as enshrined in the Children Act 1989
- All children have the right to be healthy, safe, able to enjoy and achieve, make positive contributions and have economic well being as defined in The Children's Act 2004.
- All children, regardless of age, disability, gender racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare

The Complete Works seeks to keep children safe by:

- Valuing them and listening to them and respecting them
- Appointing a safeguarding team to monitor all welfare concerns
- Appointing a Designated Safeguarding Lead and Deputy DSL for children and young people
- Adapting child protection and safeguarding practices through procedures and our Code of Conduct Policy for staff and volunteers
- Developing and implementing an effective e-safety policy and related procedures
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Recording and storing information professionally and securely and sharing information about safeguarding and good practice with children, their families, staff and volunteers
- Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a

- policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place
 - Ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance

Every member of staff has a duty to report all suspected child abuse to the organisations responsible for the young people and to the police. Therefore, all staff working with children have a responsibility to protect them from abuse and must be familiar with this document and comply with this policy. All teachers must undergo our e-safety safeguarding training every three years and attend all other safeguarding training as required. In line with *Working Together* (2015), we recognise our place in the jigsaw of information and as we see the students on a regular basis it is important for us to pass on information to the required authority.

Throughout their day-to-day contact with children, staff in an educational position, have a crucial role to play in noticing indicators of possible abuse or neglect and in referring concerns to the DSL or a member of the safeguarding team. TCW publishes guidelines, below and in the staff handbook, on such indicators and the action to take if they are found.

Descriptions of Child Abuse

Full descriptions of child abuse can be found in Part 1 of *Keeping Children Safe in Education* (July 2016) on Page 11, titled "Types of Abuse and Neglect".

Possible Indicators of Child Abuse

- Any marks, cuts, bruises, burns, tears to clothing should be noted and passed on to the safeguarding team. If the staff member questions the child about these, then they must do so with great care and without making any accusations. If a child wishes to talk then the teacher must not promise confidentiality but adhere to the guidelines given in the confidentiality section of this policy.
- A staff member should note any unusual sullenness, withdrawal, nervous, distracted behaviour, crying and extra sleepiness all of which may be indicators of abuse. Again any such behavioural changes should be noted and passed on to the safeguarding team. There may be other causes for such changes but we have a responsibility to note such indicators.
- Any signs of neglect such as dirty clothes, fingernails, unwashed hair, excessive

hunger or thirst should again be noted by tutors and passed on to the DSL.

- Any other concerns that staff have about changes in the child or the child's environment should be noted and communicated to the DSL. Any and all concerns and the action taken should be noted and followed up.

General Good Practice

Any member of staff who suspects that a child has been abused in any way must immediately report this to the Designated Safeguarding Lead. All efforts should be made to bring matters to a clear conclusion to safeguard both children and staff.

Staff must be aware that our remit is an educational one and for their own safety, must confirm that another adult is on hand, should they need assistance. If the situation arises where a staff member is asked to remain as the only adult at a venue, to supervise a young person, they must explain that they are unable to work unaided. On such occasions the staff member must inform a member of the safeguarding team, immediately, of the situation and the action they have taken in line with the Lone Worker Policy.

Staff are responsible for noticing any changes in a child's behaviour that may suggest abuse. Students' behaviour is monitored by the staff who must control the sessions, by focussing the young people's attention on the work at hand. Any unusual behavioural difficulties displayed by the young people during the session, must be reported to the Education Support Officer or Head of Centre responsible at that time and a written statement will need to be provided. These difficulties may lead to a change in an original risk assessment and the installation of a risk reduction plan. Support and assistance may also be required from the organisation in which the staff members are working.

Staff who have not been trained should never attempt to restrain a young person who demonstrates difficult behaviour. Staff who have been fully trained on a physical intervention and behaviour programme should use the restraint once all other de-escalation strategies have been exhausted to that training and alongside our physical intervention policy. If the child is at risk of harming themselves or others then the safety of the child and the teacher must be put before any other consideration. A full report must be made to Head Office following any incident.

Child Sexual Exploitation (CSE) Policy

TCW Independent School has robust and rigorous safeguarding procedures and takes its responsibilities of child protection seriously.

The Complete Works (TCW) is committed to providing a secure environment for students, where young people feel safe and are kept safe. All adults at TCW recognise that safeguarding

is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for young people or not. In adhering to this policy and subsequent procedures, staff and visitors will contribute to TCW's delivery of the outcomes to all young people, as set out in s10 (2) of the Children's Act 2004.

Our school's Child Sexual Exploitation (CSE) Policy also draws upon the guidance contained in HM Government's "Child Sexual Exploitation, definition and guide for practitioners 2017", the "London Child Protection Procedures" and DfE Guidance "Keeping Children Safe in Education, 2016" and specific CSE reports such as the DfE 'Tackling Child Exploitation Action Plan', HM Government's 'Tackling Child Sexual Exploitation', Barnardo's 'Parliamentary inquiry into the effectiveness of legislation for tackling child sexual exploitation and trafficking within the UK' and Barnardo's 'Puppet on a String' report.

Child Sexual Exploitation (CSE) is a form of child abuse and as such is dealt with under the school's Safeguarding and Child Protection Policy. At TCW, the CEO, Headteacher and board of Trustees expect safeguarding to be everybody's responsibility and expect all staff to adhere to and follow these policies.

Definition of CSE taken from Child Sexual Exploitation 2017

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Additionally, the definition of CSE taken from 'Report of the Parliamentary inquiry into the effectiveness of legislation for tackling child sexual exploitation and trafficking within the UK':

CSE is a form of child abuse, which can happen to boys and girls from any background or community. It can range from seemingly 'consensual' relationships, informal exchanges or sex in order to get affection, accommodation or gifts, through to exploitation by gangs involved in serious, organised crime.

The definition used by the Government is:

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive

'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition, for example being persuaded to post sexual images on the

Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability. ^[1]

Prosecutions for child sexual exploitation can be brought under provisions of the Sexual Offences Act 2003 for the following:

- Rape
- Sexual Assault
- Rape and other sexual offences against children under 13 years old
- Arranging or facilitating commission of a child sex offence
- Meeting a child^[2] following sexual grooming
- Paying for sexual services of a child
- Causing or inciting child prostitution or pornography
- Controlling a child prostitute or a child involved in pornography
- Trafficking within and outside the UK for sexual exploitation

It is now a criminal offence for an adult to send a sexual message to a child. ^[3]

Sexually exploited children come from a range of backgrounds and may have no additional risk factors or vulnerabilities, therefore, professionals should always keep an open mind to the possibility that a child may be at risk of exploitation. However, children may be more vulnerable to sexual exploitation if they do have additional vulnerabilities, including:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality)
- A history of abuse (including familial child sexual abuse, physical and emotional abuse and neglect)
- Learning disabilities
- Bereavement or loss
- Being black or from an ethnic minority group
- Having temporary leave to remain or being in the UK illegally

- Homelessness, including living in a hostel, bed and breakfast accommodation or a foyer
- Being a young carer
- Living in residential care
- Lacking friends from the same age group
- Having low self-esteem or self-confidence
- Living in a neighbourhood affected by gangs
- Gang association either through relatives, peers or intimate relationships
- Attending school with young people who are sexually exploited
- Friends with young people who are sexually exploited
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity.

Key indicators

- ● Going missing for periods of time or regularly coming home late
- Regularly missing school or education or not taking part in education
- ● Association with other young people involved in exploitation
- ● Having older boyfriends or girlfriends
- ● Suffering from sexually transmitted infections, pregnancies, terminations
- ● Mood swings or changes in emotional wellbeing, self harm, suicidal
- ● Drug and alcohol misuse
- Physical injury
 - Acquisition of money, clothes, mobile phones etc without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls

- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age

- Evidence of/suspicions of physical or sexual assault

- Relationships with controlling or significantly older individuals or groups

- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

Prevention

All TCW staff will be made aware of the CSE procedures within the Safeguarding and Child Protection Policy and hard copies will be available to parents, carers and professionals on request. TCW's Safeguarding and Child Protection Policy will also be available on the TCW website.

It is important to be realistic about the extent to which child sexual exploitation or any form of child abuse can be prevented, but the consensus of the evidence received was that we should aim to do so as far as possible. (*Report of the Parliamentary inquiry into the effectiveness of legislation for tackling child sexual exploitation and trafficking within the UK*)

Responsibility

As part of our wider safeguarding responsibilities school staff will be alert to:

- Disclosures by students that they have contact with an older person of the opposite / same sex or are in a relationship with this person
- Changes in behaviour, friendships, actions or requests
- Access to social media / use of technology such as mobile phones or the Internet

and sites such as Facebook, instant messaging apps such as SnapChat, WhatsApp, Houseparty, Twitter and dating apps such as Grindr and via online gaming or Youtube

Staff will monitor internet usage in school time. Chromebooks belonging to TCW alert staff to any sites the students access which are of a concerning nature. Students are requested to hand in all mobile devices during school time as per the Expectations guidelines given to all students when starting with us at The Complete Works. These are signed by staff and students, to ensure all parties are in agreement with the expectations of the school.

Where appropriate, staff will communicate with parents and carers regarding internet usage and parental controls.

Students at The Complete Works access internet safety as part of the National Curriculum, PSHE and with their teachers as part of the mentor support we provide to students on a 1:1 basis.

Use of External Agencies and Speakers

At TCW, we encourage the use of external agencies or speakers to enrich the experiences of our students, however we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our students. Such vetting will ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in complete opposition to, the school's values and ethos.

Effective partnership working across statutory and voluntary agencies is plainly crucially important in protecting children and young people at risk of or who have experienced child sexual exploitation.

TCW ensure that all safeguarding procedures are followed in relation to CSE concerns and that any individual borough procedures are followed (dependent on referring borough of that student).

Agencies involved with The Complete Works consist of, but are not limited to

- WUSH (Wise Up to Sexual Health)
- Safer London
- Sexpression (workshops for small groups)
- Tower Hamlets Prevent

A resource pack is available to all staff named "Exploited: Preventing Child Sexual Exploitation through Education".

These agencies work with students on a 1:1 basis when parental consent has been given and are part of the information sharing network between schools, parents and young person. All external agencies or speakers are subject to our vigorous vetting checks as stated above in the Recruitment section.

Training

Whole school training on Safeguarding and Child Protection is held each year and all staff attend an induction and 5 sessions of training covering Safeguarding, FGM, PREVENT and CSE policies and procedures and continued training throughout the academic year.

All TCW staff hold a Level 2 Safeguarding certificate, which must be renewed every 3 years. Management, including onsite and Head Office and particularly those who are within our Safeguarding Team hold a Level 3 Safeguarding certificate.

All staff must read Part 1 of 'Keeping Children Safe in Education, September 2016' as well as TCW's Safeguarding and Child Protection policy. New teachers are given part 1 on induction and required to sign to say they have received this.

The DSL and Deputy DSL will attend regular safeguarding training and specific CSE training.

^[1] Safeguarding Children and Young People from Sexual Exploitation: Supplementary guidance to Working Together to Safeguard Children (2009)

^[2] The UN Convention on the Rights of the Child defines a child as everyone under 18 unless, "under the law applicable to the child, majority is attained earlier" (Office of the High Commissioner for Human Rights, 1989)

^[3]The NSPCC's Flaw in the Law campaign successfully amended the Serious Crime Bill so that it is now a criminal offence for an adult to send a sexual message to a child. The Serious Crime Act amends section 15 of the Sexual Offences Act 2003.

Sexting Policy

Creating and sharing sexual photos and videos of under-18s is illegal. Sharing youth produced sexual imagery, which is commonly known as 'sexting' covers the incidents where

- A person under the age of 18 creates and shares sexual imagery of themselves with a

- peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
 - A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.
 - When such an incident involving youth produced sexual imagery comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet Safety (UKCCIS) 'Sexting in schools and colleges'.

Female Genital Mutilation (FGM) Policy

Female Genital Mutilation is a form of child abuse and as such is dealt with under the school's Safeguarding and Child Protection policy. At TCW, the CEO, Headteacher and board of Trustees expect Safeguarding to be everybody's responsibility and expect all staff to adhere to and follow these policies. The school uses the World Health Organisation definition as written below.

Definition of FGM:

"Female Genital Mutilation (FGM) comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons."

(World Health Organisation-1997)

The school has taken information from the Government Home Office guidelines and the Ofsted guidelines for "Inspecting Safeguarding", The UK Government has written advice and guidance on FGM that states;

"FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practised on a child it is a violation of the child's right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child."

"Girls are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM. UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However

women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.”

As from January 2013 Ofsted have included FGM in their “Inspecting Safeguarding” briefing for Inspectors. Annex 4 contains questions and information about FGM for inspectors. Below are excerpts from this document;

Designated senior staff for child protection in schools should be aware of the guidance that is available in respect of FGM, and should be vigilant to the risk of it being practised. Inspectors should be alert to this when considering a school’s safeguarding arrangements, and where appropriate ask questions of designated staff. Key questions could include:

- Are designated senior staff for child protection aware of the issue and have ensured that staff in the school are aware of the potential risks?
- Are staff alert to the possible signs that a child has been subject to female genital mutilation or is at risk of being abused through it?
- Has the school taken timely and appropriate action in respect of concerns about particular children?

In light of this information TCW has decided to implement these policies and procedures and has decided to take proactive steps to protect and prevent our female students from being forced to undertake FGM.

The Head Teacher and Trustees will do this in 2 ways:

1. We will maintain a robust attendance policy that does not authorise holidays, extended or otherwise.
2. We will ensure that FGM training is given for Child Protection leads and disseminated training for all staff at the front line dealing with the children.
3. The Designated Safeguarding Lead will engage in discussions with parents of children from FGM practicing communities.
4. We will ensure we deliver comprehensive PSHE lessons throughout the school both onsite and offsite.

In order to protect our children it is important that key information is known by all of the school community. This includes the following:

Indications that a child is at risk of FGM can involve:

- If the family comes from a community that is known to practice FGM –

- especially if there are elderly women present.
- If in conversation, a child may talk about FGM.
 - If a child may express anxiety about a special ceremony.
 - If the child may talk or have anxieties about forthcoming holidays to their country of origin.
 - If a Parent/Guardian requests permission for authorised absence for overseas travel or you are aware that absence is required for vaccinations.

Indications that FGM has taken place can involve:

- Prolonged absence from the school with noticeable behaviour change – especially after a return from holiday.
- Spending long periods of time away from the class during the day.
- If it comes to TCW's attention that a Parent/ Guardian has already undergone FGM, then consideration needs to be given to any Child Protection implications e.g. for younger siblings, extended family members and a referral should be made to Social Care, or the Police if appropriate.

TCW recognises that girls at risk of FGM may not be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

To ensure that FGM is not taking place, the school may sensitively and informally ask children and their families about their planned extended holiday.

Questions could include:

- Who is going on the holiday with the child?
- How long do they plan to go for and is there a special celebration planned?
- Where are they going?
- Are they aware that the school cannot keep their child on roll if they are away for a long period?
- Are they aware that FGM including Sunna is illegal in the U.K even if performed abroad?

If the family is originally from a country where girls or women are circumcised and we suspect that a child is a victim of FGM we may ask the child the following:

- Do you think you have gone through this?
- Has anything been done to you down there or on your bottom?
- Do you want to talk to someone who will understand you better?
- Would you like support in contacting other agencies for support, help or

advice?

These questions and advice are guidance and each case should be dealt with sensitively and considered individually and independently. Using this guidance is at the discretion of the Head Teacher. ☒

All interventions should be accurately recorded and referred to the DSL and Head Teacher who will then seek advice about making referrals to Social Care and to CAIT (the Child Abuse Investigation Team) following the Protection Procedure Guidelines on FGM and CP referrals. ☒

Preventing radicalisation Safeguarding Policy

This Preventing radicalisation Safeguarding Policy is one element within our overall school arrangements to Safeguard and Promote the Welfare of all Young people in line with our statutory duties set out at s175 of the Education Act 2002 (s157 of the Education Act 2002).

Our school's Preventing radicalisation Safeguarding Policy also draws upon the guidance contained in the "London Child Protection Procedures" and DfE Guidance "Keeping Children Safe in Education, 2016"; and specifically DCSF Resources "Learning Together to be Safe", "Prevent: Resources Guide", "Tackling Extremism in the UK", the "Counter-Terrorism and Security act 2015", DfE's "Teaching Approaches that help Build Resilience to Extremism among Young People" and Peter Clarke's Report of July 2014.

School Ethos and Practice

When operating this policy TCW uses the following accepted Governmental definition of extremism which is:

*'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.
(Revised Prevent Duty Guidance for England and Wales (originally issued on 12th March 2015 and revised on 23rd March 2016 , paragraph 7)*

Extremist views are challenged at our school, whether from internal sources – students, staff or trustees, or external sources - school community, external agencies or individuals. Our students see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens. As a school we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for young people and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views we are failing to protect our students. We understand that extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way.

Therefore, at TCW we will provide a broad and balanced curriculum, delivered by skilled professionals, so that our students are enriched, understand and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and not marginalized. Furthermore at TCW we are aware that young people can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times students may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in line with our Behaviour and Conduct Policy for students and the for staff the Disciplinary Policy, Code of Conduct and Grievance Policies. Where misconduct by a teacher is proven, the matter will be dealt with through the school's disciplinary procedures.

As part of wider safeguarding responsibilities school staff will be alert to:

Disclosures by students of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where students have not actively sought these out.

- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.

- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner schools, local authority services, and police reports of issues affecting students in other schools or settings.
- Issues that have surrounded “Prevent”
- Students voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or ‘hate’ terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or Anti-British views.

Our school will closely follow any locally agreed procedure as set out by our commissioning bodies (e.g. Tower Hamlets, Hackney and Southwark Authorities and schools) and in line with their agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation, such as ‘Prevent’.

Teaching Approaches

We will all strive to eradicate the myths and assumptions that can lead to some young people becoming alienated and disempowered, especially where the narrow approaches young people may experience elsewhere could make it harder for them to challenge or question these radical influences. In our school this will be achieved by good teaching, primarily via PSHE; but also by adopting the methods outlined in the Government’s guidance ‘Teaching approaches that help build resilience to extremism among young people’ DfE 2011.

We will ensure that all our teaching approaches will enable students to build resilience to extremism and give them a positive sense of identity through the development of critical thinking skills.

We will ensure that all staff are equipped and appropriately trained to recognise extremism and are skilled and confident enough to challenge it. We will be flexible enough to adapt our teaching approaches, to address specific issues so as to become even more relevant to the current issues of extremism and radicalisation.

Our approach will be to:

- Make a connection with young people through good teaching and a student centred approach.
- Facilitate a 'safe space' for dialogue.
- Equip our students with the appropriate skills, knowledge, understanding and awareness for resilience.

This approach will be embedded within the ethos of our school so that students know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation. This will work in conjunction with our school's approach to the spiritual, moral, social and cultural development of students as defined in OfSTED's School Inspection Handbook and will include the sound use of group discussions (such as Reflection Time) to help further promote the rounded development of our students.

Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution. We will achieve this by using a curriculum that includes:

- Citizenship programmes
- Open discussion and debate
- Work on anti-violence and a restorative approach addressed throughout curriculum
- Focused educational programmes

We will also work with local partners, families and communities in our efforts to ensure our school understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our student's experiences and horizons. We will help support students who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a student is being directly affected by extremist materials or influences we will ensure that this student is offered support. In such instances our school will also seek external support from the Local Authority and/or local partnership structures working to prevent extremism such as the government programme "Prevent".

At TCW we will promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs in line with the school's British Values Policy. We will teach and encourage students to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is our fundamental responsibility to keep our students safe and prepare them for life in modern multicultural, Britain and globally.

Use of External Agencies and Speakers

At TCW, we encourage the use of external agencies or speakers to enrich the experiences of our students, however we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our students. Such vetting will ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in complete opposition to, the school's values and ethos. We must be aware that in some instances the work of external agencies may not directly be connected with the rest of the school curriculum so we need to ensure that this work is of benefit to students. Our school will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to students are consistent with the ethos of the school and do not marginalise any communities, groups or individuals.
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise students through extreme or narrow views of faith, religion or culture or other ideologies.
- Activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication.

- Activities are matched to the needs of students.
- Activities are carefully evaluated by schools to ensure that they are effective.

We recognise that the ethos of our school is to encourage students to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this. Therefore by delivering a broad and balanced curriculum, augmented by the use of external sources where appropriate, we will strive to ensure our students recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help students develop the critical thinking skills needed to engage in informed debate.

As part of our procedures to ensure that students are effectively safeguarded. Teachers must follow the below visitor checklist flow chart when a visitor is planned to visit a centre.

Visitor checklist

Please let **Amrit Riyat and Sophie Battershall** know that you have a visitor coming and provide **Amrit** with the information below which will be logged on TCW's Single Central Register (SCR). The SCR is a database that is used to ensure that we are effectively safeguarding our students and staff, as well as meeting the necessary Ofsted requirements.

At least a week before the session/visit but earlier if possible:

Visitor in regular contact- Providing a workshop at least once a week or more than 3 times in a month.

We will either need to carry out a DBS check or get a current DBS number, they will need to show you the document on the day of the visit. **Inform Amrit and she will confirm what document/details are needed.**

Visitor not in regular contact- Providing a one off workshop and will be supervised at all times.

We DO NOT need to obtain a DBS but we **still need to be aware of their visit.**

All visitors

Visitor must provide a written breakdown of what the session includes- should be a mini lesson plan/SOW and a summary of exactly what will be taking place. **Send this onto Amrit.**

Get a reference for the workshop leader. This can be verbal or written but the comments must be recorded and it should be from a colleague that they currently work with (Please see 'Reference for workshops' document). **Send this onto Amrit.**

If the visitor is coming to complete an audit/give training, they must show a qualification to confirm that they are able to provide the service required. **Inform Amrit of the type of document, qualification and who saw the document.**

Consider whether a new risk assessment needs to be completed. If so, follow the **new template.**

On the day:

The visitor must **show you their I.D.** This can be in relation to where they currently work and/or driving licence/passport. **Inform Amrit that the I.D has been seen and who it was shown to.**

Ensure the workshop leader wears a '**TCW Visitor**' lanyard at all times. **Ask them to read the visitor expectations on the back of the card. Ask Amrit if you need lanyards.**

If you have been asked to get a DBS number, ask the visitor to **show you their DBS**. Do **NOT** take a photocopy.

Visitor must be supervised by at least one member of staff at **ALL** times.

Please see Health and Safety policy for building access.

Information on the back of the visitor badge will include the below:

VISITOR EXPECTATIONS

Please sign in upon arrival

You must wear a 'visitor' TCW lanyard at all times- please return at the end of your visit

You must be with a member of TCW staff at all times

Smoking is not permitted

In the event of a fire, please leave the building by the nearest exit, go to the designated assembly point. Do not re-enter the building until you are told it is safe to do so

Any accident or injury sustained on school premises should be reported to Head of Centre / Education Support Officer

If you are concerned that a young person has been harmed, is at risk of harm, or you receive a disclosure from a child, you must reported it to the Head of Centre / Education support officer or Designated Safeguarding Lead 02073770280 ext 926

Whistle Blowing

Where there are concerns of extremism or radicalisation, students and staff will be expected to treat this as a safeguarding concern and pass it on to the Designated Safeguarding Lead (DSL).

Staff at TCW will be alert to the fact that whilst extremism and radicalisation is broadly a safeguarding issue there may be some instances where a young person may be at direct risk of harm or neglect. For example; this could be due to a student displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with or staff may be aware of information about a student's family that may equally place a student at risk of harm. (These examples are for illustration and are not definitive or exhaustive). Therefore all adults working at TCW (including visiting staff, volunteers' contractors, and students on placement) are required to report instances where they believe a child may be at risk of harm or neglect to the DSL or Headteacher.

The DSL works in line with the responsibilities as set out in the DfE guidance 'Keeping Young people Safe in Education'. The DSL is the focus person and local 'expert' for school staff, and others, who may have concerns about an individual student's safety or well-being and is the first point of contact for external agencies. In line with Recommendation 2 of Peter Clarke's Report; In TCW, the role of the Designated Safeguarding Lead will be extended, at the appropriate time, to include the responsibilities of the PREVENT strand of the Government's counter-terrorism strategy.

Training

Whole school in-service training on Safeguarding and Child Protection will be organised for staff every year and will include training on extremism and radicalisation and its safeguarding implications.

The Designated Safeguarding Lead and the safeguarding team (Trustee with safeguarding responsibility, Assistant Head with safeguarding responsibility, Headteacher and Deputy DSL and PA to Deputy DSL) will attend training courses as necessary which will include training on extremism and radicalisation and its safeguarding implications.

Recruitment

Every new teacher employed with TCW will attend induction training and 5 sessions of additional training covering Safeguarding, FGM, PREVENT and CSE policies and procedures and continued training throughout the academic year.

The arrangements for recruiting all staff, permanent and volunteers, to our school will follow the guidance for safer recruitment best practice in education settings, including, but not limited to, ensuring that DBS checks are always made at the appropriate level, that references are always received and checked and that we complete and maintain a single central record of such vetting checks. We will apply safer recruitment best practice principles and sound employment practice in general and in doing so will deny opportunities for inappropriate recruitment or advancement. We will be alert to the possibility that persons may seek to gain positions within our school so as to unduly influence our school's character and ethos. We are aware that such persons seek to limit the opportunities for our students thereby rendering them vulnerable to extremist views and radicalisation as a consequence. Therefore, by adhering to safer recruitment best practice techniques and by ensuring that there is an ongoing culture of vigilance within our school and staff team, we will minimise the opportunities for extremist views to prevail.

The Role of Board of Trustees

The Board of Trustees for our School will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities as Trustees, including their statutory safeguarding duties. The Trustees will support the ethos and values of our school and will support the school in tackling extremism and radicalisation. In line with the provisions set out in the DfE guidance 'Keeping Children Safe in Education' 2016, the Trustees will challenge the school's senior management team on the delivery of this policy and monitor its effectiveness. Trustees will review this policy regularly and will amend and adopt it in accordance with any new legislation or guidance or in response to any quality assurance recommendations pertaining to the delivery of this policy and the overall safeguarding arrangements made. This policy was considered and adopted by the Trustees in line with their overall duty to safeguard and promote the welfare of young people as set out in the DfE guidance 'Keeping Children Safe in Education' 2016.

Parents will be issued with a hard copy of this policy on request. The Head Teacher will actively evaluate the effectiveness of this policy by monitoring the staff group's understanding and application of the procedures within this policy as their overall duty to safeguard young people.

Receiving Allegations and Disclosures

TCW may take the decision to refer a child to the statutory agencies and staff must overcome any reluctance to report incidents, which may result in the involvement of the Social Services or Police.

Listening to a disclosure or allegation

Allegations and disclosures may be made by young people who are students, parents and family members of students, members of staff or clients such as Local Authorities. It is important to treat all allegations with the same level of understanding and attention. Below are guidelines for essential action which is to be taken by the person receiving the concern:

- Listen carefully to the child or adult making the allegation or disclosure.
- Where necessary, only seek to gain clarification of what is being implied or alleged.
- Do not investigate any matter that may require child protection or criminal investigations.

- Avoid asking leading questions.
- Avoid interrupting the person when he/she is recalling significant events.
- Avoid making assumptions about what the person has said, or by suggesting alternative explanations for their concern.
- Keep an open mind and do not allow preconceptions about the person making the allegation to influence your actions.

Confidentiality

Some children may seek to tell staff, in confidence, that they have been abused. **Staff should not promise confidentiality to students/adults who make disclosures or allegations because that could put staff in the untenable position of being unable to protect the child.** They should inform them that this information will only be given to those who need to know. If possible, identify who these people are likely to be. It is good general practice to resist being drawn into secretive and collusive relationships with children. It is especially important for children who may have been abused that the destructive element of secrecy is not reinforced. It is essential that a relationship is built up between children and staff so that children feel that they can trust staff to do the best thing if they say they have suffered abuse.

Immediate Support

Reassure the child or adult that their allegation or disclosure will be taken seriously and explain that you will inform the DSL and possibly the Headteacher. In regards to an allegation: ensure, where possible, that the child is separated from the person being accused, without informing anyone else of the reason. This may involve careful handling by staff members delivering offsite education in the home. They should seek immediate assistance.

Recording

Record all the information – including time, date, location, those present and what was said. Where a child has disclosed a concern, the child's own words should be noted and, if possible, ask the child if they could write down their own report of events/concerns. Ideally, both you, and the person making the disclosure or allegation or sharing their concern, should sign and date the written record. Any subsequent action must also be recorded.

Report the matter to the DSL and Headteacher immediately or if unavailable, a member of the safeguarding team based at The Complete Works Head office, contact details are shown at the beginning of this policy.

If the concern/allegation is about the Head or DSL, report the matter to the Chair of Trustees or

the Trustee with responsibility for safeguarding. Details are on the contact sheet at the beginning of this policy. Provide them with a written report as soon as possible, but do not let this delay your verbal reporting. If unable to contact any of these people, consult the Named Senior Manager (Education) or LADO.

Where the student has made a disclosure or allegation, a copy of the statement or the record made of it should be kept on the section of a student's file, which is not open to general disclosure together with a written record of the outcome of any investigations. If there are related child protection concerns, records may be subject to disclosure; and, therefore, no assurances can be given regarding total confidentiality.

TCW record all Monitoring Forms, Incident Reports and Disclosures in the Safeguarding Log kept on Google Drive. Access to this document is restricted and only able to be edited by the DSL and the DSL Assistant with viewing rights to the Headteacher.

All documents relating to these safeguarding concerns such as email correspondence and student documents, are also stored confidentially on the drive in the students' folders. Hard copies of all Monitoring Forms, Incident Reports and Disclosures are stored by borough in a locked cupboard.

Records are updated continually and all safeguarding concerns are discussed in internal meetings with the DSL and ESOs and Assistant Heads or during safeguarding meetings between the DSL and the DSL Assistant.

Once a student has left TCW, their records are removed from the main safeguarding folders and stored until their 26th birthday.

Types of Allegations (this is not an exhaustive list)

Abuse of a child by another child

Many children suffer some slight injury during quarrels with other children. This is not regarded as abuse. It has to be a matter of judgement by a senior staff member, where any injury has been sustained by one child as a result of action by another, whether this is to be considered abusive. If it is considered that the child may be being physically or sexually abused or exploited by another child, even where the other child seems to be readily accepting it, the incidents must be reported, following the same procedure as above.

Abuse of a child by a parent, carer or family member

Coping with abuse and its effects is very difficult for children and it's also hard for them to talk about it. Depending on their age and maturity they might simply not understand what is

happening to them or have the words to describe it. They may also be very aware that there will be consequences if they decide to speak out. For example, they might be afraid of the abuser finding out and worried that the abuse will get worse. They may also feel that there is no one that they can tell, or that they won't be believed.

In some cases, children don't even realise that they've been abused and may believe that what they've experienced is quite normal. Those who do know that what has happened to them is wrong might be too ashamed to reveal it.

Abuse of a child by a member of staff

Allegations concerning members of staff must be reported to a senior member of TCW. Allegations concerning senior members of staff must be reported to the Chief Executive or Company Trustees.

It should be quickly established if the allegation is genuine and based on an incident, or incidents, rather than on supposition or speculation. If the allegations are of a nature to suggest that any child or children could possibly be in danger then that member of staff will be suspended from duty pending the outcome of an investigation. **Suspension is not a disciplinary procedure.** It is intended to allow space for enquiries to be made and does not imply the staff member is guilty of an offence.

This is discussed in more detail in our Discipline, Code of Conduct and Grievance Policies.

After reporting an allegation or disclosure

The member of the safeguarding team who received the staff member's concern or disclosure/allegation must update the staff member who reported the concern, disclosure or allegation with the next step. It is important that the safeguarding team acknowledge the impact receiving and passing on this information has on the individuals concerned and the general morale within TCW should be considered so that additional support can be put in place if needed.

Risk assessments and risk reductions should also be considered in relation to any practices, which it is felt, have made staff or children vulnerable.

Recruitment

An offer of an appointment to a successful candidate is conditional upon:

- The receipt of at least two satisfactory references.
- Verification of the candidate's identity and proof of address.
- Evidence of right to work in the UK.
- An enhanced DBS disclosure or a barred from working with children check (List 99).

- Verification of the candidate's medical fitness.
- Verification of qualifications.
- Overseas checks (only carried out if a successful applicant from abroad has been residing in Britain less than 6 months).

Any external workshop leaders must be supervised at all times and are required to provide proof of an existing, in-date enhanced DBS or be prepared to acquire one before any contact with students takes place.

Upon being appointed staff are provided with a copy of *Keeping Children Safe In Education* (July 2016) and must read part 1 as a minimum requirement. They are also given access to this Safeguarding Policy and they attend a compulsory Safeguarding briefing as part of their induction after which they sign and date their attendance and confirm they have read *Keeping Children Safe In Education* (July 2016) and this Safeguarding Policy.

All staff are informed, when recruited, that if at any time TCW have concerns that a member of staff poses a risk of harm or has harmed a student, TCW will forward information about this member of staff to the Independent Safeguarding Authority whether they have left our employment or have been removed from regulated activity.

Given the necessary amount of contact they have with young people, staff can also be vulnerable to allegations of abuse. It is acknowledged that these may be found to be untrue. It should be remembered however, that children and young people sometimes make allegations to draw attentions to problems experienced elsewhere in their lives or because they have misinterpreted an incident. It is also regrettable that there are occasions when allegations are substantiated.

All staff working in education can contribute to child protection by helping to create a safe environment for children and young people. Children can be helped to understand what acceptable behaviour is, how they can stay safe from harm and how to speak up if they have worries. This means that staff must also be aware of behaviour that is acceptable and behaviour that might make them vulnerable.

Any instance of a student being abused by a member of staff is particularly serious. Equally, for an innocent person to be subject to what may be a lengthy period of investigation and possibly suspension, coupled with the threat of possible arrest, is a serious ordeal. Such experience can result in long term damage to a person's health and career. Any allegation against staff should therefore be dealt with fairness and efficiency.

Assessing and minimising Risks

It is important for staff to minimise any risk to the child and to themselves by setting appropriate behavioural boundaries and by acting in a professional manner at all times. They should recognise their own and their student's vulnerabilities and abide by the following guidelines:

- A child should be able to work in as quiet and safe environment as possible.
- Staff must always dress and act in a suitable manner.
- A risk assessment should have established any triggers that cause a child to react negatively, so that these can be avoided or only introduced with great care.
- It is important that while encouraging a child to work hard that a teacher is aware of building frustrations, slowing work and time wasting activities which may well be signs that the student needs a change of activity. Use simple assistance and encouraging words like "That's going well", or "well done, that's much better." It also helps to give a child a time, e.g. "Do that for another 2 minutes and then we can go and play a game." Stick to any such promise made.
- A teacher who is concerned about their own levels of frustration or anxiety should take themselves out of the situation as quickly as possible, ensuring that the child they are leaving is safe and the other adult present is warned. If it is impossible to leave they should seek immediate assistance from head office by asking to speak to someone at once, even asking for meetings to be interrupted. No teacher seeking advice, reassurance or help in this way will be thought less of.
- It is important that teachers, while showing care and sympathy to their students and noting any significant areas of abuse or neglect, do not try to solve all the child's potential problems personally. Teachers may grow close to students, parents or carers but they should remember that they are there to educate only.
- No staff member should take a child anywhere without permission from the parent and head office and should check all the teacher material they are using for suitability. Staff should never take students anywhere in their car. Information of a personal nature should not be shared with students. (Teachers should use their judgement here – it may be fine to talk about where you went on holiday or to tell them about early work experiences but not about the name of your partner). Addresses should never be given out.
- You never take a student to your house or transport them anywhere in your car.
- Never work in the child's bedroom under any circumstances.

Appendix 1

CONTEST (counter-terrorism strategy) - Project Griffin

Aims to help the public think about ways to protect ourselves, others and to identify risks / how to act.

'KNOW WHAT TO DO and prepare yourself' in the event of a terrorist attack
Download the citizenAID app.

Prevent- early intervention, TCW! and other public services
Pursue- Police, stop terrorist attacks
Protect- Strengthen protection against a terrorist attack- MI5
Prepare- Mitigate impact of terrorist attack- Training, communication

Domestic Extremism

Extreme left wing
Animal rights extremists
Northern Ireland acts of terrorism
Anti-war
Extreme right wing

Terrorism

Lone actors
International
Environmental

Safeguarding concerns at our Centres:

Youth Centre locations	Bladed weapon
Religious buildings	Firearm
Gang affiliation	Propaganda

Threat levels are designed to give a broad indication of the likelihood of a terrorist attack.

- LOW means an attack is unlikely.
- MODERATE means an attack is possible, but not likely
- SUBSTANTIAL means an attack is a strong possibility
- SEVERE means an attack is highly likely
- CRITICAL means an attack is expected imminently

Please see the below website for the current threat level:

<https://www.mi5.gov.uk/threat-levels>

As a school, we need to be thinking about possible threats and how we can identify, reduce and act upon these if something was to occur. We hold a responsibility to recognise suspicious behaviour (in connection to the Safeguarding Policy) and collect information to communicate to the relevant professionals/999.

What to do if a suspicious item is found in a centre / outside a centre:

Use the 4C's-

Confirm-

- Question what it could be, don't touch, don't take photos, don't call on a mobile phone, don't touch light switches around the area. Phones and switches can detonate a bomb. Ensure you use a landline to make a phone call.

Clear-

- Vacate the area.
- Ensure others leave, communicate concerns and get people as far away as possible.
- Do not stand near glass or parked vehicles and find something solid to hide behind for protection.
- Cordon off area.
- Be aware of potential secondary devices.

Communicate-

- Call police when at least 150m away from the item.

Control-

- Ensure nobody has access to the item.
- Speak to Police that arrive and limit the amount of people around.

What to do if there's a bomb threat, firearm or weapon attack- RUN, HIDE, TELL

<https://www.gov.uk/government/publications/stay-safe-film>

RUN

- Escape if you can
- Consider the safest options
- Is there a safe route? RUN if not HIDE
- Can you get there without exposing yourself to greater danger?
- Insist others leave with you
- Leave belongings behind

HIDE

- If you cannot RUN, HIDE
- Find cover from gunfire
- If you can see the attacker, they may be able to see you
- Cover from view does not mean you are safe, bullets go through glass, brick, wood and metal
- Find cover from gunfire e.g. substantial brickwork / heavy reinforced walls
- Be aware of your exits
- Try not to get trapped
- Be quiet, silence your phone and turn off vibrate
- Lock / barricade yourself in
- Move away from the door

TELL

Call 999 - What do the police need to know? If you cannot speak or make a noise listen to the instructions given to you by the call taker

- Location - Where are the suspects?
- Direction - Where did you last see the suspects?
- Descriptions – Describe the attacker, numbers, features, clothing, weapons etc.
- Further information – Casualties, type of injury, building information, entrances, exits, hostages etc.
- Stop other people entering the building if it is safe to do so

ARMED POLICE RESPONSE

- Follow officer's instructions
- Remain calm
- Can you move to a safer area?
- Avoid sudden movements that may be considered a threat
- Keep your hands in view

OFFICERS MAY

- Point guns at you
- Treat you firmly
- Question you
- Be unable to distinguish you from the attacker
- Officers will evacuate you when it is safe to do so

You must STAY SAFE

- What are your plans if there were an incident?

- What are the local plans? e.g. personal emergency evacuation plan