



Safeguarding Policy

This policy covers all the programmes taught by TopUp Learning London

Updated February 2025

Emergency phone number: **+44 7456 314794** (available 24/7)

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, host families 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 DSLs are [*Ms Wei Lin*](#), [*Mr Chris Scallon*](#), and [*Dr Sam Malafeh*](#).

The Senior Manager responsible for Safeguarding-DSL is [*Dr Sam Malafeh*](#).

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 terminology:

“safeguarding” - this is a term to mean the overall care of everyone and looking after those aged 16 or 17 (in adult classes), aged 15 and under (in face to face groups or individuals), and all those aged under 18 studying online while they are under our duty of care

“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 (s) 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(s) 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. Welfare of Under 18 students online
4. Risk Assessments
5. Supervision Ratio
6. TopUp Learning Methods for Raising Awareness of Safeguarding
7. 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.
- 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.

An offer of work is conditional upon:

- Receipt of two satisfactory references (referees will be asked to comment on suitability to work with minors)
- Verification of ID and qualifications – original copy seen
- Satisfactory DBS disclosure (enhanced)
- Right to work check
- Satisfactory completion of an agreed probation period
- Offer to include link to policies

Monitoring:

We will regularly monitor the following:

- Annual DBS check or any other criminal reports
- Quarterly visa check for the right to work in the UK for those who are not UK Citizens

- Employees with no working right are not allowed to continue with their employment
- Recurring checks
- Attendance:
 - For those on full time employment: must submit their request and report on BrightHR application and wait for their line manager's approval. Absences record will be kept in BrightHR application. Staff can check their records but cannot change the approved records.
 - For those on zero hours contract, fixed term or part timers: must report to the line manager through WhatsApp followed by email and ask for confirmation. All staff must put their formal request through email.

Criminal record checks

England and Wales enhanced DBS with barred list; See below for specific requirements relating to homestay hosts.

For new staff

Staff recruited from inside the UK must have a new criminal record check, except in the following circumstances:

- a) if applicant is on DBS/PVG Update Service and the provider sees the original DBS/PVG certificate and checks their status online and there is 'no change' to status (if there is a change to status, then a new check is required)
- b) if the applicant is not on the update service, but for work with another organisation has a UK criminal record check that is less than three months old and is for a similar role in the children's workforce. In this event, a separate Barred List check is still required (available England and Wales only). To apply to access the Barred List we contact the umbrella body processing the check or the Teaching Regulation Agency (TRA).

[The Children's Barred List is a list of people whom authorities have decided must not work with children, even if they have not been convicted. The Barred List also contains people with convictions against children.] -

tra.prohibition@education.gov.uk *this email will be used to check the Barred list while waiting for an account.*

Staff recruited from outside the UK must have on first appointment reference checks (including one from most recent employer), a recent police certificate from the last country they worked in, as well as the relevant UK criminal record check even if they have never lived in the UK. In an unlikely case of not having a police check, at least one additional reference check is required.

For returning staff

Records of the full initial recruitment checks must be retained.

Staff returning from elsewhere in UK after a break of more than three months must provide a reference from the most recent employer (if different from the reference given on first recruitment). Additionally, a Barred List check is required. A new criminal records check or update service is required if the centre does not have access to the standalone Barred List.

Staff returning from outside the UK who have had a UK criminal record check, work abroad during the year and return in subsequent years (e.g. for summer work) must provide one reference from their latest employer in the intervening period (if different from the reference given on first recruitment). If there has been a period of UK residence since last working for the provider, a Barred List check is required or a new criminal records check if not on the update service and the centre does not have access to the standalone Barred List.

Delayed criminal record checks: If a criminal record check has been applied for but not yet received, the applicant must not be allowed to engage in 'regulated activity' (unsupervised); while checks are pending any deployment must be risk assessed and clearly documented measures, as set out in the safeguarding policy, implemented to manage risk. Measures include:

a) a separate Barred List check (England and Wales only, legal requirement) –

tra.prohibition@education.gov.uk

b) a risk assessment to show how keeping the unchecked adult out of regulated activity is being managed and the levels of supervision in place (for example, residential staff cannot sleep in the same area as under 18 students). Or if we have to have a teacher in class of under 18 students without DBS, then another DBS checked staff supervise them at all time.

Criminal record check renewals: Checks should be renewed every three years.

Renewals are not required if the person has joined the Update Service (available for DBS/PVG; recommended for seasonal staff), and the employer checks for an update annually.

For homestays

Criminal record checks for homestays: All adults in the homestay must have individual criminal records checks unless there is evidence that the check on the main care giver included other adults in the home – a check for a working at home role.

A home-based role DBS/PVG check allows the police to provide information on other adult residents at the same address and whether any of them are unsuitable to be hosting under 18s.

a) DBS check conducted after April 2015 for a home-based role.

b) PVG check indicating 'work carried out at home address' (E2 on hard copy form).

Home-based checks and the update services are incompatible, so checks need to be renewed every three years, except for single occupants if it can be confirmed that there are no other adults linked to the home.

NB: homestays cannot be taken out of regulated activity, so homestays cannot be used until their new criminal record check has been seen and checked.

Host recruitment should include asking applicants whether they or any of their children have had involvement with Children's services, and a question about medical fitness for the role.

Group Leaders

Group leaders appointed by an agency must be checked by the agency in their own country and the agency must confirm to the provider that these checks have been carried out and that the person concerned has been cleared.

Where an agency has confirmed that the checks have been carried out and been cleared, we reserve the right to request sight of these checks.

Group leaders coming with their own group (i.e. not sent by agency or by a school) must send in advance or bring with them evidence that they have been police checked and have been cleared.

References (staff and hosts)

The referee should be asked to confirm whether the applicant has been the subject of any disciplinary sanctions and whether the applicant has had any allegations made against him/her or concerns raised which relate to either the safety or welfare of children and young people or about the applicant's behaviour towards children or young people. Details about the outcome of any concerns or allegations should be sought.

At least one reference should comment on suitability to work with under 18s – this can be a personal reference if employment has not provided relevant opportunity).

Oral references are acceptable if a suitable checklist is followed and a record is kept of responses.

References for host need not be an employer – suitable referees include neighbours, business acquaintances, family friends, teachers, and clients; leaders or other members of an organisation where the person volunteers or is a member. Family members are not suitable referees.

Prohibited List checks: Apply only to applicants (staff or homestays) who have worked in a country's **primary or secondary education (state or private)**. The Prohibited List has names of those who have been 'struck off' and are deemed unsuitable to work with under 18s, yet have not necessarily been convicted of a crime so nothing will appear on a DBS check. Language schools cannot access the list directly but can request a prohibited list check for one or more applicants at a time via the Employer Access Team, employer.access@education.gov.uk ; phone 0207 593 5391.

Following information are required for prohibited list check:

- Teacher reference number (TRN)
- Full name (including middle name and any previous names)
- Date of birth
- National Insurance number

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
- Student Code of Conduct and handbook

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 under 18 years old book an arrival taxi to take them to their accommodation if the transport is not arranged by the school or group. The taxi drivers are enhanced DBS checked. Parents are informed of the risks if not booking a taxi transfer service in the 'TopUp Learning London (Tti) Parental Agreement'. If the student is being met by a friend or family member at the airport then we require their full contact details in advance of arrival.

Stage Three – During their Stay

Section A – Accommodation

Students aged under 18 can ONLY book half board homestay accommodation through TopUp Learning London (Tti) or residential/ hostel if they are part of a group. Some of homestays are arranged through our partner company Hosts International who are British Council accredited with some exceptional cases. All hosts welcoming Under 18 students are Enhanced DBS checked as per requirements. TopUp Learning London (Tti) has seen and approved of the Hosts International Safeguarding Policy.

If a student is staying in private/alternative accommodation, this needs to be included on the TopUp Learning London

(Tti) Parental Agreement with the name and contact details of the person at the property. All alternative accommodation arrangements for under-18 students to be checked in the student's first 2 weeks, unless they are living with their parents.

Curfews (under 18 students)

Your expectations of what is an acceptable time for the student to come home at night should be informed to the Student Services Officer at TopUp Learning London and to the student.

Curfew time, non-summer (September to June): 21:00 to 6am.

Curfew time, Summer (July and August): 22:30 to 6am

Students under the age of 16 are not allowed to go out unsupervised at anytime.

As mentioned above, please be aware that some classes and activities finish at 16.30 or 17.30 so this may also affect the time the student comes home. Students age 12+ can travel to and from the homestay alone. The distance of the homestay to school will be considered when allocating homestays. Students under the age of 16 are not allowed to go out alone during the weekend or non-school days. Hosts are required to inform the school immediately if students are not following their instruction.

If students are not home by the curfew time, host family is required to immediately contact the emergency number:

+44 7456 314794 (available 24/7)

Full table of age restrictions and curfew:

	Travel alone to school	Curfew time	Staff to Student ratio for activities and accommodation
7-11 years old	No – unless requested by parents/guardian staying in the UK for 8+ years old Not allowed to leave the house alone at anytime	Around the year: 6pm to 7am July and August: 6pm to 7am	1:10
12-15 years old	Yes – route to be guided by host/parents/guardian Not allowed to leave the house on non-school days	Around the year: 6pm to 7am July and August: 7pm to 7am	1:15
16, 17 years old	Yes – route to be guided by host/parents/guardian	Around the year: 9pm to 6am July and August: 10:30pm to 6am	1:15

Curfew time for RAAS Summer Camp is 9:30pm to 7am regardless of the age of students.

Residential accommodation: There are some residential accommodations provided. The entry to the residence is controlled, girls and boys must stay in separate units. Members of staff/group leaders stay in the residence to manage the students and support them. Members in duty are responsible to make sure 16+ years old students are not leaving the residence outside the arranged time and under 16 students do not leave the residence without supervision at any time. Headcount is done by the supervisor.

Important information about under 18 groups:

- Ratio of students to group leaders is 10 students to 1 group leader – cover is arranged for group leaders
- Group leaders to inform the emergency number immediately if they are not able to continue with their supervising duty and a cover to be arranged immediately
- Curfew time – 10:30 pm during the month of July and August
- Curfew time – 9 pm any other month of the year
- Please see the full table of age restrictions and curfew for more information
- Room check by supervisor/s and attendance recording:
 - First: 30 min after curfew
 - Second: midnight (12am) – absences are immediately reported through emergency contact
 - Additional patrolling around the corridors will take place at 3am

- Cameras installed at exit points to make sure the exits and entrance are monitored.
- Students do not have access to knives, and sharp or bladed items in the kitchen
- Students do not have access to hob/stove at anytime
- Students will only stay in the residence while supervised
- No drugs, alcohol and smoking allowed during the stay
- Prohibited areas of the building are identified and students are informed not access those
- Boundaries are clearly explained to students – no one exits the building without permission
- Non-compliance actions:
 - first time: Initial verbal warning,
 - second time: meeting with student and parents/guardians will be informed,
 - third time: cancellation of stay and return to the home country

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, address in London and their parents contact numbers. They join our Welcome Meeting for all students.

They have a separate Welcome meeting on day two of their course with one of the DSPs. This covers: Students' comfort in accommodation, journey to school and ensuring they all have the emergency phone number in their telephones.

They must check-in with the Director of Studies on Friday of each week during their stay and are told about this in the Welcome Meeting.

Section C – 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 aged under 18 must sign in at the front desk on a daily basis before class.

All students under 18's age are shown in our registers to make the teacher aware of their age.

They, or their host family on their behalf, must call in before 08.45 if they are not coming to school that day.

If we have not heard from them and they are not in class, the teacher will tell the Director of Studies by 9:20am and he will call the student immediately. If the student doesn't answer and the host family are unavailable (or guardian if private accommodation) we will keep trying. We will also try to contact them through other media, including e-mail and Facebook. If we are unsuccessful in hearing any news police will be informed within 2 hours and parents will be informed by 1pm.

Section D – Social Programme

Our Social Programme is offered for all students. Some activities are not suitable for this age group and they will be informed on this in the Welcome Meeting. These activities are not compulsory and those aged Under 18 can choose to attend or not attend. Sign-up sheets are located in the reception area. If the activity is not suitable for students Under 18 their names will be listed on the sign-up sheet so staff can be sure they do not sign up for events not suitable for their age group. All Social Activities have a risk assessment completed to ensure the whole group attending are safeguarded during the excursion. These are reviewed by the teacher prior to the excursion and the students informed of the risks and provisions put in place (see Excursion Policy). Group excursions are compulsory for those who are coming as part of a group. If a student cannot attend due to sickness, then appropriate supervision will be arranged.

Section E – Staff and Student Code of Conducts

We have Staff and Student Code of Conducts that we ask all to abide by at all times. 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.

H/S – Safeguarding and welfare of students - Missing student:

Missing a student outdoor:

Group leader/staff/supervisor or the person in charge at the time is required to:

- inform the management immediately
- Check with other students
- Check around for them. If possible, contact student through phone/WhatsApp/social media.
- Check with surrounding shops/facilities/stores/station staff
- If student is not located:
 - Inform the management immediately that they are not located.
 - Inform the police about the incident within 2 hours.
 - Management and staff to work with police to locate the students.
 - Inform parents in an agreed and adequate time – to be done by Management

Missing a student at Residence:

Group leader/staff/supervisor or the person in charge at the time is required to:

- Inform the management immediately
- Check with other students
- Check around for them. If possible, contact student through phone/WhatsApp/social media.
- Inform the residence staff to check the cameras and check all the areas of the residence with the support of residence staff.
- If student is not located:
 - Inform the management immediately that they are not located.
 - Inform the police about the incident within 2 hours.
 - Management and staff to work with police to locate the students.
 - Inform parents in an agreed and adequate time – to be done by Management

3. Welfare of Under 18 students online

As with face-to-face teaching, safeguarding and child protection is vital when teaching remotely. We have the following important processes in place to help us safeguard them.

- On application consent is received from the parent or guardian. Students cannot join a class without parental consent first being given.
- In case of online lessons, students are strongly encouraged to keep their cameras on throughout the lesson
- In case of online lessons, we have a set of helpful classroom rules for our 'kids and teens' classes which the teacher reminds the students of at the start of each lesson
- In case of online lessons, all staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:
 - Using strong password protection, with passwords that are at least 8 characters, with a combination of upper- and lower-case letters, numbers and special characters
 - Making sure the device locks automatically if left inactive for a period of time
 - Not allowing family or friends to use the device
 - Storing the device securely to avoid theft
 - Ensuring that anti-virus and anti-spyware software is up to date
 - Installing updates to ensure that the operating system remains up to date

- In case of online lessons, we have the following online Safeguarding Procedures in class:
 - Teachers can control students' camera and microphone at the start and during the lesson
 - Teachers can instantly remove students from the classroom
 - The chat facility is managed by the teacher
 - The chat facility is disabled in the breakout rooms
 - The share screen feature is disabled for students and managed by the teacher
 - The teacher "Ends meeting for all" at the end of the class
 - Under 18s are not put in a breakout room with adults
 - Participants' ability to record lessons is disabled
 - Meeting auto-record is enabled
- Staff must ensure all communication with parents and students is conducted through the school following normal guidance and ensure this remains professional.
- Staff should ensure that all safeguarding concerns are reported immediately to a DSL.

4.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 or online environments or school 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 aged under 18. This matches the maximum allowed in one class at any time.

On excursions, the same applies. When there are more than 15 under 18s per group, additional staff join the activity. For students under 16, the ratio is 10 student per staff during excursions and external activities. Please see full table of age restriction in section 2.

Online this ratio is 10 to 1. This matches the maximum allowed in one class at any time.

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
- information on the staff noticeboards in school including name-list of those aged Under 18
- weekly Staff and Management meetings

- Under 18 students are highlighted on registers

TopUp Learning London (Tti) students in school:

- Information provided in the Welcome Meeting
- Weekly meeting with under 18 students
- Safety posters on the main noticeboards
- Staff are aware of possible concern and how to raise those to management and DSL
- Long-term student meetings for those enrolled for more than 8 weeks.

7.Child Protection:

The Designated Safeguarding Leads is the person to report any concerns raised by staff, students, or other adults regarding a student under 18 at TopUp Learning London (Tti).

These are, at the time of this review, Mr Chris Scallon (DSL) and Ms Wei Lin (DSL) and Mr Sam Malafeh (DSL and the lead) are the designated safeguarding leads available to support students. During the weeks they are available at the school and they can be contacted through the emergency phone number during the weekend: +44 7456 314794

They can also be contacted by email:

Mr Chris Scallon – dos.london@topuplearning.com

Ms Wei Lin – wei.lin@topuplearning.com

Mr Sam Malafeh – sam.malafeh@topuplearning.com

Emergency phone number: +44 7456 314794 (available 24/7)

Types of Abuse:

Type of Abuse	Brief Description	Signs /things to be aware of
Neglect	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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' problems as gossip or humour • Systematically denying a young person privacy or access to needed emotional support 	<ul style="list-style-type: none"> • Failure to reach potential • Poor self esteem • Self-denigration • Sense insecurity • Withdrawn behaviour/poor socialisation • Poor academic achievement • Social isolation • Needy dependent behaviour • Experimenting behaviour

	<ul style="list-style-type: none"> • Ascribing nicknames that are offensive or derogatory and unwanted by the young person • Shunning, rubbishing or publicising concerns of 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	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • Nightmares • Sexually precocious behaviour • Bedwetting • Eating problems • Self harm or mutilation • Substance or drug misuse • Unexplained aggressive or withdrawn behaviour • Suicide attempts • Anxiety • Depression • Bruises • Pregnancy • Sexually transmitted diseases
Physical Abuse	<ul style="list-style-type: none"> • Displeasure shown in physical assault • Loss of temper or control leading to assault • Restraint that leads to bruising or injury • Idiosyncratic punishments that cause injury • Bullying that leads to physical assault • Over-chastisement/excessive discipline • Corporal punishment causing actual bodily harm 	<ul style="list-style-type: none"> • Bruises* • Fractures • Pinch marks • Bites • Scalds • Bruised eyes • Flinching • Withdrawn or rebellious behaviour
Child Sex Exploitation	Exploitation of under 18s where they receive something (gifts, money, drugs, attention) as a result of sexual activity	<ul style="list-style-type: none"> • Unexplained gifts • Older boyfriends or girlfriends • Missing school • Associating with bad company • Online grooming
Female Genital Mutilation (FGM)	The non-medical partial or total removal of external female genital organs, typically done to young girls from African countries.	<ul style="list-style-type: none"> • Disclosure of this happening to the student or a friend • It is illegal if done in the UK.

		<ul style="list-style-type: none"> • It is a legal duty on the professional adult to notify police if FGM has happened in the UK
<u>Online abuse</u>	<p>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.</p> <p>Through Social networks, gaming, mobile phone, and applications.</p>	<ul style="list-style-type: none"> • 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 <p>Be secretive and defensive about who they are talking to online and what they are doing.</p>
<u>Bullying and Cyberbullying</u>	<p>Bullying: Bullying can be emotional or physical and is often persistent rather than a one-off occurrence.</p> <ul style="list-style-type: none"> • 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 <p>Cyberbullying: This is any type of bullying that takes place online, including via social networks, gaming environments, and mobile phone applications.</p> <ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Belongings being 'lost' or damaged • Changes in usual behaviour, including introversion or unusual 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 <p>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.</p>
Grooming	<p>Grooming happens when somebody builds emotional connection with a child and gains their trust, usually for the purpose of sexual abuse, sexual exploitation, or trafficking. It happens online and face-to-face.</p>	<p>Groomers may gain a child's trust by:</p> <ul style="list-style-type: none"> • 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

		<p>advantage</p> <ul style="list-style-type: none"> • Taking them on trips, outings, and holidays
Radicalisation and Extremism	<p>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.</p> <p>Certain children are more at risk of being radicalised, such as those who have low self-esteem, are victims of bullying, or are discriminated against or marginalised.</p>	<ul style="list-style-type: none"> • Isolating themselves from family and friends • Speaking as though they are saying a scripted speech and talking about terrorism • Being unwilling to discuss their 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, specially surrounding internet use • Being sympathetic to extremist ideologies and groups
Child-on-Child Abuse	<p>Youth are also capable of abusing their peers, when at a young age. This come in the forms of violence towards another student, sexual assault, or emotional abuse.</p> <p>It can also include online sexual harassment, such as:</p> <ul style="list-style-type: none"> • Non-consensual sharing of sexual images and videos • Unwanted sexual comments and messages • Sexual exploitation, coercion, and threats 	<p>It can be difficult to know whether the concerning behaviour goes beyond normal behaviour. To work this out, three things should be assessed:</p> <ul style="list-style-type: none"> • 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
Upskirting	<p>Upskirting is a form of abuse that is a criminal offence under the Voyeurism (Offences) Act 2019</p> <p>Upskirting 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.</p>	<p>Upskirting is a common aspect of peer-on=peer abuse and can happen to any gender, but not limited to peers.</p>

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 DS(s) if they have a concern, they have regarding one of the students. The DS 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 DS/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/ agent/ homestay host/ other DS 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-year-old 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 17 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 DS (s) who will make a record of the concern and decide on the next course of action
- inform the DSL (s) IMMEDIATELY

Once the student has disclosed an allegation, the staff member must: find a member of staff to sit with them while they go immediately to report it to the DSL (s). If you are teaching online use the breakout room for the student and contact the DS or DSL immediately.

- 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 DS. 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(s) 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:
 - 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 DS(s) 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 DSP(s) 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 under 18.

For TopUp Learning London (Tti):

Camden Safeguarding Children Partnership
 Telephone: 020 7974 3317
 (9.00am- 5.00pm)
 Out of hours: 020 7974 4444
 Email: cscp@camden.gov.uk

For all accommodation providers please contact the homestay borough's Safeguarding Children's Partnership. Contact details for all partnerships for each London borough can be found at:

<https://www.londonscb.gov.uk/london-scb-contacts/>

for RAAS Junior Camp:

Surrey Safeguarding Children Partnership
 Telephone: 03004709100
 Email: cspa@surreycc.gov.uk

In the case of a disclosure/ allegation:

- The DSL(s) will tell the Senior Manager immediately.
- The DSL will contact Camden Safeguarding Children Partnership immediately. This is done following a discussion with the member of staff who raised the concern.
- The DSL(s) 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(s) are unsure whether to refer the student or not, they can call Camden's Child Protection Co-ordinator or the team social worker for advice. This must be on a “no-name” basis due to confidentiality.
- If the concern or allegation takes place outside the borough of Camden, with a homestay family, for example, the DSL will contact their local authority to the incident.
- All referrals will be acknowledged by the Camden 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) at Camden Council/Surrey Council 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) will follow Camden's “Guidance for the management of an allegation against a member of staff”. Policies/ Guidance | Camden Safeguarding Children Board, or Surrey Safeguarding Children Partnership for RAAS operation (<https://surreyscp.org.uk/professionals/dealing-with-allegations-against-people-working-with-children/>).

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 DSL(s) or DS(s), will act in their place. The other DSL(s) and DS(s) will also act in place of the Principal if they are the one against whom the allegations have been made.

With Camden Safeguarding Children Partnership, 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.

The Designated LADO for Children in Camden is Jacqueline Fearon

To contact the Local Authority Designated Officer (LADO) in Camden, you can:

- Complete the Camden LADO agency reporting form. Form can be found here: <https://cscp.org.uk/professionals/managing-allegations-against-staff-and-volunteers-lado/>
- Email the form to LADO@camden.gov.uk
- Call 020 7974 4556 to speak to the LADO

For those attending RAAS Summer Camp:

To contact the Duty LADO

Please call 0300 123 1650 (option 3)

or email LADO@surreycc.gov.uk

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.