

## **Instill Education Safeguarding and Child Protection Policy**

### **5.1 The Purpose of this Safeguarding and Child Protection Policy**

Instill Education takes seriously its responsibility under the Children Acts 1989 and 2004 and duties under Working Together to Safeguard Children 2018 to safeguard and promote the welfare of children within its care; to work together with other agencies to ensure adequate arrangements exist within our setting to identify and support those children who are suffering harm or are likely to suffer harm.

The overall intention and purpose behind this policy is underpinned by the fundamental principle of the Children Act 1989:

**‘the welfare of the child is paramount’**

Every child has a right to feel secure and be protected from harm, and cannot learn effectively unless they do so. All staff have a key role in prevention of harm and a responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm taking into account contextual safeguarding in accordance with the guidance. Each school in our group will therefore work to safeguard and promote the welfare of child students, act in the best interests of the child and ensure that any safeguarding decisions are child-centred;

This policy will contribute to this purpose by:

- providing staff with the framework they need to keep child students safe and secure in our schools and in doing so, ensure that they meet their statutory responsibilities;
- ensuring consistent good practice in the company;
- demonstrating our commitment to protecting children.

This policy applies to all employees of Instill Education who work with, care for or supervise child students or who are responsible for making arrangements for the care or supervision of child students and to those who supervise or manage such employees as well as to all staff, contractors, host families, volunteers and visitors at schools and premises which accept child students on their courses.

### **5.2 Policy Statement**

**Instill Education aims to:**

- establish and maintain a safe, caring, positive and stimulating environment for students to learn in;
- establish and maintain a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to;
- include in courses, where appropriate, activities and opportunities for students to acquire skills and attitudes, to both resist abuse in their own lives and to prepare themselves for responsibilities in their adult lives
- raise awareness in both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible causes of abuse;

- maintain an awareness that abuse can happen in any setting and be vigilant and aware at all times in our schools and within the wider company context;
- have systems in place for identifying and responding to child students in need of support and/or protection;
- establish a procedure within each school to be followed by all members of the school community in cases of suspected or reported abuse;
- develop and promote effective working relationships with other agencies, such as the police and the local authority;
- carry out appropriate checks on members of staff, contractors, volunteers and host families who will work with child students; and
- regularly review our child protection materials and actions, and correct any deficiencies or weaknesses as soon as possible.

### 5.3 Definitions

In this policy:

***Safeguarding and promoting the welfare of children*** is defined as: “protecting children from maltreatment; preventing the 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 outcomes.” (KCSIE 2021)

***Child Protection*** is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm. (Working Together to Safeguard Children 2018)

***Abuse*** is a form of maltreatment of a child. It can be neglect, physical, emotional or sexual abuse or any combination of these. Children can be harmed by another adult or adults, or another child or children either by direct acts and/or failing to provide proper care. Further explanation is given later in this policy. (Children Act 2004 and Education Act 2002)

A ***child student*** is a student under the age of 18, whether studying on courses specifically aimed at children, or courses aimed at adults on which under-18s are accepted.

***School*** includes both permanent and temporary schools and their premises

***School Lead*** means the lead staff member of a permanent school or the course leader of a temporary school.

### 5.4 Legislative Framework

This policy has been written in line with Keeping Children Safe in Education (KCSIE) 2021. It has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related legislation and guidance, including:

- Keeping Children Safe in Education (KCSIE) 2021
- Keeping Children Safe in Education (KCSIE) Part I and Annex – Sept 2021
- Working Together to Safeguard Children 2018
- Information Sharing: Advice for Practitioners 2018
- Local Authority Safeguarding Children Board (LSCB) and Oxfordshire Safeguarding Children Board (OSCB) child protection guidelines, procedures and model policy
- The Child Safeguarding Practice Review Panel in charge of overseeing serious safeguarding cases and commissioning national reviews of cases
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (guidance document) 2018

- GDPR and the Data Protection Act 2018
- Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Children and Social Work Act 2017
- Counter Terrorism & Security Act 2015
- Dealing with Allegations of Abuse Against Teachers and Other Staff (2011)
- Safeguarding Vulnerable Groups Act 2006
- Childcare Act 2006 (as amended in 2018)
- Children Act 2004
- Female Genital Mutilation (FGM) Act 2003
- Education Act 2002

## 5.5 Roles and Responsibilities

All adults working with or on behalf of child students have a responsibility to safeguard and promote the welfare of child students.

We recognise that staff concern around child protection can compromise good practice, and so to combat this we have established clear lines of accountability, training and advice to support the process for individual staff members.

### a) Directors of Instill Education

The Directors of OISE Holdings Limited, the main holding company of Instill Education, have the ultimate oversight of and responsibility for Safeguarding and Child Protection within the group.

The Directors will appoint the **Group Designated Safeguarding Lead (Group DSL)** and will listen to, and take appropriate action based on his/her report on Safeguarding and Child Protection Matters. The Directors will make proper resources available for the establishment and implementation of Safeguarding and Child Protection policies and procedures.

### b) Group Designated Safeguarding Lead

The **Group Designated Safeguarding Lead (Group DSL)** is appointed by the Directors and based at Corporate Support Office. The Group DSL has delegated responsibility from the Directors for managing and coordinating child protection within the group. Further information about the role of the Group DSL can be found in KCSIE 2021 Appendix B.

The Group DSL will:

- attend regular and appropriate training for the DSL position, including refreshers and updates;
- attend regular Generalist Safeguarding training to enable him/her to spot signs and indicators of potential abuse, and to help him/her know how to respond to a report or suspicion of abuse and support other staff with this;
- revise and update this Safeguarding and Child Protection Policy and related central policies and procedures, at least annually, to ensure that these are effective and comply with all relevant legislation and official guidance;
- support and co-ordinate the School DSL's, with the assistance of the School Leads;
- arrange training for School DSL's and other staff as required;
- carry out spot-checks and unannounced visits to monitor compliance with Safeguarding and Child Protection policies and procedures;
- support and advise on the implementation of safer recruitment for staff who will work with children;

- support school DSL's in making a decision to recruit or dismiss staff where there are safeguarding concerns;
- make decisions about whether a member of staff should be reported to the DBS, in accordance with statutory obligations, because of concerns about his or her suitability to work with children, and take appropriate actions if required;
- form relationships with, and liaise with, external bodies, such as the Local Authority Designated Officer (LADO), Channel Programme and/or the police. N.B. In an emergency, any member of staff should summon emergency help without delay;
- decide if referral to an external agency is necessary for any child and take appropriate action;
- promote multi-agency working where ongoing support or investigation is necessary;
- keep, securely and confidentially, records of his/her activities, reports or concerns about children or staff, deficiencies in policy or practice or other relevant Safeguarding and Child Protection matters.

The Group DSL reports to the Directors on Safeguarding and Child Protection matters.

### c) School Lead

The **School Lead** or **Manager** of each permanent school and the Manager of each temporary school will:

- appoint a Designated Safeguarding Lead (DSL) for their school;
- appoint a Deputy DSL for their school if necessary;
- ensure that the name and contact details of their School DSL any Deputy School DSL and the Group DSL are prominently displayed in the school;
- support and manage their School DSL so that he/she is able effectively to carry out his/her duties under this policy;
- maintain a school environment where child students are listened to, and their concerns taken seriously, and will ensure that child students know how to get help if they need it;
- work with the School DSL to formulate school-specific Safeguarding policies and procedures, inform colleagues about them and about this Safeguarding and Child Protection Policy and be responsible for checking that all staff understand them and comply with them;
- work with the academic managers or education managers to introduce, where appropriate, activities and opportunities for students to acquire skills and attitudes, to both resist abuse in their own lives and to prepare themselves for responsibilities in their adult lives;
- contact the Group DSL before investigating or making any decision under the school's disciplinary procedure about warning or dismissing a member of staff where there are safeguarding concerns;
- oversee the implementation of Safer Recruitment in the school, in conjunction with the School DSL.

### d) Designated Safeguarding Lead for each school

The **Designated Safeguarding Lead (DSL)** in each school has a special responsibility for safeguarding child students in that school, and for ensuring local adherence to the policies and procedures put in place with the aim of reducing the risk of abuse.

The **School DSL** will:

- attend regular Advanced and/or Specialist training to provide them with the knowledge and skills required to carry out the DSL role;
- attend regular Generalist Safeguarding training to enable him/her to spot signs and indicators of potential abuse, and to help him/her know how to respond to a report or suspicion of abuse;
- make themselves familiar with this Instill Education Safeguarding and Child Protection Policy and all related company policies and procedures;
- work with the School Lead to formulate school-specific Safeguarding policies and procedures, inform colleagues about them and about this Safeguarding and Child Protection Policy and be responsible for checking that all staff understand them and comply with them;
- work with the School Lead to facilitate the implementation of Safer Recruitment in the school;

- act promptly, in accordance with this Safeguarding and Child Protection Policy and any school-specific Safeguarding policies and procedures to prevent, stop or report abuse of a child where he or she becomes aware of this, or where he or she believes a child is at risk;
- ensure that he or she knows how to contact the Group DSL, the Local Authority Designated Officer (LADO), the local authority person responsible for coordinating private fostering arrangements and any other multi-agency practitioner or external expert designated or permitted by the Group DSL;
- access help, support or advice from the Group DSL or such deputy as s/he has designated;
- seek to form and foster good relationships with local external bodies responsible for child protection, where appropriate, and in conjunction with the Group DSL, taking a multi-agency approach;
- attend child protection or safeguarding meetings with other agencies where appropriate;
- keep, securely and confidentially, records of his/her activities, reports or concerns about children or staff, deficiencies in policy or practice or other relevant child protection matters;
- report any concerns or deficiencies with these policies or their implementation to the School Lead and/or the Group DSL. In the case of a temporary school the course leader should also report to the manager.

#### **e) All staff in schools which make provision for child students**

Every member of staff who works with, cares for or supervises child students or who is responsible for makes arrangements for the care or supervision of child students, or who supervises or manages such employees, and every member of staff, contractor, host family, volunteer and visitor at schools and at a premises which accepts child students on their courses is considered a person to whom this policy relates and must therefore adhere to the following commitment.

Each member of staff to whom this policy relates and who has contact with students under-18s will:

- complete Generalist Safeguarding training every 3 years and any other Safeguarding and Child Protection training required by the school;
- be given a copy of this Safeguarding and Child Protection Policy and all relevant school-specific Safeguarding policies and procedures, read and adhere to these policies and discuss questions or concerns with the School DSL;
- understand expected standards of behaviour in relation to child students;
- encourage a culture of listening to children and taking account of their wishes and feelings;
- understand his or her responsibilities to prevent or reduce opportunities for others to abuse children;
- be alert to the signs and symptoms of abuse and the procedures for referring concerns to the School DSL under this policy;
- be aware of and alert to the signs and symptoms of abuse and be able to respond appropriately;
- be aware of the importance of information sharing both within the school and with multi-agency practitioners where necessary;
- be aware that his or her duty to safeguard children extends to a duty to report to the School DSL inappropriate staff behaviour or group policy or practices which could put children at risk of harm;

Should any member of staff be unable or unwilling to talk with the School DSL about safeguarding or child protection concerns, he or she should contact any School Deputy DSL, the School Lead or Group DSL.

### **5.6 Safer recruitment**

The School Lead will ensure that each school follows the Safer Recruitment Policy and procedures for all staff including volunteers, working with child students, or in a school which accepts child students aged under 18. This policy can be read in conjunction with KCSIE 2021 Part III which sets out clear safer recruitment guidance for schools.

Each school will have an interview panel where there will be at least one 'Safer Recruitment' trained person. This training needs to be renewed every 5 years (option is via the Safer Recruitment Consortium and they can be accessed via this link: [www.saferrecruitmentconsortium.org](http://www.saferrecruitmentconsortium.org) or via the NSPCC).

It is essential that appropriate pre-employment safeguarding checks are carried out on all adult members of homestay hosts who will house children, and on all staff who will teach, supervise or care for children, or who will have unsupervised access to children. Appropriate checks are set out in the separate detailed policies, but will normally involve the completion of a declaration, the checking of identity, the checking of references, and an enhanced Disclosure Scotland/Disclosure and Barring Service (DBS) check. Where we use staff employed by a third party, such as in summer residences, it is our responsibility to ensure that these checks have been carried out.

If the DBS check has not come back by the day the employment starts, then the employment is subject to two references with a safeguarding focus being taken up, the employee signing a Child Protection Declaration and completing a 'DBS-pending' Risk Assessment with all the necessary control measures indicated put in place. This includes being able to be seen and checked on in person by one or more DBS-checked members of staff at all times. A DBS-pending arrangement is therefore not suitable for lone workers, workers in a location where no other staff members are DBS checked, or people working with children at their own homes including homestay hosts; they must have satisfactory DBS checks prior to starting work.

Any member of staff, contractor, volunteer or member of a homestay host family judged not suitable to work with children must be reported to the Group DSL and they will advise and support in deciding if notification should be made to the appropriate bodies, including Disclosure Scotland/DBS. Instill Education reserves the right to refuse or terminate employment if the checks are not satisfactory.

Schools should maintain a Single Central Record (SCR) with details of pre-recruitment checks and training for all staff, host families and volunteers.

## **5.7 Types of Abuse**

### **What are Child Abuse and Child Neglect and how to recognise the signs?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or by another child or children. Although abuse is often divided into the following four categories for ease of description, two or more forms of abuse are often found together.

#### **a) Physical abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### **b) Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are

worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

#### **c) Sexual abuse**

Sexual abuse involves forcing or inciting a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may include non-contact activities, such as children looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

#### **d) Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development..

Neglect may involve a parent or carer failing to:

Provide adequate food, clothing and shelter.

Protect a child from physical and emotional harm or danger.

Ensure adequate supervision.

Ensure access to appropriate medical care or treatment.

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

#### **Some indications of the possibility of abuse:**

Staff should be concerned about a child if he or she:

- Has an injury which is not typical of the bumps and scrapes normally associated with an accidental injury.
- Regularly has unexplained injuries.
- Frequently has some injuries (even when apparently reasonable explanations are given).
- Gives confused or conflicting explanations about how injuries were sustained.
- Exhibits significant changes in behaviour, performance or attitude.
- Exhibits bizarre or unusual behaviour
- Indicates lack of trust in adults
- Indulges in sexual behaviour which is unusually explicit and/or inappropriate to his or her age / stage of development.
- Discloses an experience in which he or she was, may or could have been significantly harmed.

In addition, any other cause for believing that a child may be suffering harm, or that school practices or the behaviour of others could be putting a child at risk, should be reported to the School DSL without delay.

### **e) Child sexual exploitation (CSE)**

The 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, affections, gifts, money) as a result of them performing and/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 intimidations are common, involvement in exploitative relationships being characterised in the main by the child's or young person's limited availability of choice, resulting from their social/economic and/or emotional vulnerability. (DfE 2009)

#### **Key facts about CSE**

- Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8.
- It affects both girls and boys and can happen in all communities.
- Any person can be targeted but there are some particularly vulnerable groups: Looked After Children, Children Leaving Care and Children with Disabilities.
- Victims of CSE may also be trafficked (locally, nationally and internationally).
- Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.
- Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

#### **Good practice – Individuals**

- Recognise the symptoms and distinguish them from other forms of abuse
- Treat the child/young person as a victim of abuse
- Understand the perspective / behaviour of the child/young person and be patient with them
- Help the child/young person to recognise that they are being exploited
- Collate as much information as possible
- Share information with other agencies and seek advice / refer to Social Care

#### **Good practice – Organisations**

- Ensure robust safeguarding policies and procedures are in place which cover CSE
- Promote and engage in effective multi-agency working to prevent abuse
- Work to help victims move out of exploitation
- Cooperate to enable successful investigations and prosecutions of perpetrators

Link to guidance:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

### **f) Forced Marriage (FM)**

FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014.

A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.



FM is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

Link to guidance:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/800306/6-1914-HO-Multi\\_Agency\\_Statutory\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800306/6-1914-HO-Multi_Agency_Statutory_Guidance.pdf)

### **g) Female Genital Mutilation (FGM)**

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.

FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Other than in the excepted circumstances, it is an offence for **any person (regardless of their nationality or residence status)** to:

1. perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
2. assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the Act); and
3. Assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a **UK national or permanent UK resident** (section 3 of the Act).

N.B. There is a specific legal duty on teachers to report to the police any concerns regarding a pupil and FGM, as described in KCSIE 2021 Annex B.

Link to guidance:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322310/HMG\\_Statutory\\_Guidance\\_publication\\_180614\\_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf)

### **h) Radicalisation and Extremism**

The Counter Terrorism & Security Act 2015 places a Prevent duty on specified schools to have “due regard to the need to prevent people from being drawn into terrorism”. The education and childcare specified authorities in Schedule 6 to the Act are as follows:

- The proprietors of maintained schools, non-maintained special schools, maintained nursery schools, independent schools (including academies and free schools) and alternative provision academies, PRUs, registered early years providers, registered late years providers and some holiday schemes.

The Schools of Instil Education which are subject to the Prevent Duty, as well as all schools as part of best practice, will be expected to demonstrate activity in the following areas:

- Assessing the risk of children being drawn into terrorism
- Demonstrate that they are protecting children and young people from being drawn into terrorism by having robust safeguarding policies.
- Ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board.

- Make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism
- Expected to ensure children are safe from terrorist and extremist material when accessing the internet in school

Any School DSL unsure about the Prevent Duty in their school should contact the Group DSL for more information.

Online Prevent training can be accessed at: <http://www.elearning.prevent.homeoffice.gov.uk>

### **i) Peer on Peer Abuse**

Children can abuse other children. This is most likely to include, but may not be limited to:

- Bullying (including online);
- Physical abuse such as hitting, kicking, biting;
- Sexual violence or sexual harassment, including sexting;
- Upskirting, which involves taking a picture under a person's clothing without their knowledge;

All staff should be clear as to the school's code of conduct and policy regarding student behaviour.

### **j) Child Criminal Exploitation (CCE)**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs to groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Link to guidance: <https://www.oscb.org.uk/safeguarding-themes/child-exploitation-modern-slavery/child-drug-exploitation-county-lines/>

### **k) Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. **All** staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children

should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Link to guidance: <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

## **5.8 Dealing with a Disclosure**

If a child discloses that he or she has been abused in some way, the member of staff should:

- Immediately stop what he or she is doing and listen to what is being said
- Don't display shock or disbelief.
- Accept what is being said.
- Allow the child to talk freely.
- Reassure the child, but do not make promises which it might not be possible to keep – in particular, you cannot promise confidentiality.
- Don't apportion blame
- Stress that it was the right thing to tell.
- Listen, rather than ask direct questions. You don't need to get all the details at this stage – you just need enough information for the School DSL and the Group DSL to assess what may have happened and what needs to be done.
- Not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told.
- Make a written record as soon as you can
- Contact the School DSL, the School Lead or the Group DSL without delay
- NOT allow the child to be interviewed a second time by other members of staff, however well-meaning. Accept what the child says and report to the School DSL, the School Lead or directly to the Group DSL.

### **General points on how to respond to a child wanting to talk about abuse:**

- Show acceptance of what the child says (however unlikely the story may sound).
- Keep calm.
- Look at the child directly.
- Be honest.
- Tell the child you will need to let someone else know – don't promise confidentiality.
- Even when a child has broken a rule, they are not to blame for the abuse.
- Be aware that the child may have been threatened or bribed not to tell.
- Never push for information. If the child decided not to tell you after all, then accept that and let them know that you are always ready to listen.

#### Some helpful things to say:

- Tell me...
- I understand what you are saying.
- Thank you for telling me.
- It's not your fault.
- I will help you.

#### Things not to say:

- Why didn't you tell anyone before?
- I can't believe it!

- Are you sure this is true?
- Why? How? When? Who? Where?
- Never make false promises.
- Never make statements such as 'I am shocked, don't tell anyone else'.

At the end of the conversation:

- Reassure the child that they were right to tell you and show acceptance.
- Let the child know what you are going to do next and that you will let them know what happens.
- Contact the School DSL, the School Lead or go directly to the Group DSL.
- Consider your own feelings and seek pastoral support if needed.

## 5.9 Reporting and Referring Concerns

We recognise the importance of sharing information and reporting concerns to ensure children are protected. The following procedures apply to all staff working with child students and will be covered by training to enable staff to understand their role and responsibilities. They aim to provide a robust framework which enables staff to take appropriate action where they are concerned that a child is being harmed or is at risk of harm. The prime concern must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the welfare of the child must be paramount.

When a child has made a disclosure, the member of staff should:

- make brief notes as soon as possible after the conversation;
- record the date, time and place and any noticeable non-verbal behaviour and the exact words used by the child;
- draw a diagram or refer to a diagram template to indicate the position of any bruising or other injury;
- record statements and observations rather than interpretations or assumptions;
- sign and date your notes;
- Not destroy the original notes in case they are needed by a court;
- Give all records to the DSL promptly. No copies should be retained by the member of staff or volunteer.

Following receipt of concerns, the DSL must::

- Decide whether there are sufficient grounds for suspecting significant harm, in which case, a referral must be made to the Police (and local Children's Social Care where appropriate). A referral, where appropriate, should be made as soon as possible, and at least within 24 hours.
- Record the reason for this decision. Share the facts, any suspicions or allegations and whether there has been contact with the family or not.
- Normally the school should seek to discuss any concerns about a child student's welfare with the family wherever possible before making a referral, unless doing so would place the child at increased risk of could impact a police investigation. The DSL should clarify with the Police if this is the case and a plan put in place. The child's view should also be taken into consideration.
- If there is not considered to be a risk of significant harm the DSL will either actively monitor the situation or contact the appropriate named personnel at the end of this policy.

We recognise the importance of working together with other professionals and agencies in line with statutory guidance.

Schools are not investigating agencies where there are child protection concerns. Due to the overseas student base we recognise that our child students may need ongoing care in their own country. We will, however, contribute to all investigation and assessment processes as required, including safeguarding meetings, Child

Protection Conferences, Core Groups, Strategy meetings, Child in Need meetings or other early help multi-agency meetings as required.

### **5.10 Record Keeping**

Where a safeguarding concern is noted, all concerns, discussions and decisions (and justifications about those decisions) will be recorded in writing, with details of how they were followed up. If members of staff are in any doubt about recording requirements they should discuss their concerns with the school DSL.

Incident/Welfare concern forms or reporting procedures are available in each school.

Safeguarding records are kept for individual children and are maintained confidentially and separately from all other records relating to the child in the school.

Safeguarding records are kept in accordance with the General Data Protection Regulation (GDPR) and our own Instill Education **Data Protection Policy**, and are retained centrally and securely by the DSL.

### **5.11 Confidentiality**

All matters relating to Safeguarding are confidential:

- The School Lead, School DSL or Group DSL will disclose any information about a pupil to other members of staff on a need to know basis only.
- The School Lead, School DSL and Group DSL have a professional responsibility to share information with other agencies to the extent necessary in order to safeguard children.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- There is a lawful basis for child protection concerns to be shared with agencies which have a statutory duty of child protection.

DfE Guidance, Information Sharing: Advice for Practitioners 2018 provides further details:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

### **5.12 Training and Support**

All our staff working with under 18s are expected to be aware of the signs and symptoms of abuse and be able to respond appropriately. All such staff will sign to confirm they have read and understood this Safeguarding and Child Protection Policy and this information will be recorded in the school.

The Group DSL, School DSL and any members of the DSL team undergo DSL training every two years in accordance to enable them to fulfil their role.

All other staff working with children or in a school where child students are accepted undertake generalist level safeguarding training every three years, and regular updates around safeguarding are shared with staff via the Group DSL and School DSL.

Separate training is provided for new staff as part of the induction process.

Any update in national or local safeguarding should be shared in regular staff briefings, e-bulletins or meetings by the School DSL and then shared with host families, contractors or volunteers as appropriate in order to keep up with any developments relevant to their role.

### **5.13 Allegations involving school staff**

All school staff should receive training and guidance on appropriate behaviour and should take care not to place themselves in a vulnerable position with a child. Particular care should be taken if it is necessary to see a child alone. All staff should follow the code of conduct at all times.

This procedure should be used if it is alleged that a member of staff, host family member or volunteer in the school or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

If a child student or their representative makes a complaint of abuse against a member of staff, the person receiving the complaint must:

- take the complaint seriously and immediately inform the School Lead and/or School DSL;
- make a record of the concerns reported to him or her including details of anyone else who is said to have witnessed the incident or allegation.
- If the concern is brought to the School Lead, they will immediately inform the School DSL and/or the Group DSL.
- If the allegation concerns the School Lead the person receiving the complaint will inform Group DSL who will follow the procedures above without involving the School Lead.
- The Group DSL, in consultation with the School Lead, will decide if the allegation needs to be referred to the LADO or the police for investigation. If the allegation constitutes a serious criminal offence, it may be necessary for the Group DSL to do so before informing the member of staff.
- Referrals should be made to DBS when an employer or organisation believes a person has caused harm or poses a future risk of harm to vulnerable groups, including children.
- If the Group DSL decides that a referral is not indicated at this stage the School Lead will investigate following the school's disciplinary procedures.
- Careful consideration needs to be given to the suspension of the member of staff against whom an allegation has been made. Any suspension must be seen as a neutral action which does not predict the outcome of any disciplinary process.

### **5.14 Whistleblowing in a Safeguarding Context**

Whilst Instill Education has a separate **Whistleblowing Policy**, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly. This does not replace the Whistleblowing Policy and should be read in conjunction with this policy.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

The School Lead is responsible for all school staff. If anyone has concerns that any member of staff within the school is not following safeguarding processes or behaving in a way that is placing children at risk, they should, in the first place, make the School Lead aware.

If the concern is about the School Lead, they should raise this with the Group DSL or one of the Directors.

If anyone would prefer to raise their concerns outside of the school, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk) for national organisations.

If anyone believe that a child is being abused by individuals outside the school, they can make a referral to the Police.

Further guidance for staff can be accessed through: <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2> and through the NSPCC website: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

### **5.15 Related Policies:**

Code of Conduct

E-safety Policy

Social media policy

Preventing Extremism and Radicalisation Policy

Alcohol Drug and Tobacco policy

Recruitment and selection policy (England and Wales)

Recruitment and selection policy (Scotland)

Recruitment of host families

Health and Safety policy

DBS Policy – Recruitment of Ex-offenders

Recruitment of Ex-offenders (Scotland)

Policy Statement– Secure storage, handling, use, retention and disposal of Disclosure Information

Safer Recruitment Policy

Anti-Bullying Policy

Data Protection Policy

Risk Assessments

Whistleblowing Policy

### **5.16 Policy review**

The Instill Education Safeguarding and Child Protection Policy and other specific policies in use throughout the organisation are reviewed each year and revised as and when necessary. This policy was last reviewed in December 2021.

## Safeguarding and Child Protection Policy 2021

### Contact List

In Regent London we recognise that all our staff have a full and active part in protecting our child students from harm, and that the child's welfare is our paramount concern.

Any individual can contact the DSL or Deputy DSL if they have concerns about a young person under 18.

Key contacts within the school	Name	Contact details
Designated Safeguarding Lead (DSL)	<i>Janey Futerill</i>	<i>Janey.futerill@regent.org.uk</i>
Deputy DSL	<i>Diego Amaya</i>	<i>Diego.amaya@regent.org.uk</i>
Group DSL	Jessica Loveday	Binsey Lane Support Office 01865 258334 <a href="mailto:jessica.loveday@instilleducation.com">jessica.loveday@instilleducation.com</a>
Group Deputy DSL and Alternative contact in absence of Group DSL	Jozef Windsor	14 Friars Entry, Oxford, OX1 2BZ 01865 258328 <a href="mailto:jozef.windsor@oise.com">jozef.windsor@oise.com</a>

Key contacts within the local area	When to contact	Contact Details
Police	Serious concerns about a CHILD	<b>If you think a child is in immediate danger call 999</b>  Call 111 for non-emergency advice and information
Local Authority Designated Officer (LADO)	Concerns about the actions of an ADULT working around children	Kembra Healy      Tri-Borough Safer Organisations Manager and LADO Tel: 0208 753 5125 Email: <a href="mailto:kembra.healy@lbhf.gov.uk">kembra.healy@lbhf.gov.uk</a>
Westminster Safeguarding Children Board	Information and advice about safeguarding children in the local area	<b>020 7641 4000 or</b> <b><a href="mailto:accesstochildrensservices@westminster.gov.uk">accesstochildrensservices@westminster.gov.uk</a></b>

National contacts	When to contact	Contact Details
NSPCC	Any concerns about a child  Concerns about how Safeguarding and Child Protection are handled within our organisation.	0808 800 5000 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>  <a href="https://www.nspcc.org.uk/">https://www.nspcc.org.uk/</a>
CEOP	Concerns about Child Exploitation and Online Protection	<a href="https://www.ceop.police.uk/safety-centre/">https://www.ceop.police.uk/safety-centre/</a>

We are committed to reviewing our policy and good practice annually. This policy was last reviewed on: 5 January 2022 by Jozef Windsor. Senior Designated Lead.

To be reviewed Jan 2023