

INSTILL EDUCATION CHILD PROTECTION POLICY

The purpose of this Child Protection Policy

This policy applies to all employees of Instill Education who work with, care for or supervise child students or who are responsible for making arrangements for the care or supervision of child students. It also applies to those who supervise or manage such employees.

In this policy:

a “child student” is a student under the age of 18, whether studying on courses specifically aimed at children, or courses aimed at adults on which under-18s are accepted and
“School” includes both permanent and temporary schools
“School Principal” means the principal of a permanent school, and the course leader of a temporary school.

We have an explicit duty to safeguard and protect students from abuse as defined in the Children Act 2004 and the Education Act 2002. The overall intention and purpose behind this child protection policy is underpinned by the fundamental principle of the Children Act 1989:

‘the welfare of the child is paramount’

Each school in our group will therefore work to safeguard and promote the welfare of child students. To do this we will act in accordance with all applicable legislation. Where relevant to our activities, we will also seek to follow published government guidance, including:

- Local Authority Safeguarding Children Board (LSCB) and Oxfordshire Safeguarding Children Board child protection guidelines and procedures
- DfES guidance ‘Safeguarding Children and Safer Recruitment in Education 2006’
- HM Government ‘Working Together to Safeguard Children 2010’
- “Keeping Children Safe in Education” 2015
- This policy has been developed in accordance with the principles established by the Children Act 1989; and in line with the following:
 - “Working Together to Safeguard Children 2015”
 - “Framework for the Assessment of Children in Need and their Families” 2000

Instill Education aims to:

- establish and maintain a safe and caring environment for students to learn in;
- raise awareness in both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible causes of abuse.
- include in the course, where appropriate, activities and opportunities for students to acquire skills and attitudes, to both resist abuse in their own lives and to prepare themselves for responsibilities in their adult lives.

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

Roles and Responsibilities

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

1. Each School

The principal of each permanent school and the manager of each temporary school will appoint a **Designated Safeguarding Lead (DSL)** and the School Principal will ensure that the name and contact details of the **Designated Safeguarding Leads** are prominently displayed in the school.

The Designated Safeguarding Lead should be appropriately trained (ideally to a specialist or level 2 in Child protection and safeguarding). He/She has a special responsibility for safeguarding child students in that school, and for ensuring local adherence to the policies and procedures put in place with the aim of reducing the risk of abuse.

The School Principal has overall responsibility for his or her school and will support and manage the School DSL that he/she is able effectively to carry out his/her duties under this policy.

The School Principal will maintain a school environment where child students are listened to, and their concerns taken seriously, and will ensure that child students know how to get help if they need it.

The School Principal will work with the academic manager or director of studies to introduce, where appropriate, activities and opportunities for students to acquire skills and attitudes, to both resist abuse in their own lives and to prepare themselves for responsibilities in their adult lives

The School DSL will ensure that she or he is familiar with the Child Protection Policies, and will check that her/his colleagues know about these, and comply with them.

The School DSL will receive training to enable him/her to spot signs and indicators of potential abuse, and to help him/her know how to respond to a report or suspicion of abuse.

The School DSL must act promptly, in accordance with child protection policies, to prevent, stop or report abuse of a child where he or she becomes aware of this, or where he or she believes a child is at risk. The School DSL should access help, support or advice from the Group DSL or such deputy as s/he has designated.

The School DSL will ensure that he or she knows how to contact the **Group Designated Safeguarding Lead**, the Local Authority Designated Officer and the local authority person responsible for coordinating private fostering arrangements, and any other external expert designated or permitted by the **Group Designated Safeguarding Lead**. Where appropriate, and in consultation with the Group DSL, the School DSL will seek to form and foster good relationships with local external bodies responsible for child protection.

The School DSL will keep, securely and confidentially, records of his/her activities, reports or concerns about children or staff, deficiencies in policy or practice or other relevant child protection matters.

The School DSL should report any concerns or deficiencies with these policies or their implementation to the School Principal and the **Group Designated Safeguarding Lead**. In the case of a temporary school the course leader should also report to the manager.

The School Principal and the School DSL will ensure that each employee to whom this policy relates and who has contact with students under 18:

- completes the Generalist child protection training every 3 years;
- receives appropriate information and training about standards of behaviour in relation to child students;
- receives appropriate information and training about his or her responsibilities to prevent or reduce opportunities for others to abuse children;

- receives appropriate information and training about being alert to the signs of abuse and the procedures for referring concerns to the School DSL under this policy;
- is aware that his or her duty to safeguard children extends to a duty to report to the School DSL inappropriate staff behaviour or group policy or practices which could put children at risk of harm; and
- is given a copy or otherwise has unrestricted access to a copy of all relevant child protection policies and is instructed to read and follow these, and discuss questions or concerns with the School DSL

For temporary schools, the manager may carry out some or all of this duty and confirm to the course leader that he/she has done so.

Should any member of staff be unable or unwilling to talk with the School DSL about their child protection concerns, he or she should contact the School Principal, the **Group Designated Safeguarding Lead**.

Safer recruitment

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

2. Corporate Office

The **Group Designated Safeguarding Lead** , currently Jozef Windsor, is appointed by the Directors and based at Corporate Office. The Group DSL has delegated responsibility from the Directors for managing and coordinating child protection within the group.

The Group DSL supports and co-ordinates the School DSLs, with this assistance of the School Principals.

The Group DSL is responsible for revising and updating the Child Protection Policies, at least annually, to ensure that these are effective and comply with all relevant legislation and official guidance.

The Group DSL carries out spot-checks and unannounced visits to monitor compliance with Child Protection policies.

The Group DSL oversees recruitment for staff who will work with children, including the implementation of the staff recruitment policy, and either the Group DSP or the relevant young learners manager should be involved in any decision to recruit or dismiss staff where there are child protection concerns.

The Group DSL makes decisions about whether a member of staff should be reported to the DBS , in accordance with statutory obligations, because of concerns about his or her suitability to work with children, and does this if required.

Except in an emergency, the Group DSL is responsible for forming relationships with and liaising with external bodies, such as the Local Authority Designated Officer and/or the police. In an emergency, any member of staff should summon emergency help without delay.

The Group DSL decides if a referral to an external agency is necessary in relation to any child, and takes appropriate action.

The Group DSL arranges training for School DSL's and other staff as required.

The Group DSL undertakes regular training and refresher courses and updates.

The Group DSL will keep, securely and confidentially, records of his/her activities, reports or concerns about children or staff, deficiencies in policy or practice or other relevant child protection matters.

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

3. Instill Education

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

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

What are Child Abuse and Child Neglect?

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

Physical abuse

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

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and

limitation of exploration and learning, or preventing the child participating in normal social interaction.

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

Sexual abuse

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

Neglect

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

Neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter.
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision.
- Ensure access to appropriate medical care or treatment.

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

Some indications of the possibility of abuse:

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

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

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

Child sexual exploitation (CSE)

The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people, (or a third person or persons) receive something, (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing and/or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for

example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidations are common, involvement in exploitative relationships being characterised in the main by the child's or young person's limited availability of choice, resulting from their social/economic and/or emotional vulnerability. (DCSF 2009)

Key facts about CSE

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

Good practice – Individuals

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

Good practice – Organisations

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

Link to guidance

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/278849/Safeguarding_Children_and_Young_People_from_Sexual_Exploitation.pdf

Forced marriages (FM)

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

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

FM is illegal in England and Wales. This includes:

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

Link to the guidance:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf

Female Genital Mutilation (FGM)

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

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

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

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

Link to the guidance:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf

Prevent

The Counter Terrorism & Security Act 2015

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

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

Schools/settings subject to the Prevent Duty will be expected to demonstrate activity in the following areas –

- Assessing the risk of children being drawn into terrorism
- Demonstrate that they are protecting children and young people from being drawn into terrorism by having robust safeguarding policies.
- Ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board.
- Make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism
- **Expected to ensure children are safe from terrorist and extremist material when accessing the internet in school**

Dealing with a Disclosure

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

- Immediately stop what he or she is doing and listen to what is being said
- Don't display shock or disbelief.
- Accept what is being said.
- Allow the child to talk freely.

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

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

- Show acceptance of what the child says (however unlikely the story may sound).
- Keep calm.
- Look at the child directly.
- Be honest.
- Tell the child you will need to let someone else know – don't promise confidentiality.
- Even when a child has broken a rule, they are not to blame for the abuse.
- Be aware that the child may have been threatened or bribed not to tell.

- Never push for information. If the child decided not to tell you after all, then accept that and let them know that you are always ready to listen.

Some helpful things to say:

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

Things not to say:

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

At the end of the conversation:

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

Record Keeping

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

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

Confidentiality

All matters relating to Safeguarding are confidential:

- The School Principal, School DSL or Group DSL will disclose any information about a pupil to other members of staff on a need to know basis only.
- The School Principal, School DSL and Group DSL have a professional responsibility to share information with other agencies to the extent necessary in order to safeguard children.
- All staff must be aware that they cannot promise a child to keep secrets.

Recruitment of staff and host families

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

Any member of staff judged not suitable to work with children must be reported to the Group DSL so that s/he can decide if notification should be made to the appropriate bodies, including the Disclosure and Barring Service.

Allegations involving school staff

- All school staff should receive training and guidance on appropriate behaviour and should take care not to place themselves in a vulnerable position with a child. Particular care should be taken if it is necessary to see a child alone.
- If a child student or its representative makes a complaint of abuse against a member of staff, the person receiving the complaint must take it seriously and immediately inform the School Principal. He or she should also make a record of the concerns reported to him or her including details of anyone else who is said to have witnessed the incident or allegation.

- The School Principal will immediately inform the School DSL or the Group DSL.
- Careful consideration needs to be given to the suspension of the member of staff against whom an allegation has been made. Any suspension must be seen as a neutral action which does not predict the outcome of any disciplinary process.
- The Group DSL, in consultation with the School Principal will decide if the allegation needs to be referred to the LADO or the police for investigation. If the allegation constitutes a serious criminal offence, it may be necessary for the Group DSL: to do so before informing the member of staff.
- If the Group DSL decides that a referral is not indicated at this stage the School Principal will investigate following the school's disciplinary procedures.
- If the allegation made to a member of staff concerns the School Principal the person receiving the complaint will inform Group DSL who will follow the procedures above without involving the School Principal.

Contact Details:

Designated Safeguarding Lead

Lis Alexandre

lis.alexandre@basilpaterson.co.uk

0131 225 3802

Group Designated Safeguarding Lead:

Jozef Windsor

01865 258328

Jozef.windsor@oise.com

Related Policies:

Safeguarding Statement

Alcohol Drug and Tobacco policy

Recruitment and selection policy (England and Wales)

Recruitment and selection policy (Scotland)

Recruitment of host families

Health and Safety policy (in Health & Safety Manual)

DBS Policy – Recruitment of Ex-offenders

Recruitment of Ex-offenders (Scotland)

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

Anti-Bullying Policy

Reviewed January 2017

To be reviewed January 2018