Safeguarding & Child Protection Policy

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Policy Name: Safeguarding & Child Protection Policy

Description: Guidance and procedure for safeguarding, protecting and promoting the welfare of our students.

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1. Introduction

a. Purpose and aim of this policy

All tangerine:ed staff, along with tangerine:ed's owners, are fully committed to their responsibility to safeguard and promote the welfare of all of our students. We aim to create a caring, secure and safe environment in which young people have fun while learning, and in which they feel respected and valued no matter what their background.
All of our systems, processes and policies operate with the best interests of our students at heart.

The aim of this policy is to:

- Outline the framework that we use to ensure that our students learn in a safe and happy environment which enables them to find and pursue their passions and ambitions.
- Detail the systems and processes we use to ensure students remain safe from the time that they arrive on a tangerine:ed course until they depart.
- Raise the awareness of all staff regarding safeguarding / child protection issues and define their roles and responsibilities in reporting possible cases of abuse.
- Ensure effective communication between all staff on safeguarding / child protection issues.
- Identify students who are suffering, or likely to suffer from, harm.
- Be clear with all parties, including students and their parents / carers, regarding our approach to safeguarding and child protection.

It is essential that all tangerine:ed staff, whether they work for us permanently or at one of our centres in the summer, understand their safeguarding responsibilities. This policy aims to raise the awareness of all staff of their responsibilities in identifying and reporting possible cases of abuse or of instances where a child is thought to be at risk. It also ensures that there are structured procedures, understood by all staff, which will be followed by everyone in cases where abuse or the risk of harm are suspected. All staff receive a copy of this policy, including the tangerine:ed Staff Code of Conduct, when they are first appointed to work for us, and they are asked at this time to confirm that they have read and understood it. This policy also forms the basis of the safeguarding training which all staff receive as part of their induction.

The policy is reviewed and updated in the light of experience and of the latest guidance and regulations. It is posted on tangerine:ed's website, and copies are available on request to parents, and anyone associated with tangerine:ed.

b. Definition of safeguarding and child protection

Safeguarding and promoting the welfare of children refers to:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children are growing up in circumstances that are consistent with the provision of safe and effective care
- Taking action to enable all children to flourish and to achieve their full potential as people and as members of the wider community
- Enabling children to have optimum life chances and to enter adulthood successfully.

Child Protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer from harm as a result of abuse or neglect. Safeguarding is a broader term than child protection and involves being proactive in mitigating risk to children by putting measures in place to keep children safe. It encompasses all the elements set out above and is what any educational establishment should do for all children. Child protection is part of this definition and refers to reactive activities or measures undertaken to protect children who have been harmed or are at significant risk of harm. Policies and procedures for child protection are, therefore, included in this safeguarding policy.

Where a child is thought to be suffering significant harm, or to be at risk of suffering significant harm, this must be reported to children's social care immediately. Action must also be taken to promote the welfare of children who are believed to be in need of additional support, even if they are not suffering harm or at immediate risk. Such instances must be addressed through inter-agency assessment using local processes.

c. tangerine:ed's commitment to safeguarding

The central principle of tangerine:ed's approach to safeguarding is that we are always child-centred in everything that we do, and the welfare of the child is always the paramount consideration. In all situations, and in particular where there may be a potential conflict of interest, the child's best interests must always be the primary aim of every action or decision. This does not mean that any risk to our students is eliminated. Rather, we expect all tangerine:ed staff to recognise where a student is at risk of, or is actually being, harmed and do all they can to reduce further risk of harm. This applies equally to any volunteers, contractors or partner agency staff working for tangerine:ed centrally or at one of our centres. We are committed to exceeding statutory requirements and aligning our practices with the guidelines and standards set out by relevant accrediting bodies.

As part of our safeguarding policy, tangerine:ed is committed to:

- Promoting and prioritising the safety and wellbeing of children and young people.
- Ensuring all adults working with children understand their roles and responsibilities in respect to safeguarding.
- Providing our employees with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children.
- Ensuring that the children in our care, their parents/carers and overseas agents are aware of who our safeguarding leads are and understand our safeguarding procedures.
- Taking appropriate action in the event of incidents / concerns of abuse and providing individual/s who raise or disclose concerns with appropriate support.
- Ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained securely.
- Preventing the employment / deployment of unsuitable individuals.
- Ensuring robust safeguarding arrangements and procedures are used effectively.

We are committed to promoting this policy and associated safeguarding procedures throughout the organisation and ensuring that it is followed by everyone at tangerine:ed. Failure to comply with this policy and procedures will be addressed without delay and may ultimately result in dismissal / exclusion from the organisation.

d. Importance of early intervention

In the context of child protection, Early Help means taking action and providing support as soon as a problem emerges. There is strong evidence that helping children early and providing support at the right time and in the right place can reduce the likelihood of problems escalating and improve long term outcomes for children and their families. Consequently, all members of staff need to be alert to any signs of emerging problems or potential concerns, which must be flagged to a member of the tangerine:ed Safeguarding team as soon as possible.

e. Accountability and ownership

The Directors, Graham Colloby and Edwina Laycock, together form tangerine:ed's Central Leadership Team (CLT) and hold ultimate responsibility for safeguarding across the organisation. Edwina also fulfils the role of Designated Safeguarding Lead (DSL), and is trained to Specialist level (formerly Level 3), Graham is trainer to Advanced level (previously referred to as level 2) The CLT are committed to providing strategic challenge to test and assure themselves that tangerine:ed's safeguarding policies and procedures are compliant with all current legislation and that there is a robust whole organisation approach to safeguarding. The CLT are aware of the local safeguarding partnerships that are in place in each of the locations where tangerine:ed operates and recognise their duty to work together with local authorities and agencies.

The CLT is responsible for ensuring that this safeguarding policy, together with the accompanying procedures, are implemented across the organisation and followed by all staff and volunteers. It is also responsible for ensuring that all staff undergo safeguarding and child protection training which provides them with an understanding of

tangerine:ed's expectations, and who is responsible for handling safeguarding issues, at induction. The CLT are responsible for ensuring that measures are in place at each venue used by tangerine:ed (including filtering and monitoring systems) to safeguard those students who are educated at that venue. The DSL is nominated to liaise with the local safeguarding board and any partner agencies on issues of child protection.

While tangerine:ed's summer centres are in operation, responsibility for ensuring that tangerine:ed's safeguarding policies are maintained is delegated to the individual Centre Management Teams, led by the Centre Manager in the role of on-site Designated Safeguarding Officer (DSO). The on-site team, working with the CLT, are responsible for ensuring that the culture of their centre facilitates concerns being raised and handled sensitively, that the centre is secure, and that students have the opportunity to learn about how to stay safe and protect themselves through the curriculum. The on-site DSO is also responsible for ensuring that all adults working with children at their centre:

- Understand, adopt, adhere to and implement tangerine:ed's safeguarding policy
- Respect and promote the rights, wishes and feelings of all students throughout their time working at a tangerine:ed centre
- Safeguard and promote the welfare of all tangerine:ed students
- Report any safeguarding concerns brought to their attention or of which they are aware to tangerine:ed's management, and follow up on concerns as appropriate to their role
- Conduct themselves in accordance with the tangerine:ed Code of Conduct

f. Scope of this policy

This policy applies to all staff employed by tangerine:ed, including year-round and seasonal staff, volunteers and external contractors. It also applies to anyone who is not employed by tangerine:ed but comes into contact with tangerine:ed students, including agents, host school staff, transport drivers, host families and group leaders. It is an expression of our commitment to safeguarding in all aspects of our operations, and to work together with other agencies to ensure that we have effective systems and procedures to identify, assess and support any children who may be suffering from harm, at risk of suffering from harm, or in need of additional support.

g. Equality and anti-discrimination

We are committed to always putting a young person's welfare first and believe that each of our students has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of their race, religion, ability, gender or culture. Every student is entitled to benefit from their time at a tangerine:ed centre or programme, and every adult who works for us is expected to have a demonstrable commitment to safeguarding our students. All students have the same equal rights to protection, but we recognise that we need to do more for some students because of their special educational needs, disability, gender, religion or sexual orientation. We acknowledge that some children, including disabled children or those from minority ethnic communities, can be particularly vulnerable to abuse and we accept the responsibility to take all reasonable and appropriate steps to ensure their welfare.

h. Monitoring and reviewing this policy

tangerine:ed's CLT reviews this policy at least once a year, as well as in light of new or updated guidance from the UK Government or one of our accrediting bodies. The DSL is responsible for monitoring for any updates and amending this policy as required. We believe that it is essential that young people have a voice in how they are safeguarded, and so feedback from students, as well as from staff, is collected and incorporated into future versions of this policy as appropriate.

2. Context

a. Legal framework

tangerine:ed recognises and accepts its responsibility to safeguard all students under the UN Convention on the Rights of the Child (1989, http://www.unicef.org/crc/files/Rights_overview. pdf), specifically recognising its obligation to protect our students from harm under the following Articles of the UN convention:

- Article 3: which states that the best interests of children must be the primary concern in decision making about them.
- Article 13: which states that children have the right to get and share information as long as it is not damaging to them or another child.
- Article 14: which states that children have the right to think and believe what they want and to practise their religion.
- Article 19: which states children have the right to be protected from hurt and mistreatment, physically and mentally.
- Article 34: which states that governments should protect children from sexual exploitation and abuse.
- Article 35: which states that governments should take all measures to ensure that children are not abducted, sold or trafficked.
- Article 36: which states that children should be protected from any activity that takes advantage of them or could harm their welfare and development.
- Article 37: which states that no one is allowed to punish children in a cruel or harmful way.

This policy has been written with regard to the following documents which provide a regulatory framework for educational organisations operating in the UK:

- 'Keeping Children Safe in Education' – 'KCSIE' – (DfE, September 2023)
- 'Working Together to Safeguard Children' (DfE, 2018, revised Feb 2019)
- 'What to do if you're worried a child Is being abused – advice for practitioners (March 2015)
- The Children Acts 1989 and 2004
- The Education Act 2002
- The Human Rights Act 1998
- Equality Act 2010: advice for schools
- Safeguarding and Child protection Briefing for Educational Establishments, Generalist level training (OSCB, August 2023)
- The use of social media for on-line radicalisation (July 2015)
- Prevent Duty Guidance: England and Wales (updated October 2023)
- 'Signs, symptoms and effects of child abuse and neglect', NSPCC factsheet
- What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Board (oscb.org.uk)
- Guidance material published on the website of the Oxfordshire Safeguarding Children Board
- The National Minimum Standards for Boarding Schools (September 2022)
- UK Council for Child Internet Safety (UKCCIS)
- Mental health and behaviour in schools (2018)

b. tangerine:ed's educational context

tangerine:ed offers year-round group mini stays in the UK for young learners and young adults aged 8–17 in boarding schools and university colleges.

Centres are run by a centre management team and employ teachers who are referred to as 'counsellors', who are residential and responsible for teaching, student welfare and the leisure programme. The majority of students are international and come from a wide variety of nationalities. Students generally stay for a 1 or 2-week course. The majority of students are coming as part of a group with a group leader. The temporary nature of tangerine:ed's centres, and the short period of time that both students and staff stay for, both influences how tangerine:ed's safeguarding and child protection policy is operationalised.

3. tangerine:ed staff with designated responsibility for safeguarding

a. Designated Safeguarding Lead (DSL)

The Head of Operations is tangerine:ed's Designated Safeguarding Lead (DSL), and is the key member of staff within tangerine:ed with responsibility for:

- The promotion of a safe environment for the children and young people on tangerine:ed programmes.
- Raising awareness within the organisation of issues relating to the welfare of children and young people.
- Ensuring that tangerine:ed's safeguarding policy is effectively implemented.

The DSL is trained to the standard of Advanced Safeguarding for Designated Leads (previously known as level 3) and is supported in their work by one Deputy and, while the programme is in operation, a Designated Safeguarding Officer is based at each tangerine:ed Centre.

The DSL, along with everyone involved in the safeguarding of children at tangerine:ed, is guided by two principles:

1. The welfare of the child is always paramount
2. Confidentiality should be respected as far as is reasonably possible

Edwina Laycock (DSL) can be contacted at edwina.laycock@tangerineed.com or on +44 07704 006829.

b. Responsibilities of the DSL

The DSL takes the lead responsibility for safeguarding and child protection, including online safety. With the help and support of the other staff with designated responsibility, the DSL is responsible for: raising awareness and ensuring that tangerine:ed's safeguarding policies are known and used appropriately by all members of the tangerine:ed community; offering guidance, advice and support to other colleagues where needed; initiating no-names consultations with the Locality Community Support Service (LCSS); ensuring that prompt contact is made, by him or by another member of the designated team, with Children's Social Care where there are concerns that a child may be at risk or in need of help; managing links with local community agencies and any referrals that may need to be made to Children's Social Care and/or the LADO and, where appropriate, also to the DBS, the TRA or the police; and ensuring that all tangerine:ed staff receive the necessary safeguarding induction and training on appointment.

The DSL is also responsible for sharing information about students joining a tangerine:ed course with key staff where appropriate. As our responsibilities under the Prevent Duty are a part of our broader safeguarding responsibilities, the DSL is also the 'Prevent Designated Lead'. In line with KCSIE September 2023, the DSL takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place at each venue operated by tangerine:ed. The DSL is also responsible for updating tangerine:ed's CLT on significant changes to legislation that impact this safeguarding policy and procedures.

c. tangerine:ed centre staff with delegated safeguarding responsibility

Each tangerine:ed centre has an on-site Designated Safeguarding Officer (DSO), who is the senior member of staff at that tangerine:ed centre with on-site responsibility for safeguarding and child protection. This person is generally the Centre Manager and is responsible for handling day-to-day and low-level safeguarding issues and for ensuring that staff at their centre are appropriately trained. As a minimum, the DSO has completed advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2). The DSO has a named Deputy, who can stand in for them on a day off, who is also a member of the Centre Management Team, and who has also completed Advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2) as a minimum. In practice, the DSO will generally be the Centre Manager, and the Director of Studies or Academic Manager will generally be their deputy.

The DSO works closely with the DSL and Deputy DSLs so that issues can be triaged by the person with the correct level of responsibility and training in the most appropriate way. Training is given to Centre Management Teams at induction about the level of concern that must be reported to the DSL or their Deputy, to ensure that concerns are raised as appropriate.

d. Responsibilities of all staff

It is essential that all tangerine:ed staff are aware that safeguarding incidents can happen anywhere and at any time, and that they are required to be alert to any possible concerns. Safeguarding incidents can be associated with external factors outside of the school or family, so "contextual safeguarding" (wider environmental factors in a student's life that may be a threat to their safety and/or welfare) should be considered. All staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. In such circumstances, all staff have a responsibility to take appropriate action, working with other services as needed. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL or DSO if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate open communication.

All staff have a responsibility to identify children who may benefit from 'early help'. 'Early help' means providing support as soon as a problem emerges. In the first instance, staff should discuss early help requirements with the DSL or DSO. All students know that there are adults to whom they can turn if they are worried. If staff members have concerns about a child, they should raise these with the DSL or DSO, without delay. Reporting to the DSL also includes instances where there is a concern that a child or young person may be at risk of being radicalised or drawn into extremism. The DSL and tangerine:ed CLT will decide whether to make a referral to Children's Social Care. It is important to note, however, that the DfE guidance 'Keeping Children Safe in Education' (September 2023) makes clear that 'anybody can make a referral'. If a child is thought to be in immediate danger or is at risk of harm, a referral will be made immediately to children's social care or to the police. If the referral is not made by the DSL, then the DSL must be informed as soon as possible that a referral has been made.

If staff members have concerns of a safeguarding or child protection nature about another member of staff, volunteer, or any other adult at the centre, then this must be referred to the DSL or member of CLT without delay. If designated staff believe that a crime may have been committed, then the matter will be reported to the police without delay.

e. Training

In addition to ensuring that all staff adhere to this Safeguarding and Child Protection policy, one further way in which tangerine:ed meets its safeguarding responsibilities is by ensuring all staff receive appropriate safeguarding training and that senior staff have the relevant additional training qualifications. tangerine:ed's DSL and Deputy DSLs have completed Advanced Safeguarding Training for Designated Leads (previously known as level 3), and on-site Designated Safeguarding Officers and their Deputies have completed Advanced Level Safeguarding Training for Designated Staff (previously known as level 2). Additionally, Safer Recruitment training has been completed by the person responsible for overseeing recruitment at tangerine:ed. Training is renewed every two years as required.

All other tangerine:ed staff receive safeguarding training as part of the induction process, and for returning seasonal staff this is renewed each year. At induction, all staff receive Basic Safeguarding Training (previously known as level 1), and they are asked to read and confirm their understanding of the tangerine:ed Safeguarding and Child Protection policy before commencing work with tangerine:ed. To ensure that they have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk, of harm, during staff induction time is spent focusing on a variety of different scenarios. Induction training also includes details of what to do and who to contact if a member of staff is concerned about a student.

4. Safeguarding concerns vs immediate risk of harm

All staff need to be clear about the distinction between a safeguarding concern and a child being in immediate danger or risk of harm. Both types of situation require prompt and clear action on the part of staff, but the nature of the response may be different. If a child is thought to be in immediate danger or is at risk of harm, a referral must be made immediately to children's social care or to the police.

5. Recognising child abuse

Abuse is defined as any form of maltreatment of a child and can manifest itself as direct harm to a child or a failure to take action to protect a child who is at risk of, or already suffering from, harm. The types of abuse which are most commonly observed are:

- Physical abuse: may involve hitting, shaking, throwing, poisoning, burning, scalding or otherwise causing harm to a child.
- Emotional abuse: the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved or valued only in so far as they meet the needs of another person.
- Sexual Abuse: involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This form of abuse can involve direct contact activities but also noncontact activities over social media or the internet.
- Neglect: This is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development.

While the above are the four main areas of potential abuse, abuse itself can take many forms involving on or more of these areas.

Child abuse may occur in the family or in an institutional or community setting by those known to them or, more rarely, by others, e.g., via the internet; it may be committed by a member of the school staff; or it may be committed by other children within an educational establishment. Staff need to be aware that technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of abuse online as well as in day-to-day life. Staff should also be aware that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges, including: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; being more prone to peer group isolation than other children; the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

a. Types of abuse and neglect

Type of Abuse	Definition	Indicators
Physical	May involve hitting, shaking, throwing, squeezing burning or scalding, poisoning biting, drowning, suffocating or otherwise causing physical harm to a child.	There can be a lot of overlap between the signs and symptom of one type of abuse and another. Indicators of abuse could be: • Unexplained cuts, • bruises, marks, abrasions, burns • Unwell • Distress • Self-harm or attempts at suicide • Withdrawn • Isolated
Emotional	Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the emotional development of the child. It may involve conveying to children they are worthless, inadequate, unloved and threatening severe punishment, preventing the child from taking part in normal activities and/or abandonment. Also verbal abuse, taunting and shouting. It may take the form of text or cyberbullying.	

Sexual	Young people are abused by adults, those in a position of trust, adolescents or other young people who use them to meet their own sexual needs. This involves sexual intercourse, attempted sexual intercourse, fondling, and any penetrative act (oral/anal) intercourse, masturbation and exposure to pornographic material. 'Grooming' a child in preparation for abuse, including via the internet, is a form of sexual abuse.	• Aggressive • Overtly sexual behaviour • Unwashed • Bed-wetting • Clothes unchanged • Not taking part in activities • Not eating
Neglect	Is persistent failure to meet a child's basic physical and /or psychological needs. This can include not providing appropriate food, clothes, warmth and medical care or leaving a child unsupervised and failing to protect them from physical or emotional harm.	

6. Child on child abuse

Children can abuse other children, and this can happen both inside and outside of an educational organisation, as well as online. All staff should maintain an attitude of "it could happen here". It is very important that all staff challenge abusive behaviour between students and are clear as to tangerine:ed's policy and procedures with regard to child-on-child abuse. Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying; prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or anything 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 stand-alone 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-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- Upskirting (which is a criminal offence) 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 to cause the victim 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).

tangerine:ed has a zero-tolerance approach to child-on-child abuse, where this behaviour will not be dismissed as "just banter", "having a laugh", "part of growing up" or "boys being boys". We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and simply not being reported, and we therefore make it absolutely clear to our students that child-on-child abuse, whatever form it may be in, is not acceptable.

Students can report child-on-child abuse to any member of staff, with the confidence that their concerns will always be taken seriously and dealt with promptly, firmly and fairly. Children may not find it easy to tell staff about abuse verbally, but they can show signs or act in ways that they hope adults will notice and react to. In some cases, a friend may make a report, or a member of staff may overhear a conversation or observe a behaviour that indicates something is wrong. If staff have any concerns regarding a child's welfare, including concerns about child-on-child abuse, they

must report it immediately. Allegations of child-on child abuse will be recorded/logged and will always be followed up on.

a. Bullying, including cyber-bullying

Bullying may be defined as repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons. It may be deliberate harassment or an act of omission which causes physical or psychological hurt. Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease physically or morally in order to frighten into action or inaction. Bullying can also result from a one-off incident. It can include:

- Physical: pushing, hitting, kicking, pinching, poking, biting, taking/damaging belongings
- Verbal: name-calling, homophobic abuse, racist abuse, threats, belittling, spreading rumours, taunts, teasing, making disparaging or offensive remarks, sarcasm
- Emotional: tormenting, ridiculing, humiliating, spreading rumours, ignoring, isolating, threatening gestures, manipulation, coercion, intimidation, hiding belongings
- Cyber-bullying: in which emotional, psychological (e.g., social exclusion) or verbal bullying can be conducted through a digital medium, such as text messages, social media or gaming and email, all of which may be used to transmit offensive or embarrassing messages and photographs.

Signs that may indicate bullying include behavioural changes such as reduced concentration; becoming withdrawn, depressed, tearful, emotionally up and down; becoming reluctant to participate in education or educational activities; physical signs such as stomach aches, headaches, difficulties in sleeping, changes in eating habits; appearing ill at ease in an educational environment or in the company of peers or a desire to remain with adults; seeming upset, withdrawn or outraged after using phone/ tablet/ computer and being unwilling to talk or secretive about online activities and mobile phone use.

tangerine:ed has a zero-tolerance approach to bullying. Staff who become aware of a case of bullying should inform the on-site DSO or their deputy, so that the Safeguarding Team can decide on the best way to handle it. Generally, this will be by using 'Restorative Justice', which dispenses with the notion of victims and perpetrators and focuses on solutions to the problem, based on mutual understanding and shared perceptions. If restorative justice fails, tangerine:ed's Anti-Bullying Policy will be implemented, which will involve an investigation and may ultimately lead to the exclusion of the student perpetrating the bullying. However, no decision to exclude a student will be made without clear evidence that bullying has taken place.

Under the Children Act (1989) a bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Where this is the case, tangerine:ed is required to report the concern to the local authority children's social care.

b. Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Harmful sexual behaviours (HSB) are abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, e.g., if the older child is disabled or smaller in stature. HSB can occur online and/or face to face and can also occur simultaneously between the two.

tangerine:ed understands its duty to safeguard and promote students' welfare in relation to sexual behaviour and works hard to foster healthy and respectful relationships between students in our care. It does this through remaining vigilant to relationships between students and looking out for any indications of HSB. Staff are encouraged to report any concerns that they have with regards to how students are relating to one another, which they can do by speaking to the DSO at their centre.

c. Child-on-child sexual violence and harassment

Sexual violence or harassment can occur between two students of any age or sex, or through a group of children sexually assaulting or harassing a single student or another group of students. Sexual violence includes rape, assault by penetration, intentionally touching another person in a way that is sexual or causing someone to engage in sexual activity without consent. Sexual harassment, defined as 'unwanted contact of a sexual nature', can occur anywhere and can take place either online or offline. Sexual harassment violates an individual's dignity, making them feel intimidated, degraded or humiliated, and can create a hostile, offensive or sexualised environment. Sexual harassment must always be challenged.

Examples of sexual harassment 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.
- Physical behaviour such as deliberately brushing against someone or interfering with someone's clothes.
- Upskirting (which is a criminal offence).
- Displaying pictures, photos or drawings of a sexual nature.

Online sexual harassment includes:

- Consensual or non-consensual sharing of nudes and semi-nude images and/or videos
- Sharing of unwanted explicit content
- Sexualised online bullying
- Unwanted sexual comments and messages, including on social media
- Coercing others into sharing images of themselves or performing acts they're not comfortable with online

Cases of sexual harassment will be dealt with in the same way as bullying. However, with sexual harassment there is an added emphasis on ensuring that students are able to get the support that they need as soon as possible and recognising the embarrassment that the young person will likely feel in reporting a case of sexual harassment. tangerine:ed summer centres have a named female point of contact who is known to students and who female students can speak to when they require additional support.

Any report of sexual violence or abuse must be made to the tangerine:ed DSL immediately, who will make an immediate risk and needs assessment together with the tangerine:ed CLT. This risk assessment will consider:

- The victim (especially their protection and support)
- Whether there may have been other victims
- The alleged perpetrator(s)
- Any actions appropriate to protect other young people
- Any actions required to make the location of the reported incident safer
- Intrafamilial harms and any necessary support for siblings

This risk assessment will be recorded and kept under review so that any risks posed to other students can be considered. In the event of any disclosure about child-on-child abuse, all the children involved, whether alleged perpetrator(s) or victim, will be treated as being 'at risk', and this will inform how the situation is handled. In all cases of sexual violence or abuse, the DSL will engage with the local authority children's care and specialist services as required, and any professional risk assessments (e.g., from social workers or sexual violence specialists) will be used to inform and update the internal risk assessment.

d. Sharing nudes and semi-nudes

The 'sharing of nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices (e.g., Apple's AirDrop which works offline). Professionals may

refer to ‘youth produced sexual imagery’ or ‘sexting’. The legal term for youth produced sexual imagery or ‘youth involved’ sexual imagery is indecent imagery.

The sharing of nudes and semi-nudes is illegal: by sending an explicit image, a young person is producing and distributing child abuse images, and therefore risks being prosecuted, even if the picture is taken and shared with their permission. It also leaves students potentially very vulnerable as the sender has no control over the images. They may be stored or shared online with any number of others. Although they can be deleted on social media or they may appear to last only a few seconds on apps like Snapchat, images can still be saved and copied by others, and they may be found at any point in the future. This may lead to embarrassment, emotional distress, bullying and increased vulnerability to blackmail and exploitation.

tangerine:ed is required to inform the police of any cases where explicit images are shared. This should always be done by the DSL or a member of the tangerine:ed CLT, who must be informed immediately of any cases. Instances where nudes or semi-nudes are shared will always be responded to by investigating swiftly, fully and by following the guidance set out by the UK Council for Internet Safety (UKCIS, December 2020), to make sure our students are safeguarded, supported and educated. It will be explained to students, in a way that avoids alarming or distressing them, that the law is in place to protect children and young people rather than criminalise them. See Sharing nudes and semi-nudes: advice for education settings working with children and young people (www.gov.uk) for further information.

e. Allegations of abuse made against other students

Where there is reason to believe that a child may be suffering, or is likely to suffer, significant harm as a result of the actions of another child (or children), the response will be considered in the light of all the relevant facts and circumstances. In the event of any disclosure of child-on-child abuse, all children involved, whether alleged perpetrator or victim, will be treated as being ‘at risk' and this will inform how the situation is handled. All allegations of abuse made by one child against another will always be investigated promptly and in full, with this investigation being conducted either by the on-site DSO under the DSL’s supervision or, depending on the nature of the allegation, by the DSL themselves. In all cases, the DSO and DSL will discuss the circumstances and other members of the tangerine:ed CLT will be involved as appropriate. Additionally, the advice of the LADO will be sought at a very early stage, with any disclosure, allegation or concern being referred to the LADO in the usual way.

Students will only be suspended or excluded if there is no reasonable alternative. Where suspension or exclusion is deemed appropriate, the reasons and justification will be recorded and the individual notified of the reasons. At this stage, agents may only be informed that the student has been suspended or excluded once the students has been informed of this. If the student briefs the agent themselves and the agent seeks clarification from tangerine:ed, further details will be provided as appropriate.

Allegations that are found to have been malicious will be removed from tangerine:ed records and will not be referred to in reference requests from external agencies.

7. Specific safeguarding issues

a. Mental health and self-harm

Where children have suffered abuse, neglect or some other traumatic adverse childhood experience, this may have a lasting impact on their mental health throughout their childhood and adolescence. It is important that staff are aware that for some children their experiences can impact on their mental health, behaviour, and education. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff in educational settings are well placed to observe children on a day-to-day basis and identify those whose behaviour suggests they may be experiencing some form of mental health problem or be at risk of developing one. If a member of staff is concerned about the mental health of a student, they should take immediate action by speaking to the DSO or DSL, if there is an immediate safeguarding concern, or by recording

it so that it is escalated to the safeguarding team if the concern is of a less immediate nature. Where the concern is not of an immediate nature, the DSL will ensure that it is communicated to the child's parents.

Mental health issues of an immediate concern often manifest themselves in the form of self-harm. Self-harm can take a number of physical and/or emotional forms, and there are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is important for adults who work with children and young people to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. Links have been established between depression and self-harm, and it is not unusual for a child or young person who is self-harming to also be a victim of bullying, under too much pressure, being emotionally abused, grieving or having relationship problems with family or friends. The feelings that these issues bring up can include; low self-esteem, low confidence, loneliness, sadness, anger, numbness and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

Staff should be vigilant for physical indicators of self-harm including cuts, bruises, burns and/or bald patches (where hair has been pulled out), as well as emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits and isolation or withdrawal. If staff suspect that a student is self-harming this must be referred to the DSO immediately, who will notify the DSL. The DSL will consider the next steps. It is likely that this will require discussion with the student involved and their parents/carers to agree the best course of action given the circumstances.

b. Child Criminal and Sexual Exploitation

Child Criminal and Sexual Exploitation are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. The perpetrator or facilitator exploits the victim for their own financial advantage or increased status, generally in exchange for something the victim needs or wants or through violence or the threat of violence. These forms of exploitation can affect both male and female children and can include children who have been moved for the purpose of exploitation ("trafficked"). Consequently, it is a particular risk in scenarios where students are away from the environment of their home country.

Children who are the victim of Child Criminal Exploitation may:

- Appear to have been given unexplained gifts or new possessions
- Associate with other young people involved in exploitation
- Suffer from changes in their emotional well-being
- Misuse drugs and alcohol
- Go missing for periods of time or regularly come home late
- Regularly miss school or be absent for part of their education.

In addition to the above indicators of Child Criminal Exploitation, the following can also be indicators of Child Sexual Exploitation:

- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant

Both boys and girls can be victims of both criminal and sexual exploitation, although there is often a difference in how girls and boys experience criminal and sexual exploitation.

Child Criminal Exploitation can include children being coerced into shoplifting or pickpocketing or being forced or manipulated into committing vehicle crime or threatening/ committing serious violence to others. The criminal exploitation of children is often connected with drugs, including children being forced or manipulated into transporting drugs or money thought county lines. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, e.g., using dedicated mobile phone lines, both locally and across the UK. Children can be exploited to move, store and sell drugs and money; can be targeted and recruited into county lines in a number

of locations; and are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county line gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Key to identifying potential involvement in county lines are missing episodes, where the student may have been trafficked for the purpose of transporting drugs. In this instance referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, County Lines exploitation can affect any young person under the age of 18 irrespective of gender and is still considered to be exploitation even if the activity appears consensual. It is often associated with violence or threats of violence, force or enticement-based compliance methods. One feature of County Lines and Child Criminal Exploitation is some form of power imbalance between victim and perpetrator, which can be due to gender, cognitive ability, physical strength, status, economic resource or other imbalances. This means that international students, who do not speak English as their first language, can be particularly vulnerable to Child Criminal Exploitation and drug trafficking, and so the approach adopted at tangerine:ed is one of vigilance and the acceptance that "it could happen here".

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit for Professionals and OSCB Child Criminal Exploitation.

Child Sexual Exploitation is a form of child sexual abuse which may involve physical contact including assault by penetration, non-penetrative acts (such as masturbation, kissing, rubbing and touching outside clothing) and non-contact activities. It can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge (e.g., through others sharing videos or images on social media). It can affect any child who has been coerced into engaging in sexual activities, including 16- and 17-year-olds who can legally consent to have sex. Some children may not realise that they are being exploited, for example because they believe that they are in a genuine romantic relationship. The sexual exploitation of children and young people under 18 can involve exploitative relationships where young people receive something in return for performing sexual acts. Exploitation of any student can occur on a face-to-face level or through the use of technology, such as mobile phones or computers and game consoles. In these situations, a student could be encouraged to send or post indecent images of themselves. In all cases the person exploiting the victim does so by misusing the power they have over them. This power may come through virtue of age, physical strength and/or economic resources. Violence, intimidation and coercion are common in exploitative relationships.

Child Sexual Exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Victims of Child Sexual Exploitation may well carry two mobile phones, or one phone and two SIM cards. tangerine:ed staff who suspect that a child may be at risk of any form of exploitation, or who believe that this has already taken place, should report their concern to the DSO or DSL and record the concern in writing.

c. Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. These behaviours can include, but are not limited to, psychological, physical, sexual, financial or emotional abuse or neglect. Children can be victims of domestic abuse, and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships. Domestic abuse inevitably has a detrimental and long-term impact on children's health, well-being, development, and ability to learn.

Operation Encompass operates in all police forces across England and helps police and educational organisations work together to provide emotional and practical help to children. It provides an advice/helpline service for staff members from educational settings who may be concerned about children who have experienced domestic abuse (Tel: 0204 513 9990). tangerine:ed staff are encouraged to make use of this service if appropriate.

d. Honour-based abuse (Forced Marriage & FGM)

Honour-based abuse (HBA) encompasses crimes which are committed ostensibly to protect or defend the honour of the family and/or the community and include Female Genital Mutilation (FGM) and Forced Marriage (FM). All forms of HBA constitute abuse, regardless of the motivation behind them, and should be treated as such.
A forced marriage is one that is entered into without the full and free consent of one or both parties, and where duress is involved. This duress can include physical, psychological, financial, sexual or emotional pressure. This is very different to an arranged marriage where both parties give consent. The UNHRC has adopted a resolution against child and forced marriages which recognizes child, early, and forced marriage as involving violations of human rights. In addition, in the UK it is a crime to do anything that might cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to nonbinding, unofficial "marriages" as well as legal marriages. Although sensitivity to a variety of cultural practices is essential in the international context within which tangerine:ed operates, staff are expected to always act in the students' best interests and follow this safeguarding policy with regards to HBA in the same way as for any other safeguarding or child protection matter.

FGM involves procedures that intentionally alter or injure the female genital organs for non-medical reasons and is practised as a cultural or religious phenomenon in certain communities in particular parts of the world, including Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including those from Yemen, Afghanistan, Kurdistan, Indonesia and Pakistan. It comprises any procedure involving the partial or total removal of the external female genitalia, or other injury to the female genital organs. It is illegal in the UK, as it is considered to be a form of child abuse with long-lasting harmful consequences, and is surprisingly common in the UK, with over 1,700 victims referred to specialist clinics in the UK during the last 2 years. tangerine:ed takes concerns around FGM seriously and makes staff aware of the possible signs and indicators that may alert them to the possibility of FGM.

There are a range of potential indicators that a child or young person may be at risk of FGM. Taken individually, these may not indicate risk, but where there are two or more indicators present, they could signal a risk to the child or young person. These indicators include:

- A child coming from a community known to practise FGM
- A child talking about getting ready for a special ceremony
- A child's family taking a long trip abroad or talking about going abroad to be 'cut' or to prepare for marriage.
- Knowledge that a sibling has undergone FGM Indicators that a girl has had FGM may include:

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet
- Showing unusual behaviour after an absence from school
- Being particularly reluctant to undergo normal medical examinations
- Asking for help (but not being explicit about the problem due to embarrassment or fear)

Section 5B of the UK Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers to inform the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under the age of 18. Those failing to report stand to face disciplinary sanctions. The expectation at tangerine:ed is that any member of staff who suspects that a child has experienced FGM should also report their concern to the DSL or DSO. In cases where a staff member has not discovered that FGM has taken place but is concerned that the child is at risk of FGM, they should follow the tangerine:ed safeguarding procedures. The DSL will then involve children's services where appropriate. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so great sensitivity should always be shown when approaching the subject. If staff have a concern that a child may be at risk of FGM, action must be taken without delay.

e. Child abduction and community safety incidents

Child abduction is the unauthorised removal or detention of a minor from a parent or anyone with legal responsibility for the child and can be committed by parents or other family members, people known to the victim, and by strangers.

Community safety incidents are incidents in the vicinity of the tangerine:ed centre which raise concerns, e.g., people loitering nearby or unknown adults engaging children in conversation. tangerine:ed aims to build students' confidence and give them practical advice on how to keep themselves safe, so that they do not fall victim to these issues.

f. Preventing radicalisation

tangerine:ed views radicalisation as a form of abuse, and we take measures as part of our safeguarding policy to counter-act it. Core to this is an understanding of the Fundamental British Values, which are promoted on all tangerine:ed courses. These are:

- Democracy
- The Rule of Law
- Individual Liberty
- Mutual respect and tolerance of different faiths and beliefs

The Counterterrorism and Security Act 2015 places a duty on educational establishments to have due regard to the need to prevent radicalisation, and to take active steps to prevent students from being drawn into extremism or terrorism. This is known as the 'Prevent Duty'. Some definitions which are key to the Prevent Duty include:

- Radicalisation: the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Extremism: the vocal or active opposition to the Fundamental British Values. The definition also includes 'calls for the death of members of our armed forces in this country and overseas'.
- Terrorism: an action that endangers or causes serious violence to a person/people, property or electronic systems.

At tangerine:ed, we actively reject all forms of intolerance and extremism as one of the central tenets of our approach to learning, which embraces international-mindedness and respect for other cultures. In line with government guidance, we see the Prevent Duty as being an integral part of our duty of care and of our safeguarding responsibilities towards our students. Just as we need to be vigilant about signs of possible physical, emotional, sexual and other types of abuse or neglect, so we need to be alert to signs of any of our students being at risk of radicalisation or extremism.

In line with government guidance, we consider our responsibilities under the Prevent Duty to be part of our broader responsibilities to safeguard and promote the welfare of our students. To this end, all staff are expected to communicate such concerns as soon as they are identified to the DSO or DSL (who is also the Prevent Lead). The DSL will consult with the local Prevent team and follow their advice on how to proceed. This may result in a referral to the local Channel programme. Likewise, keeping our students safe from risks of terrorist exploitation via social media is an integral part of our efforts to safeguard children from online abuse. Furthermore, we have a duty to ensure that any speakers we invite to speak on any of our programmes are suitably vetted in advance and supervised while they are speaking or otherwise interacting with students, to ensure that such talks can never present an opportunity for the promotion of extremist or partisan views.

All tangerine:ed staff receive training to support their awareness of the Prevent Strategy and enable them to identify and support individuals who are vulnerable to being drawn into terrorism. All tangerine:ed settings cooperate fully with their Local Authority 'Channel Panel' in the carrying out of its functions, and with the police in undertaking their initial assessments as to whether a referral is appropriate. Channel provides support at an early stage to people who are identified as being vulnerable to being drawn into terrorism, as well as a mechanism for organisations to make referrals if they are concerned about an individual being vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

A child in the process of being radicalised may show some or all of the following signs:

- Becoming involved with a new group of friends
- Searching for answers to questions about identity, faith and belonging
- Possessing extremist literature or advocating violent actions

- Changing their behaviour and language
- Seeking to recruit others to an extremist ideology

However, it is important to note that there is no single way of identifying an individual who is susceptible to an extremist or terrorist ideology. As with any safeguarding risk, staff should be alert to changes in a child's behaviour which could indicate they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views, and so staff need to use their professional judgement in identifying students who might be at risk of radicalisation. Government guidance makes it clear that all children may be vulnerable to radicalisation or display concerning behaviour. Staff need to bear in mind that there are numerous reasons why children may demonstrate the behaviours listed above. It is important, therefore, to be cautious in assessing these factors to avoid inappropriately labelling or stigmatising individuals because they may possess a particular characteristic or fit a particular profile.

The government's 'Educate against Hate' website is a good source of information and guidance for staff and parents and includes possible warning signs of radicalisation: Radicalisation and Extremism - Examples and Behavioural Traits

8. Technology-related Safeguarding issues

a. Online safety

New technologies have become integral to the lives of children and young people and adults in today's society, both within schools and in their lives outside school. The use of these exciting and innovative tools in school and at home has been shown to raise educational standards and promote pupil / student achievement. However, the use of these new technologies can put young people at risk. For one thing, the use of technology has become a significant component of many of the safeguarding issues listed above, with technology often providing the platform that facilitates harm. tangerine:ed endeavours to protect and educate students and staff in their use of technology and establish mechanisms to identify, intervene in and escalate any concerns where appropriate. The issues classified within online safety can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material, such as pornography, fake news, racism, misogyny/misandry, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users, for example peer to peer pressure or adults posing as young people with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that causes harm, including making, sending and receiving explicit images and online bullying
- Commerce: risks such as online gambling, inappropriate advertising, phishing or financial scams.

Issues relating to e-safety at tangerine:ed are the responsibility of the DSL, but it is recognised that our teaching venues do not belong to the company. Therefore, the DSL will work closely with staff at these venues, especially those who handle the venue's IT infrastructure, to ensure that our students do not come to harm online.

tangerine:ed operates an IT Acceptable Usage policy to ensure that our students are protected from online harm and know what is and what is not acceptable when accessing materials online, which they are asked to read and sign when they arrive for their tangerine:ed programme. This policy asks students to agree that they will be responsible for their online behaviour whilst on a course at tangerine:ed and will not do anything online that might risk their own safety or that of others. Specifically, students are asked to:

- Not share their username or password, or use another person's username or password
- Be aware of 'stranger danger' online and not share personal information
- Not meet anyone offline who they have met online unless they have a member of staff with me
- Report immediately to staff any unpleasant or inappropriate material or messages
- Not accept friend requests or communicate with anyone that they haven't met offline (in real-life)

- Only use personal devices and school devices at times allowed in the tangerine:ed rules
- Not create, access, share or store any illegal or inappropriate material
- Not install or store programmes on tangerine:ed or other users' equipment that will alter or affect that equipment
- Not access, copy, remove or alter other people's or tangerine:ed online materials or settings without their permission
- Not clone phones or online profiles of others in order to gain trust or act dishonestly towards tangerine:ed students, staff or members of the public
- Be polite when they communicate with others online
- Not take, send or share on social media pictures of anyone without their permission

Students are told at induction that breaking these rules will lead to sanctions, including being sent home in the event of any serious breaches. In the event of any online behaviour of an illegal nature, the DSL will contact the police in the UK, and in some circumstances in the student's home country.

b. Filtering and monitoring

In order to meet the requirements of our online safety policy, tangerine:ed aims to use venues with adequate filtering and monitoring systems in place. In the case of tangerine:ed programmes which take place in UK boarding schools, the tangerine:ed DSL will meet with the school's DSL prior to the commencement of the tangerine:ed programme at that school to gain an understanding of the filtering and monitoring systems in operation. Agreement will be reached as to how the tangerine:ed DSL or on-site DSO will be notified of any breaches to tangerine:ed's IT Acceptable Usage policy which are flagged via the venue's filtering and monitoring systems.

The nature of our operations means that tangerine:ed is not always able to control the filtering and monitoring regime in place at its centres, especially in the case of university venues. In this situation, all staff working at the centre are expected to be increasingly vigilant to any students who are exhibiting any of the indicators of abuse detailed in this policy.

It is the responsibility of the tangerine:ed DSL to ensure that all centre staff are aware of the filtering and monitoring systems in place at their centre.

c. Mobile phone policy

tangerine:ed recognises that parents in the international community feel the need for their children to have access to a mobile phone for communication home. This helps with safeguarding and student protection, especially when students are away from their home country. tangerine:ed has a mobile phone policy, which is the responsibility of the tangerine:ed DSL, and allows students to use their mobile phones to contact their parents at specific times of day. The operationalisation of this policy is the responsibility of the on-site DSO, and all centre staff are expected to implement the policy on a day-to-day basis. As outlined above, staff should be especially aware of students with more than one mobile phone or SIM card, as this can be an indication of child exploitation. tangerine:ed staff are also reminded at induction of the need to be vigilant to how students use their mobile phones and aware of any bullying or harassment taking place. tangerine:ed takes such conduct extremely seriously and may involve the police or other agencies as appropriate.

Staff who use their personal devices to communicate with students opens themselves up to the possibility of allegations. It is therefore tangerine:ed policy that all virtual communication with students must take place via a tangerine:ed -issued device, and we provide sufficient smartphones at each centre to facilitate this. Any case of a staff sharing their personal mobile number with a student is considered to be a breach of tangerine:ed's Staff Code of Conduct.

d. Remote learning and communication

From time to time, it may be necessary for tangerine:ed staff to communicate with students remotely, for the purposes of learning or assessment. For example, students who are considering enrolling on a tangerine:ed programme may need to be interviewed before their place on a course is confirmed. There may also be times in the future when

learning is required to take place remotely. Within this context, it is important to consider how we communicate with young people via video and other online platforms, especially if it is of a one-to-one nature. The tangerine:ed DSL is responsible for ensuring that all remote communication takes place along acceptable guidelines which safeguard the child while protecting the member of tangerine:ed staff from allegations. Below are some guidelines that tangerine:ed staff should follow to ensure remote learning and communication occurs in a safe environment:

- Ensure that any non-work-related applications, files or apps are closed prior to meeting a student remotely.
- Only record remote communication if absolutely essential and always ensure that students and parents are happy prior to any recording of remote communication taking place.
- Remember that normal professional boundaries apply with regards to dress and behaviour and be aware of the background in any calls. It is always safest to blur the background in any remote communication.
- Be aware in the usual way of any safeguarding or wellbeing concerns, and report these to the DSL as usual.

9. Dealing with disclosures or allegations of abuse

If a member of tangerine:ed staff is made aware of any allegation of abuse, or if knowledge of possible abuse comes to their attention, it is their duty to listen to the student, to provide re-assurance that the student is being taken seriously and that they will be supported and kept safe, and to record the student's statements without probing or putting words into the student's mouth. On hearing an allegation of abuse or complaint about abuse directly from a student, staff should limit questioning to the minimum necessary for clarification, asking open ended questions as necessary. Staff are reminded that a guarantee of confidentiality should never be given, and that the student should be told that the matter will be referred in confidence to the appropriate people. The member of staff should then make and submit an accurate written record and inform the on-site DSO, tangerine:ed DSL or another member of the safeguarding team immediately so that appropriate agencies can be informed within 24 hours and the matter resolved without delay.

All referrals to outside agencies should generally be made by the tangerine:ed DSL, who will refer as follows:

- Allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering or is likely to suffer significant harm will be referred to the MASH (Multi-Agency Safeguarding Hub) as soon as possible, and in any case within 24 hours.
- Concerns relating to child sexual exploitation or radicalisation will be referred to the relevant bodies following the guidance issued by the relevant local children's board. The DSL or another member of the designated team may, in the first instance, contact the LCSS for a consultation in which the name of the child is not given. The advice received will determine the action to be taken next.

Allegations against a member of staff (including the DSL) or any other person in a position of trust at the centre must be reported to the Director or owner of tangerine:ed. Where the allegation is against the Director, the member of staff should inform the owner directly. If the owner cannot be reached immediately, then the LADO should be contacted directly. Any such allegations of abuse will be dealt with according to statutory guidance.

Staff can also choose to contact the MASH directly if they receive an allegation or disclosure, as UK legislation states that 'anybody can make a referral'. Contact details for the MASH can be found at the end of this policy.

tangerine:ed staff who receive a disclosure or allegation of abuse should follow the principles below:

1. Receive: stop and listen to a child who wishes to speak in confidence. During any disclosure listen, allow silences and try not to show shock or disbelief.
2. Reassure: stay calm, make no judgements and empathise with the child. Reassure the child and tell them what your actions are going to be.
3. React: keep questions open such as "is there anything else you need to tell me?". Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.
4. Record: make brief notes about what the child says during the conversation (or as soon after as you can). Record exactly what the child says and not your interpretation of what is said.

5. Report: follow the procedures outlined in this document to ensure the DSL is informed as soon as possible.

a. Taking the child's wishes into account

tangerine:ed's has a policy of always taking the child's wishes and feelings into account whenever there is a safeguarding concern. The child's wishes will help to determine the best course of action for the safeguarding team to take. However, tangerine:ed acknowledges that in some cases the child may lack the understanding to make the best decision, and so the tangerine:ed safeguarding team will always endeavour to make the best decision on the child's behalf in conjunction with external agencies, parents /carers and other stakeholders.

b. Safeguarding children with special educational needs

It is recognised that children with special educational needs or disabilities (SEND) can present additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include; assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration; children with SEND can be disproportionately impacted by issues such as bullying, without necessarily showing outward signs; communication barriers. It is important, therefore, to be particularly sensitive to these issues when considering any aspect of the welfare and safety of such children, and to seek professional advice where necessary.

10. Practical guidance for staff

a. Informing the DSL of safeguarding concerns

tangerine:ed staff are expected to raise any concerns or disclosures that they might have / be aware of with the DSL, or another member of the safeguarding team. For staff at a tangerine:ed summer centre, this may well be in person with the on-site DSO, who will usually be the Centre Manager. Raising an issue in person with a member of the safeguarding team does not absolve individual staff members from the need to record the concern or disclosure in writing. It is essential that a full and clear record is kept at all stages of the child protection process. This needs to be done as soon as possible after the concern or disclosure has come to light, as delay may be prejudicial to the child's safety.

Once a staff member has reported their concern, they should take no further action. Staff should not investigate a suspicion of abuse, whether it be centred on a member of the school staff or a member of the child's family. The child should not be questioned beyond establishing that there is cause to refer the case to the relevant external agency.

b. Responding to concerns from a child

A concern may come to light as a response to something a child says to you. Often, this disclosure can be made during casual conversation. Whenever you respond to a concern, the needs and wishes of the child should be paramount, along with protecting the child. It is important that the child feels as much in control of the process as is reasonably possible. If someone shares a safeguarding concern about themselves or someone else:

- Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. Do so as neutrally as you possibly can, without displaying shock or disbelief.
- Reassure and praise the child that they are being taken seriously and that they will be supported and kept safe. Tell the child that you believe them, and that it is not their fault. Children rarely lie about abuse, but they may have tried to tell others and not been heard or believed.
- Never give a child the impression that they are creating a problem by reporting any form of abuse and/or neglect. A child should never be made to feel ashamed for making a report.
- Stay calm. Be aware of your own reactions. Do not transmit shock, anger or embarrassment.
- Encourage the child to talk without asking leading questions. Do not put words into the child's mouth or make judgemental statements about any person.
- Keep your own responses short and simple and do not offer new information. Do not interrogate the child. Check you have understood what the child is telling you. Do not make any comments about the offender, who may be someone that the child loves.

- Be aware the child may retract what they have told you but ensure that you report exactly what you have heard.
- Write brief notes of what they are telling you, if possible while they are speaking. Include details of any injuries.
- Always keep your original notes, however rough. It's what you wrote at the time that may be important later. If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards.
- Record the date, time, place and any noticeable non-verbal behaviour. Wherever possible, record the actual words used by the child. Record statements and observable things rather than your interpretations or assumptions.
- Never make a promise that you will keep what is said confidential or secret. If you are told about abuse, you have a responsibility to report it so that action can be taken. However, reassure the child that the information will only be shared with those who need to know.
- Do not ask a child to repeat his or her account for another member of staff.
- Explain what you have to do next and who you have to talk to.
- Discuss with the designated member(s) of staff whether any steps need to be taken to protect the person who told you about the abuse.
- If the disclosure is about the sharing of nudes or semi-nudes (indecent images), never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download with you – this is illegal. You should not ask the child to disclose information regarding the imagery, and should not delete it, or ask the child to delete it. If you view the imagery by accident (e.g., if someone has shown to you before you have had the chance to ask them not to), you should report this to the DSL and seek support.
- Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people. This should be left to children's social care and the police, who are trained to do this.
- Never discuss issues with colleagues, family or friends. The information you have received must remain between yourself and the safeguarding team. Any information divulged must be on a need-to-know basis.

Please note that the child's parents / carers (including group leaders) will always be informed of allegations of abuse made by a child, unless this puts the child or the subsequent investigation at risk (e.g. if they are the subject of the allegation). The DSL is responsible for reaching a decision about who to inform of the allegation.

c. Reporting and recording procedures

tangerine:ed staff have a duty to record and report any concerns that they might have with regards to child protection and safeguarding. It can sometimes be difficult to know when to record and report, especially with what may appear to be minor issues, for fear that one may be acting too soon, on a hunch that may prove groundless, or getting a colleague or a member of the student's family 'into trouble'. However, even minor concerns may have an unexpected significance when taken in the context of further information and circumstances of which you may not be aware. It is, therefore, important to report even minor concerns. If a member of staff is not sure whether they should record something or not, they should seek guidance from the on-site DSO or DSL, or from another senior member of staff.

tangerine:ed records, reports and tracks safeguarding concerns. As part of the induction process the DSL or DSO will ensure that staff know how to report a safeguarding concern. This process facilitates the confidential recording of safeguarding records and alerts the relevant safeguarding team to any concerns at their centre. The tangerine:ed DSL and their deputies are able to view all concerns. This allows the safeguarding team to build a picture of an individual student's welfare, which is especially important given that an overall child protection issue can often be seen via a number of lower-level concerns. For each individual concern recorded, the safeguarding team must record a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of actions taken, decisions reached and the outcome. Staff who add a disclosure that they have received from a student should include:

- As full an account as possible of what the child said (in their own words)
- An account of the questions put to the child
- Time and place of disclosure
- Who was present at the time of the disclosure

- The demeanour of the child, where the child was taken and where returned to at the end of the disclosure

The bottom line is to remember that the consequences of not reporting a concern that a child has been abused, or a disclosure from a student, could well be far more serious than making a report that later proves to be unfounded.

d. Information sharing and data protection

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. In other words, where the welfare and safety of one or more children are concerned, the need to share information with the relevant agencies trumps data protection. However, tangerine:ed is aware of the requirement to follow GDPR regulations in its role as a data processor. As such, records concerning disclosures about sexual abuse, sexual assault, and sexual violence are retained for a minimum of 75 years. Other records regarding child protection issues are kept until the child turns 25.

e. Informing parents

tangerine:ed believes that, as a general principle, parents should be kept informed of any concerns regarding their children. However, we also recognise that there are circumstances in which it may not be in the child's best interests for their parents to be made aware of a concern. It is important to stress that concerns of a child protection nature must always, in the first instance, be referred to the DSL, on-site DSO, or to another senior member of staff with safeguarding responsibility. tangerine:ed's DSL is responsible for making any decision about informing parents of a child protection issue.

Where it has been judged that a referral to Children's Social Care needs to be made, we will aim to share our intention to refer with the student's parents or guardians, unless it is deemed that to do so would put the child at greater risk of harm or impede a criminal investigation. Whether it is appropriate to inform parents in advance and if so, how, when and by whom this information is best communicated will normally be discussed with social care staff and a course of action determined in conjunction with them.

f. Reporting to the police

Whenever a member of tangerine:ed staff believes that a crime has been committed, they should report this to the DSL, who will then report the matter to the police without delay. The DSL is responsible for ensuring that the rights, entitlements and welfare of the child are supported and safeguarded throughout this process, and has a legal responsibility to ensure that the police are acting properly and fairly in relation to a vulnerable detained person's rights and entitlements, as well as helping the young person understand their rights. This is especially important in our context, where students are away from the environment of their home country and do not speak English as their first language.

g. Support for staff following a disclosure

tangerine:ed recognises that where staff have been involved in reporting and responding to abuse, they may find this very difficult to deal with if not adequately supported. tangerine:ed therefore keeps a list of organisations (such as law firms, hospitals and counsellors) which can provide support, and which can be made available to staff on request.

11. Students absent from class

As the vast majority of tangerine:ed students stay in residential accommodation, student absences from lessons and activities are rare. On all courses, it is the responsibility of a designated member of tangerine:ed centre staff to ensure that students are woken up in the morning and ready for the school day, so absences due to oversleeping are limited. The only reason why students are generally absent from lessons is because of ill health, which is dealt with as a student well-being concern. Students who feel too ill to attend their lessons should speak to a member of staff first thing in the morning. The member of staff should report this to their Centre Manager (who will also inform the student's Group Leader if the student is part of a group). The Centre Manager (in consultation with the Group Leader if appropriate) will make a decision as to whether the student needs to be taken to the hospital or 111 needs to be telephoned, and

arrangements will be made accordingly. This is then also recorded and the DSL is informed so that agents/parents can be told.

Children who go missing from school with no explanation, or who fail to return after a planned absence, will be regarded as an immediate safeguarding concern. Every effort will be made to locate the child, liaising with the police and welfare officers as appropriate. Where a student is absent from lessons or activities for any reason other than sickness, and this absence has not been approved, the tangerine:ed centre senior management team will immediately take steps to locate the student and check their status. If the student cannot be located on campus, a member of the centre senior management team will call their mobile phone. If the student still cannot be contacted or located, the Centre Manager should inform the DSL, who will contact the police to report the student as a missing person.

In the event that a student feigns illness in order to get out of lessons or activities, this will be treated as a potential indication of a safeguarding concern and the student will be spoken to by the on-site DSO. The centre safeguarding team will monitor the student closely to ensure that there are no other indications of emerging safeguarding concerns. It is important to remember that not wanting to participate in school activities can act as a vital warning sign of a range of safeguarding issues, including neglect, child sexual and child criminal exploitation, mental health problems, risk of travelling to conflict zones, etc.

All cases of absence and follow-up actions taken must be recorded. Further information about how to deal with absence from class or other school activities can be found in tangerine:ed's attendance policy.

12. Promoting awareness of and support with safeguarding issues amongst students

tangerine:ed aims to create a robust safeguarding culture in all of its centres, where staff play a key role in helping to ensure that students relate well to one another and feel safe and comfortable at the centre. We work hard to build a spirit of openness in which students understand that they have access to a wide range of adults who will listen to and support them. We aim to ensure that all students know that their concerns will be treated seriously and that they can safely talk about their feelings, express their views and give feedback. Systems are in place to promote this, including feedback questionnaires, classroom discussions, and the counsellor system which means that students build up close relationships with staff who they see both in class and for extra-curricular activities and excursions. Posters displayed around our centres provide easily understood and accessible information about how students can report concerns and access support. We also use lesson time and regular student meetings to support our students to feel safe, develop confidence and independence and increase in self-esteem and self-assertiveness, while not condoning aggression or bullying.

All tangerine:ed staff, especially those with direct day-to-day contact with students, are expected to lead by example and play a full part in the collective effort to promote an awareness among all students of issues relating to health, safety and well-being. Staff also have a responsibility for maintaining a spirit of tolerance, mutual support and open communication within the centre and for ensuring that bullying is kept at bay and that tangerine:ed's anti-bullying policy is applied whenever the need arises. The curriculum used on tangerine:ed's various programmes are designed to foster the development of our students' confidence, understanding of their place in the world and cross-cultural communication, as well as to ensure that they are taught how to keep themselves and others safe.

At tangerine:ed we listen to our students and involve them when reviewing our policies and considering how we can better address child protection and safeguarding issues. All bullying, including cyber-bullying, prejudice based and discriminatory bullying, is taken very seriously and we aim always to deal with any instances that may arise pro-actively, sensitively and promptly – and in a way that is designed to raise awareness and to help with the personal development not only of those directly concerned but also their peers and the broader student community.

13. Excursions and free time supervision

tangerine:ed takes its responsibility to safeguard our students from harm at all times extremely seriously, including during the less formal periods of free time between lessons and on excursions. The majority of tangerine:ed students are new to the cities where they are studying or visiting on excursions, and so it is incumbent on tangerine:ed staff to ensure that they are safe (and feel safe) at all times.

Students who are attending courses advertised as being for those between the ages of 8 to 12 are supervised in person by a responsible member of tangerine:ed staff at all times and do not receive unsupervised free time. For older students, the following policy is in operation:

- Students will be told that they must have a mobile phone prior to arriving on a tangerine:ed programme. They will be asked for their mobile phone number, which will be saved on their record on tangerine:ed student management system.
- A full risk assessment will be conducted prior to each excursion, and as part of the risk assessment process decisions will be made about the areas within which it is considered safe for students to stay during any period of free time on the excursion. Any potential risks within this designated area will be ascertained and measures put in place to mitigate these risks.
- Whenever an excursion has periods of remote supervision, there will be a briefing prior to the excursion. At this briefing, students will be instructed on the designated area that they must stay within during the period of remote supervision and reminded that they are not allowed to take public transport.
- The length of time when students are not under the in-person supervision of a member of staff is limited to 2 hours for those on courses for 13-18 year olds.
- When students are not under the in-person supervision of a member of staff, they are supervised remotely (for example, when they sign out of the centre or have shopping time on an excursion).
- At times when students are remotely supervised, they must be in groups of a minimum of 3, and must be contactable, with mobile phones switched on, at all times.
- One member of staff will be stationed in a central location that students can reach easily if they need support; that member of staff will have:
    - The trip smartphone
    - A list of students' mobile phone numbers (printed from the student management system) ○ A list of which students are together in groups
- Each group must check in with tangerine:ed staff halfway through each period of remote supervision by sending a message to the trip smartphone, confirming that all members of the group are accounted for.
- Where students are at an excursion venue with a single entrance / exit, at least one member of staff will be stationed at this entrance / exit at all times.
- Where there are multiple entrances / exits at an excursion venue, or when students have periods of remote supervision, staff will roam the designated area.
- Any student found to have not followed the remote supervision rules (e.g. they didn't stay in a group of 3 or went outside the designated area) will lose the right to remotely supervised free time and will have to stay with a member of tangerine:ed staff at all times until the end of their course.

As part of the booking process, tangerine:ed always gains consent from parents/carers (or a group leader who has parental consent to act as 'in loco parentis') for their child to have remotely supervised free time. Where this consent is not granted, the child or young person will always be supervised in-person by a member of tangerine:ed staff, regardless of their age.

A risk assessment is produced by the Activity Manager, and signed off by the Centre Manager, for all activities and excursions. These risk assessments are read, and signed to say that they have been understood, by every adult involved in supervising the activity or excursion (whether they are a member of tangerine:ed staff or a group leader). tangerine:ed's risk assessments are living documents which reflect the situation 'on the ground', and as such they are reviewed regularly, including throughout the activity or excursion, in light of evolving situations. Our aim in producing every risk assessment (based on guidance from the HSE) is to identify hazards, decide who might be harmed and how, evaluate the risks and decide on precautions, record any significant findings and review the assessment and update if necessary. The risk assessment process is overseen by tangerine:ed's Operations Manager, who has received the appropriate training, under the supervision of the DSL.

14. Accommodation and private fostering arrangements

All accommodation that tangerine:ed uses is checked to ensure that it is of an acceptable standard before first being used, and thereafter on a regular basis. This check includes an assessment of the suitability of all residence staff, homestay providers and other residents staying in the home. In the case of host family accommodation, a DBS check is conducted on all adults living in the home. Thereafter, tangerine:ed regularly checks host family accommodation to ensure that acceptable standards are being maintained. In addition, we ensure that an age-appropriate curfew has been agreed with our host families, and that they know that they should contact the tangerine:ed emergency phone in the event that the student does not return to their accommodation before the curfew.

A student under the age of 16 who is living with a host family for more than 28 days, or who is taking a course at a tangerine:ed centre of more than 28-days duration, is considered to be in a 'private fostering arrangement'. In these cases, tangerine:ed liaises directly with the private fostering team within the social services private fostering department local to the home tuition or host family regarding the placement. The tangerine:ed DSL will provide the private fostering team with basic information about the student, including their name, age, nationality and, where appropriate, which host family they are living with. This is done soon after the placement is confirmed and no later than seven days after the start of the placement. Families with private fostering arrangements must follow specific criteria. The tangerine:ed safeguarding team is responsible for conducting all required checks.

15. Safer staff recruitment

a. Safer recruitment practices

tangerine:ed's procedures for the selection and recruitment of all staff and volunteers follow the government's recommendations for the safer recruitment of staff and volunteers who work with children and young people and comply with the principles and practices set out in 'Keeping Children Safe in Education' (September 2023). All tangerine:ed staff are subject to the necessary statutory pre-appointment checks before commencing their employment, as are any volunteers, host families, contractors and agency or third-party staff (e.g. taxi and coach drivers) who tangerine:ed may use. Appropriate suitability checks are conducted by tangerine:ed on anyone who may come into contact with under 18s as part of their work. These checks may be conducted via:

- The Disclosure and Barring Service (in England and Wales)
- The Protecting Vulnerable Groups Scheme (in Scotland)
- Access NI (in Northern Ireland)
- A police 'Certificate of good conduct' (for staff employed outside the UK)

In some cases, a combination of these checks may be used, for example where a member of staff has spent time working in both the UK and overseas.

In addition, the following will be obtained for all staff employed by tangerine:ed:

- At least 2 references (all references will be followed up with the referee)
- Proof of identity and, where applicable, qualifications
- A declaration of convictions

Additionally, all gaps in CVs must be explained satisfactorily. Reference requests will ask specifically whether there is any reason that the candidate should not be engaged in situations where they have responsibility for, or substantial access to, persons under the age of 18. In the case of seasonal staff who have worked for tangerine:ed for one or more summers and are returning, references and checks will be sought each time the employee returns to ensure that the most up-to-date information is available. To make this more efficient, tangerine:ed has a policy of signing staff up for the DBS update service. Potential applicants and returning staff will be informed of all suitability requirements pre-application.

The DSL is responsible for co-ordinating all staff recruitment procedures and checks at tangerine:ed and has completed Safer Recruitment training. The DSL conducts the initial interview with all prospective employees to ensure that safer recruitment principles are applied throughout the recruitment process.

b. Single Central Record

tangerine:ed maintains a Single Central Record (SCR) of all staff, which complies with all current regulations and contains records of all the required documentation and checks for all staff, host family members (and anyone over the age of 16 who lives in the home of a host family). The SCR is monitored and reviewed to ensure compliance by the tangerine:ed DSL and CLT.

The record must also show the date on which each check was completed/certificate obtained and who saw them:

- Start date of employment/ Service Agreement Date
- Role
- Identity:
    - Name ○ Address ○ Date of Birth
    - Evidence of photo ID, date seen and who checked by. Record what was seen (passport/ driving licence etc). Ideally, schools should also see a birth certificate that matches the photo ID.
- Background checks: ○ Evidence of qualification, date seen and who they were checked by. Record "no" if qualifications are not needed for the role. Make sure the original certificate proving the qualification is seen and recorded.
    - Prohibition order checks (undertaken by the regional HR team on all teachers who qualified or worked in the UK. (Regional HR would need to provide schools with evidence that these checks have been undertaken)
    - Section 128 check (Only applies to UK citizens taking up positions as Principals or senior leaders). This check is undertaken on any individual in a leadership position in one of our schools. Regional HR should undertake these checks on the school's behalf.
    - Background checks must cover ten years (except in the USA), and all countries lived in over the last ten years, including contractors and third parties with regular unsupervised contact with students.
    - When a social media/internet search was undertaken on the candidate (except where this conflicts with local regulations)
- Right to work: ○ Visa/ Passport, etc – date seen and who checked by · References: ○ There should be a minimum of 2 references. References should be followed up by phone or email to confirm the author, with the date of the follow-up recorded.

16. Staff behaviour and code of conduct

tangerine:ed aims to create an atmosphere of trust, mutual respect and open communication at all of our centres, where individuality and global mindedness are encouraged. Our centres are deliberately small as we want our staff to get to know each of the students that they work with as individuals. However, staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. Our Staff Code of Conduct is designed with the safety and protection of both staff and students in mind.

The purpose of the tangerine:ed Staff Code of Conduct is to assist staff working with children and young people to:

- Work safely and responsibly and monitor their own standards and practice
- Set clear expectations of behaviour and codes of practice relevant to each role
- Support the organisation in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken

The Code of Conduct is read and agreed to by all members of staff as part of the new staff induction process. It is based around the guidance outlined in this section of the safeguarding policy.

a. Making a professional judgement

At all times, tangerine:ed staff are expected to use their judgement to secure the best interests and welfare of the children and young people in their charge. It should be stressed that the guidance given in this section of the safeguarding policy cannot provide a complete checklist of what is or is not appropriate behaviour for staff in all circumstances. There may be circumstances in which staff members are required to make a decision or take an action in the best interests of a child which contravenes the guidance below, or where no guidance exists. In such circumstances, the judgements and actions taken should always be reported to the Centre Manager or a member of tangerine:ed's CLT as soon as possible after the event. The bottom line is that staff should always consider whether their actions are warranted, proportionate and safe.

b. Propriety and behaviour

All staff employed by tangerine:ed are responsible for maintaining public confidence in their ability to safeguard the welfare and best interests of children and young people, and so should adopt high standards of personal conduct at all times. This is true whether staff are in the workplace or elsewhere, and it is essential that staff remember that safe practice involves using judgement and integrity about their behaviour at all times and in all contexts. There may be times, for example, when an adult's behaviour or actions in their personal life may come under scrutiny from the local community, the media or public authorities. This could be because their behaviour is considered to compromise their position in the workplace or to indicate an unsuitability to work with children or young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. tangerine:ed has, therefore, developed a set of rules which ensure that staff do not bring the organisation into disrepute.

- Staff should not smoke or drink alcohol whilst in the company of, or whilst responsible for, children and should not be under the influence of alcohol at times when they may reasonably be required to take responsibility for the supervision of children. This means, for example, that staff should not drink off-site at lunchtime when they will be returning to work in the afternoon or evening. Additionally, tangerine:ed operates a 'dry site' policy which staff are expected to follow at all times, which states that under no circumstances should alcohol be taken onto, or consumed at, a tangerine:ed centre, even if the member of staff who consumes the alcohol is off duty.
- Staff should not behave in an aggressive, violent or forceful manner which would lead any reasonable person to question their suitability to work with, or act as a role model to, children and young people.
- Staff should dress in a way which is appropriate to their role while at a tangerine:ed venue or on an excursion or activity outside the school, taking care to dress appropriately for the work being undertaken. Those who dress in a manner which could be considered as inappropriate make themselves vulnerable to criticism or allegations. Staff should dress in a way that:
    - Is not viewed as offensive, revealing or sexually provocative
    - Does not distract, cause embarrassment or give rise to misunderstanding ○ Is absent of any political or otherwise contentious slogan ○ Is not considered discriminatory and is culturally sensitive
- All children and young people have a right to be treated with respect and dignity, even when they display difficult or challenging behaviour. Staff should not use any form of degrading treatment to punish a child. The use of corporal punishment for children and young people is both illegal and unacceptable.
- The use of sarcasm, demeaning or insensitive comments towards children and young people is not acceptable in any situation. Any sanctions or rewards should be used equitably and in line with tangerine:ed's behaviour management policy.

c. Position of Trust

As a result of their knowledge, position and/or the authority vested in their role, all adults working with children and young people are in a position of trust in relation to the child or young people in their care. A relationship between an adult and a child or young person cannot be a relationship between equals. Within this context, there is an increased potential for exploitation and harm of vulnerable children and young people. Where a person aged 18 or over is in a specified position of trust with a child under 18, it is a criminal offence under Section 16 of the Sexual Offences Act,

2003 for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity even if, in the case of those over the age of 16, the relationship is consensual. tangerine:ed policy states that members of staff must not under any circumstances engage in a relationship with any tangerine:ed student, regardless of that student's age. Failure to adhere to this policy would result in disciplinary procedures being invoked. Staff are reminded to take all reasonable steps to ensure their actions and behaviour do not place them or students in their care at risk of harm or of allegations of harm. Interactions and communications between staff and students must remain professional in nature at all times.

tangerine:ed staff are expected to have a clear understanding of the need to maintain appropriate boundaries in their contacts with children and young people, and any intimate or sexual relationship between children / young people and adults in tangerine:ed's employment will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable. Staff should never use their status and standing to form or promote relationships which are of a sexual nature, or which may become so. Any sexual activity between an adult working for or with tangerine:ed and a child or young person with whom they work will be regarded as a criminal offence and will be reported accordingly. It is important to remember that sexual activity does not only involve physical contact including penetrative and nonpenetrative acts, but may also include activities such as causing children to engage in or watch sexual activity or the production of pornographic material.

Staff working in educational contexts have been known to embark on a course of behaviour known as 'grooming' where a relationship of trust is developed with a child or young person which is then exploited so that sexual abuse can take place. Staff should be aware that showing favouritism to an individual student or consistently conferring inappropriate special attention upon a child may be construed as being part of a 'grooming' process, and as such will give rise to concerns. Consequently, staff should not engage in any communication which could be interpreted as sexually suggestive or provocative (through verbal or written communication of any form), talk about their own sexual relationships or make sexual remarks about or directed at a young person. Relationships between staff and students should at all times be professional, healthy and respectful. Staff must think carefully about the language they use and their demeanour, attitudes and conduct when dealing with children and young people.

Occasionally, a child or young person may develop an infatuation with a staff member. Staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should also remain aware that such infatuations carry a high risk of words or actions being misinterpreted, and they should make every effort, therefore, to ensure their own behaviour is above reproach. In this situation, a staff member who becomes aware that a child or young person is developing an infatuation with them should discuss this at the earliest opportunity with their Centre Manager so that appropriate action can be taken to avoid any hurt, distress or embarrassment. Staff are also reminded to be mindful of their words and actions in one-to-one situations with children and young people.

Many of the seasonal staff employed by tangerine:ed, especially those in the role of Activity Leader, are of a similar age to tangerine:ed's students. For younger staff there can be an increased risk of many of the concerns covered in this section. For example, there may be a greater risk of students developing an infatuation with staff who are of a similar age to them, and a greater possibility of their actions being misconstrued and resulting in allegations. It is therefore essential that younger staff working for tangerine:ed ensure that they read and understand this safeguarding policy, do everything that they can to protect themselves, and speak to the on-site DSO, the DSL, or another member of the safeguarding team if they have any concerns. Senior staff at tangerine:ed have a specific responsibility to safeguard younger members of staff and to be vigilant to any actions taken by younger staff that may be misconstrued.

d. Communication with students

It is essential that staff working with children and young people avoid exposing themselves to the risk of allegations. Therefore, communication between tangerine:ed staff and students always needs to take place within clear and explicit professional boundaries, and be of a professional nature, whatever method is used for that communication. Written communication should always take place via an email address or online platform (including Microsoft Teams

and WhatsApp) that is designated by tangerine:ed for this purpose. Communication with students should never be from a staff member's personal phone or email address, and if a member of staff needs to contact a student by telephone or email, this should only be done using a school mobile phone and/or tangerine:ed email address, so that it can be monitored and checked if needed.

In order to safeguard staff from allegations of inappropriate conduct, tangerine:ed has adopted a number of guidelines to be followed in all staff communication with students. Staff should not:

- Write messages of a personal nature to any tangerine:ed student in any medium or share any personal information with a child or young person.
- Use their personal mobile to communicate with or to take photographs / videos of a young person.
- Accept students as friends on social media.
- Give their personal mobile phone numbers or personal email addresses to students or communicate with students via personal text message or WhatsApp.
- Communicate with former students on personal social media for one calendar year after that student completes their tangerine:ed programme (and even then, only when the student is above 18 years of age). · Use a social network site to complain or criticize a colleague, the school or an individual child.

Any breach of these guidelines will be dealt with according to the tangerine:ed disciplinary procedure. Staff should inform their Centre Manager immediately if they are contacted by a young person on a personal device or via social media.

As outlined in section 13 of this policy, excursion leaders must take a tangerine:ed -issued mobile phone on every excursion, along with a printed list of students' mobile phone numbers. The tangerine:ed mobile phone should be used for any contact with students during the excursion. All communication with students during the excursion must be via WhatsApp or Microsoft Teams, and a record of any WhatsApp or Teams messages must be retained on the phone so that there is a record of all conversations with students should this be required. Following the excursion, the excursion leader should return the list of mobile phone numbers to the Activity Manager, who should dispose of it securely.

e. One-to-one situations

It is feasible for members of staff to find themselves in one-to-one situations with students from time to time. In this scenario, staff should bear in mind their responsibility to ensure that their behaviour is totally beyond reproach and cannot lay them open to allegations of abuse. It is best practice to:

- Avoid one-to-one meetings with students in remote or secluded areas of the tangerine:ed centre
- Ensure that other staff members are within earshot if at all possible
- Use a room with a visual panel and / or leave the door open (unless there are good reasons why the conversation has to take place in confidence)
- Avoid the use of 'Engaged' or equivalent signs, as these may create an opportunity for secrecy or the interpretation of secrecy

Any one-to-one situations in which a student shows signs of becoming uncomfortable or ill at ease should always be reported to the on-site DSO, or their deputy, and recorded in writing.

It is not permitted for staff to arrange to meet students away from the school premises unless approval for this has been obtained from their parent/carer and the tangerine:ed DSL.

f. Physical contact with students

There are occasions when it may be entirely appropriate and proper for staff to have physical contact with tangerine:ed students, but it is crucial that they do so only in ways which are appropriate to their professional role. Staff should not have unnecessary physical contact with students and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by students or onlookers. A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection. Physical contact

should never be secretive, or for the gratification of the adult, or represent a misuse of authority. Staff should, therefore, use their professional judgement at all times with regards to any physical contact with students.

Where exercises or procedures need to be demonstrated, for example in sport or music, great caution should be used if the demonstration involves contact with students and, wherever possible, contact should be avoided. It is acknowledged that staff may occasionally need to initiate physical contact with students so that they can perform an activity safely, to demonstrate the use of a particular piece of equipment or to assist them with an exercise. This should always be done with the student's agreement, contact under these circumstances should always be for the minimum time necessary to complete the activity, and it should take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child. Other scenarios where staff may need to have physical contact with students are for restraint and physical intervention and for first aid.

If a member of staff believes that an action could be misinterpreted or that it may have been misinterpreted, they should record the incident and circumstances in writing and inform the on-site DSO, the tangerine:ed DSL or another member of the safeguarding team, who will advise on the best course of action in the circumstances.

g. Physical restraint

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on themself or on another individual, and then only as a last resort when all efforts to diffuse the situation have failed. Where physical restraint is required, another member of staff should be present to act as a witness if at all possible. All incidents of the use of physical restraint must be recorded in writing and reported immediately to the on-site DSO, who will decide what to do next in consultation with the tangerine:ed DSL.

h. Need to know

tangerine:ed staff should never give an absolute guarantee of confidentiality to anyone wishing to tell them about something serious. Instead, they should guarantee that they will pass information onto only those people who must be told in order to ensure the proper action is taken to sort out the problem, and that they will not tell anyone who does not have a clear need to know. The tangerine:ed safeguarding team will take whatever steps they can to protect the informing student or adult from any retaliation or unnecessary stress that might result from a disclosure being made.

Staff are expected to only share any private information about children and young people to which they have access when it is in interests of the child to do so. Such information must not be used to intimidate, humiliate, or embarrass a child or young person, and should never be shared casually in conversation or passed onto any person other than on a strictly need-to-know basis. In some circumstances, a member of staff may be expected to share information about a child, for example if abuse is suspected. In such cases, staff have a duty to pass such information on without delay, but only to those with designated responsibility for child protection. If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from the on-site DSO, the tangerine:ed DSL or a member of the tangerine:ed CLT.

i. Photography and videos

Any activities involving the taking or recording of images should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of students. Parents/carers are asked to consent to photographs of their child being taken by tangerine:ed staff prior to the student’s arrival on their tangerine:ed programme, and this consent can be withdrawn by the student or parent/carer at any time. It is the responsibility of the Activity Manager at each centre, under the supervision of the Operations Manager, to ensure that students are only photographed when this consent has been given. Prior to a student’s being photographed, it is essential that the student agrees to the image being taken. In the event that images are to be used for publicity purposes or published in the media or on the Internet, extra care should be taken to ensure that all parties understand the implications of their image being taken.

When taking photographs or videos of students, staff should:

- Be clear about the purpose of the activity and what will happen to the images when the lesson/activity is concluded, when an image or video is taken as part of a learning activity.
- Ensure that a member of the centre management team is aware of the image's use and purpose.
- Avoid taking images in one-to-one situations or that show a single child with no surrounding context.
- Ensure students are aware that they are being photographed and check that they agree to this – never record an image of a student without their knowledge or agreement.
- Use only equipment provided or authorised for use by tangerine:ed.
- Remain sensitive to any students who, for whatever reason, appear uncomfortable and recognise the potential for the taking of images to raise concerns or lead to misunderstandings.
- Always be able to justify any images of children in their possession.
- It is totally unacceptable for any member of tangerine:ed staff to take photographs of students for their personal use.

j. Whistleblowing

Safeguarding is everyone's responsibility, and everyone at tangerine:ed should feel able to contribute to and help improve the organisation's safeguarding and child protection policy and procedures. All adults working for, or with, tangerine:ed should feel able to raise concerns about what they may consider to be inadequate or unsafe practice or about potential failures in tangerine:ed's safeguarding policy and procedures. Such concerns should be addressed directly to the DSL or to another member of the safeguarding team. They will always be taken seriously and given careful consideration by the tangerine:ed CLT.

Likewise, if any adult working for, or with, tangerine:ed has concerns about the behaviour of another adult towards a child or young person, they should report their concerns at once to the tangerine:ed DSL or Director. To report such a concern, they may talk to the DSL or Director in person or by phone to make a verbal report in the first instance. They will then be asked to make a written note of their concerns and submit them by email immediately after the verbal report has been made. If the initial report is made in writing, the person who reported the concern will be invited to a meeting as soon as reasonably possible to hear the concerns in more detail.

It is essential that any concerns are reported at once, and without fear of retribution. A member of staff or a student reporting a child protection issue, allegation or concern will suffer no adverse consequences, regardless of the status of the person against whom the allegation was made and whether the allegation or concern proves to be founded over time, provided the report was made in good faith.

In the event that staff, for whatever reason, do not feel able to raise concerns regarding any child protection failures internally, or feel that their safeguarding concerns are not being addressed, they should contact the NSPCC whistleblowing helpline (tel: 0800 028 0285, from 8 am to 8 pm Monday to Friday, or email: https://www.nspcc.org.uk/about-us/our-services/nspcc-helpline/).

17. Allegations against staff and volunteers

a. Dealing with an allegation against a member of staff

tangerine:ed's central leadership team give the highest level of priority to any situations where a member of staff has:

- Behaved in a way that has harmed a child, or that may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates that he or she may pose a risk of harm to children · Behaved or may have behaved in a way that indicates they may not be suitable to work with children

If an allegation of abuse is made against a member of tangerine:ed staff, the quick resolution of that allegation is our priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be avoided. At the same time, the allegation will always be treated with the greatest care, bearing in mind that the response has to be considered and sensitive to all parties. Our response must strike a balance between the need to

protect children from abuse on the one hand, and the need to protect staff from false or unfounded accusations on the other.

An allegation may be received in one of various ways: it may be a direct complaint made by a student or a parent to another member of staff or directly to a relevant external agency; it may come from another party that may have been told about or witnessed the abuse; or it may come as an anonymous referral. If a member of staff is informed about a possible allegation, s/he should report the matter to the on-site DSO (or their deputy) immediately, who will then report the matter to the tangerine:ed DSL or Director.

The tangerine:ed DSL will manage the case going forward and will discuss the allegation with the LADO (Local Authority Designated Officer) for the area where the allegation is reported to have taken place as soon as possible and, in any case, within 24 hours of receiving the allegation. In cases where the on-site DSO is the subject of the allegation or concern, allegations should be reported directly to the tangerine:ed DSL. If the member of staff feels that there is a conflict of interest in reporting the matter to the Director or DSL, they should report it directly to the LADO. If the allegation is against the DSL, then it must be reported either to the Director or owner of tangerine:ed, or vice versa, without informing the party involved in the allegation first. In all cases, the member of staff receiving the disclosure / allegation may choose to contact the MASH directly, given that UK legislation states that anybody can make a referral.

Each situation will be assessed on its own merit and with due regard to the welfare of the child in question, while at the same time supporting the person who the subject of the allegation is. Under no circumstances should the tangerine:ed management, or indeed any member of staff, conduct their own investigation without prior consultation with the LADO or, in more serious cases, the police, so as not to jeopardise statutory investigations.

The timescale required to deal with a particular issue will depend on the nature, seriousness and complexity of the allegation. However, in all cases, the aim will be to try to resolve the issue as quickly as possible while, of course, ensuring a fair and thorough investigation. All allegations will therefore be investigated as a priority and without delay. The LADO will judge whether or not the allegation or concern meets the relevant threshold with the information available at that time. Should the information change, further consultation may take place. If, after initial consideration and discussion with the LADO, it is concluded that the allegation does not involve a possible criminal offence, it will be for tangerine:ed to deal with, which it will do quickly and with due regard to the tangerine:ed disciplinary procedures.

In cases where tangerine:ed deals with allegations, appropriate action will be instituted within three working days. Where a disciplinary hearing is required and no further investigation is needed, this hearing must be held within 15 working days, although it will generally take place sooner than this. Where further investigation is required, the nature, content and context of the allegation will be discussed with the LADO and a course of action agreed, including how the investigation should be carried out and by whom, whether the police should be informed, and what should be said to the individual concerned and the parents of the child/children involved.

Where the allegation concerns a member of staff, a volunteer or another student, the subject of the allegation would normally be informed as soon as possible after the result of any initial investigation that has been authorised or conducted by the LADO is known. A member of staff will normally be appointed to keep the person informed of the likely course of action and the progress of the case. Where an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved.

b. Suspension

In cases where a decision is made that there is a possible risk of harm to a child, tangerine:ed may decide to suspend the staff member involved in the allegation until the case has been resolved. Before the staff member is suspended, however, the tangerine:ed safeguarding team will consider whether alternative arrangements can be put in place until the allegation has been resolved. A member of staff will therefore only be suspended if it is judged that there is no reasonable alternative. The advice and guidance of the LADO will always be sought in such instances.

Where the decision is taken to suspend a member of staff, the reasons and justification will be recorded and the member of staff notified of these reasons. As part of its duty of care to its staff, tangerine:ed will seek to provide effective support to any staff member who may be facing an allegation. They will be provided with a named point of

contact at tangerine:ed if they have been suspended. For residential staff, tangerine:ed will make arrangements for the staff member concerned to be housed outside of a tangerine:ed centre so that s/he does not have direct contact with students until the matter is resolved.

c. False allegations

If an allegation is determined to be false or unsubstantiated, tangerine:ed will ensure that this is reflected in the staff member's record and no further action is taken. Should an allegation made by a student be shown to have been deliberately invented or malicious, a decision will be made about whether any disciplinary action should be taken against that student. Students found to have made malicious allegations are likely to have breached tangerine:ed's behaviour policies and a decision could therefore be made to exclude them from their tangerine:ed programme. If the person who made the allegation was not a student, a decision may be made to notify the police.

tangerine:ed staff are reminded during induction to do what they can to protect themselves from false allegations, for example by:

- Ensuring that one-to-one meetings with students take place in rooms with glass panels in the door · Recording all conversations
- Never offering students lifts in private vehicles
- Being careful about sharing jokes or the use of inappropriate language

d. Keeping a record of allegations

The outcome of the investigation of an allegation will record whether it is:

- Substantiated – there is sufficient evidence to prove the allegation.
- Unsubstantiated – there is insufficient evidence either to prove or disprove the allegation. The term therefore implies neither guilt nor innocence.
- Unfounded – to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- False – there is sufficient evidence to disprove the allegation.
- Malicious – there is sufficient evidence to disprove the allegation – and that there has been a deliberate act to deceive.

If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a comprehensive record of the allegation, details of how it was followed up and resolved, and a note of any action taken and decisions reached will be kept on the confidential personnel file of the member of the staff concerned, and a copy provided to him or her, in accordance with DfE advice.

e. References

tangerine:ed has a legal requirement to include all substantiated allegations in employment references, provided that the information is factual and does not include opinions. In cases where an allegation has been found to be false, unfounded, unsubstantiated or malicious, tangerine:ed will not make mention of the allegation in employment references.

f. Review following the conclusion of a case

As soon as practically possible after the conclusion of a case in which an allegation is substantiated, the DSL will review the circumstances of the case with the LADO to determine whether any improvements need to be made to tangerine:ed's procedures or practice to avoid similar events from occurring in the future. The DSL will ensure that the review is thorough and takes into account all aspects of the case and how it was dealt with, including a review of the decision to suspend a member of staff where this was the case.

18. Role of the Group Leader in Safeguarding

Many students come on a tangerine:ed programme as part of a group, who are often from the same school and travel to the UK and participate in their tangerine:ed programme together. These groups are generally accompanied by one

or more group leaders (depending on the size of the group). Group leaders have a pivotal role in ensuring that students in their group are well looked after during their stay with tangerine:ed, and as such work closely with the centre management team to ensure that children in their group are adequately safeguarded.

tangerine:ed has formal agreements with agents to ensure that suitability checks have been conducted on all adults accompanying students under the age of 18. In addition to this, we require that all group leaders are made aware of this safeguarding policy and our practices and, upon arrival at a tangerine:ed centre, sign a declaration that they have understood them.

Should a concern be raised by, or an allegation of abuse made against, a group leader, it should be reported to the on-site DSO, who will then immediately raise the concern with the tangerine:ed DSL. The steps outlined above will then be taken with regards to the allegation.

19. Related Policies

There are several policies associated with this Safeguarding and Child Protection Policy. These are listed below and will be made available to all adults working with children on tangerine:ed programmes:

- Health and Safety Policy
- First Aid Policy
- Fire Safety Policy
- Risk Assessment Policy
- IT Acceptable Usage Policy for Staff
- IT Acceptable Usage Policy for Students
- Student Code of Behaviour
- Staff Code of Conduct
- Safer Recruitment Policy
- Tackling Extremism & Radicalisation Policy
- Prevent Policy
- Whistle-blowing Policy
- Disciplinary Procedure
- Emergency Action Policy and Procedure
- Crisis Management Policy
- Group Leader Policy
- Managing a Concern and Reporting Abuse Policy

Appendices

Appendix 1 – Contact details of staff with safeguarding responsibility

- Director: Graham Colloby (graham.colloby@tangerineed.com)
- Designated Safeguarding Lead: Edwina Laycock (Edwina.laycock@tangerineed.com)
- Deputy DSL: Genevieve Bueno-Colloby (genevieve.colloby@tangerineed.com)

tangerine:ed's Central Leadership team are:

- Director: Graham Colloby
- Director: Edwina Laycock

Appendix 2 - External agency contact information

National

- Emergency Prevent reports: Anti-Terrorist Hotline – 0800 789 321 counter.extemism@education.gov.uk
- NSPCC helpline help@nspcc.org.uk; 0800 028 0285
- Police: emergency – 999; non-emergency – 101
- Disclosure and Barring Service (DBS) – 03000 200 190
- Forced Marriage Unit: 020 7008 0151; fmu@fcdo.gov.uk

The Children's Commissioner for England

The Children's Commissioner for England promotes the views and best interests of children and young people in England, and is a good source of information and advice on children's rights. The current Commissioner is Rachel de Souza. You may find out more about the work of the Children's Commissioner's office by visiting www.childrenscommissioner.gov.uk. Children and young people under the age of 18 may use the website not only to seek information but also to make contact and communicate their views and questions: Contact us | Children's Commissioner for England (childrenscommissioner.gov.uk)

London

- Lambeth Safeguarding Children Partnership (LSCP): https://www.lambethsaferchildren.org.uk/ · Local Authority Designated Officers (LADOs): Andrew Zachariades; 020 7926 4679; LADO@lambeth.gov.uk
- MASH (Multi-Agency Safeguarding Hub) – 0207 926 3100 (Monday to Friday, 9am to 5pm); 0207 926 5555 (Monday to Friday, 5pm to 9am, weekends and public holidays); helpandprotection@lambeth.gov.uk.
- Children's Social Care Team (Lambeth) – Emergency Duty Team – dutymanager@lambeth.gov.uk
- Child Sexual Exploitation: Children and Families Contact Service – CSE Coordinator - CHenchion@lambeth.gov.uk or 0207 926 8569
- Lambeth Prevent Hotline: 020 7926 3668, prevent@lambeth.gov.uk

Oxford

- Oxfordshire Safeguarding Children Board (OSCB): www.oscb.org.uk
- Local Authority Designated Officers (LADOs): Jo Lloyd; Donna Crozier; Sandra Barratt; Lorna Todd; Becky Langstone; Sophie Kendall - 01865 810603; LADO.safeguardingchildren@oxfordshire.gov.uk, ESAT.safeguardingchildren@oxfordshire.gov.uk
- MASH (Multi-Agency Safeguarding Hub) – 0345 050 7666, mash-childrens@oxfordshire.gcsx.gov.uk
- Children's Social Care Team (Oxford City) – 01865 328563, Emergency Duty Team – 0800 833 408
- Child Sexual Exploitation: Kingfisher Team – 01865 309196
- Thames Valley Police Prevent Officer: preventreferrals@thamesvalley.pnn.police.uk

Brighton

- Brighton and Hove Safeguarding Children Board (BHSCP): www.bhscp.org.uk
- Local Authority Designated Officers (LADOs): Darrel Clews; 01273295643; Darrel.Clews@brightonhove.gov.uk
- MASH (Multi-Agency Safeguarding Hub) – 01273 290400; FrontDoorForFamilies@brightonhove.gov.uk
- Children's Social Care Team (Brighton and Hove) – 01273 290400, Emergency Duty Team – 01273 295555
- Child Sexual Exploitation: Front Door for Families Team – Email: FrontDoorforFamilies@brightonhove.gov.uk
- Brighton and Hove Police Prevent Officer: Phone - 01273 291 115; Channel@sussex.pnn.police.uk

Cambridge

- Cambridgeshire Safeguarding Children Board: www.safeguardingcambspeterborough.org.uk
- Local Authority Designated Officers (LADOs): 01223 727 967; LADO@cambridgeshire.gov.uk;
- Children's Social Care Team (Cambridge) – 0345 045 5203, Email –
- safeguardingboards@cambridgeshire.gov.uk, Emergency Duty Team – 01733 234 724
- Child Sexual Exploitation: 01733 864170
- Cambridgeshire Police Prevent Officer: prevent@cambs.pnn.police.uk