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SAFEGUARDING AND CHILD PROTECTION POLICY

Last Reviewed/Updated: 19.11.2020

Next Review/Update: 19.11.2021

Introduction

The Designated Safeguarding Lead and the Deputy DSLs, the management staff, the admin staff, teachers and support staff at Regent College all 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), both mental and physical
- To prevent impairment of children's health (be it mental or physical) 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

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 PHSEE which equip students with the skills they need to stay safe from abuse and radicalisation 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.
- Referring cause for concern (where you do not believe there is suffering or likely suffering or immediate danger to a child) cases to the DSL for follow up, including informing them of any actions you have taken with this regard, if relevant.

(* refer to separate policy – New Appointments and Safe Recruitment Policy 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.

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.

- Sharing information about concerns with agencies who need to know and involving children and their parents/carers appropriately including, the Police, the Harrow Safeguarding Partners and the Local Authority Designated Officer (“LADO”) and in “Prevent” with the Channel process
- Any member of staff can refer to the LADO, police or Children’s Services if a child is suffering or likely to suffer harm or is in immediate danger; 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 Harrow Safeguarding Partnership within 24 hours of a disclosure or suspicion of abuse, although if there is risk of immediate harm this contact must be immediately. If staff make a referral themselves, they must update the DSL about it afterwards.
- 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.
- 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.

Key Contacts

Emergency Services

999 (ambulance, fire, police)

101 (police – non emergency)

Regent Independent College Safeguarding Team

Designated Safeguarding Lead

Mr Amit Obhrai

Contactable on:

Amit.Obhrai@regentcollege.uk.com or 0208 966 9900

Deputy Designated Safeguarding Lead

Mrs Maja Skibinska

Contactable on:

Maja.skibinska@regentgroup.org.uk or 0208 966 9900

Regent Independent College Co-Principals

Dr Selva Pankaj

Contactable on:

Selva.Pankaj@regentgroup.org.uk or 0208 966 9900

Mrs Tharshiny Pankaj

Contactable on:

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

Harrow Strategic Safeguarding Partnership's

Local Authority Designated Officer (LADO)

Ms Janice Miller

Contactable on:

Janice.Miller@harrow.gov.uk Tel: 020 8736 6435 Monday – Friday

Children and Family Services (to discuss concerns or make referrals)

Contactable on: 020 8901 2690

DfE Prevent Helpline:

0207 340 7264

DBS Helpline

0800 0200 190

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 as per the Key Contacts section.

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.

Staff should also make students aware that they will be listened to should they wish to raise a concern or disclose something.

Students are invited to approach staff in person, by email or by phone. Students can also raise safeguarding related queries or concerns within the anonymous student survey.

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

Key Staff Roles

Proprietary Body

The proprietary body is RTC Education Ltd. The Chair of the body is Dr Maurizio Bragagni.

The responsibility of the proprietary body includes:

- ensuring that the Policy and Procedures approved are 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.

Contact details are provided in the key contacts section.

The proprietary body member with oversight of safeguarding at the College is Mrs Tharshiny Pankaj.

Co-Principals

The Co-Principals are Mrs Tharshiny Pankaj and Dr Selva Pankaj.

The Designated Safeguarding Leads

Mr Amit Obhrai (Director of Studies) is the Designated Safeguarding Lead (DDSL)

Mrs. Maja Skibinska (Exams Assistant) is a Deputy Designated Safeguarding Lead (DDSL).

The DSL and DDSLs are as required, part of the senior leadership team.

Their responsibilities include:

- Making sure all staff are aware how to raise safeguarding concerns
- Ensuring all staff understand the symptoms of child abuse and neglect
- Referring any concerns to social care
- Monitoring children who are the subject of child protection plans
- Maintaining accurate and secure child protection records

For the full role description of the DSL, please see Appendix I.

Training of the DSL and DDSL is in line with locally agreed procedures with Harrow Safeguarding Partnership and the team keep informal supplementary training up to date annually or more often. The Level 3 course is refreshed every two years. The Level 2 course is refreshed every 3 years.

Contact details for the Designated Safeguarding Leads and Deputies are provided in the Key Contacts section.

Staff Awareness, Training and Support

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

Raising Awareness:

- to promote and act in line with Safeguarding Policy and Child Protection Procedures
- to read any safeguarding updates from the DSL/DDSL as relevant
- Responsibility to provide a safe environment in which children can learn
- Be aware of the early help process and understand their place in it
- Be aware of the referral process to social care and the role they play in it
- to have sound knowledge of the different forms of abuse and a clear understanding of the possible physical and behavioral indicators
- Be aware that safeguarding issues can manifest themselves via peer on peer abuse and be clear about the school policy on peer on peer abuse.
- To promote awareness that some categories of student (including but not limited to looked after students – see section on Looked After Children -, those with SEN, young carers, EAL students, asylum seekers, those living in difficult circumstances – such as temporary accommodation or in homes where there is domestic violence – may be at higher risk of abuse or may face greater difficulty in recognizing and/or disclosing it.

Training and Support:

- all staff are to receive and read Part 1 KCSIE September 2020 and Annex A and appropriate confirmation of this is recorded
- all staff are to receive and read the safeguarding policy
- to attend safeguarding sessions when held
- undertake required online training on various topics
- All new staff, must be provided with induction training that includes:
 - the college Safeguarding Policy (this includes a section on children missing in education)
 - the staff Code of Conduct, including the Whistleblowing Procedure
 - the identity of the Designated Safeguarding Lead and the Deputy
 - a copy of Part 1 KCSIE September 2020 (including Annex A) and sign off as such
 - the College's online safety policy and training
 - Prevent training
 - student behaviour policy

Training (induction and regular updates) is in line with the Harrow Local Safeguarding Partnership.

Referrals

- to inform the DSL or DDSL of all cases of cause for concern, actual or suspected abuse. If staff are accused or implicated then the procedures followed are as per Allegations against Staff section in this policy
- To escalate these directly to Harrow safeguarding team if no action is taken by the DSL/DDSL or if the student is in immediate risk of danger and by waiting to speak to the DSL puts the student at greater risk.

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 one working day.

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).

Looked After Children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

The DSL will take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

Students with social workers

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Mental Health Concerns

It is acknowledged that displaying symptoms of a mental health concern can indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will raise their concerns with the DSL first, but in exceptional circumstances, if the DSL is not available, staff can refer the matter externally themselves if they believe there is a safeguarding concern.

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 provided in the Key Contacts Section.

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 all staff working for and on behalf of Regent Independent 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 2018

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. Sexual abuse can be carried out by one child or children on another/s. 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). It should be noted that abuse can take place wholly online or may be used to facilitate 'off-line' abuse and sex abuse of children by children.

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. FGM can be a part of honour based abuse. Honour based abuse is a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or honour. Violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

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 2020. This document may be accessed here: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

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 to the DSL. Nonetheless, you should inform the DSL after making the report so that they are aware of the situation unless the policy have instructed otherwise. 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. Some may occur as a result of being witness to domestic abuse.

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. It should be noted that

abuse can take place wholly online or may be used to facilitate 'off-line' abuse and sex abuse of children by children.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual (who may be male or female and adult or child) or a group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual and the child may not know that it constitutes CSE. Child sexual exploitation does not always involve physical contact (penetrative and non-penetrative acts); it can also occur through the use of technology. It may, or may not, be accompanied by violence or threats of violence. It may be a one-off occurrence or continual and may be opportunistic or organized. Indicators of CSE can include having an older boy/girlfriend and suffering from sexually transmitted infections and/or getting pregnant.

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 mental or physical 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 extremist ideologies associated with terrorist groups. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying 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 Safeguarding Partnership / 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 given in the Key Contacts section.

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 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' abuse, and CSE can be found in Annex A: Further information, of Keeping Children Safe in Education September 2020. Staff should inform the DSL as soon as possible if they make a referral to local authority children's social care about any extremism concerns

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 of 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'. This may be especially targeted at students with SEND who are deemed more vulnerable.
- Understand the potential for "grooming"

Children who go missing

The Missing Child Policy Procedure ensures that all measures are taken to monitor attendance and provide guidance to all staff when a student is missing from lessons. 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 (to be read in conjunction with Appendix II)

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. A forced marriage is where one or both people do not or cannot consent to the marriage, and pressure or abuse is used to force them into marriage

Children particularly at risk include those at risk of harm/neglect, those at risk of FGM/forced marriage, those from gypsy, Roma, or traveler families, those from families with parents serving in the military, those who have run away from home or care, those who are supervised by the

youth justice system, those who have ceased attending school and those who come from new migrant families.

If a child is failing to attend college regularly or has been absent without the college's permission for a continuous period of 20 college days or been absent for ten days after an authorized absence has ended, 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. The College will also inform the local authority when a child leaves the College (either as a result of withdrawal or as a result of being removed from the College by the College management for reasons such as non-payment of fees or expulsion) and the name of the new school or if the parents have not informed us of their child's new place of education.

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

Peer on Peer Abuse

Types of abuse

There are many forms of abuse that may occur between peers and the list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken. It can be noted that whilst most peer on peer abuse is perpetrated against females by males, all abuse of this kind is unacceptable and will be taken seriously, including, where necessary, referral to an outside agency. That said, the College endeavours to minimize the likelihood of such occurrences by promoting an atmosphere of cohesion and tolerance (through PADP and PSHEE programmes and assemblies on themes such as anti-bullying)

Physical abuse e.g. (biting, hitting, kicking, hair pulling, etc.)

Physical abuse may include hitting, kicking, pinching, shaking, biting, hair pulling or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken. It may be done in the guise of hazing.

Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault, etc.)

Sexually harmful behaviour from young people is not always contrived or with intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour

and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, sexual harassment, sexual violence, sexting, inappropriate role play to sexually touching another or sexual assault/abuse.

This also includes upskirting, which is defined as: “taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm”. As of 12th April 2019 this was a criminal offence.

Bullying (physical, name calling, homophobic etc)

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

An imbalance of power: Young people who bully use their power – such as physical strength, access to embarrassing information or popularity – to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.

Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason, e.g. size, hair colour, gender, sexual orientation and excluding someone from a group on purpose.

Cyber bullying

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites to harass, threaten or intimidate someone for the same reasons as stated above.

Prejudiced behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Expected action taken from all staff

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these

simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with the situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred, as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a “blame” culture and leave a child labelled.

In all cases of peer on peer abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

Gather the facts

Speak to all staff who were present and children dependent on age and understanding, using consistent language and open questions. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened? Only interrupt the young person from this to gain clarity with open questions, “where, when, why, who”. (What happened? Who observed/saw the incident? What was seen? What was heard? Did anyone intervene?)

Track evidence through observations, incident reports

Consider the Intent (begin to Risk Assess).

Has this been a deliberate or contrived situation for a young person to be able to harm another?

Can you define a trigger?

Are staff consistent with behaviour management?

Are all new staff to the setting informed of the circumstances and required amount of supervision?

Are the parents working together with the setting on using the same strategies?

Are the parents consistent at home?

Decide on your next course of action.

If from the information that you gather you believe any young person to be at risk of significant harm you must make a safeguarding referral to social care immediately (where a crime has been committed the police should be involved also). If this is the case, once social care has been contacted and made a decision on what will happen next then you will be informed on your next steps.

It may also be that social care feel that it does not meet their criteria in which case you may challenge that decision, with that individual or their line manager. If on discussion however, you agree with the decision, you may then be left to inform parents.

Informing parents

If, once appropriate advice has been sought from police/social care you have agreement to inform parents or have been allocated that role from the other services involved then you need to inform the parents as soon as possible. If social care/police are not going to be involved then equally, this information may need to be shared with the parents.

The best way to inform parents is face to face. Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another.

The same procedures should be followed when dealing with sibling on sibling abuse.

Points to consider

What is the age of the children involved?

How old are the young people involved in the incident and is there any age difference between those involved?

Where did the incident or incidents take place?

Was the incident in an open visible place to others? If so was it observed? If not, is more supervision required within this particular area?

What was the explanation by all the children involved of what occurred?

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

What is each of the children's own understanding of what occurred?

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Children's Services Social Care.

Repetition

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

Next Steps

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

For the young person who has been harmed

What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on cyberbullying, relationship abuse, etc. It may be that through the continued curriculum of PHSEE and PDP that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in the setting so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

For the young person who has displayed harmful behaviour

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through a CAF/strengthening families/early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that the young person receives a consequence for their behaviour. This may be in the form of restorative justice, e.g. making amends with the young person they have targeted if this has been some form of bullying. In cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency.

Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others, in which case an individual risk assessment may be required. This should be completed via a multi- agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

After care

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which cases, regular reviews with the young people involved following the incident(s) are imperative.

Preventative Strategies for Regent

Regent recognises that it is important to develop appropriate strategies in order to prevent the issue of peer on peer abuse rather than manage the issues in a reactive way.

The setting recognises that peer on peer abuse can and will occur even with the most stringent of policies and support mechanisms. In which case it is important that staff continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting children/young people to talk about any issues and through sharing information with all staff.

The following strategies are in place to prevent peer on peer abuse.

We ensure that our setting has an open environment where the children feel safe to share information about anything that is upsetting them or worrying them.

We ensure that the children are adequately supervised (in line with ratio guidance) during snack/lunch, in the outdoor area, moving through the setting and off-site, i.e. school outings,

Our setting has a strong and positive PSHE / PDP curriculum

It is incredibly important that staff do not dismiss issues as “banter” or “growing up” or compare them to their own experiences of childhood.

It is necessary that staff consider each issue and each individual in their own right before taking action.

If staff minimise the concerns raised it may result in a child/young person seeking no further help or advice.

Serious Crime

Staff must be aware of the indicators that children are involved in serious crimes. Indicators of these include, but are not limited to:

Increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs

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 Safeguarding/Cause for Concern Reporting Form (see Appendix III) 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 in their absence 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 Harrow Safeguarding Partnership 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. It can be noted that parental consent for referrals to statutory agencies is not required.

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 behaviours 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.**
- **Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.**

It can be noted that the College does not use supply staff or volunteer staff.

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) whose contact details are provided in the Key Contacts section 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) must not carry out investigations themselves.

If an allegation is made against a member of staff it must be responded to immediately to the DSL (with the Co-Principals kept informed) 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 possible other senior staff members 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 Co-Principal(s), the person receiving the

allegation will immediately inform the LADO, without prior notification to the Co-Principals and the DSL should be kept informed.

If the allegation concerns the DSL or DDSL, then the Co-Principals must be informed without prior notification to the DSL or DDSL.

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 Harrow Safeguarding Partnership 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 until the case is resolved or, where the circumstances are considered to warrant it, dismissed. It is reasonable to ask the police to give some indication of their timescale.

Consideration is given to making a referral to the TRA (Teaching Regulation Agency) where a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a 'conviction at any time for a relevant offence'.

Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in <https://www.gov.uk/government/publications/teacher-misconduct-the-prohibition-of-teachers--3>

Further guidance is published on the TRA website
<https://www.gov.uk/government/collections/teacher-misconduct>

A referral will be made to the DBS if an allegation is substantiated and it is thought that the individual has or may have engaged in conduct that has harmed or is likely to harm a child, or that they might pose a risk of harm to a child

Record Keeping:

Details of allegations that are found to have been malicious will be removed from personnel records.

For all other allegations a clear and full summary of the allegation, and how it was followed up and resolves and details of actions taken or decisions made are kept on the personnel file, confidentially, and a copy provided to them.

The College will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website).

All other records are retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

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 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, Personal Development Sessions and other pastoral support systems how to behave online and keep safe and build resilience in dealing with such matters. Students are taught that abuse can take place wholly online or that it may be used to facilitate offline abuse.

All students should be made aware of the Regent ICT & E-safety Policy, ICT Acceptable Use Agreement and Wi-Fi Acceptable Usage Policy. These policies are given to students as part of induction and copies are available through the admin office.

The IT Manager and other key personnel may also be consulted with for further advice.

PROCEDURES FOR DEALING WITH INAPPROPRIATE/ILLEGAL INTERNET ACCESS OR MATERIAL

Regent College have installed robust web filtering software - The software is WebBlocker URL Filtering within the WatchGuard suite - 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 IT Manager, 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 2020.

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.’

Remote Learning

Students are reminded that when remote learning (via video-conferencing software such as MS Teams or Zoom), that our IT & E-safety Policy and our Wi-Fi Usage Policy and the Safeguarding Policy continue to be in force. Staff are asked to be vigilant and take steps such as ensuring that they have no-inappropriate material in the background of their teaching environment and not engaging in one-to-one teaching sessions unless there is a supervisor. Teachers must immediately report any concerns to the DSL. Students are asked to ensure their video cameras are turned off until such time that parents have issued their consent for their child to have their video camera turned on and provided assurances that they will be supervised. All sessions are recorded and students and parents are made aware of this.

Policy on keeping staff safe (to be read in conjunction with Appendix IV)

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 Safeguarding Partnership 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

1. Keeping Children Safe in Education September 2020
2. Care Standards Act 2000 and Children Act 1989 and 2004 (Section 17 and 47) London Child Protection Procedures (<http://www.londoncp.co.uk/> - (to be read in conjunction with Appendix V)
3. Working Together to Safeguard Children 2018
4. 'Statutory guidance on children who run away or go missing from home or care' (Jan 2014) DfE
5. Prevent Duty Guidance for England and Wales – HM Government – March 2015
6. The Prevent Duty – Departmental advice for schools and childcare providers – June 2015
7. The Use of Social Media for online radicalisation (July 2015)
8. Mandatory Reporting of Female Genital Mutilation- procedural information – HM Office October 2015
9. "Prevent" Counter-Terrorism and Security Act (2015)

10. Sexting in schools and colleges: responding to incidents and safeguarding young people: UK Council for Child Internet Safety
11. Teacher misconduct: information for teachers. A guide for teacher's subject to teacher regulation disciplinary procedures –June 2015
12. Teacher misconduct: the prohibition of teachers July 2014 updated 31 Oct 2015
13. Regulated Activity in relation to children: scope
14. Children Missing Education – September 2016
15. Teaching Online Safety in School, June 2019

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
- Hand Held Device 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 documents can be found on

<https://www.harrowscb.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.

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.cjism.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 028 0285

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

Appendix I - DSL Job Role Spec

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children’s social care as required;
- support staff who make referrals to local authority children’s social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school’s or

college's child protection policy and procedures, especially new and part time staff;

- are alert to the specific needs of children in need, those with special educational needs and young carers;116
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school's or college's child protection policies are known, understood and used appropriately;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child protection file

Where children leave the school or college the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required. In addition to the child protection file, the designated safeguarding lead should also

consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Appendix II - 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.harrowlscb.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 Student/Student Child Visa procedures where appropriate.

Appendix III - Safeguarding / Cause for Concern Form

Please use this form when you have concerns about a child/young person. To be sent to:

Designated Safeguarding Lead:

- *Mr Amit Obhrai*

Or Deputy Designated Safeguarding Lead:

- *Mrs Maja Skibinska*

Child's Name

.....

Age if known

Concerns:

.....
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.....
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.....
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.....
.....
.....
.....

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

Your name **Date**

Role at Regent College.....

Appendix IV – Keeping Staff Safe

Communication with Children and Young People at Regent College (including the Use of Technology Taken from ‘Guidance for safer working practice for those working with children and young people in education settings’ May 2019

In order to make best use of the many educational and social benefits of new and emerging technologies, pupils need opportunities to use and explore the digital world. Online risks are posed more by behaviours and values than the technology itself.

Staff should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use policies which detail how new and emerging technologies may be used.

Communication with children both in the ‘real’ world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand-held devices. (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

Staff should not request or respond to any personal information from children other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as ‘grooming behaviour’ Staff should not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web-based identities.

If children locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their manager. The child should be firmly and politely informed that this is not acceptable. Staff should, in any communication with children, also follow the guidance in section 7 ‘Standards of Behaviour’. Staff should adhere to their establishment’s policies, including those with regard to communication with parents and carers and the information they share when using the internet.

This means that adults should:

- not seek to communicate/make contact or respond to contact with pupils outside of the purposes of their work
- not give out their personal details
- use only the equipment and internet services provided by the school or setting, unless school policies state otherwise
- only use internet-enabled personal devices in line with school acceptable use policies
- follow their school / setting’s acceptable use policy and online safety guidance
- ensure that their use of technologies could not bring their employer into disrepute
- not discuss or share data relating to children/ parents / carers in staff social media groups

This means that education settings should:

- wherever possible, provide school devices such as cameras and mobile phones rather than expecting staff to use their own (e.g. on school trip)

Appendix V - 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>

Appendix VI

Other information that may be useful on specific safeguarding related topics.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Forced Marriage

Any person may be forced into marriage – this includes people of all ages, genders, ethnicities and religions. A forced marriage is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into the marriage. Forced marriage is illegal in the UK. It is a form of domestic abuse and a serious abuse of human rights.

The pressure put on a person to marry can take different forms:

- physical pressure might take the form of threats or violence (including sexual violence)
- emotional or psychological pressure might take the form of making someone feel they are bringing shame on their family, making them believe that those close to them may become vulnerable to illness if they don't marry, or denying them freedom or money unless they agree to the marriage

In some cases people may be taken abroad without knowing that they are to be married. When they arrive in that country, their passport(s)/travel documents may be taken to try to stop them from returning to the UK.

What is consent?

For a marriage to be consensual, it must be entered into freely by both people getting married. You should feel you have a choice. Legally, people with certain learning disabilities or severe mental health conditions are not able to consent to marriage, even if they feel the marriage is what they want.

Honour Based Abuse

The definition of "honour" based abuse is: "an incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/ or community for alleged or perceived breaches of the family and/or community's code of behaviour."

This can take many forms including:

- Forced marriage
- Domestic violence (physical, sexual, emotional or financial abuse)
- Sexual harassment and sexual violence (rape and sexual assault or threat of rape and sexual assault)
- Threats to kill
- Social ostracism or rejection and emotional pressure
- Denial of access to children
- Pressure to go or move abroad
- House arrest and excessive restrictions of freedom
- Denial of access to the telephone, internet, or passport/key documentation
- Isolation from friends and own family