

Summer Program Safeguarding & Child Protection Policy

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1. Introduction: TASIS England is committed to building a 'culture of safety' in which the children and young people in our care are protected from abuse, harm and radicalisation.

TASIS England will respond promptly and appropriately to all incidents or concerns regarding the safety of a child or young person that may occur. TASIS England's safeguarding and child protection procedures comply with all relevant legislation and with guidance issued by Surrey Safeguarding Children Partnership (SSCP) and Surrey Children's Single Point of Access (C-SPA).

There is a Designated Safeguarding Lead (DSL) available at all times while the TASIS England Summer Program is in session. The DSL coordinates safeguarding and/or child protection issues and liaises with external agencies (eg Social Care, SSC and the police).

If you have a safeguarding concern about any child or young person on the Program, contact the following people:

The Program DSL:

• Program DSL - Mr Colin Williams: +44 (0) 7770 339 754

Program Directors

- Mrs Sia Georgaklis: +44 (0) 7407 855 106
- Mr Tom Trembulak: +44 (0) 7392 319 943

On-call DSL:

- 24-06 to 28-06 Mr Darren Singh-MacPherson: +44 (0) 7774 658 911
- 29-06 to 12-07 Mr Bryan Nixon: +44 (0)7392 319 933
- 13-07 to 25-07 Mr Jason Tait: +44 (0) 7392 319 922
- 26-07 to 03-07 Mr Darren Singh-MacPherson: +44 (0) 7774 658 911

The legal definition of a child In England, Northern Ireland and Wales, is anyone who has not yet reached their 18th birthday. Once they turn 18, they are legally an adult. (UK Government, Department for Education Guidance - *Working together to Safeguard Children 2018 - (updated February 2024*)

This policy complies with the latest UK government statutory guidance published by the Department for Education (DfE) <u>Keeping Children Safe in Education</u> and <u>Working Together to</u> <u>Safeguard Children</u>. Additionally, it adheres to the latest UK government non-statutory DfE guidance provided in <u>Keeping Children Safe During Community Activities, After-School Clubs</u> <u>and Tuition: Non-Statutory Guidance for Providers Running Out-of-School Settings 2022</u>.

Note: This policy may refer to the School or the Program interchangeably, both terms refer to the TASIS England Summer Program

TASIS England is committed to safeguarding and promoting the welfare of students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

KEY INTERNAL CONTACT DETAILS

Sia Georgaklis - Director of TASIS England Summer Program sgeorgaklis@tasisengland.org - Mob: 07407 855 106

Tom Trembulak – Director of TASIS England Summer Program

ttrembulak@tasisengland.org - Mob: 07392 319 943

Colin Williams – Designated Safeguarding Lead for TASIS England Summer Program, Houseparent, Summer School Teacher

cwilliams@tasisengland.org – Mob: 07770 339 754

Bryan Nixon - The Head of School for TASIS The American School in England, responsible for managing the DSL and Safeguarding at TASIS England. Deputy Designated Safeguarding Lead for Summer School Program (session 2)

bnixon@tasisengland.org - Tel: 01932 582 314 - 07392 319 933

Jason Tait - Director of Pastoral Care (EYFS - 12th grade), Designated Safeguarding Lead (Whole School) and Prevent Officer reporting directly to the Head of School. Deputy Designated Safeguarding Lead for Summer School Program (part session 1 & 2)

jtait@tasisengland.org - Tel: 01932 582 312 - Mob: 07392 319 922

Darren Singh-MacPherson - Director of inclusion, Wellbeing & Compliance, Deputy Designated Safeguarding Lead for Summer School Program (session 1)

dsinghmacpherson@tasisengland.org - Tel: 01932 582435 - Mob: 07774 658 911

David King - Deputy Designated Safeguarding Lead, Chair of the Board of Directors, the Proprietor with Leadership responsibility for Safeguarding and Prevent Duties

dking@tasisengland.org - Tel: 01932 565 252 - Mob: 07564 341 887

Duty Manager mobile - available for emergencies 24/7: Mobile: 07553 287 524















2. Contact numbers

Surrey Children's Single Point of Access (C- SPA)

- Availability: 9am to 5pm, Monday to Friday
- Phone: 0300 470 9100
- Out of Hours: 01483 517898
- Email: <u>cspa@surreycc.gov.uk</u>
- Out of Hours: edt.ssd@surreycc.gov.uk
- Early Help: The early Help Hub can now be contacted on the details above

Local Authority Designated Officer (LADO):

- Availability: 9am to 5pm, Monday to Friday
- Phone: 0300 123 1650
- Out of Hours: 01483 517898
- Email: <u>LADO@surreycc.gov.uk</u>
- Out of Hours: edt.ssd@surreycc.gov.uk

Surrey Safeguarding Children's Partnership (SSCP):

- Availability: 9am to 5pm, Monday to Friday
- Phone: SSCP Support Team: 01372 833330
- Phone: SSCP Chair: 01372 833378
- **Email:** partnership.team@surreycc.gov.uk

Prevent:

- **Contact:** PC Oliver Greenaway
- **Phone:** 101 ext. 39055 mobile: 07720 043980
- Email: <u>Oliver.Greenaway@surrey.pnn.police.uk</u>
- Prevent referral process: preventreferrals@surrey.pnn.police.uk

Female Genital Mutilation (FGM):

- **Contact:** Police non-emergency 101 and for emergency calls 999.
- Phone: Advice and guidance NSPCC Helpline 0800 028 3550
- Email: fgmhelp@nspcc.org.uk

Miscellaneous:

- Police: 999 (emergency)
- **Police:** 101 (non-emergency)
- Anti-terrorist hotline: 0800 789 321
- NSPCC Child Protection Helpline: 0808 800 500
- Childline: Tel: 0800 1111 www.childline.org.uk
- Ofsted: 0300 123 1231

3. Contextual Safeguarding: We recognise that young people's behaviours, levels of vulnerability and levels of resilience are all informed by the contexts in which young people spend their time. When spending time within extra-familial contexts, young people may be exposed to healthy norms which promote pro-social relationships, or they may encounter harmful norms that are conducive to abusive and exploitative relationships.

As a result, we identify, assess and intervene where possible in all of the social environments where abuse and exploitation of young people may occur – in essence to take a *'contextual'* approach to safeguarding. For example, our school leadership team works with professionals and the student body to challenge harmful, gendered school cultures, thus improving the pre-existing school environment.

Additionally, we help to promote a culture of safety within the Program and around the School regarding students' online activities – a place where young people spend an increasing amount of time, raising their vulnerability to potential abuse.

Please visit <u>https://www.contextualsafeguarding.org.uk/</u> for more information.

- **4. Child Abuse and Neglect:** Child abuse is when a child is intentionally harmed by an adult or another child it can be over a period of time but can also be a one-off action. It can be physical, sexual or emotional and it can happen in person or online. It can also be a lack of love, care and attention this is neglect (NSPCC).
 - Physical abuse Physical abuse is when someone hurts or harms a child or young person on purpose. It includes: hitting with hands or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching, breaking bones and drowning.
 - Emotional abuse Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child. Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.
 - **Neglect** Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing.
 - Sexual abuse When a child or young person is sexually abused, they're forced, tricked or manipulated into sexual activities. They might not understand that what is happening is abuse or that it's wrong for the abuser to do this to them. They might be afraid to tell someone or behave as though this is normal for them to experience, both are valid for the child to be displaying. Sexual abuse can happen anywhere – and it can happen in person or online.

TASIS England is committed to safeguarding and promoting the welfare of students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

Under no circumstances should any staff member or volunteer physically or psychologically harm a child or young person. If any adult causes physical or psychological harm or injury to, or mistreats a child or young person, they could be prosecuted for a criminal offence.

5. Signs of child abuse and neglect:

Signs of possible abuse and neglect may include:

- noticeable changes in a child's behaviour
- deterioration in a child's general wellbeing
- unexplained bruising or marks
- comments made by a child which give cause for concern
- reasons to suspect neglect or abuse outside the setting, eg in the child's home, or that a
 female may have been subjected to (or is at risk of) female genital mutilation, or that the
 child may have witnessed domestic abuse
- inappropriate behaviour displayed by a member of staff, or any other person. For example, inappropriate sexual comments, excessive one-to-one attention beyond the requirements of their role, or inappropriate sharing of images, digitally or otherwise

If a child makes a disclosure to a member of staff, that member of staff will:

- reassure the child that they were not to blame and were right to speak out
- early in the interaction, inform the child that this information must be shared with the DSL and possibly some other professionals to ensure their safety
- listen to the child but not question them
- give reassurance that the staff member will take action
- record the incident in writing as soon as possible (see section 19 below: Recording a concern)

If a member of staff witnesses or suspects the abuse of a child, they will report the matter *immediately* to the DSL, using a Cause for Concern Form (available from the Summer Program Office). Staff must ensure that a face to face or telephone conversation has taken place with the DSL, this ensures that the DSL has received the necessary information as quickly as possible, sending just the form or an email or SMS is not sufficient. The concern will be recorded using a Cause for Concern form and handed to the DSL, staff should not cause unnecessary delay in reporting to the DSL by pausing to record the incident, you should make notes but the priority is to ensure the information is received by the DSL who will then make a decision regarding next steps. Once reported to the DSL the incident should be recorded in writing fully with as much detail as possible.

If a third party expresses concern that a child in our care is being abused, they should be encouraged to contact Children's Social Care directly. If they are unwilling to do so, we will explain that the Program is obliged to contact Surrey C-SPA and the incident will be logged accordingly.

- **6. Child-on-child abuse:** Children are vulnerable to abuse by their peers. Child-on-child abuse is taken seriously by staff and is subject to the same child protection procedures as other forms of abuse. Staff are aware of the potential uses of mobile devices and information technology for bullying and abusive behaviour between young people. Staff will not dismiss abusive behaviour as normal between young people. The presence of one or more of the following in relationships between children should always trigger concern about the possibility of child-on-child abuse:
 - inappropriate or sexual activity between children, including sharing nude or semi-nude images sometimes know as sexting or youth-produced sexual imagery
 - one of the children is significantly more dominant than the other (eg much older)
 - one of the children is significantly more vulnerable than the other (eg in terms of disability, confidence, physical strength)
 - there has been some use of threats, bribes or coercion to ensure compliance or secrecy

If child-on-child abuse is suspected or disclosed, we will follow the same procedures for responding to any other form of child abuse.

7. Concerns and allegations of abuse made against other children: We recognise that some students on occasion will negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the whole School Anti-Bullying (including Cyber-bullying) and Behaviour Management Policies. Staff are clear as to our policy and procedures with regards to child-on-child abuse and are trained to manage a report of child on child sexual violence and sexual harassment. The Program understands that although we may have few or even no reported cases of child-on-child abuse, such abuse may still be taking place and simply not being reported. For more information regarding sexual violence and sexual harassment between children – Please see our whole school Safeguarding Children Child Protection Policy which is available on the TASIS England website which contains government guidance from Keeping Children Safe in Education.

We recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victim/survivors and boys' perpetrator(s), but that all child-on-child abuse is unacceptable and will be taken seriously. **We have a zero-tolerance approach to abuse** and that it should never be tolerated or dismissed as 'just banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Child-on-child abuse can take many forms, including:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim/survivor humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- 8. When dealing with abuse by young people on peers: TASIS England follows the key UK government safeguarding documents, Keeping Children Safe in Education and Working Together to Safeguard Children, even where an alleged perpetrator(s) is a child. We adhere to all UK legislation including the Human Rights Act 1998 and the Equality Act 2010. Additionally, we use a Child-on-Child Abuse toolkit to support staff in safeguarding students. Sexualised abuse, including verbal abuse by peers is a safeguarding issue and is included in the School's broader approach to safeguarding. If the School or Program receives an allegation of abuse by one or more students but is alleged to have taken place outside of the School premises, our safeguarding principles remain the same, and we could still carry out a referral to children's services as necessary.

However, where there is 'reasonable cause to suspect that a student is suffering, or likely to suffer significant harm' the concern or allegation of child-on-child abuse must be reported to the DSL immediately, who will then refer to the Surrey Children's Services. A factual written record should be made of the concern or allegation, but no attempt at this stage should be made to investigate the circumstances. A copy of the discussions and outcomes will be kept in all relevant students files. If appropriate the DSL will refer students to an external safeguarding agency such as Childline and NSPCC.

The Program will ensure:

- effective implementation of the Program's safeguarding and anti-bullying policies (and recognition that sexualised abuse, including verbal abuse, by peers is a potential safeguarding issue
- advice is sought from statutory agencies, as appropriate, and readiness to make a referral if an incident meets the <u>referral threshold</u> set by the Surrey Safeguarding Children Partnership
- advice for practitioners in: What to do if you're worried a child is being abused is followed
- effective information sharing with any agencies or other professionals involved

- where allegations of abuse or assault have been made against one or more students, a thorough risk-assessment of the situation and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) should be carried out with a view to ensuring the safety of all students and that both alleged victims/survivors and perpetrator(s) receive appropriate support
- decisions arising that might include, for example, whether the accused student should be removed from the Program for a period of time, or from certain classes; whether contact with certain individuals should be prevented or supervised
- the availability of counselling, the adequacy of arrangements for listening to children etc
- good record keeping of related conversations, meetings and communications
- if a child is in immediate danger or is at risk of imminent harm, the emergency services should be called on 999, this would be followed up with an immediate referral to Children's Social Care
- 9. Sexual Violence and Sexual Harassment between children: At TASIS England, we take our definition of sexual violence from the <u>Sexual Offences Act 2003</u> and Keeping Children Safe in Education, which considers rape, assault by penetration and sexual assault, all types of sexual violence. TASIS England recognises that sexual violence can happen both inside and outside school and can occur online and offline. All allegations of sexual violence will be reported to the police, in parallel with Children's Social Care.

In addition, we define sexual violence as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual violence and sexual harassment can be between two children, or a group of children of any age and sex. Both sexes may be affected, although girls are more likely to be victims/survivors, and boys are more likely to be perpetrator(s)s. 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.

We recognise that Children with special education needs and/or disabilities (SEND) are likely to be more vulnerable. TASIS England is aware that online sexual violence or sexual harassment can be more complex, such as non-consensual sharing of sexual images; sexualised online bullying; unwanted sexual comments including on social media and sexual exploitation, coercion and threats. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- upskirting
- physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes (this may cross a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature

• online sexual harassment, which might include non-consensual sharing of nude and semi-nude images and or videos (both often referred to as 'sexting'), inappropriate sexual comments on social media, exploitation, coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

10.Responding to reports of sexual violence and sexual harassment: Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. We recognise that children may not find it easy to tell staff about abuse they may have experienced verbally and that staff may be informed by a third party or through behaviour indicators of the victim/survivor.

We understand the importance of the School's role in acting upon any concerns immediately and making sure all victim/survivors are reassured and that they are being taken seriously, regardless of how long it has taken them to come forward. Though it may not be necessary to report one-off issues of sexual harassment to the police, each allegation of abuse will be taken seriously, and the DSL will still refer these allegations to Children's Social Care, who will support the School in deciding whether the victim/survivor or alleged perpetrator(s) are in need of protection or other services. However, all allegations of sexual *violence* will be reported to the police, in parallel with Children's Social Care. Though children's sexual behaviours can be developmentally expected, some more harmful sexual behaviours may cause developmental damage. The Brook sexual behaviours traffic light tool is used to help us consider harmful sexual behaviours.

Reports of sexual violence are often complex and require difficult decisions to be made, on a case-by-case basis, with the DSL taking the lead role, supported by external agencies such as Children's Social Care or the police. Some situations are statutorily clear: a child under the age of 13 can never consent to sexual activity (the age of consent in the UK is 16); sexual intercourse without consent is considered in UK law as rape; creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

11.Actions following a report of sexual violence and/or sexual harassment: A

factual written record should be made of the concern or allegation, taking the victim/survivor seriously, but no attempt at this stage should be made to investigate the circumstances, unless a child is in immediate danger or is at risk of harm, in which case the police and/or Children's Social Care should be contacted. Every report will be considered on a case-by-case basis.

Additionally, in cases where there is a report of rape, assault by penetration or sexual assault this should be passed to the police. Victim/survivors will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; they will not be made to feel ashamed for making a disclosure. The DSL will follow the advice for practitioners in <u>What to</u> do if you're worried a child is being abused and will follow through the outcomes of the discussion and if so advised by Children's Social Care, will make a formal referral if the incident meets the referral threshold set by the Surrey Safeguarding Children Partnership ensuring

effective information sharing with any agencies or other professionals involved. The DSL will ensure good record keeping of related conversations, meeting and communications with a copy of the discussions, and outcomes kept securely. Staff should not assume that someone else is dealing with the incident and should discuss concerns with the DSL. Where an incident between two students takes place away from the School, the School's duties and procedures remain the same.

All staff are required to read, understand and comply with part 1 of the DfE guidance Keeping Children Safe In Education so they are aware of how to manage a disclosure and are aware of anonymity in cases where an allegation is progressing through the criminal justice system. TASIS England will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media.

The DSL will make an immediate written risk and needs assessment where there has been a report of sexual violence, considering the victim, alleged perpetrator(s) and other children and staff at the School (including actions to protect them). Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. Risk assessments will be kept under review. In cases of sexual violence, a professional risk assessment by external specialists may be required, and should be used to inform the School's own risk assessment. TASIS England will consider carefully any report of sexual violence or harassment and act in the best interests of the child.

TASIS England will also consider carefully when to inform the alleged perpetrator(s), and this may be discussed with relevant agencies. The School actively considers the risks posed to our students and ensures adequate measures are in place to protect students and keep them safe. Staff may be expected to participate in any early help assessment, child protection enquiry, strategy discussion or other outcome, following a referral to Children's Social Care.

12. With any report of sexual violence and/or harassment, the DSL will consider:

- the wishes of the victim/survivor in terms of how they want to proceed. Victim/survivors will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children, including age gaps or differences in maturity, cognition or understanding (including SEND or learning difficulties)
- if the alleged incident is a one-off or a sustained pattern of abuse
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- If there are ongoing risks to the victim/survivor, other children, adult students or school staff

- any other related issues and wider context
- **13.Managing the report:** Whatever the School's response, it is underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded. Dependent on the disclosure of sexual violence or sexual harassment, the School will consider the following courses of action:
 - **Managing internally:** in some cases of sexual harassment (such as one-off incidents) the School may manage the incident internally, without the involvement of early help, following our behaviour management policy;
 - **Involve Early help:** when a report may not require the use of statutory intervention, involving early help is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
 - Referral to Children's Social Care: in cases where there has been harm, or a child is at risk of harm or there is in immediate danger, a referral will be made to C-SPA. Parents or carers will generally be informed of this, unless there is a clear reason not to at this stage. A risk and needs assessment will also be produced;
 - **Reporting to the police:** in cases where rape, assault by penetration or sexual assault is reported. TASIS England will not wait for the outcome of a police investigation before protecting the victim/survivor, perpetrator(s) and other children in the School. The DSL will work closely with the police to ensure that the School's actions do not jeopardise the police investigation. If a child is convicted or cautioned, the School will update the risk assessment and consider suitable action through their behaviour policy. It is important for TASIS England to ensure the victim/survivor and perpetrator(s) remain protected, especially from bullying or harassment. Where no further action is taken, or a child found not guilty, TASIS England will continue to support the victim/survivor and perpetrator(s).

14.This is how victim/survivors of child-on-child abuse will be supported: All

students involved, whether perpetrator(s) or victim/survivor, are treated as being 'at risk'. A thorough risk-assessment and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) will be carried out with a view to ensuring the safety of all students. It would be decided whether the accused student should be removed from the Program for a period of time, or whether the alleged perpetrator(s) would be removed from classes and any transport etc. which is shared with the victim/survivor.

Sleeping arrangements may need to be amended and consideration would be given to whether contact between certain individuals should be prevented or supervised. The School would assess whether counselling or referral to an external safeguarding agency such as ChildLine and NSPCC is required and if the adequacy of arrangements for listening to children is appropriate. We recognise that any actions taken will be in the best interests of all children involved and is not perceived to be a judgement of guilt of the alleged perpetrator(s).

Additionally:

- support for the victim/survivor will consider their age, the nature of the allegations and the risk of further potential abuse; alleged perpetrator(s) may also have unmet needs themselves
- the needs and wishes of the victim/survivor will be paramount, and they will be able to continue their normal routine as far as possible
- TASIS England will be prepared to support victim/survivors
- TASIS England will take all reasonable steps to protect victim/survivors from bullying or harassment as a result of any report they have made
- TASIS England must ensure the victim/survivor is safeguarded, but still provide the perpetrator(s) with an education and support as necessary
- TASIS England may discipline the alleged perpetrator(s), including while the police or social care investigation is ongoing, although they will liaise with these bodies to assist in determining any sanctions
- TASIS England will be clear about when their actions are to support the victim/survivor or perpetrator(s), and when their actions are to discipline the perpetrator(s) for their conduct
- a student against whom an allegation of abuse has been made may be excluded from the program for a fixed period during the investigation and the Program's policy on behaviour, discipline and sanctions will apply
- **15. Interviews by the police:** If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to any advice from Children's Social Care, the student's parents are informed as soon as possible and that the student is supported during the interview by an appropriate adult (provided by the School if necessary). Usually, the DSL will try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement to make a referral to C-SPA if necessary. However, in accordance with DfE guidance, this will only be done when this will not place the child at increased risk. The child's views will also be taken into account. Where there are doubts or reservations about involving the child's family, the DSL should clarify with C-SPA or the police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the child and that the School will be involved in the enquiry or police investigation.
- **16.Supporting witnesses of sexual violence or sexual harassment:** Consideration should be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required. Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". The School will do all it can to ensure both the victim/survivor and alleged perpetrator(s), and any witnesses, are not being bullied or harassed. Social media is very likely to play a significant role in the fall out from any incident or alleged incident. There is the potential for contact between victim/survivor and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim/survivor or alleged perpetrator(s)

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online. When writing a risk-assessment for the students involved in an incident of sexual violence or sexual harassment, we will consider whether any additional potential support is needed to keep all our students safe.

- **17.Extremism and radicalisation:** All childcare settings have a legal duty to protect children from the risk of radicalisation and being drawn into extremism. There are many reasons why a child might be vulnerable to radicalisation, for example:
 - feeling alienated or alone
 - seeking a sense of identity or individuality
 - suffering from mental health issues such as depression
 - desire for adventure or wanting to be part of a larger cause
 - associating with others who hold extremist beliefs

Signs of radicalisation - Signs that a child might be at risk of radicalisation include:

- changes in behaviour, for example becoming withdrawn or aggressive
- claiming that terrorist attacks and/or violence are justified
- viewing violent and/or extremist material online
- possessing or sharing violent extremist material with others

If a member of staff suspects that a child is at risk of becoming radicalised, they will record any relevant information or observations on a Cause for Concern form and refer the matter to the DSL without delay.

- **18.Recording a concern:** All information about the suspected abuse or disclosure, or concern about radicalisation, will be recorded on a Cause for Concern form as soon as possible after the event. The record should include:
 - date of the disclosure, or the incident, or the observation causing concern
 - date and time at which the record was made
 - name and date of birth of the child involved
 - a factual report of what happened. If recording a disclosure, you must use the child's own words
 - name, signature and job title of the person making the record
 - the DSL should be made aware of all incidents on paper or electronic Cause for Concern forms. They will then decide, usually in discussion with another senior manager, on an appropriate course of action

For concerns about child abuse, the DSL will contact Surrey C-SPA. The DSL will follow up all referrals to Surrey C-SPA in writing within 48 hours. If a member of staff thinks that the incident has not been dealt with properly, they may contact Children's Social Care directly. For minor concerns regarding radicalisation, the DSL will contact Surrey C-SPA or, if available, the Local

TASIS England is committed to safeguarding and promoting the welfare of students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

Authority Prevent Lead for support and advice for the prevention of radicalisation. For more serious concerns the DSL will contact the police on the non-emergency number (101), or the anti-terrorist hotline on 0800 789 321. For urgent concerns the DSL will contact the police using 999.

- **19.Female Genital Mutilation (FGM):** Any child who is suspected to be a victim/survivor or is considered to be at risk of FGM must be referred to the police and Surrey C-SPA. Any member of staff aware of a child who is suffering or is likely to suffer FGM may contact the police directly, if you are unsure contact the DSL or a Program Director.
- **20.Allegations against staff:** All allegations of child abuse against staff will be reported to the the Program Directors, the DSL and, if available, the Head of School. In each case, the Director, Head of School or DSL will refer to the LADO (Local Authority Designated Officer), within 24 hours via the C-SPA who will then advise regarding next steps and subsequent investigation including any potential police involvement.. The police will be informed if a criminal offence is alleged. Guidance will also be sought from the LADO and/or police to enable the School to make a decision about whether or not the person against whom an allegation has been made should be allowed to remain on school premises and if so what, if any, conditions should apply.

If TASIS England is given information that alleges a member of staff is or was abusing a child who is not a student at the School, the DSL would immediately report to the LADO and follow the procedure as if it were one of our own students. In borderline cases, where there may be room for doubt as to whether a referral should be made, the reporting staff member will consult with the LADO without identifying the family. However, as soon as sufficient concern exists that a student may be at risk of significant harm, a referral to Children's Services will be made without delay.

The School will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the police will be informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/children agreed. In cases where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children would be applied.

21.Delayed Recruitment Checks: TASIS England recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances TASIS England will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country. If a satisfactory reference is obtained the School may allow the applicant to commence work pending receipt of the formal check if the applicant is considered suitable on the basis of the information the TASIS England has obtained.

All suitability assessments must be documented and retained on file. Continued employment will remain conditional upon TASIS England being provided with the outcome of the formal check and it being considered satisfactory by the School. In addition, where an applicant for a teaching position has worked as a teacher outside of the UK, the School will ask the applicant to obtain from the professional regulating authority of the teaching profession in each country in which they have worked as a teacher, evidence which confirms that they have not imposed any sanctions or restrictions on the applicant and that they are not aware of any reason why the applicant may be unsuitable to work as a teacher. The School will also ask shortlisted applicants (and their referees) to disclose whether they have ever been referred to, or are the subject of a sanction issued by, the regulator of the teaching profession in the countries in which they have carried out teaching work.

Sanctions and restrictions issued by the regulating authority of another country will not necessarily prevent a person from working as a teacher at the School. However, the School will take all relevant information into account in determining whether an applicant is suitable to work at the School.

If the formal check is delayed and references are not available, the applicant's proposed start date may be delayed until the formal check is received.

If no information is available from a particular country the School will carry out an assessment of whether the applicant is suitable to work at the School on the basis of all other suitability information that has been obtained.

TASIS England will take proportionate, risk-based decisions on a person's suitability in such circumstances. All suitability assessments must be documented and retained on file.

- **22.Promoting awareness among staff**: The School promotes awareness of child abuse and the risk of radicalisation through staff training. The School ensures that:
 - the DSL has relevant experience and receives appropriate training in safeguarding and the Prevent Duty, and is aware of the Channel Duty guidance and how to access it
 - DSL training is refreshed in line with Surrey Safeguarding Children Board requirements
 - safer recruitment practices are followed for all staff
 - all staff have a copy of this Safeguarding Policy, understand its contents and are vigilant to signs of abuse, neglect or radicalisation
 - all staff are aware of their statutory duties with regard to the disclosure or discovery of child abuse, and concerns about radicalisation
 - all staff receive basic safeguarding training, and safeguarding is a permanent agenda item at all staff meetings
 - all staff receive basic training on the Prevent Duty
 - all staff are familiar with reporting and recording on Cause for Concern forms
 - the School's procedures are in line with the government guidance in <u>Working Together to</u> <u>Safeguard Children</u> and <u>What To Do If You're Worried A Child Is Being Abused</u> (copy and paste the paper title accordingly if viewing this policy in print).

23.Use of mobile phones and cameras: Photographs will only be taken of children with their parents' permission. Only school authorised cameras and devices will be used to take photographs of children during the Summer Program. Neither staff nor visitors may use their personal mobile phones to take photographs at the School. For more details see our Mobile and Smart Technology Policy within the <u>TASIS England Online Safety Policy</u> available on the School website.

Students are expected to use the network systems in a responsible manner. It is not possible to compile a complete set of rules about what is, and what is not, acceptable; however, the above should be a guide and in cases of dispute the decision of the Program Directors and/or Head of School will be final.

Student access to networked resources is a privilege, not a right. Students will be expected to use the resources for the educational purposes for which they are provided and in accordance with the Acceptable Use Policy.

Resources:

- Children Act 1989
- Children Act 2004
- Children & Families Act 2014
- The Equality Act 2010
- The Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children
- What To Do If You're Worried A Child Is Being Abused, Advice for Practitioners
- Keeping Children Safe in Education
- TASIS England Safeguarding Children Child Protection Policy
- Surrey Safeguarding Children Partnership https://www.surreyscp.org.uk/