

Safeguarding Policy

This policy covers all the programmes taught by TopUp Learning – RAAS Summer Camp Reigate

Safeguarding Statement: TopUp Learning is committed to safeguarding and promoting the welfare of everyone at TopUp Learning, in particular those aged under 18. We are fully committed to ensuring that consistent effective safeguarding procedures are in place on site, off-site and online to support **everyone** (including but not limited to staff, students, and group leaders) within the organisation. We expect all TopUp Learning staff to share this commitment and behave accordingly.

All concerns are passed to our Designated Safeguarding Leads (DSL).

Our DSL is <u>Ms Amelie Francoise</u>. The Senior Manager responsible for Safeguarding-DSL is <u>Dr</u> <u>Sam Malafeh</u>.

The purpose of this policy is to ensure that everyone at TopUp Learning is aware of what safeguarding is, why it is important, and the behaviour expected of them. It is linked closely with our Staff and Student Code of Conducts. We expect all adults reading this document to be clear on their role and responsibilities.

Key terminologies:

"safeguarding" - this is a term to mean the overall care of everyone and looking after those aged under 18

"Child protection" - Protecting children and vulnerable adults from abuse

"**abuse**" - all forms of physical and/ or emotional ill treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context or relationship of responsibility, trust or power "**concerns**" - these are when someone *is* worried or concerned that a child, (under 18) is at risk of harm, or that they are not being cared for in the appropriate manner

"**disclosure/ allegations**" - this is when there is information which shows that an adult may have behaved in a way that harms a child, *has* committed a criminal offence against a child or related to a child or has behaved in a way that could pose a risk of harm mid working closely with or regularly with a child.

Related Policies: Student Code of Conduct Staff Code of Conduct Health and Safety Policy Fire Safety Policy Bullying and Harassment Policy E-Safety Policy Excursions Policy Attendance Policy Prevent Policy Parental Agreement

Policy Review: TopUp Learning policies are all reviewed annually by the Designated Safeguard and the Senior Manager responsible for Safeguarding. Students and teachers are consulted throughout the year, see section 5.

Yearly Report: At the end of each year the DS will create a yearly report on the concerns and allegations. This is a record of the year and reviews the actions taken.

This document has 7 Sections:

- 1. Safer Recruitment
- 2. Welfare of Under 18 students in the school
- 3. Risk Assessments
- 4. Supervision Ratio
- 5. TopUp Learning Methods for Raising Awareness of Safeguarding
- 6. Child Protection including awareness, dealing with concerns and allegations, recording and reporting.

1.Safer Recruitment

We follow these steps when recruiting new staff for roles within the school or for our online provision.

Recruitment process

- All jobs advertised include our Safeguarding Statement
- Applicants are told on their Invitation to Interview our commitment to Safeguarding

Interview process

• Applicants are asked questions during the interview to learn about their experience and attitude to working with Under 18s.

- All gaps in CV's are investigated.
- All qualifications are checked, original copy seen and copied where this is not possible screenshots are taken of the applicant with their documentation and saved.
- If the interviewee already has corrected enhanced DBS in place, dated within the last 2 years this is accepted, if they don't have one or it has an older date they are requested to apply
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- Photographic proof of ID is requested and copied or where this is not possible screenshots are taken of the applicant with their documentation and saved.
- 2 references are contacted, in which their experience with Under 18 students asked about

<u>Job Offer</u>

• The DBS form is sent with the job offer letter and Staff or Teacher handbook which reiterates the importance of their commitment to our company ethos.

DBS Checks

All staff must have an Enhanced DBS check. If they are from abroad or have been living abroad, TopUp Learning London (Tti)/TopUp Learning (online) will check the British Council's International Criminal Records Checks directory to ensure the correct documentation is provided.

What will happen if a new staff member's Enhanced DBS is not received prior to start date:

- If they already have an Enhanced DBS for work for the children's workforce dated within the last 2 years this will be accepted in the interim period. This is providing their references can confirm their experience and the correct attitude with this age group and there are no concerns regarding gaps in their CV.
- They will not teach any classes that include students aged under 18, will not partake in Social Programme activities and will be requested not to socialise in the common areas with students.
- They can teach no more than 2 weeks without the renewed DBS
- They must have completed the online Safeguarding training and signed a Self-Declaration from before they teach their first class
- A staff member <u>will not</u> commence employment prior to the submission of their completed paperwork to obtain criminal clearance
- If the suitability check shows that the new staff member does have a conviction in the last 3 years related to safeguarding or posing a risk of harm to children, they will not be offered a job at TopUp Learning London (Tti)/TopUp Learning (online).

2. Welfare of Under 18 students in the school

TopUp Learning London (Tti) is aware that students aged under 18 years old require additional support from our Welfare team.

We have the following important processes in place to help us safeguard them.

Stage One – Enquiry/Application

On receipt of an enquiry or an application form for a student aged under 18 the following 4 documents are sent to parent, student or agency. These are:

- Letter of Consent to Travel
- Parental Agreement
- Safeguarding Policy Mini Version

Student Code of Conduct

It is made clear that the enrolment is not confirmed until the Letter of Consent to Travel and the Parental Agreement have been returned to the school with signatures.

Stage Two – Arrival in the UK

All students arriving in the UK are given our school emergency telephone number.

We request that those aged under 18 book an arrival taxi or charted coach to take them to the campus. The drivers are enhanced DBS checked. Parents are informed of the risks if not booking a transfer service in the 'TopUp Learning London (Tti) Parental Agreement'. From the airport to the campus, students will be accompanied by a responsible group leader.

Stage Three – During their Stay

<u>Section A – Accommodation</u> Students live in OUR campus RAAS Summer camp in Reigate. The dormitories are divided according to the age and the gender of students and are permanently monitored by a responsible group leader.

Section B - First Day at School

As with all students, we collect their emergency contact details and check their travel documents. The form they complete includes their emergency contact and their parents' contact numbers. They join our Welcome Meeting for all students.

<u>Section C</u> – Attendance

TopUp Learning London (Tti) has a strict Attendance Policy in place for all students. In addition to that, for this age group there are the following provisions in place:

All students must attend all classes according to the timetable that will be given to them and to their group leaders.

If we have not heard from them and they are not in class 10 minutes after the beginning of the class, the teacher will tell the Director of Studies or the camp manager and the group leader will be called immediately.

Section D - Activities and Excursions

The activities and excursions are part of the camp and are mandatory for ALL students. The Activities and Excursions are all monitored by the dedicated activity leaders and the group leaders. All activities have a risk assessment completed to ensure the whole group attending are safeguarded during the excursion. These are reviewed by the Activity leader prior to the excursion and the students informed of the risks and provisions put in place (see Excursion Policy).

Section E – Staff and Student Code of Conducts

We have Staff and Student Code of Conducts that we ask all to always abide by. These ensure that both are aware of the expectations we have of them and assist us to safeguard everyone. Everyone is asked to behave in a manner which fits within the Code of Conduct while a member of TopUp Learning London (Tti).

Section F – Health and Safety

Please see the Health and Safety Policy, the Fire Safety Policy and the Student and Staff Codes of Conduct as well as the other related policies mentioned on page one.

3.Risk Assessments

TopUp Learning London (Tti) completes risk assessments to ensure the safeguarding of everyone at the school. Risks are identified and managed through the use of risk assessments. These will be carried out:

- on annual basis for the school and online environments
- for all school excursions see Excursions Policy
- whenever there are any changes to the school environments or practices
- following any serious incident.

These are produced by the Senior Manager and the Directors with input from school staff and students where necessary.

5. Supervision Ratio

During the classes in school there can be a maximum of 15 students with one teacher. This matches the maximum allowed in one class at any time. During activities or on excursions, the same applies, 15 students for 1 activity leader

6. TopUp Learning Methods for Raising Awareness of Safeguarding

TopUp Learning ensures that there is a strong awareness of the importance of Safeguarding. TopUp Learning has several ways to ensure that everyone is aware of it. Below is a list of some of the ways we do this, although the list is not exhaustive:

TopUp Learning staff:

- weekly meetings providing teachers with the opportunity to raise student issues and the Director of Studies with the opportunity to update them regarding Under 18 students in school
- CPD sessions where staff participate in safeguarding training
- weekly Staff and Management meetings

TopUp Learning London (Tti) students in school:

- Information provided in the Welcome Meeting
- Safety posters on the noticeboards in the classrooms and in dormitories
- Lessons plans developed to inform students on important aspects: e-safety, anti-bullying etc.
- Student and Policy Handbooks accessible in student areas and online

7.Child Protection:

The Designated Safeguarding Person is the person to report any concerns raised by staff, students, or other adults regarding a student aged under 18 at TopUp Learning London (Tti) - RAAS Summer Camp Reigate.

These are, at the time of this review, Ms Amelie Francoise (DSL) and Mr Sam Malafeh (DS). Amélie is available at the main office if RAAS Reigate. You can contact her by email <u>amelie.francoise@topuplearning.com</u> or by phone 00 44 (0)7438 530 463 Sam is located in the main office at 148 Camden High Street. You can contact him in person Monday to Friday by visiting the main office or by email (<u>sam.malafeh@topuplearning.com</u>) or telephone: 00 44 (0) 207 419 2300 or 00 44 (0)7899 677 528 from Monday to Friday. **Emergency phone number**, 24/7 - 00 44 (0)7438 530 463

Types of Abuse:

Type of Abuse	Brief Description	Signs /things to be aware of
Neglect	 Young people who are left alone inappropriately. Young people who are abandoned. Young people who are inappropriately supervised. Young people who are left with inappropriate carers. Young people who are punitively or carelessly deprived of food. Young people whom necessary 	 Socially repressed Emotionally distant/flat Lacking self-love, self- esteem or efficacy Poor physical growth Deficient social skills Aggressiveness or withdrawn behaviour Aimlessness
Emotional Abuse	 Terrorising, teasing, taunting, tormenting a young person Withdrawing/withholding attention, affection, emotional care Persistently blaming, rejecting and isolating a young person Derogatory remarks about a person's race, gender, physical characteristics, names and academic or sporting abilities or lack of ability Breaking confidentiality/using students' 	 Failure to reach potential Poor self esteem Self-denigration Sense insecurity Withdrawn behaviour/poor socialisation Poor academic achievement Social isolation Needy dependent

Presistently ignoring the young person • Persistently ignoring the young person • Research now documents the emotionally harmful impact of domestic violence. Young people may see, hear or be held to ransom during incidents. Domestic violence is now recognised to be an emotionally abusive environment for a young person • Grooming • Redicalisation Sexual Abuse • Genital and sexual contact between a young person and an adult/another person • Penetration – oral, vaginal or anal • Genital exposure • Female genital mutilation • Exposing young person to pornographic materials • Any act where the young person is the object of another's sexual gratification • Displeasure shown in physical assault • Loss of temper or control leading to assault • Displeasure shown in physical assault • Over-chastisement/excessive discipline • Corporal punishment causing actual bodily harm • Buying that leads to physical assault • Over-chastisement/excessive discipline • Corporal punishment causing actual bodily harm • Exploitation of under 18s where they receive something (gifts, money, drugs, attention) as a result of sexual ac- tivity
 the young person Persistently ignoring the young person Research now documents the emotionally harmful impact of domestic violence. Young people may see, hear or be held to ransom during incidents. Domestic violence is now recognised to be an emotionally abusive environment for a young person Grooming Radicalisation Sexual Abuse Genital and sexual contact between a young person and an adult/ another person Penetration – oral, vaginal or anal Genital exposure Female genital mutilation Exposing young person to pornographic materials Any act where the young person is the object of another's sexual gratification Substance or drug mi - Unexplained aggress withdrawn behaviour Suicide attempts Anxiety Depression Bruises Pregnancy Sexually transmitted
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 privacy or access to needed emotional support Ascribing nicknames that are offensive or derogatory and unwanted by the young person Shunning, rubbishing or publicising concerns of

Mutilation (FGM)	male genital organs, typically done to young girls from African countries.	 the student or a friend It is illegal if done in the UK. It is a legal duty on the professional adult to notify police if FGM has happened in the UK
<u>Online abuse</u>	Children may be abused online by people they know or by strangers. It can often feel like there is no escape from abuse that is online and like it follows the child wherever they go. Through Social networks, gaming, mobile phone, and applications.	 May spend much more time online than before (texting, gaming, or using social media) Begin to spend significantly less time online than before Become withdrawn, upset, distressed, and agitated, especially after using the internet or their phone Be secretive and defensive about who they are talking to online and what they are doing.
Bullying and <u>Cyberbullying</u>	 Bullying: Bullying can be emotional or physical and is often persistent rather than a one-off occurrence. Physical bullying, such as hitting, slapping, kicking, or pushing someone Verbal bullying and emotional abuse, including name-calling, threatening, and intimidation Non-verbal abuse, such as making hand gestures Excluding someone, including ignoring and isolating them Bullying based on racial and sexual preferences and disability Cyberbullying: This is any type of bulling that takes place online, including via social networks, gaming environments, and mobile phone applications. Sending threatening and abusive messages over text or another messenger platform Sharing embarrassing photos and videos of someone and shaming them online Trolling – sending multiple upsetting messages to someone or encouraging others to do so Setting up hate sites or hate groups about a child Creating fake accounts under a child's name and causing trouble and embarrassment using their identity. 	 Belongings being 'lost' or damaged Changes in usual behaviour, including introversion or unusal aggressive behaviours Being afraid to go to school, skipping school, or being 'ill' every morning Underachieving at school Physical injuries, such as unexplained bruises Asking for money or stealing it, which is usually to give to the bully who is demanding it. Being nervous and anxious, having low confidence, and becoming withdrawn Problems with eating and sleeping A child who is the subject of bullying may also begin to bully others to cope with their trauma and feel like they are back in control.
Grooming	Grooming happens when somebody builds emotional connection with a child and gains their trust, usually ofr the purpose of sexual abuse, sexual exploitation, or trafficking. It happens online and face-to-face.	 control. Groomers may gain a child's trust by: Pretending to be somebody they are not. Offering advice and understanding Buying them gifts and giving them attention Using their professional position or reputation to their advantage Taking them on trips, outings, and holidays
Radicalisation and Extremism	Radicalisation in children can happen quickly or over some time and can be triggered by a specific incident or trauma, seeing something in the news, or being radicalised by an extremist. Certain children are more at risk of being radicalised, such as those who have low self-esteem, are victims of bullying, or are	 Isolating themselves from family and friends Speaking as tough they are saying a scripted speech and talking about terrorism Being unwilling to discuss their

	discriminated against or marginalised.	 views and opinions Refusing to listen to different points of view Developing a sudden disrespectful and dismissive attitude towards others Becoming increasingly angry Becoming more secretive, especially surrounding internet use
		Being sympathetic to extremist ideologies and groups
Peer-on-Peer Abuse	 Youth are also capable of abusing their peers, when at a young age. This comes in the forms of violence towards another student, sexual assault, or emotional abuse. It can also include online sexual harassment, such as: Non-consensual sharing of sexual images and videos Unwanted sexual comments and messages Sexual exploitation, coercion, and threats 	 It can be difficult to know whether the concerning behaviour goes beyond normal behaviour. To work this out, three things should be assessed: Whether true consent existed between the parties Whether there was a power imbalance between the parties Whether there was an exploitative element to the activity
Up skirting	 Up skirting is a form of abuse that is a criminal offence under the Voyeurism (Offences) Act 2019 Up skirting occurs when someone takes picture under a person's clothing, with or without underwear, without them knowing or without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm. 	Up skirting is a common aspect of peer-on=peer abuse and can happen to any gender, but not limited to peers.

Other information:

Neglect

The child may fear the following:

- Being intimate
- Being known
- Being rejected
- Being wrong or a failure

Possible people who are causing the abuse:

- Parents
- Carers
- Anyone given the care, charge and control of a young person

Emotional Abuse

The child may fear the following:

- Being different
- Being loved/unloved
- Being known
- Being rejected
- Being emotionally exposed

Abusers can be parents, carers/teachers, other adults and other young people.

Sexual Abuse

The child may fear the following

- Pregnancy
- Physical damage
- Being blamed for the abuse

- Being disbelieved called a liar
- Escalation of the abusive behaviour
- Being sent away punishment
- Intimacy
- Sexually transmitted diseases

Physical Abuse

The child may fear the following:

- Of a certain person, a particular gender or group
- Of antagonising their abuser
- Of losing face
- Of being disbelieved or called a liar young person unable to give a clear account of what has happened fear they will be viewed with suspicion
- Of being called a wimp
- Of others finding out
- That it won't stop or be addressed
- Of physical injury

Abusers can be parents/ relatives, teachers/carers, other adults and young people.

NB: some disabilities (or their onset) affect balance, co-ordination or the blood condition so that the young person has frequent bruising. Even within these situations abuse might still be present.

Recognising abuse

For each of above types please remember:

- · Many forms of abuse may not leave physical signs
- Many kinds of sexual abused not leave physical evidence
- Forensic evidence can disappear within a short period of time
- Sexually abused young person can suffer physical injury
- Young people of all ages, able bodied, disabled, young person with or without learning differences, boys and girls from all races, cultures and classes, are abused
- Young people may indicate in different ways that they are being abused
- A young person's unhappiness and distress can often be seen in their behaviour
- Young people may also show unhappiness but can be adept at hiding their distress
- Race and culture may influence a young person's behaviour, their distress showing in different ways
- Signs and types of behaviour may indicate a young person is being abused, but may not be evidenced of abuse
- There can be other explanations for a young person's behaviour

TopUp Learning London (Tti) Staff Responsibilities

How to deal with Concerns

- TopUp Learning London (Tti) has a responsibility to investigate any student at the school who people believe could be a risk of harm. They must speak to the DSL if they have a concern, they have regarding one of the students. The DSL will advise on what action should be taken.
- Concerns can arise from observations, information from another student, staff member etc.

- Concerns will be recorded using the Concern (and Disclosure/Allegation) Form. These are kept securely, in chronological order.
- The DSL will respond to the Concern in the manner they see fit following their training. This could be monitoring, further investigation, discussing the matter with parent/group leader prior to taking action.

How to Deal with Disclosures/Allegations

Disclosures/Allegations are when there is information which indicates an adult may have harmed one of TopUp Learning London (Tti)'s under 18 students. This could possibly be a criminal offence against or related to the child or be behaviour that demonstrates that they could pose a risk of harm working with those aged 18 or under.

If a student speaks to a member of staff to report an incident and/or about abuse, the member of staff will follow these guidelines:

- listen to what is said without displaying shock or disbelief and accept what the child is saying. The staff member should remain calm.
- allow the child to talk freely
- not assume it is something related to abuse
- reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made
- reassure the child that what has happened is not their fault and that they were right to tell someone
- not ask direct questions or put words into the student's mouth, but allow the student to tell their story
- not criticise the alleged perpetrator
- not draw too much attention to the situation
- explain that they need to report this to the DSL who will make a record of the concern and decide on the next course of action
- inform the DSL IMMEDIATELY

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- not tell the assisting staff member what it is regarding, just ask them to be there as reassuring presence
- not inform any other member of the team what the child said apart from the DSL. It is confidential!
- write a report of the meeting on the Concerns (&Disclosures/Allegations) Form. This must
 use the student's exact words and make a note if their level of English is low. Do not
 include opinions or change the English to be grammatically correct or correct vocabulary –
 this is the job for the Social Services team. Use neutral language!
- it is also possible to revisit the child to make sure they are ok
- look after themselves too, it can be upsetting hearing of child abuse

Records

Only the DSL have access to the relevant forms. All information is recorded, and all records are signed and dated. They are kept confidentially and chronologically.

- Records show:
 - $\circ~$ what the concerns were
 - whether any follow-up action was taken

- how and why decisions were made
- All incidents, disclosures or signs of abuse are fully recorded with dates, times, locations and actions taken.

Confidentiality and information sharing

The DSL will only share information with professionals or agencies with the student's consent. Only relevant information will be disclosed to those that need to know. Information is confidential. If the staff member reporting the concern or DSL has any queries regarding confidentiality, they will seek advice from MASH.

Referrals

TopUp Learning London (Tti) is in the Borough of Camden which has everything in place to Safeguard those aged 16 or 17 years old.

For TopUp Learning – RAAS Reigate:

Surrey C-SPA Telephone: 0300 470 9100 Out of hours: 01483 517 898 Email: <u>cspa@surreycc.gov.uk</u>

The Chief LADO can be contacted at the following number: 0300 123 1650 or by email <u>LADO@surreycc.gov.uk</u>

In the case of a disclosure/ allegation:

- The DSL will tell the Principal immediately.
- The DSL will contact Surrey Safeguarding Children Paternship immediately. This is done following a discussion with the member of staff who raised the concern.
- The DSL will contact the parents immediately to inform them and seek their consent. Parental consent must be sought prior to the referral being made unless to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.
- All referrals are made by telephone and then the CAF form sent within 48 hours.
- Where the DSL is unsure whether to refer the student or not, they can call Surrey Safeguarding Children Partership for advice. This must be on a "**no-name**" basis due to confidentiality.
- All referrals will be acknowledged by the Surrey Safeguarding Children Partnership manager within 24 hours and the DSL(s) informed of what action will be taken.

Attendance at case conferences and core groups

The DSL(s) will liaise, as needed with the Family Services and Social Work (FSSW) to ensure that all relevant information held at the school is provided to them during the investigation. They will work with them to support the child, as needed.

Allegations Against TopUp Learning London (Tti) Staff

If the event that an allegation is made against a member of staff or volunteer TopUp Learning London (Tti) - Summer camp Reigate will follow Surrey's "Guidance for the management of an allegation against a member of staff". Policies/ Guidance | Surrey Safeguarding Executive Group

The Principal (who is also the Senior Manager for Safeguarding) will be TopUp Learning London (Tti) representative for the purposes of the allegation procedure. They will link with the Local Authority Designated Officer for all allegations raised. In their absence, one of the DS(s), will act in their place. The DS will also act in place of the Principal if they are the one against whom the allegations have been made.

With Surrey Safeguarding Executive Group, TopUp Learning London (Tti) will have an initial discussion at which the following actions will be agreed:

- immediate action to protect the student
- when and what the parents should be told
- what should be said to the adult facing the allegation and should s/he be suspended

Suspension – This is not an automatic response. It is considered when the child is at risk of serious harm or the concern is so serious it would result in immediate dismissal due to gross misconduct.

Suspension would be communicated to the staff member within 24 hours.

If the allegation against the staff member is substantiated, and if the Principal and MASH representative agree that the person is unsuitable to work with children. The Principal will refer the individual to the DBS to protect students aged 17 or under in the future.

TopUp Learning London (Tti) recognises the importance to provide a duty of care to the staff member against whom the allegation has been made. The Principal will be their key contact at the school during the time of the investigation.

Allegation against another student under 18

Procedure if a child protection allegation is made against another under 18 TopUp Learning student. TopUp Learning will appoint a suitable DSP to support the person who has been accused.

- The under 18s parents, (also group leader & agent if appropriate) will be informed of the allegation and kept informed at every stage of the developing situation
- DSL will follow guidance provided by local child protection authorities

• If other agencies become involved, e.g. police, the under 18 will be accompanied throughout the process by their DSP support

• If other agencies are not involved and TopUp Learning need to carry out an internal investigation, the under 18 accused will be supported by their DSP and accompanied by them to any interviews.

Improving Safeguarding of children and vulnerable adults at TopUp Learning London (Tti)

We are always looking to improve our safeguarding and welfare procedures. If you have any queries, suggestions or worries regarding the information contained in this policy, or require further clarification of any points, please do not hesitate to contact, the DSL or any one of the DSPs.