

Safeguarding & Child Protection Policy

Our safeguarding and guidelines for students, homestay guardians, parents, and staff adhere to the AEGIS standards. Safeguarding forms, the very core of education guardianship and all SE staff and homestay guardians must be trained according to these standards. Most of our guidelines relating to safeguarding are taken directly from “Safeguarding children” on the government website:

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

The SE ethos is based on all these aspects of safeguarding being prioritized as part of the broader mission to achieve the five main goals of KCSIE and “Every child Matters”

What is safeguarding?

Safeguarding legislation and government guidance says that safeguarding means:

- protecting children from maltreatment
- preventing impairment of children’s health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- and “undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.”

Every Child Matters (ECM) is a UK government initiative that was launched in 2003, at least partly in response to the death of Victoria Climbié. It is one of the most important policy initiatives and development programmes in relation to children and children's services of the last decade and has been described as a "sea of change" to the children and families agenda.

It has been the title of three government papers, leading to the Children Act 2004. Every Child Matters covers children and young adults up to the age of 19, or 24 for those with disabilities.

Its main aims are for every child, whatever their background or circumstances, to have the support they need to:

- Be healthy
- Stay safe
- Enjoy and achieve
- Make a positive contribution
- Achieve economic well-being

A helpful acronym to remember the 5 main aspects of a child’s wellbeing is SHEEP:

- Safety: always being safe
- Health: staying healthy
- Enjoyment: being happy and achieving
- Economy: having financial security and being financially aware
- Positivity: making a positive contribution, and being engaged

Safeguarding is far and away the most important aspect of guardianship in the minds of the Sutherland Education leadership. Andrew Sutherland is a chair of governors of an independent day school with nearly 1100 pupils and has for two years been the designated safeguarding governor monitoring safeguarding in the school. Considerable benefits to young international students and their parents are gained from the input from forums, workshops attended by the Sutherland Education leadership and from regular bulletins. Andrew Sutherland is the founder of AEGIS and Sutherland Education triggered the sector of professional guardianship we have in the UK today. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has an important role to play.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has an important role to play. It is important all SE staff and guardian homestays recognise the important role they play in protecting children. This must include identifying concerns early, providing help for children, promoting children's welfare and preventing concerns from escalating.

DEFINITIONS:

Child is defined as any person under the age of 18.

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. Safeguarding means:

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

Prevent is the name given to part of the government's strategy to prevent terrorism by reducing the possibility of radicalisation.

DSL (Designated Safeguarding Lead) is the person identified as taking the lead in safeguarding matters in an organisation. This person (and possibly a deputy) will be trained to a higher level.

Local Safeguarding Partnership (LSP) Formerly Local Safeguarding Children Board (LSCB) and consisting of the local authority, the clinical commissioning group within the local authority and the chief office of police within the local authority.

LADO The role of the Local Authority Designated Officer (LADO) is to coordinate all allegations and concerns made against a person who works with children.

List of LSP/Partnerships in London:

Barking and Dagenham

[Barking and Dagenham Safeguarding Children Partnership](#)

Barking Town Hall
1 Town Square
Barking IG11 7LU
Tel: 0208 227 3578

Barnet

[Barnet Safeguarding Children Partnership](#)

Safeguarding Division
Building 2, North London Business Park
Oakleigh Road South
London N11 1NP
Tel: 0208 359 4049

Bexley

[Bexley Safeguarding Children Partnership](#)

Civic Centre
2 Watling Street
Kent DA6 7AT
Tel: 0203 045 4320

Brent

[Brent Safeguarding Children Arrangements](#)

Brent Civic Centre
Engineers Way
Wembley HA9 0FJ
Tel. 020 8937 4300

Bromley

[Bromley Safeguarding Children Partnership](#)

Social Services
Bromley Civic Centre
Stockwell Close
Bromley BR1 3UH
Tel: 0208 461 7816

Camden

[Camden Safeguarding Children Partnership](#)

5 Pancras Square
London N1C 4AG
Tel: 0207 974 6658

City of London

[City of London and Hackney Safeguarding Children Partnership](#)

Hackney Learning Trust
1 Reading Lane
E8 1GQ
Tel: 0208 356 4183

City of Westminster

[City of Westminster Safeguarding Children Partnership](#)

Croydon

[Croydon Safeguarding Children Partnership](#)

Tel: 0208 604 7275

Ealing

[Ealing Safeguarding Children Partnership](#)

Perceval House
14-16 Uxbridge Road
Ealing W5 2HL
Tel: 0208 825 5000 (switchboard)

Enfield

[Safeguarding Enfield](#)

Civic Centre
Silver Street
Enfield EN1 3XA
Tel: 0208 379 2767

Hammersmith and Fulham

[Local Safeguarding Children Partnership for Kensington and Chelsea and Westminster \(formerly Hammersmith & Fulham, Kensington and Chelsea and Westminster\)](#)

Haringey

[Haringey Safeguarding Children Partnership](#)

River Park House
Wood Green
London N22 8HQ
Tel: 0208 489 3145

Harrow

[Harrow Strategic Safeguarding Partnership \(HSSP\)](#)

Civic Centre 1
Station Road
Harrow HA1 2UL
Tel: 0208 424 1147

Hillingdon

[Hillingdon Safeguarding Children Partnership](#)

Civic Centre
High Street
Uxbridge UB8 1UW
Tel: 0189 555 6633

Hounslow

Hounslow Safeguarding Children Partnership

Children and Families
7 Bath Road
Hounslow TW3 3EB
Tel: 0208 583 3066

Islington

Islington Safeguarding Children Partnership

3 Elwood Street
N5 1EB
Tel: 0207 527 4209

Kensington and Chelsea

Kensington and Chelsea

Kingston-Upon-Thames and Richmond

Kingston-Upon-Thames and Richmond Safeguarding Partnership (Achieving for Children)

Kingston: Room 53
Guildhall
Kingston upon Thames
KT1 1EU

Richmond: Ground Floor
Civic Centre
44 York Street
Twickenham TW1 3BZ
Tel: 0783 438 6459

Lewisham

Lewisham Safeguarding Children Partnership

Child Development Centre
3rd Floor
Laurence House
Catford SE6 4RU
Tel: 0208 314 3396

Merton

Merton Safeguarding Children Partnership

10th Floor
Merton Civic Centre
London Road
Morden SM4 5DX
Tel: 0208 545 4866

Newham

Newham Safeguarding Children Partnership

Newham Dock Side
1000 Dockside Road
London E16 2QU
Tel: 0203 373 1356 Int: 31356

Redbridge**[Redbridge Safeguarding Children Partnership](#)**

Lynton House 255-259

Ilford IG1 1NN

Tel: 0208 708 5282

Richmond-upon-Thames**[Richmond-upon-Thames](#)****Southwark****[Southwark Safeguarding Children Partnership](#)**

Southwark Council

Southwark Safeguarding Children Board

London SE1 2TZ

Tel: 0207 525 3306

Sutton**[Sutton Safeguarding Children Partnership](#)**

London Borough of Sutton

Sutton Civic Offices

ST Nicholas Way

Sutton SM1 1EA

Tel: 0208 770 4879

Tel: 0207 364 4955 / 2063

Waltham Forest**[Waltham Forest Safeguarding Children Board](#)**

Walthamstow Town Hall,

Forest Road,

London,

E17 4JF

Tel: 0208 496 3231

Wandsworth**[Wandsworth Safeguarding Children Partnership](#)**

Town Hall Extension

Wandsworth High Street

SW18 2PU

Tel: 0208 871 8610 / 7401

Windsor and Maidenhead (Achieving for Children)**[Local Safeguarding Children Partnership for Kensington and Chelsea and Westminster \(formerly Hammersmith & Fulham, Kensington and Chelsea and Westminster\)](#)**

Kensington Town Hall,

Hornton Street,

London,

W8 7NX

Tel: 0773 931 5388

LADO contacts:

Bath & Northeast Somerset Council: LADO@bathnes.gov.uk, tel. 01225 396810

Brighton & Hove City Council: tel. 01273 29 00 00, LADOenquiries@brighton-hove.gov.uk

Bristol Council: ADO@bristol.gov.uk , tel. 0117 903 7795

Gloucestershire Council: amadmin@gloucestershire.gov.uk, tel. 01452 426994

Hampshire County Council: tel. 01962 876364, child.protection@hants.gov.uk

Kent Council: centraldutyteam@kent.gcsx.gov.uk, tel. 03000 41 08 88

Lancashire County Council: LADO.admin@lancashire.gov.uk, tel. 01772 536694

Lincolnshire County Council: LSCP_LADO@lincolnshire.gov.uk ,tel. 01522 554 674

North Somerset Council: LADO@n-somerset.gov.uk, tel. 01275 888 808

North Yorkshire Council: ado@northyorks.gov.uk, tel. 01609 798005

Oxford Council: LADO.SafeguardingChildren@oxfordshire.gov.uk

Reading Borough Council: cspoa@reading.gov.uk, tel. 0118 937 3641

Shropshire Council: lado@shropshire.gov.uk, tel. 0345 678 9021

Suffolk Council: LADO@suffolk.gov.uk, tel. 0808 800 4005

Surrey Borough Council: tel. 0300 123 1650, LADO@surreycc.gov.uk

West Berkshire's Council: LADO.LADO@westberks.gov.uk, tel. 01635 503153

West Sussex Council: tel. 0330 222 6450, LADO@westsussex.gov.uk

Wiltshire Council: LADO@wiltshire.gov.uk, tel. 0300 456 0108

If there aren't your area LADO contact details, please contact any of the above, they are going to provide you with the correct telephone number.

The role of SE and its personnel

SE is fully committed to safeguarding and promoting the welfare of all its students. SE recognizes its responsibility to safeguard and promote the welfare of children within the legal framework of the Children Acts 1989 and 2004.

SE aims to always act in the best interests of the child regardless of gender, age, ethnicity, nationality, religion, or disability as all children have a right to safety and protection from any harm or potential harm (behaviour that causes physical or psychological damage). Parents have a right to believe that the organizations to which they entrust their children are safe. We have a duty of care to ensure the safety and wellbeing of every child in our guardianship, and we are committed to safeguarding and promoting the welfare of children and young people. For the purposes of this policy a child is defined as a person under the age of 18. This policy was updated in June 2022, and we are committed to reviewing it annually, drawing on feedback from students, staff, school, parents, and homestays.

- SE makes sure that the staff, schools, and guardian homestays become fully aware of their responsibility to safeguard and promote the welfare of children
- SE staff and guardian homestays are made aware of the need to be alert to the signs of abuse and know what to do with their concerns
- All SE staff, guardian homestays and other volunteers are subject to rigorous recruitment procedures
- All SE staff and guardian homestays are given appropriate support and safeguarding training
- Safeguarding Policy and Supporting Policies (Anti-bullying policy, Anti Radicalisation Policy, Online Safety Policy, Missing Student Policy, Safe Recruitment Policy, Whistleblowing Policy, Staff and Homestay Code of Conduct) are reviewed annually, and any new legislation is implemented

SE Principal, Prevent, Designated Safeguarding Lead (DSL) Andrew Sutherland	+44 (0) 7774646886 andrew@sutherland-education.com
Deputy DSL, Prevent Wioletta Laszyn	+44 (0) 203 8083 800 wioletta@sutherland-education.com

All SE staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm in accordance with this guidance.

SE strongly recommends its staff, guardian homestays and volunteers to read Keeping Children Safe in Education (KCSIE)

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

All SE staff and guardian homestays:

- Are aware of the systems in the organisation which support safeguarding, and these are explained to them as part of staff/homestay induction
- Receive appropriate safeguarding and child protection training (including online safety) prior to working with students

In addition, all staff should receive safeguarding and child protection updates (including online safety), annually, to provide them with the skills and knowledge to safeguard children effectively. A formal record of all safeguarding training is kept by SE

- Know the DSL in Sutherland Education and how to report any abuse
- Know what to do if a child tells them they are being abused or neglected. This includes understanding they should never promise a child that they will not tell anyone else about a report of abuse, as this is unlikely to be in the best interests of the child, and,
- Should be able to reassure all victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.
- All SE staff and guardian homestay are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Sutherland Education is aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

What is Abuse?

Abuse is mistreatment by any other person or persons that violates a person's human and civil rights. The abuse can vary, from treating someone with disrespect in a way that significantly affects the person's quality of life, to causing actual physical or mental suffering.

Somebody may abuse or neglect a child or young person by inflicting harm, or by failing to act to prevent harm. They may be abused in a family or in an institutional, education or community setting by those known to them or by others unknown to them (e.g., via the internet).

Abuse can take place on a face-to-face basis inside or outside of a college or sixth form, or indirectly via the internet, for example, Twitter, Facebook or Skype, or via emails and instant messaging. In short, there is a potential for abuse whatever young people do and wherever they spend their time.

Your duty of care is to be aware of signs and indicators of abuse, but NOT to investigate. That is for SE to manage in conjunction with social care professionals and the police. SE personnel and guardian homestays' role is to pass on the information to the DSL or SE Principal who then communicate the information to the LADO

There are different types of abuse:

1. Physical abuse, which may involve:

- hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm
- someone fabricating the symptoms of, or deliberately inducing, illness.

2. Emotional abuse which includes psychological abuse may involve:

- conveying to a young person that they are worthless or unloved, inadequate, or valued only because they meet the needs of another person
- not giving the young person opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate
- imposing expectations that are inappropriate to the age or development of the young person (especially where there are additional areas of vulnerability; for example, a learning disability) or preventing them from taking part in normal social interaction
- seeing or hearing the ill-treatment of someone else
- serious bullying, including cyberbullying, which causes the young person to frequently feel frightened, intimidated or in danger
- exploitation or corruption.

Psychological abuse also includes radicalising a child or young person who may be subsequently drawn into terrorist-related activity.

There is some level of emotional abuse in all types of abuse, but it may also occur alone.

3. Sexual abuse which may involve:

- physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts (e.g. masturbation, kissing, rubbing and touching outside of clothing)
- non-contact activities, such as involving young people in looking at or producing sexual images, watching sexual activities
- encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

4. Neglect includes: is the persistent failure to meet a child's basic physical and/or psychological needs and likely to result in the serious impairment of the child's health or development. Neglectful acts of omission may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter, including excluding the young person from home or abandoning them
- protect a young person from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate health, education, or social care services.
- be responsive to a young person's basic needs or deliberately withholding information about a person's rights or entitlements.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant

Child Criminal Exploitation (CCE) CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

(a) in exchange for something the victim needs or wants, and/or

(b) for the financial or other advantage of the perpetrator or facilitator and/or

(c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable

adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in several locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Several of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

Peer on Peer Abuse

Children can abuse other children. This generally referred to as peer on peer/child abuse and can take many forms. It happens both inside and outside of the school and online. It is most likely, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationship between peers
- Physical abuse
- Sexual abuse
- Non-consensual sharing of nudes and semi nudes' images and/or videos
- Causing someone to engage in sexual activity without consent
- Upskirting
- Initiation/hazing type violence and rituals
- Gang activities

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Bullying or Peer Abuse occurs when children are singled out for ridicule and torment by peers who are relatively more powerful than they are. The children who do the tormenting (e.g., the bullies) are typically older, physically larger, more aggressive or more socially powerful than their victims. The bullies' goal is to experience themselves as powerful and dominant. Their acts of bullying are designed to induce in their victims a sense of powerlessness, helplessness and humiliation, the appearance of which is proof of their dominance. Their ability to force victims to experience painful states they cannot avoid or ignore is proof of bullies' potency and effectiveness.

Spotting the Peer-on-Peer signs:

- Absence from school or disengagement from school activities
- Physical injuries
- Mental or emotional health issues
- Becoming withdrawn – lack of self esteem
- Lack of sleep
- Alcohol and substance misuse
- Changes in behaviour
- Inappropriate behaviour for age
- Harmful towards others

It is important to remember that as with all safeguarding issues, peer on peer abuse can impact on children and young people without those characteristics. The issue facing professionals is that these characteristics will often make the child more visible, whilst those without any of the characteristics above may be less likely to come into contact with professional. It is therefore important to look at interlinking factors and not isolated incidents.

It is important to recognise that children are vulnerable to abuse in a range of social contexts as they form different relationships in their neighbourhoods, schools and online and these can feature violence and abuse which is often hidden to adults. Peer influence and pressure is a major factor in decisions made by young people to join groups. Understanding the power dynamic that can exist between children and young people is very important in helping to identify and respond to peer on

peer abuse – there will be a power imbalance and this may be due to age or status – social or economic – and the child/young person who has harmed in one situation may be the one being harmed in another so it is essential to try to understand the one harming and what is driving their behaviour before giving sanctions.

A thorough investigation of the concerns should take place to include any wider contexts which may be known. However, the child/young person who has been harmed should always be made to feel safe and actions will need to be taken to separate them from the those harming them and ensure that the abuse is not allowed to continue. The issues of the interplay between power, choice and consent should be explored with children/young people.

Reporting. The following general principles and guidelines should be followed:

1. Initial response

- Any direct disclosure by a student pupil of an incident of abuse should be taken very seriously and managed sensitively. Basic principles of listening sensitively, providing reassurance, not asking leading questions and not guaranteeing confidentiality should be remembered.
- All incidents should be responded to in line with the Safeguarding and Child Protection Policy.
- Any incident should be referred to the DSL or the Principal without delay.

2. Taking action

When necessary, the DSL will take advice from LADO on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the student or students accused of abuse.

If a student against whom an allegation of abuse has been made is required to be interviewed by the police, then the student will be supported during the interview by an appropriate responsible adult.

3. Recording Process and Outcomes

Notes should be made of all conversations and meetings to do with any incident of peer-on-peer abuse. Formal written records should be completed immediately or within 24 hours.

Records should include date, time, place, persons involved, nature of disclosure and any relevant details:

- Questions and notes should be clear, explicit, and non-avoidant, and avoid vague statements or euphemisms
- Records should contain exact language or vocabulary used by the child and where, when the incident happened and whether anyone else was around
- Do not interrogate or ask leading questions)

These should be emailed to the DSL immediately. Records of all safeguarding concerns are kept by the DSL. The DSL will offer ongoing support in the best interests of the students in our care and action

may need to be co-ordinated where there is a wider investigation involving Children's Social Care and/or the Police

Honour-based abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage) So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

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.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

Actions

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. In schools, where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers- if a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

E-Safety

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation, or emotional abuse.

Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online).

Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

SE adopts a holistic approach to online safety which:

- captures the range and complexity of the risks and of children's experiences of those risks
- seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the internet
- handles all cases of online harm appropriately and with sensitivity

Most of our children will use mobile devices and computers at some time. They are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing children to engage in sexually harmful conversations, webcam photography or face to- face meetings, radicalisation or sexual predation.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

1. content: being exposed to illegal, inappropriate or harmful material

This includes but is not limited to:

- violent pornography or sexual images of children which affect a child's perception of girls, love and relationships
 - material promoting harmful behaviours such as self-harm or eating disorders
 - propaganda or material promoting extremism, radicalisation and/or terrorism
 - material showing or depicting extreme violence or brutality
 - social media such as Facebook and Instagram which can provide children with distorted and unrealistic images of others' lives, causing some children to feel inadequate or distressed about their own lives
2. contact: being subjected to harmful online interaction with other users

This includes but is not limited to:

- cyber-bullying
- contact from individuals seeking to groom children for the purposes of sexual abuse or radicalisation

3. conduct: personal online behaviour that increases the likelihood of, or causes, harm

This includes but is not limited to:

- responding to and engaging with individuals seeking to groom or abuse children
- youth produced sexual imagery

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. *(If pupils, students or staff appear at risk, please report to the AntiPhishing Working Group (<https://apwg.org/>)).*

Having assessed the level and nature of risk posed to our students, and bearing in mind the prevalence of online harm and abuse in the UK, we consider the risk of online harm to be material, particularly in relation to: cyber-bullying; harm caused by youth produced sexual imagery, internet pornography or on-line grooming; and harmful material promoting behaviours such as self-harm and eating disorders.

Any child may suffer from online harm, and all staff should be alert to the risk of it. Indicators that a child may be being abused or harmed online overlap with other indicators of abuse which can be found at Appendix 1 of the Safeguarding Policy.

If you suspect that a child may be at risk of or suffering from online harm, follow the procedure set out at Section 3 of the Child Protection Procedures and discuss any concerns with the DSL immediately. The DSL will discuss the incident with you and agree on a course of action in accordance with the safeguarding procedures set out in the Safeguarding policy.

Internet Policy

It is our policy to make sure that all our guardian homestays are well informed about the types of online abuse and the signs and symptoms to look out for. This information is shared through sources such as this handbook and in our workshops. We also seek to ensure that all our guardian homestays know how to respond regarding recording information, not guaranteeing confidentiality and informing the appropriate persons.

Bullying Online or Cyberbullying

Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games, and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images, or videos.

Children may know who's bullying them online – it may be an extension of offline peer bullying - or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of engaging in bullying behaviour.

Cyberbullying includes:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- 'trolling' - the sending of menacing or upsetting messages on social networks, chat rooms or online games

- excluding children from online games, activities, or friendship groups
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking, or stealing online identities to embarrass a young person or cause trouble using their name
- sending explicit messages, also known as sexting
- pressuring children into sending sexual images or engaging in sexual conversations.

Online Grooming

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking.

Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.

Groomers may be male or female. They could be any age.

Many children and young people don't understand that they have been groomed or that what has happened is abuse.

Groomers can use social media sites, instant messaging apps including teen dating apps, or online gaming platforms to connect with a young person or child.

They can spend time learning about a young person's interests from their online profiles and then use this knowledge to help them build up a relationship.

It is easy for groomers to hide their identity online - they may pretend to be a child and then chat and become 'friends' with children they are targeting.

Groomers may look for:

- usernames or comments that are flirtatious or have a sexual meaning
- public comments that suggest a child has low self-esteem or is vulnerable.

Groomers don't always target a particular child. Sometimes they will send messages to hundreds of young people and wait to see who responds.

Groomers no longer need to meet children in real life to abuse them. Increasingly, groomers are sexually exploiting their victims by persuading them to take part in online sexual activity.

Sexual Abuse Online

When sexual exploitation happens online, young people may be persuaded, or forced, to:

- send or post sexually explicit images of themselves
- take part in sexual activities via a webcam or smartphone
- have sexual conversations by text or online

Abusers may threaten to send images, video, or copies of conversations to the young person's friends and family unless they take part in other sexual activity.

Images or videos may continue to be shared long after the sexual abuse has stopped.

How to spot Abuse, signs, and symptoms

The signs of child abuse aren't always obvious, and a child might not tell anyone what's happening to them.

Children might be scared that the abuser will find out, and worried that the abuse will get worse. Or they might think that there's no-one they can tell or that they won't be believed.

Sometimes, children don't even realise that what's happening is abuse. Below is list of things to look out for:

- Child becomes secretive and reluctant to share information.
- Child is reluctant to go to school/home to parents/home to guardian homestay host
- Child is unwilling to bring friends home or reluctant for professionals to visit the family home/homestay home or school
- Poor school attendance and punctuality
- Parents show little interest in child's performance and behaviour at school.
- Parents are dismissive and non-responsive to professional concerns.
- Child is reluctant to get changed for sports etc.
- Child wets or soils the bed.
- Child drinks alcohol regularly from an early age, experiments with drugs such as marijuana
- Child is concerned for younger siblings without explaining why.
- Child becomes secretive and reluctant to share information.
- Child talks of running away.
- Child shows challenging/disruptive behaviour at school or in the homestay
- Child is reluctant to get changed for sports etc.

Reports of any abuse

Hearing the report

The following guidelines should be observed:

If a child or group of children disclose the fact that they are upset or worried, or if a child or group of children give the appearance of being upset, every effort should be made to keep the individual or group of individuals calm and to alleviate, as far as possible, any distress. It is not appropriate to try to force conversation whilst there is an emotive atmosphere. The individual(s) concerned should be taken to a private place where, if you feel the situation warrants it, a second responsible adult should be asked to be present.

- Confidentiality should never be guaranteed.
- Questioning should be limited, and 'leading' questions should be avoided.
- The matter should be referred immediately to DSL, SE Principal, if both are not available then directly LADO
- A written record of alleged abuse should be made as soon as possible.

- An allegation of abuse should never be discounted simply on the grounds of the child's location or because the alleged abuser is someone well known to and trusted by the individual to whom the disclosure has been made
- Do not start your own investigation and do not share any details with your colleagues, friends or family. When a child discloses information to you, he or she may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets.
- During your conversation with the child, allow her or him to speak freely, do not ask investigative questions – such as how many times this has happened or whether it happens to someone else too. Tell the child what will happen next, that someone might come to see him/her before the end of the day. Contact the designated person, write up your conversation as soon as possible on the record of concern form and hand it to the designated person.

Reporting the feedback

Allegations of abuse made by a child should be reported as follows:

- A child should speak to a member of the SE personnel who reports it to DSL, Wioletta Laszyn or SE Principal Andrew Sutherland. The Designated Safeguarding Lead will make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
- The DSL will refer cases of suspected abuse to the local authority children's social care as required. The DSL will support staff and homestays who make referrals to local authority children's social care; the DSL will refer cases to the Channel programme where there is a radicalisation concern as the DSL will refer cases where a crime may have been committed to the Police as required.
- If the alleged abuser is the SE staff the child should initially report it to DSL or the SE Principal. This individual should then report the matter to the Social Services Department. SE will follow the guidance in Keeping Children Safe in Education
- If SE staff or guardian homestays have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then this should be referred to the SE Principal
- Any allegations against a member of guardianship organisation staff, volunteers or homestays will be to LADO immediately and follow their advice. SE will not investigate the case.
- Where there are concerns/allegations about DSL or the SE Principal, this should be reported directly to the local authority designated officer LADO.
- The notification and prompt handling of all concerns about adults is fundamental to safeguarding students. It helps to identify and prevent abuse and to protect adults against

misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours.

- If a child speaks to one of the adults of the homestay about any abuse that has taken place, the homestay reports it to DSL or the SE Principal. If none of the above is contactable, please do contact appropriate authorities such as:
 - ✓ NSPCC on 0800 136 663
 - ✓ ChildLine on 0800 1111
 - ✓ LADO in Gloucestershire on 01452 426565
 - ✓ Local Safeguarding Partnership (LSP) <https://www.gloucestershire.gov.uk/council-and-democracy/joint-ventures/districtborough-local-strategic-partnerships-lsps>
 - ✓ tel. 01242 235354
 - ✓ Police on 101 (not emergency) Police on 999 (if a child is at immediate risk)

SE will be the main point of contact with the parents and will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the Designated Safeguarding Lead (DSL) will make contact first with the school to find out if there has been any relevant action taken by them and then with the parent in the event of a concern, suspicion, or disclosure. However, if we believe that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's social care.

Liaison with all stakeholders

Ongoing communication is maintained with parents, agents (where appropriate), and the student's school. Staff and guardians in their respective roles are provided with clear guidelines as to how and when to communicate with all stakeholders appropriately according to the circumstance. All material communications must be copied to the main office, where they are recorded, usually within the file (electronic) for each student. Records are kept of all significant communications both internal and external.

Any person responsible for the welfare of a child has a duty under English law to report any suspicions of abuse to the relevant authority.

Recording action

Sutherland Education is extremely diligent in keeping detailed and accurate records (mostly electronically) of communications and situations regarding each student, and of actions taken. Please use the opportunity freely to email us about your student, in all aspects of his or her life in your home. We are particularly interested in the level of commitment to study and personal development.

Safeguarding records will be stored securely and separately to the general student files. These will be stored confidentially by the DSL in a password protected file. Only the DSL will have access to these files. Records will be detailed and accurate. These will include all concerns about a student even if there is no need to make an immediate referral and record the rationale for decisions made and action taken. Copies of any correspondence or notes from conversations with the LSP, school DSL or other external body will be included in the file. SE will ensure that the indication of the existence of the additional child protection file is marked on the student file record. Information will only be shared in a 'need-to-know' basis in order to safeguard the student.

Useful websites:

- Child Exploitation and Online Protection <https://www.ceop.police.uk/safety-centre>
- The NSPCC provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies)
- Support from specialist sexual violence sector organisations such as Rape Crisis <https://rapecrisis.org.uk> or The Survivors Trust <https://www.ceop.police.uk/safety-centre>
- The Anti-Bullying Alliance has developed guidance for schools about Sexual and sexist bullying. <https://anti-bullyingalliance.org.uk>

Online concerns can be especially complicated and support is available from:

- The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and college staff regarding online safety issues
- Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF) <https://www.iwf.org.uk>
- Childline/IWF *Report Remove* is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online <https://www.iwf.org.uk/our-technology/report-remove>
- UKCIS Sharing nudes and semi-nudes advice: Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery). Please see footnote 8 for further information <https://www.gov.uk>
- Thinkuknow from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online <https://www.thinkuknow.co.uk>
- LGFL 'Undressed' provide schools with advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders. <https://undressed.lgfl.net>

Low Level Concerns

The overarching aim of SE low-level concern procedure is to facilitate a culture in which the clear values and expected behaviours are lived, constantly monitored, and reinforced by SE staff and guardian homestays.

The intention is to maintain a culture of openness, trust and transparency in which SE staff and guardian homestays are confident and clear about expected behaviours of themselves and their colleagues. The delineation of boundaries and reporting lines ensure SE staff and guardian homestays feel empowered to raise any low-level concern where the behaviour might be construed as falling short of the standards set out in SE Guidelines and provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that

concerns when raised will be handled promptly and effectively whilst on the other hand protecting staff from false allegations.

What is a low-level concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with SE Guidelines or simply – even if not linked to a particular act or omission – have caused a sense of unease as to the adult's behaviour particularly towards or around children. From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in SE Guidelines.

What should I do if I have a low-level concern?

Where a low-level concern exists, it should be reported to the DSL or the SE Principal as soon as reasonably possible and hopefully within 24 hours of becoming aware of it (where the concern relates to a particular incident).

How will my low-level concern be handled?

The DSL will discuss all low-level concerns she receives with the SE principal as soon as possible and in any event within 24 hours of becoming aware of it. The SE principal will in the first instance satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure below. The circumstances in which a low-level concern might be reclassified are where:

- the threshold is met for an allegation
- there is a pattern of low-level concerns which collectively amount to an allegation or
- there is other information which when considered leads to an allegation.

Where SE Principal is in any doubt whatsoever, advice will be sought from the Local Authority Designated Officer (LADO), if necessary, on a no-names basis. Having established that the concern is low-level, the DSL or SE Principal as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc

What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file unless either:

- the concern (or group of concerns) has been reclassified as an allegation as above
- the concern (or group of concerns) is sufficiently serious to result in formal action under the SE grievance, capability or disciplinary procedure.

Preventing Radicalisation

Preventing radicalisation is part of SE commitment to keeping students safe. In line with section 26 of the Counterterrorism and Security Act 2015, SE is under a duty to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the “Prevent duty”. Being

drawn into terrorism includes not just violent extremism but also non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views which can be exploited by others. SE aim is to ensure that all staff and guardian homestays are aware of the importance of preventing extremism and radicalisation, and that they understand what radicalisation and extremism is, and the associated risks.

There is no typical profile for a person likely to become involved in extremism and those involved in extremism come from a range of different backgrounds and experiences. However, it is vital that SE staff including guardian homestays are aware of these possible signs which could include (but might not be limited to) the following:

- Religious conversion.
- Change in behaviour or personal appearance.
- New friends, distance from old friends.
- Attempts to impose own beliefs on others.
- Being in possession or accessing materials or symbols associated with an extremist cause.
- Showing sympathy for violence, especially to other faiths or cultures.
- Secretive behaviour.

Where necessary, SE will establish effective partnerships with parents, families, and local authorities. It is paramount that any concerns or incidents, however small, are reported immediately to SE office who will report to the DSL. Any report will be dealt with sensitively and carefully, with confidentiality assured for the person reporting the concern.

Radicalization refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

(Taken from "Prevent duty guidance").

All students and Staff **MUST** show proper tolerance and respect to others, and they have a responsibility to report any who don't to SE office.

Missing Student Policy

It is the responsibility of SE staff to actively search for students who are missing, including working with the authorities where appropriate. For the purposes of this policy, the term 'missing' refers to a student not being present without authorisation or explanation, or long overdue in returning.

On occasions when a staff member identifies a student as missing, immediate action is required as outlined in the procedures below.

Good communication is at the heart of safeguarding. It is important to ensure that your student has all the contact details by which to communicate with you both in hard copy and electronically, and likewise you have the student's mobile number, both in your mobile and written down.

It is part of good safeguarding practice to always know where a student is. Never allow a student to leave your home without knowing where the student is going, whom they are meeting if this is the case and the arrangements regarding travel. Acquiring any mobile numbers and other contact details of any friends, associates or places being visited (without any sense of intrusion, naturally) adds to the

safety of the arrangement. How much you insist on knowing will depend on the age of the student; sensible parental standards are anticipated here, with a license to err on the side of needing to know even with the older student. In fact, there should be few occasions on which it would be deemed permissible for a student to withhold any such information.

Please ensure that you have ascertained this information and that you have given due consideration to the age of the student and the appropriateness of the arrangement in line with these guidelines. You are always able to override these guidelines in the direction of tighter control on the basis of being aware of your concerns for the student's welfare. The legal liability rests always with Sutherland Education - as long as you are not guilty of any criminal act, such as hitting them over the head with a rolling pin!

If a child or young person goes missing out of hours and SE receives a report then the staff member who takes the call is responsible for ensuring the completion of the initial reasonable enquiries where a student is absent/missing during an event (for example half term, exeat or during a suspension/expulsion) which will include:

- If appropriate, reviewing the flight and transfer details (with communication to the airline and transfer company to confirm transport arrangements for the student).
- Contacting the student (leaving a message if no answer) asking them to contact the on-duty member of staff and repeating this contact every 30 minutes.
- Contacting the houseparent to collate any relevant information about the whereabouts of the student – this is only possible if the houseparent is at school.
- Contacting the parent/agent to collate any relevant information about the whereabouts of the student.
- Contacting the homestay to collate any relevant information about the whereabouts of the student.
- Contacting Key Guardian to collate any relevant information about the whereabouts of the student, along with any contact details we may not be aware of.
- Review of information held on file which may indicate friends or associates who the student may be with.

Any member of SE staff or guardian homestay may report a child or young person as absent or missing to the police where they have genuine concerns for their safety.

Following a risk assessment, the receiving police force will record a report of absent or missing where there are grounds to do so. In cases of missing children or young people, the police will work cooperatively with Children's Social Care staff during any enquiry.

The incident lead is responsible for ensuring the school is informed of any report made to the police of an absent or missing child or young person, as the school retains the overall duty of care. The school should be updated with any developments as they should always know the whereabouts of the student, especially those on visas.

The incident lead is responsible for ensuring that the parents/agent are informed of any report made to the police of an absent or missing child or young person. The parents/agent should be regularly updated (recommended a minimum of every 4 hours) with any developments. This is to ensure that they are fully informed as to the situation involving their son or daughter.

Student might go missing:

- Not returning to school after an exeat weekend or school holiday
- Not arriving from home country after the school break
- Not returning to homestays by curfew time
- Going missing on a school trip, activity, or sporting event

Students not arriving at the airport

The student might have not found SE driver and has taken a different taxi or might have not left their home country i.e., missed the flight or suddenly got ill. Please do contact the parents/agent first, then review the flight and transfer details (with communication to the airline and transfer company to confirm transport arrangements for the student or the parents/agent)

Students not returning to homestays by curfew time

Students are expected to return to their homestay by the curfew time. However, in case of a student not returning home by the curfew time staff, host families are required to follow this procedure: No later than 10 minutes after the agreed curfew time, the homestay must contact the student to find out where they are.

- If the student is too far away to walk or got lost, families are required to pick the student up, or arrange a taxi communicating name and position of the student. Families need to ensure the student only accepts a taxi driver who knows their name.
- Contact any friends, associates, or venues to enquire after your student's whereabouts.
- Should contact the student prove unsuccessful, within a 15 min after the time arranged, a member of the SE team must be contacted and alerted. The 24/7 emergency line may be used for this purpose (07774 646 886), or otherwise a Key Guardian contacted. You will then be guided in next steps and supported in determining the whereabouts of the student.
- The DSL or SE Principal is responsible for ensuring the school is informed of any report made to the police of an absent or missing child or young person, as the school retains the overall duty of care. The school should be updated with any developments as they should always know the whereabouts of the student, especially those on visas
- A student who falls into the 'Missing' category must be reported to the police as soon as possible by telephoning 101 for a non-emergency report or 999 for an emergency response i.e., information received that a child or young person is in immediate danger of harm.
- If the above stage is reached, a full record of all actions is to be written down: the time, place, when a student was last seen, what appeared to have happened, the length of time that the child was missing and how she/he appeared to have gone missing.
- All parties need to be informed as soon as the student is found.

Privacy

As with confidentiality, one must not offer a student the right to total privacy. There are occasions when a room search, and confiscation may be deemed necessary. This should only be conducted by the homestay guardian (preferably in the company of another adult), and only with the approval and guidance of the Key Guardian or a member of Sutherland Education's pastoral team. The circumstances leading to any decision to conduct a search should first be described in writing by email or text. Likewise, the consent to conduct a search should be received in writing beforehand and the outcome communicated to SE in writing.

Only in the extreme circumstances of an emergency should either a search or a breach of personal privacy, such as entering a bathroom (in the case of a student falling unconscious, for example) be conducted immediately, without consultation.

At all times every sensitivity should be demonstrated regarding the morale and self-esteem of the student, and his or her personal space. It is important to share any suspicions of wrongdoing on the part of the student with SE personnel as soon as they arise and at the earliest opportunity.

Beyond making enquiries with a student and expressing concerns, do not interrogate the student or make any accusations. Straight observations, expressions of concern and reminders of the house rules are all quite acceptable. When carrying these out, it is advisable to do so in an informal atmosphere and, where possible, in the company of another adult. Being firm about unacceptable behaviour is advised and will always be fully supported by SE but avoid expressing frustration where humanly possible.

It is well to remember that at any time you can ask for the immediate withdrawal of a student from your home. This is your right to do. At the same time, we all are working to achieve within the realms of what is deemed reasonable, the highest level possible of safeguarding on behalf of every student.

Whistleblowing

Whistleblowing is the term used when someone who works in or for an organisation wishes to raise concerns about malpractice or wrongdoing. It is regulated by The Public Interest Disclosure Act of 1998, also known as the Whistleblowing Act.

To further understand Whistleblowing, please read the below extract from '*Whistleblowing, Guidance for Employers and Code of Practice, March 2015*':

"To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things. The first is that they are acting in the public interest. This means, that personal grievances and complaints are not usually covered by whistleblowing law. The second thing that a worker must reasonably believe is that the disclosure tends to show past, present, or likely future wrongdoing falling into one or more of the following categories:

Criminal offences (this may include, for example, types of financial impropriety such as fraud)

- failure to comply with an obligation set out in law
- miscarriages of justice
- endangering a person's health and safety
- damage to the environment
- covering up wrongdoing in the above categories."

Whistleblowing is very different from a complaint or a grievance, which are not usually covered by whistleblowing law. If you wish to raise concerns over how child protection issues are being handled, the NSPCC Whistleblowing Advice Line can be reached on 0800 028 0285. If you have a complaint of a grievance, please see Complaint Procedure.

Reporting

SE recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty to those for whom SE is providing a service (international students). SE will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

Confidentiality

All allegations will be treated in confidence. SE will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation. Sometimes the whistleblower might be asked to give a statement as part of the investigation, in which case their identity may have to be revealed.

Anonymous allegations

This policy encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to prove. In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

Untrue allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

Procedure for making an allegation

Depending on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice, if the whistleblower believes that SE management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to any of the following:

The NSPCC whistleblowing helpline. Telephone number 0800 028 0285 between 8am and 8pm Monday to Friday or email help@nspcc.org.uk

Protect provide a free, confidential advice line for concerned staff to call before whistleblowing. The helpline is 020 3117 2520 and their website is: www.pcaw.co.uk.

AEGIS Telephone number 01453 821 293 or email yasemin@aegisuk.net

All SE staff, guardian homestays, school staff, parents, students and agents have the right to refer their allegations to the local LADO

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation.

Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Any allegations reported to SE should be responded to in writing by SE Principal within 5 working days
Further information and advice can be found here: <https://www.gov.uk/whistleblowing>

DSL and Safeguarding Training

SE responsibility for staff training lies with the DSL (Designated Safeguarding Lead) who ensure that all staff members involved in recruitment complete a Safer Recruitment Training Course. DSL person is Andrew Sutherland, mob. 07774646886,
email: andrew@sutherland-education.com

Deputy DSL person is Wioletta Laszyn, tel. 02038083800
mail: wioletta@sutherland-education.com

SE staff including Guardian Homestays participate in Safeguarding Training which needs to be renewed every three years and must be completed prior to hosting students under 18.

All staff and homestays receive regular safeguarding updates, at least once a year.

Use of photographs and videos

Taking photographs and films of students' activities can help to celebrate their successes and achievements, but the students and their parents have a right to decide whether their images are taken and how these may be used, regardless of age. Some students and parents may not be comfortable with images of themselves, or their children being shared. It is important to be aware of child protection and safeguarding issues when taking photos of or filming children and young people. The potential for misuse of images can be reduced if organisations are aware of the potential dangers and put appropriate measures in place.

Always ask for written consent from a child and their parents before taking any picture or video and do not share them online i.e., on your social media.

Review

We are committed to reviewing our policy and good practice annually.

Policy date: 23rd July 2025

Responsibility for Policy Review: Wioletta Laszyn