

SAFEGUARDING AND CHILD PROTECTION POLICY

Last Reviewed/Updated: 03.09.2018

Next Review/Update: 03.09.2019

Introduction

The Advisory Board, Principal (who is the Designated Safeguarding Lead) and the Deputy DSLs, teachers and support staff at Regent College fully recognize their responsibility to safeguard and promote the welfare of the children and young people in our care, and that **safeguarding is everyone's responsibility**. This responsibility encompasses the following principles:

- To protect children from harm (maltreatment)
- To prevent impairment of children's health and development
- To ensure that children are growing up in circumstances consistent with the provision of safe and effective care thus enabling those children to have optimum life chances and to enter adulthood successfully
- To treat the interests of our children as paramount (taking into consideration their disability, culture and history, and recognising the vulnerability of SEND students)
- to consider at all times the best interests of the child

The Advisory Board approves this policy and it is annually reviewed by them. The policy encompasses and address their commitment to the above principles through:

Prevention - ensuring all reasonable measures are taken to minimize the risk of harm to children's welfare. These include:

- Ensuring safer recruitment practice*
- Ensuring through training that all teaching and non-teaching staff are aware of and committed to the Safeguarding Policy and Child Protection Procedures ("the Policy and Procedures")
- Adopting a code of conduct for teachers.
- Establishing a positive, supportive and secure culture in which children can learn and develop, together with a college ethos which promotes in all students a sense of being valued, listened to and respected
- Including in the curriculum, activities and opportunities for PSHE which equip students with the skills they need to stay safe from abuse and radicalization which will help them develop realistic attitudes to the responsibilities of adult life
- Providing pastoral support that is accessible and available to all students and ensuring that students know to whom they can talk about their concerns.

(* refer to separate policies and guidance for full details; this guidance will follow the Independent Schools Standards Regulations and comply with guidance with regard to the

DBS (Disclosure & Barring Service). All employees undergo full pre-employment checks including an enhanced DBS check and, where applicable, the disqualification by association (Child Care Act 2006)

Protection – ensuring all appropriate actions are taken to address concerns about the welfare of a child or children, working to agreed local policies and procedures in full partnership with other local agencies especially the Police and Children’s Social Care (Safeguarding Children Joint Chief Inspectors’ Report Department of Health October 2002). These include:

- Sharing information about concerns with agencies who need to know and involving children and their parents/carers appropriately including, the Police, the Harrow Local Safeguarding Board (HLSCB) and the Local Authority Designated Officer (“LADO”) and in “Prevent” with the Channel process
- Any member of staff can refer to the LADO or Children’s Services; however it is the expectation that the DSL or DDSL are the primary communicators with LADO and Children’s Services as appropriate. They will contact the LADO and HLSCB within 24 hours of a disclosure or suspicion of abuse, although if there is risk of immediate harm this contact must be immediately
- The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Harrow’s LADO can be contacted via the Children and Families team on 0208 8901 2690.
- Monitoring children known or thought to be at risk of harm and to contribute to assessments of need and support packages for those children.

Safeguarding, in addition to child protection, encompasses issues such as student health and safety, bullying/cyber-bullying, appropriate medical provision, drugs and substance misuse.

Managing Safeguarding and Child Protection

Roles and Responsibilities

Staff

All staff have a statutory obligation to report to the Designated Safeguarding Lead (DSL) if there is suspicion of abuse of a student or if a student discloses abuse or allegations of abuse. In addition, any members of staff may refer a concern to the LADO or the Children and Families Team, if they feel it necessary or appropriate. Harrow’s LADO can be contacted via the Harrow Children and Families team on 0208 8901 2690.

This is an inescapable, personal and professional responsibility by all staff for the protection of children from harm.

Staff could have their suspicion or concern raised in a number of ways, the most likely of which are:

- the conduct of a member of staff
- a child, parent or member of staff ‘disclosing’ abuse
- evidence of physical hurt that may or may not be accompanied by
- unusual or uncharacteristic behavior by a child.

The following individuals have specific roles and responsibilities under Child Protection Procedures that are outlined below:

Advisory Board (“AB”)

It is an essential feature of good governance that responsibility is not delegated to others without first ensuring reliable mechanisms for monitoring and evaluation of policy implementation (ISI Integrated Handbook Guidance, September 2015). Advisory Board of Regent College (as displayed on the College’s website) have ultimate and collective responsibility for ensuring students’ wellbeing, which encompasses safeguarding. Their responsibilities include:

- assessing the safeguarding risks that might arise from the College’s operations.
- ensuring that the college has Policy and Procedures known to all staff and Advisory Board members, that are in accordance with Local Authority and inter-agency procedures and that these are made available to parents on request and carrying out a review of this Policy and these Procedures annually in the Autumn term and following any serious incident report to the Charity Commission;
- approving the College’s Annual Report to the Advisory Board on Safeguarding Children (“the Annual Reports”) and submitting these to the Local Safeguarding Children’s Board (“LSCB”);
- undertaking monitoring to ensure effective implementation of the Policy and Procedures through the receipt of an annual presentation from the Designated Safeguarding Leads (“DSLs”) and through informal and on-going discussion with staff. The presentation must cover staff training (including the DSL and DDSL); the steps being taken to listen to students ; any referrals to children’s services (anonymized) in respect of the promotion of welfare; any referrals to the LADO in respect of staff; and specific themes arising from these or elsewhere in the college and steps taken as a result.

Nominated Advisory Board Member:

Dame Dana Ross-Wawrzynski DBE is the **Nominated member** for Safeguarding and Child Protection at Regent College. Her responsibilities include:

- On behalf of the AB, carrying out detailed monitoring of the implementation of the Policy and Procedures (including an annual review of sample entries in the Single Central Register);

- Maintaining close and regular contacts with the DSL and DDSL
- Working with the DSLs and DDSLs to review the Annual Reports and judge the efficiency with which procedures have been implemented and to report on this to the FGB;

She can be contacted through the Regent College Senior Academic Administrator – Ms Caroline Shephard who can be contacted through Caroline.Shephard@regentgroup.org.uk or telephoned on 0208 966 9900.

Chair of Advisory Board

It is also the role of the Chair of Advisory Board, Dame Dana Ross-Wawrzynski DBE, to deal with allegations of abuse made against the members of the senior management. Any allegation of abuse against a member of staff will be reported to the Chair of the Advisory Board.

Please contact Dame Dana Ross-Wawrzynski DBE on 0161 941 5681 or at DRW@bfet.uk.

Principal

Mrs. Tharshiny Pankaj is the Principal of Regent College and **Mr Steve Hurl** is the Head Teacher. Their responsibilities include:

- ensuring that the Policy and Procedures approved by the AB fully implemented;
- ensuring that the role of DSL and DDSL are filled by individuals with appropriate qualifications and experience and given significant prominence in the college community;
- ensuring that DfES guidance is followed to ensure safe staff recruitment and that adequate staff checks and records are maintained.

The Designated Safeguarding Leads

Mrs. Tharshiny Pankaj is the **Designated Safeguarding Lead (DSL)**.

Miss Caroline Shephard is a **Deputy Designated Safeguarding Lead (DDSL)**.

Contact details for the Designated Safeguarding Leads and Deputy:

Tharshiny.pankaj@regentgroup.org.uk or 0208 966 9900

Caroline.shephard@regentgroup.org.uk or 0208 966 9900

Awareness, Training and Support

Any member of staff can refer to the LADO or Harrow Local Safeguarding Children Board however it is the expectation that the DSL or DDSL are the primary communicators. They will contact the LADO and LSCB within 24 hours of a disclosure or suspicion of abuse. Together they hold the following responsibilities:

Raising Awareness:

- to monitor and review annually, liaising with the Advisory Board, the effectiveness of the Safeguarding Policy and Child Protection Procedures to ensure that they comply with current best practice
- to ensure parents have access to the Safeguarding Policy and Child Protection Procedures which alerts them to the fact that referrals may be made and explain the role of Regent College in this to avoid later conflict. It is available on the college website and a hard copy is provided on request or from reception.
- to ensure, where necessary, records are passed on to the receiving college if a student transfers.
- to have good links and working relationship with the LSCB and LADO/Police (if a criminal matter) so that staff are aware of local policies and training opportunities and keep staff aware of child protection procedures.

Training and Support:

- all staff, including Advisory Board members are to receive and read Part 1 KCSIE September 2018 and appropriate confirmation of this is recorded
- all staff, including Advisory Board members are to receive the safeguarding policy
- the DSL and DDSL to receive Prevent Training and coordinate the school's implementation of the Prevent Duty, including protocols for visiting speakers
- the DSL and DDSL undertaken LSCB training (Levels I, II & iii) and to undertake regular updates once every **two** years as a minimum to include inter-agency working plus any additional training to remain compliant with new guidance and legislation
- to manage and deliver Child Protection training for all staff who work with children, and keep records of this training. Any new legislation or updates will be communicated with staff on a regular (at least annual) basis either electronically or through Inset (or both).
- All new staff, including Advisory Board members, must be provided with induction training that includes:
 - the college Safeguarding Policy
 - the teacher Code of Conduct, including the Whistleblowing Procedure
 - the identity of the Designated Safeguarding Person and the Deputy
 - a copy of Part 1 KCSIE September 2018 (including Annex A)

Advisory Board members should ensure that as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

Referrals

- to communicate immediately with **Children's Social Care whenever an allegation or disclosure is made (current or historical)**. We do not have any threshold for referrals. We always direct all allegations to Children's Social Care
- to have sound knowledge of the different forms of abuse and a clear understanding of the possible physical and behavioral indicators and know when it is appropriate to make a referral to the LSCB (Children and Families Team on 020 8901 2690)
- to ensure that in all cases of actual or alleged harm to a student, the London Child Protection Procedures are followed. This will involve contacting the Local Authority Designated Officer (LADO). The function of the LADO is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in a school. Harrow's LADO can be contacted via the Children and Families Team on 020 8901 2690.
- to inform the DSL or DDSL of all cases of actual or suspected abuse. The only exception to this would be if DSL or DDSL were implicated in the concerns, in which case the Chair of the Advisory Board would be informed

- to act as a focal point for liaison with Children’s Social Care and other authorised agencies, ensuring that full and prompt sharing of information is provided at the time of referral and that the referral is confirmed in writing under confidential cover
- to act as a source of support, advice and expertise within College on matters of Child Protection and welfare
- ensure that clear, detailed written records of welfare concerns about students are kept secure and in a locked location
- the college will not investigate allegations of abuse but instead refer to LADO.

This needs to be carried out in order to inform inspectorate bodies of any allegations of serious harm or abuse of any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises and of the action taken in respect of these allegations. The college will endeavour to report any allegations or concern as immediately as possible but definitely within 14 days.

For those children who have need for additional support or input from outside agencies the college will work with local processes including use of the Common Assessment Framework (CAF) and Team around the Child (TAC).

Confidential Reporting (‘Whistleblowing’)

All staff should be aware of their duty to raise concerns, where they exist, about the management of Child Protection, which may include the attitude or actions of colleagues. If the member of staff reporting suspicions remains unsatisfied by a decision not to act by the DSL or DDSL, he or she may, as a responsible citizen, enact the College Whistleblowing policy and report concerns directly to Children’s Social Care. He or she will be considered to have acted as a responsible citizen and will not be held accountable for undermining a college decision.

The phone number for referral – Children and Families Team – is 0208 8901 2690

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them; see Whistleblowing Policy

The NSPPC whistleblowing helpline is available to staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nsppc.org.uk

See link: <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Child protection procedures and guidance

What is Child Protection?

Child Protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

What is significant harm?

The Children's Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and require discussion with the statutory agencies.

Scope and Purpose of these Procedures

These procedures apply to the Governors, senior management, teachers and all staff working for and on behalf of Regent college and explain what action should be taken if there are concerns that a child is or might be suffering harm. A child is a person under 18 years but the principles of these procedures apply also to vulnerable young adults over 18 years.

As well as this policy, the college has extensive arrangements to fulfil other safeguarding and welfare policies including early help strategies within the pastoral system.

See: Working together to Safeguard Children – 2015

The procedures are available to parents on request or via the College website.

What constitutes child abuse?

All college staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Please consider that an abuser could also be female.

Children may be abused in a family or in an institutional community setting by those known to them, or more rarely by others (e.g. via the internet).

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical 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. Physical abuse involves physical injury to a child, where there is definite knowledge or reasonable suspicion that injury was deliberately inflicted or was not prevented. It may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. It also involves giving a child poisonous substances, inappropriate drugs and alcohol. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse, as well as being a result of an act of commission, can also be caused through omission or the failure to protect, as well as forced marriages and female genital mutilation (FGM).

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Indicators

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found in Annex A: Further information, of Keeping Children Safe in Education (KCSIE) September 2018. This document may be accessed here: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Female Genital Mutilation:

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). Teachers have a duty to make a report to the police where, in the course of their professional duties, they either:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour.

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply.

The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

The duty does not apply in relation to at risk or suspected cases or in cases where the woman is over

18. In these cases, you should follow local safeguarding procedures.

To make a report it is recommended that the person does it orally by calling 101, the non-emergency number. However, where there is a risk to life or likelihood of serious immediate harm, then it should be reported immediately to police, including dialing 999 if appropriate. Reports should be made within 24 hours ideally. Further guidance can be found at the following link: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>.

If a member of staff cannot confirm or has suspicions that FGM has been carried out on a girl under the age of 18 years then they should follow the safeguarding policy. If FGM is believed to have been carried out on a girl under 18 years old then it will be reported to the Police by the DSL or by any member of staff.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a 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 (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Serious bullying may be regarded as emotional, sexual or physical abuse and will be considered under Child Protection Procedures.

Further information on Preventing Radicalisation

Protecting children from the risk of radicalisation should be seen as part of colleges' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Radicalisation and violent extremism could cause harm or have the potential to cause harm to the child and others. Under the Prevent Duty (2015) the college will report in line with the recommended policies and procedures to the Harrow LSCB / the local Police force (Tel: 101) / Prevent Channel duty offices as appropriate. The DfE dedicated telephone number for non-emergency advice for staff and governors is 0207 3407264 and the mailbox is: counter-extremism@education.gsi.gov.uk.

Indications or Signs of Possible Abuse including radicalisation:

- Signs of looking unwashed, undernourished, weight loss etc; inappropriate clothing for the conditions
- Changes in behaviour – depression or withdrawn behaviour or attention seeking behaviour
- fearful behaviour - fear of specific people places, fear of separation etc
- Mentioning being left alone or unsupervised
- Regressive or aggressive behaviour e.g. bed-wetting or severe temper outbursts that are out of character
- Mood swings
- Changes of friendship group
- Persistent or multiple bruising in unexpected places, that cannot be explained by normal childhood activity
- Minor injuries in unlikely places
- Burns, scalds or bites
- Delay in seeking access to medical care/treatment

- Excessive preoccupation with sexual matters
- Knowledge of sexual matters inappropriate for age of child
- Promiscuous behaviour
- Sexually explicit or otherwise disturbing creative writing or artwork.
- Expression of opinions that are at odds with our shared values, and which may be tantamount to, or explicitly inciting violence and/or illegal acts.

The above list is by no means exhaustive, and it is important to be aware that there may be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of students. Questions of the young person being in moral danger, being uncared for, engaging in anti-social or inappropriate behaviour and so on may be referred to the DSL, who will discuss the matter with the Deputy DSL, and through them, as necessary, to Children's Social Care. Such cases may also be referred to the Medical Centre and through them to Children's Social Care. Staff are well advised to look beyond the setting- what is happening in other areas of the child's life? Further detailed information on Radicalisation, 'honour based' violence, and CSE can be found in Annex A: Further information, of Keeping Children Safe in Education September 2018.

Staff have a duty to be responsible in promoting the welfare of students at all times and to take action to safeguard their welfare.

Key points:

- Be vigilant
- Listen to children
- Observe changes in attitude or behaviours
- Respond to specific concerns at any early stage – self-harming, depression, eating disorders etc
- Report any concerns to the appropriate designated professional
- Do not conduct any own investigations but contact relevant agencies who will have the authority to do so
- Be prepared to whistle blow if you have any concerns about the conduct of volunteers or colleagues in respect of their handling of children
- Be open to the potential of peer on peer abuse – this will always be taken seriously, and not dismissed as 'banter' or 'growing up'.
- Understand the potential for "grooming"

Children who go missing

The Missing Child Policy Procedure ensure that all measures are taken to monitor attendance and provide guidance to all staff when a student is missing from lessons or house. In addition, Regent College is cognisant of the 'Statutory guidance on children who run away and go missing from home or care' - January 2014 and Working Together to Safeguard Children July 2018 and all matters of this type are referred to the DSL or DDSL, who will liaise with the appropriate agencies.

Children missing from education

A child going missing from education is a potential indicator of abuse or neglect. The appropriate safeguarding procedures will be used for children who go missing from school, particularly on repeat

occasions. Staff are aware of potential triggers such as travelling to conflict zones, FGM, forced marriages etc. If a child is failing to attend college regularly or has been absent without the college's permission for a continuous period of 10 college days or at an interval agreed with the local authority then the local authority will be notified of the absence. The local authority will be notified when a student is deleted from the admission register / college register. This will be acted upon as soon as the grounds for deletion are met, but no later than deleting the student's name.

See the link below for further guidance:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children Missing Education - statutory guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

Procedures following any form of disclosure – the 5 ‘R’s

Receive	Respond	Reassure	Record	Report
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Receive:

- **Listen** sympathetically and with an open mind
- Stay calm, conveying this through word and action
- **Never promise confidentiality, only discretion. It is important that the student understands from the outset that if they choose to disclose information that indicates actual or potential harm to themselves or others, then certain actions will need to be taken. If necessary, pause a child before he/she has begun what you anticipate might be a disclosure and remind them**
- Allow the child to talk and finish their story. Let them tell you what they want and no more
- Do not ask any leading questions

Respond:

- Where necessary clarify what has been said
- Ensure that you have a full understanding of the facts as related by the student, perhaps by reporting back to the student for his/her confirmation
- Never ask leading questions
- When the student has finished make sure they feel secure. Explain what you will do next and (where appropriate) the referral process
- **Action must be taken immediately if the student is in imminent danger**

Reassure:

- Acknowledge their courage in talking to you and reassure them that what they have said will be taken seriously
- Remind them that the abuse is not their fault
- Reassure them but do not promise what you may not be able to deliver – ‘Everything will be alright now’ – it may not be.

Record:

- Record as much as you can remember as soon as possible (preferably immediately) afterwards, using the student’s own words as far as possible. Include who was present and the date, time and location of the incident or disclosure
- Complete a Cause for Concern Reporting Form and give this, with any other accompanying information, to the DSL.

Report:

- Refer the matter within 24 hours or sooner and **immediately if any student is in danger** to the DSL or DDSL. Do not discuss with parents/carers. The DSL or DDSL will agree with the Social Care team when parents/carers should be contacted and by whom.

You must ensure that your report is properly followed up as outlined in this procedure. If you believe that this has not happened, you should escalate your concern to the LADO. You also have an ongoing duty to continue to be aware of and react to any other safeguarding incidents that may occur.

The DSL will be aware that you may need support following a disclosure.

Action to be taken by the Designated Safeguarding Lead / Deputy Designated Safeguarding Lead

- Following the receipt of a report, the DSL or DDSL will seek advice from the LADO/Children's Social Care (depending on who the allegation is made against)
- This may be done without giving names at first), and then follow the advice given. Regent College will not investigate allegations of abuse, but will instead always refer to the appropriate authority. In cases of serious harm the Police would be informed from the outset
- Agree with Children's Social Care any necessary next steps in relation to:
 - * informing a student's parents
 - * medical examination or treatment
 - * immediate protection for the victim or a student who has given information about an abuser or a student against whom an allegation has been made
- Inform the student or adult who made the initial allegation of what the next steps are to be
- Inform the DSL or DDSL of the allegation and action taken
- Ensure long term protection support for all students involved
- Any advice given will be clearly recorded as a file note.

When there are reports of abuse involving a number of students against a student or other students or any specific safeguarding issues the DSL or DDSL will meet with appropriate staff following advice from Children's Social Care and coordinate the matters in line with guidance from LSCB and ISI. The DSL or DDSL will:

- Follow procedure and refer to the Children's Social Care
- Ensure secure supervised spaces for all involved
- Involve the Deputy DSL and members of SMT trained to Level 2 as appropriate
- Follow guidance above with respect to each student in a secure supervised environment.
- If a student appears injured and/or distressed in anyway then medical attention may need to be received
- Practical and up to date support and information can also be found on www.nspcc.org.uk or via the www.gov.uk website

If there is an allegation against a person outside the college community the DSL will seek advice from external agencies and contact the parents as and when appropriate.

Regent College will always undertake to share their intention to refer a child to Children's Social Care with their parents/carers unless to do so could put the child at greater risk or harm, or impede a criminal investigation.

Procedures Following an Allegation of Abuse by a Member of Staff

It is important to draw a distinction between complaints and allegations against staff. In other words, the difference between behaviors that suggest misconduct or unprofessionalism, and those which specifically raise child protection concerns.

An allegation should be made if a teacher or other member of staff 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**
- **Behaved towards a child or children in a way that indicates he or she is unsuitable to work with children.**

If an allegation is made against a teacher or member of staff then the quick resolution of that allegation will be a clear priority as this is a benefit to all concerned. Any unnecessary delays should be eradicated.

Any concern which involves the possibility of physical, emotional or sexual abuse will always be referred within 24 hours to the Local Authority Designated Officer (LADO) and their advice taken prior to any investigation. If child protection procedures are needed, an investigation will be carried out by Children's Social Care and the Police.

The Designated Safeguarding Lead (and or DDSL) and Advisory Board must not carry out investigations themselves.

If an allegation is made against a member of staff it must be responded to immediately and with the utmost discretion to ensure protection for the child and support for the person who is the subject of the allegation. The informant should be told that the matter will be referred in confidence to the appropriate people. This must be done and the written record passed on **the same day** to the Designated Safeguarding Lead. The circumstances should be kept strictly confidential until it has been judged whether or not an allegation or concern indicates possible abuse. The concerns will be discussed with the Local Authority Designated Officer.

If it is decided by the appropriate LADO that an investigation is called for, it is the responsibility of the Children's Social Care manager to arrange a Strategy Meeting. This would normally involve the Police, Children's Social Care, the DSL, and preferably a member of the Advisory Board of Regent College. The arrangements agreed upon will include informing the parents and seeking their consent for any immediate medical examination.

If the allegation made to a member of staff concerns the Principal(s) or Head Teacher, the person receiving the allegation will immediately inform the Chair of the Advisory Board, without prior notification to the Principal or Head Teacher. If the allegation concerns the DSL or DDSL, then the Chair of Advisory Board must be informed.

If the allegation is made against a contractor, an investigation will necessarily involve the organisation or agency of employment. For those who are self-employed the allegation will be passed directly to the LSCB team for advice or action.

The person who is the subject of the allegation will normally be informed as soon as possible after the result of the initial investigation is known, or the decision is made to dispense with one, but not invited to make a response. There should be a warning that anything said will be recorded.

If it is established that the allegation is not well founded, either on the basis of the medical evidence or further statements, then the person against whom the allegation has been made would normally be informed that the matter is closed and any notes will be removed from their personnel file and will not be referred to in any references.

Students that are found to have made malicious allegations are likely to have breached college behaviour policies. The college will then determine what, if any, sanctions are appropriate. Police may well be informed if there are grounds to believe that a criminal offence may have been committed. Also, Children's Social Care may need to be involved with any follow up work with the student.

If the police decide to take the case further, the member of staff implicated would normally be suspended or, where the circumstances are considered to warrant it, dismissed. It is reasonable to ask the police to give some indication of their timescale.

The College will report to the DBS **within one month of leaving** any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children, and the college has a duty to consider referral to the National College for Teaching and Leadership (NCTL) this will be in line with the criteria by NCTL. Advice about whether an allegation against a teacher is sufficiently serious to refer to NCTL can be found at: [Teacher Misconduct The Prohibition of Teachers - October 2015](#)
Or the NCTL website: <https://www.nationalcollege.org.uk>

Record Keeping: a clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, will be kept on the confidential personnel file and will be retained until the member of staff reaches retirement age, or for a period of 10 years after the allegation has been made. The college will provide information regarding an allegation for the purposes of future references and DBS disclosures.

Good Practice Recommendations for Record Keeping will involve;

- Ensuring that a proper record is kept of any Child Protection referral and action taken, and that this is kept securely and in confidence
- Child Protection records should be kept for the approved timescale for the various Authorities we are in conjunction with and then shredded on the basis that this information has been shared with Children's Social Care who will continue to hold copies

- When notes are dispatched to another college ensure that the original copies are held and that photocopies are dispatched with notes and records of delivery i.e. special delivery / recorded delivery
- Ensuring that Child Protection files are monitored every term.

Policy on allegations involving sexual impropriety

If a member of staff is informed by a student of an event involving sexual impropriety of any kind, whether between students or staff and students, the following steps should be taken:

- Listen sympathetically and afterwards briefly note the content of what was disclosed, sign and date it
- Contact the DSL or DDSL immediately, who will discuss with and the LADO whether Children's Social Care should be notified
- If Children's Social Care is notified and it is agreed that Regent College alone should follow up the issue, the DSL or DDSL will interview the complainant and oversee the disciplinary aspects of the enquiry
- If Children's Social Care seeks further investigations, they will open an enquiry. In these circumstances, Regent College's internal disciplinary procedures will be suspended until cleared by Children's Social Care.

This policy should be implemented regardless of whether the complainant is over or under 16. Parents should be informed as soon as a referral to Children's Social Care has been made by the Child Protection Liaison Person, unless to do so would put the student at greater risk of harm.

Statement on confidentiality

The management of confidentiality is an essential factor in all issues relating to Child Protection. The only purpose of confidentiality with respect to Child Protection is to benefit the child.

Staff should never give students or adults an absolute guarantee of confidentiality but must ensure that the information is disclosed only to the people who need to know.

It should be explained to children and young people that secrets cannot and should not be kept if keeping them means that they, or others, will continue to be harmed.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998 European Convention on Human Rights, Article 8). Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, obtaining consent may not be possible or be in the best interests of the child, for example, where safety and welfare of that child necessitates that the information should be shared. The law permits the disclosure of confidential information

necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt.

Policy on safeguarding and ICT

SAFEGUARDING AND ICT GUIDELINES

Protecting young people in the online world means thinking beyond the college environment. With the advance of Internet technology, students increasingly will have access to personal devices not covered by College network protection and therefore the emphasis should be on educating all users as to the risks involved and their obligation to act responsibly whilst online.

Safeguarding students in both the real and virtual world is the responsibility of all staff. Staff must be familiar with these guidelines and understand how to respond to e-safety incidents. Staff need to be vigilant for threats of radicalization on line as well as cyber bullying or any other safety issues. Students will be taught through the curriculum including PSHEE and other pastoral support systems how to behave and build resilience in dealing with such matters.

All students should be made aware of the Regent ICT & E-safety Policy, ICT Acceptable Use Agreement and Wi-Fi acceptable usage policy and what to do if they have any ICT safeguarding concerns. Other college policies relating to Mobile devices and Social media also needs to be consulted. The Network Manager and other key personnel may also be consulted with.

PROCEDURES FOR DEALING WITH INAPPROPRIATE/ILLEGAL INTERNET ACCESS OR MATERIAL

Regent College have installed robust web filtering software to ensure the protection of its students whilst accessing the Internet. It is recognized that no software is infallible and the following procedures will be abided by where necessary.

Discovery of inappropriate websites, by staff or students, should be reported immediately to the DSL or DDSL, who in liaison with the Network Manager will consider referral to <https://ceop.police.uk/> and the Police.

Illegal material within the School's network is a very serious situation and must always be reported to the Police. Any incident that involves inappropriate adult access to legal material on Regent Schools' premises will be dealt with by the School's disciplinary policy in conjunction with the Police.

Action in the event of discovery of illegal material:

- seek immediate and specific advice from the DSL or DDSL who will consult with the Head of Technology, Principal and the Police
- prevent any further access to the device/network location until the correct advice is gained

- **unless absolutely necessary, DO NOT remove the power from a working device and under no circumstances start a device if it is already switched off**
- Consider if it is necessary to prevent remote access to the device/network/location
- If it is believed that a member of staff or student who has left the site, could remove or damage evidence on the device remotely, unplug **ONLY** the network cable from the back of the device to prevent this access from occurring
- If the device is already turned off and it is no longer realistically possible to prevent further physical access (i.e. due to lack of supervision, high levels of access or an unoccupied location) disconnect the power at the base unit (not the wall) and remove the laptop. Store this device securely in a location where no one else can gain access to it and make a note of the date, time and name of the individual who performed this action.

Under no circumstances should any member of staff attempt to conduct an investigation of their own or bring in an outside expert to do so as this may compromise the evidence if a legal case were to result. In some cases this may constitute a criminal offence in itself.

Further information regarding Safeguarding and ICT can be found in Annex C Keeping Children Safe in Education September 2018.

Guidance on sexting

Details of how to respond to incidents of sexting can be found at the following link: www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/

This will always be taken seriously and acted upon and not dismissed as 'banter' or 'part of growing up.'

Policy on keeping staff safe

Good Practice and Guidance on the Prevention of Allegations of Abuse - 'Safe School, Safe Staff' Regent College is committed to ensuring that relationships between staff and students are conducted on a professional basis. Anticipation of possible risks and seeking to prevent all reasonable risk of misunderstandings and false allegations are seen as part of this commitment.

Good practice includes valuing and respecting children as individuals and the adult modelling of appropriate conduct – please refer to the Staff Code of Conduct.

It is recognized that it is the action rather than the intention that may subsequently give rise to problems.

It is always recommended as good practice that all staff only used Regent owned devices to take photographs, records etc., of students.

It is important for all staff and others in contact with children to:

- be mindful of safe working practices and alert to situations which may present risks and manage these
- ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged
- empower children – discuss with them their rights and responsibilities, what is acceptable and unacceptable, and what they can do if there is a problem.

Staff and others must never:

- hit or otherwise physically assault children
- develop relationships with children which could in any way be deemed exploitative or abusive
- use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- behave physically in a manner which is inappropriate or sexually provocative
- condone, or participate in, behaviour of children which is illegal, unsafe or abusive
- act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse
- discriminate against, show differential treatment, or favour particular children to the exclusion of others
- never touch a child in a way which may be considered indecent – e.g. never touch a student below the shoulder unless there is a justifiable reason
- do anything of a personal nature for a student that he/she can do for him/herself
- indulge in horseplay, tickling or other games involving physical contact.

Staff should:

- avoid inviting students (groups or individuals) to their homes unless there is a good reason and it has been approved by Senior Management.
- not give students their home address, home telephone number, mobile telephone number, or email address
- not give a student a lift in their own vehicle other than on college business and with permission from the senior management

This is not an exhaustive list. The principle is that staff should avoid actions or behaviour which may constitute poor practice or potentially abusive behaviour or be open to misinterpretation.

If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded in writing as soon as possible and given to the DSL or DDSL with a copy placed on the child's file.

Responding to the needs of children requiring extra help to protect and promote their welfare

Staff vigilance may identify children who may not reach external agencies' thresholds for intervention but still need our help to protect and promote their welfare in and out of school.

These children will be high priority in our pastoral system and should be well known to key pastoral staff and prioritised within the school. When dealing with these children the key points are:

- Listen and give the children time and space to talk safely
- Remember that no child under the age of 16 years can give informed consent to sexual activity. It is important to operate within Harrow LSCB guidance on this issue and the handling of children under 16 years old.
- Record actual comments and concerns raised without putting words into their mouths
- Recognising that the child is free to speak to whomever they feel comfortable with, not just dedicated counsellors and pastoral staff
- Remember - never promise confidentiality
- Engage parents where appropriate and talk openly but do not avoid talking to Children's Social services if there are concerns about the welfare of the child at home. Never share concerns with parents if you are at risk of causing further damage to the child. In these matters take advice from DSL, DDSL or Children's Social care team.
- Take advice from external agencies and cooperate fully with them
- Understand the differences between "actual" harm and "likely" harm and what needs to be done

Related Documentation

- 'Safeguarding children in Education' - DfES/0027/2004
- What to do if you are worried that a child is being abused - DfES/2003 www.dfes.gov.uk
- Care Standards Act 2000 and Children Act 1989 and 2004 (Section 17 and 47) London Child Protection Procedures (<http://www.londoncp.co.uk/>)
- 'Safeguarding Children: Safer recruitment and selection in education' - DfES/1568/2005
- 'Safeguarding Children in Education: Dealing with Allegations of Abuse Against Teachers and Other Staff' - DfES/2044/2005
- Safeguarding Children and Safer Recruitment in Education (2007, updated 2010) DfES
- Working Together to Safeguard Children 2010 (updated version March 2015) DfES
- Associated guidance replace Chapter 5 of SCSRE
- Dealing with Allegations of Abuse against Teachers and Other Staff (October 2012) DfES
- 'Statutory guidance on children who run away or go missing from home or care' (Jan 2014) DfES
- Keeping Children Safe in Education – Part 1 (March 2015) DfES

- Keeping Children Safe in Education DfES (2015)
- Prevent Duty Guidance for England and Wales – HM Government – March 2015
- The Prevent Duty – Departmental advice for schools and childcare providers – June 2015
- The Use of Social Media for online radicalisation (July 2015)
- Mandatory Reporting of Female Genital Mutilation- procedural information – HM Office October 2015
- Disqualification under the Childcare Act 2006 (by association)
- “Prevent” Counter-Terrorism and Security Act (2015)
- Sexting in schools and colleges: responding to incidents and safeguarding young people: UK Council for Child Internet Safety
- Teacher misconduct: information for teachers. A guide for teacher’s subject to teacher regulation disciplinary procedures –June 2015
- Teacher misconduct: the prohibition of teachers July 2014 updated 31 Oct 2015
- Keeping Children Safe in Education – September 2016
- Regulated Activity in relation to children: scope
- Children Missing Education – September 2016

Related College Documentation

- Whistleblowing Policy
- Regent College Safer Recruitment Policy
- Anti-bullying policy
- Equal Opportunity Policy
- ICT & E-safety Policy
- Wi-Fi Acceptable Usage Policy
- ICT Acceptable Use Agreement
- Behaviour Policy
- Staff Code of Conduct
- Health and Safety Policy
- Missing Children Policy
- Risk Assessments
- AEN policy
- EAL policy
- Staff misconduct and discipline policy

Further LSCB documents can be found on

<http://www.harrowlscb.co.uk/>

The Safeguarding Policy and Child Protection Procedures will be reviewed at least annually and in the light of statutory changes and after any child protection concern.

Useful Contacts:

Children and Families Team - contact LADO via this number;
0208 8901 2690

Police 101 or 999 emergency

Police Prevent Team 01793 507926

Anyone who is concerned about a young person or adult at risk of extremism or radicalisation may make a referral to the Channel Programme. Referral for young people up to and including age 18 (up to 25 with learning disability) should be made on a CAF (Common Assessment Framework) to Duty&Assess@harrow.gov.uk.cjsm.net detailing your concerns about the young person and relevant history. Referrals for people aged 19 and over should be made on the Prevent Referral Form which can be obtained via enquiry to prevent@harrow.gov.uk or call the Children and Families Team on 0208 901 2690

ChildLine/NSPCC 0800 11 11

Disclosure and Barring Services 0800 0200 190 customeroffices@dbs.gsi.gov.uk

Cause for Concern Form

Please use this form when you have concerns about a child/young person. Hand it or email it completed to the:

Designated Safeguarding Lead:

- *Mrs. Tharshiny Pankaj*

Or Deputy Designated Safeguarding Lead:

- *Miss Caroline Shephard*

Child's Name

.....

Age if known

House if known

..... **Concerns:**

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..... **(Continue on other side if necessary)**

Your name **Date**

Role at Regent College.....

Appendix I

KEEPING STAFF SAFE

Communication with Children and Young People at Regent College (*including the Use of Technology*)

Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behavior which could be construed as grooming. They should not give their personal contact details to children and young people including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents/carers. E-mail or text communications between an adult and a child young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet based web sites.

Internal e-mail systems should only be used in accordance with the organization's policy.

This means that the organization should:

- *have a communication policy which specifies acceptable and permissible modes of communication*

This means that adults should:

- *not give their personal contact details to children or young people, including their mobile telephone number and details of any blogs or personal websites*
- *only use equipment e.g. mobile phones, provided by organization to communicate with children, making sure that parents have given permission for this form of communication to be used*
- *only make contact with children for professional reasons and in accordance with any organization policy*
- *Recognize that text messaging is rarely an appropriate response to a child in a crisis situation or at risk of harm. It should only be used as a last resort when other forms of communication are not possible*
- *not use internet or web-based communication channels to send personal messages to a child/young person*
- *Ensure that if a social networking site is used, details are not shared with children and young people and privacy settings are set at maximum.*

Taken from:

Guidance for Safer Working Practice for Adults who Work with Children and Young People. DfES 2009.

Appendix II: Safer Recruitment of Staff (NB to be read in conjunction with Regent College Safer Recruitment and Selection Policy)

Issues relating to child protection and the welfare of students are central to the process of appointing both teaching and support staff.

The appointment process is designed to deter potential offenders from applying; all advertisements should make reference to the Safeguarding Policy. All applicants are required to complete application forms which are scrutinized for discrepancies, anomalies and gaps in employment, and are designed to prompt interviewers to detect lacunae, frequent changes of jobs and movement around the country. They state the primacy of child protection concerns at the college and require a declaration of past convictions and whether or not the candidate is on the barred list and disqualified from working with children.

- Ideally references should be sought on all short-listed candidates, and should be obtained prior to interview so that any issues of concern they raise can be explored further with the referee and taken up with the candidate at interview. Where a reference has not been obtained before interview, ensure that it is received and scrutinised, and any concerns are resolved satisfactorily, before the person's appointment is confirmed. References should be completed on a reference pro forma and include sections requiring declarations of concerns raised, whether proven or not, which relate to the safety and welfare of children. References must be from at least two sources or institutions, and should always be sought and obtained directly from the referee. On receipt, the written reference should be checked to ensure all specific questions have been answered and information provided correctly corresponds with that on the candidates application form.
- When interviewing, at least one member of the interview panel must have completed the Safer Recruitment in Education training. The Heads will, where possible, be accompanied by a member of the Senior Management Team when interviewing so that proceedings may be recorded. Support staff will be interviewed by a member of the Human Resources team together with the relevant line manager. Senior staff will be interviewed by the Bursar and the Human Resources Manager. Those interviewing must not be afraid to ask difficult questions of the candidate or referee.
- On the day of interview, identity and qualification checks must be conducted and verified for each candidate by scrutiny of appropriate original documents. A form of photographic identification should be sought, except in exceptional circumstances, combined with evidence of address. Satisfactory explanations for gaps in employment history should also be sought at interview.
- Offers of appointment for all staff should be conditional on satisfactory completion of the following pre-appointment checks and a probationary period; references, identity,

qualifications, permission to work in the UK, DBS, the barred list, prohibition from Management check (for those appointed to a managerial role), prohibition from teaching check, disqualification declaration for those working or directly concerned in the management of Early Years settings, and medical declaration. Where the appointee has lived outside of the UK further checks should be obtained i.e. Certificate of Good Conduct.

Any member of staff found not suitable to work with children will be notified to the Independent Safeguarding Authority (DBS). Any raised concern, whether proven or not, will be reported in staff references.

- In addition to staff files the Human Resources Manager will keep and maintain a single central record of recruitment and vetting checks to ease checking against names if enquiries are made or concerns raised.

Where an employee (teaching or non-teaching) is provided by a third party, identity checks must be conducted. Written confirmation must be obtained from the agency to confirm that all checks the College is required to conduct for its own employees has been undertaken. In relation to the DBS the written notification from the agency must confirm that relevant DBS disclosures have been requested for that individual, whether or not the Disclosure has been received, and if received whether it included any disclosed information. Other adults, who will come into direct contact with students as part of their business with the School, or on an infrequent basis, will need an Enhanced DBS disclosure and identity checks conducted.

- Assurance will be obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with Regent students on another site (for example, in a separate institution).

Appendix III - Children Missing from Education

Safeguarding concerns for children who move college or 'disappear'

If we become aware that a UK based child is missing from education, in whatever capacity, and we need to check their educational status, we should make enquiries with the Harrow Children Missing Education Liaison Officer Dwayne Phillips; Dwayne.phillips@harrow.gov.uk Telephone: 0208 901 2690

Further information can be found at;

www.harrowscb.co.uk/wp-content/uploads/2015/06/Missing-Children-Protocol_Jun-2016_V3.pdf

If a non UK national is missing from education and they have a Child Protection plan in place we will endeavor to pass on the information to the appropriate authorities, probably through the child's Guardian.

In addition, the UK Visa and Immigration service will be informed in line with Tier 4 procedures where appropriate.

Appendix IV - Children Act Sections 17

and 47 Section 17

17 Provision of services for children in need, their families and others.

<http://legislation.data.gov.uk/ukpga/1989/41/section/17/data.htm?wrap=true>

Section 47

47 Local authority's duty to investigate.

<http://legislation.data.gov.uk/ukpga/1989/41/section/47/data.htm?wrap=true>