



**REGENCY EDUCATION LTD**  
Incorporated under the companies act 2006 – Registered No. 09265399  
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## **Safeguarding and Child Protection Policy**

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## 1. Policy Statement

Regency Education recognises its moral and statutory responsibility to safeguard and promote the welfare of children. The purpose of this policy is to provide staff, volunteers and host families with the framework they need in order to keep children safe and secure whilst they are in our care. The policy also informs parents, agents and partner schools how we will safeguard their children whilst they are in our care.

This policy relates to all students under our care regardless of gender, age, ethnicity, nationality, religion or disability. All children and young people have the right to protection from any kind of abuse and the right to exist in a safe and friendly environment whilst in the care of Regency Education.

The safety and welfare of children, or Child Protection, means protecting children from physical, emotional or sexual abuse or neglect. This policy is in line with the requirements of the Association of Education and Guardianship of International Students (AEGIS) and National Minimum Boarding Standards.

Regency Education is committed to the ongoing promise of safeguarding students. Everyone who meets children has a role to play in safeguarding children. In order to fulfil this responsibility effectively, Regency Education requires all staff and host family members to make sure their approach is always a child-centred one. This means that they should consider, at all times, what is in the best interests of the child.

The following policies accompany our Safeguarding Policy and will be referred to if necessary:

- **Missing Student Policy**
- **Emergency Response Policy**
- **Whistleblowing Policy**
- **Online Safety Policy**

## 2. Child Protection Principles

The following principles underpin our provisions and practices in relation to safeguarding and child protection:

- Regency Education will provide a safe and secure environment for all students;
- Host families and transfer companies provide a safe and secure environment for all students;
- All students feel safe, secure and protected from harm;
- All students know who to turn to for help, advice or support, can access services confidentially, quickly and easily and have access to 24-hour support;
- The Director of the company has overall responsibility and accountability for the safeguarding and welfare of the students;
- All staff share in the responsibility to protect students from harm, remain vigilant in identifying safeguarding and child protection issues and to follow policies and procedures relating to safeguarding and child protection;
- Students and staff have effective means by which they can raise child protection concerns or report issues;
- Staff have at least one reliable means to contact all students quickly and directly;
- Staff are aware of the medical or learning needs of individual students via the Student Record;
- In cases where the whereabouts of a student under Regency Education is not known or the student is believed to be at risk of harm, procedures to locate the student by the safest and quickest means possible, or secure the safety of the student will be invoked immediately by following the Missing Student policy;

- The company has procedures in place that enable child protection concerns and incidents to be dealt with promptly and effectively and in line with relevant legislation.

### **3. Child Protection Obligations**

We aim to ensure that the students in our care experience at all times a caring and secure environment in which they feel safe, respected and valued. In pursuit of this aim, Regency Education undertakes the following:

- Training is provided for all staff and homestays to a level appropriate for their role (see training section below);
- We promote an environment of trust, openness and clear communication between students, school and Regency Education staff and our host families, so that student welfare, safety and pastoral care is recognised as the top priority;
- We respond to any reported allegation or suspicion of child abuse in accordance with Regency Education procedures as outlined below;
- We ensure that all guardianship staff, host families and personnel offering outsourced services who come into direct contact with students in our care, are recruited using safer recruitment practices and are formally screened through the completion of an enhanced DBS check;
- We maintain links with the appropriate agencies who have a statutory responsibility to deal with child welfare and child protection concerns. If you have any reason to believe that a child in your care is suffering from any form of abuse or neglect then please report it immediately in confidence to the DSL or DDSL using the contact details listed in this policy.

### **4. Definition of child safeguarding**

Child safeguarding is the process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.

Safeguarding responsibilities are with every member of staff who will have the appropriate training in place to react to safeguarding concerns.

#### **4.1 Staff Training**

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. We have 1 Designated Safeguarding Lead (DSL) that has been trained to child safeguarding level 3. This is renewed every three years. All other members of the team have completed Safeguarding training course ( Level 1). New staff will receive training during their induction. We request from a primary carer within each homestay to undertake safeguarding training (level 1 as a minimum).

Definitions of each level can be found below.

#### **Level One: Introduction or Induction**

In general, a 'Level One,' 'Introduction' or 'Induction' to safeguarding training course should entail how to recognise the signs of abuse, respond to a disclosure, report your concerns, and record information.

### **Level Two: Advanced Safeguarding**

A 'Level Two' or 'Advanced Safeguarding' goes into detail about the procedures of safeguarding, scenarios and what happens after a referral. 'Advanced' or 'Level Two' safeguarding training will have material as it is devised for someone who has day to day or frequent contact with children or vulnerable people.

### **Level Three: Designated Safeguarding Lead**

Level three is often used to refer to the training of Designated Safeguarding Lead. This training is far more detailed on handling a wider range and taking charge of safeguarding issues. The Designated Safeguarding Lead is Tanya Ellis, Director of Regency Education.

## **4.2 Key Safeguarding Contact Details**

Designated Safeguarding Lead (DSL) – Tanya Ellis	+44 (0)7969385028 contactus@regencyeducation.co.uk
Operations Manager/Prevent Lead - Ella Bates	+44(0)7704170679 contactus@regencyeducation.co.uk
Emergencies 24/7 The Police	+44 (0)7969385028 999
Childline www.ChildLine.org.uk	0800 1111
NSPCC Helpline	0808 800 5000

## **5. Definition of abuse**

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

### **5.1 Physical abuse**

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

### **5.2 Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **5.3 Sexual abuse**

involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

### **5.4 Neglect**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **5.5 Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### **5.6 Bullying / Cyber-Online abuse**

Any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. This can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

### **5.7 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE 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 taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **5.8 Female Genital Mutilation (FGM)**

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **5.9 Child trafficking**

Where children are recruited, moved or transported and then exploited, forced to work or sold.

### **5.10 Grooming**

Children and young people can be groomed online or in the real world, by a stranger or by someone they know - a family member, friend or professional.

### **5.11 Harmful sexual behaviour**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously.

### **5.12 Child on Child abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature.

This is most likely to include, but may not be limited to:

- abuse within intimate partner relationships;
- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- 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;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

## 6. Recognising Signs of Abuse

It can often be difficult to recognize abuse. The signs listed in these guidelines are only indicators and many can have reasonable explanations. Children may behave strangely or seem unhappy for many reasons, as they move through the stages of childhood or their families experience changes. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further.

Someone can abuse a child by actively inflicting harm or by failing to act to prevent harm. Abuse can take place within a family, in an institutional or community setting, by telephone or on the Internet. Abuse can be carried out by someone known to a child or by a complete stranger.

If you are worried about a child it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

### Symptoms of Abuse:

- Acts out excessive violence with other children.
- Lacks social skills and has few if any friends.
- Significantly underweight but eats well when given food.
- Reluctant to go to school.
- Is reluctant to get changed for sports etc.
- Wets or soils the bed.
- Drinks alcohol regularly from an early age.
- Is concerned for siblings or peers without explaining why.
- Becomes secretive and reluctant to share information.
- Talks of running away.
- Shows challenging/disruptive behaviour at school.

## 7. Responding to a disclosure

Stay calm, sometimes issues are raised which, whilst seemingly complex, are generally safeguarding matters and not necessarily a child protection issue. These matters should be responded to by offering a supportive response and where necessary or relevant, refer them to DDSL/DSL.

When a student self-discloses a matter that constitutes a potential or alleged situation of abuse, the staff member must take the student to a private place within view but out of ear-shot of other people. Promises of confidentiality must not be given. Tell the student that you have a duty to pass on the information, only to those who need to know.

- Listen carefully to what is said
- Do not interview them, but ask what happened, keep questions to a minimum and obtain sufficient facts to understand what is being alleged
- Allow the child to continue at their own pace
- Ask questions for clarification only and always avoid asking leading questions (questions that suggest a particular answer).
- Do not make assumptions or offer explanations
- Remember that an allegation of child abuse may lead to a criminal investigation, so do not attempt to personally investigate any allegations of abuse
- Reassure the child that they have done the right thing in telling you
- Tell them what you will do next and with whom the information will be shared



## 8. Raising a safeguarding concern

Staff and host families 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. This should not prevent staff or host families from having a professional curiosity and speaking to a DSL if they have concerns about a child.

When a safeguarding concern is raised, Regency Education guarantees to:

- Ensure every child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Provide support to staff that are aware or are the subject of the concern.
- Not prematurely jump to any conclusion until a full investigation has taken place internally or with the support of outside agencies.
- Make sure records are kept and those concerned are kept up to date during the investigation.
- Take appropriate action once the investigation has concluded.

Staff and host families are reminded that any safeguarding information must be kept confidential. Any member of staff or host family with an issue or concern relating to child protection, including but not limited to allegations of child abuse, should discuss it immediately with the Designated Safeguarding Lead (DSL) Tanya Ellis on +44 (0)7969385028, email: [contactus@regencyeducation.co.uk](mailto:contactus@regencyeducation.co.uk).

The DSL will decide how and with whom information will be shared. In most cases your Regency Education DSL will liaise with the DSL at the child's school and potentially the Police and Social Services depending on the severity of the concern. Parents will always be informed of any safeguarding concern that is raised.

Any concern that is an immediate risk to the child will be referred to the Police without parental consent.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

## 9. Low Level Concern Policy

This policy is in place to cover concerns that do not meet the harm threshold. It is in place to manage and record any such concerns and take appropriate action to safeguard children. Regency Education promotes an open and transparent culture in which all concerns are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that someone (an adult or child) may have acted in a way that:

- raises professional curiosity
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:



- an adult being over friendly with children
- a member of staff having favourites
- taking unauthorised photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating a peer or child

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of Regency Education; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Regency Education aims to achieve the purpose of this policy by:

- Ensuring staff understand and abide by the Staff Code of Conduct Policy
- Encouraging staff to raise to share any concerns
- Address unprofessional/inappropriate behaviour immediately
- Flagging any inadequacy in Regency Education's safeguarding policies and procedures

### **Who to share a concern with**

Any concern should be shared with Regency Education DSL, Tanya Ellis  
+44 (0)7969385028, [contactus@regencyeducation.co.uk](mailto:contactus@regencyeducation.co.uk)

The DSL will decide if it is a low-level concern but may refer the concern to LADO if it meets the threshold for harm as described in our Safeguarding Policy.

### **How will Regency Education respond**

All low-level concerns are recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then Regency Education will aim to do this as far as reasonably possible. Records are kept securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

If the concern has been raised via a third party, such as a school, the DLS will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses

Where a pattern of behaviour is identified, Regency Education will decide on a further course of action, either through our disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, the case will be referred to LADO.

## **10. Self-Reporting**

Regency Education recognises that staff, host families or drivers may find themselves in a situation which could be misinterpreted, or might appear compromising to others, or, on reflection, feel they behaved in a manner which they consider falls below the standard set out in the code of conduct. Regency Education encourages self-reporting in these circumstances, and it is seen as a positive action.

Self-reporting promotes safeguarding and safer practice by

- enabling staff and volunteers to get support with a potentially difficult issue and/or addressing it at the earliest opportunity;
- demonstrating awareness of the expected behavioural standards and self-awareness as to the person's own actions or how they could be perceived; and,
- contributing to maintaining a culture where everyone aspires to the highest standards of conduct and behaviour

We will then follow our procedure above and will interview the person who is self-reporting first to get a full report.

Regency Education will self-report to AEGIS any significant safeguarding concerns or situation which could appear compromising or be misconstrued, or where behaviour has fallen below expected standards.

## **11. Safer recruitment**

Safer recruitment is not just about carrying out the right DBS/PVG checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from governing bodies, proprietors, and all staff to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures, and consequently enshrined in its ethos.

### **Job Descriptions**

Regency Education will predominantly recruit from within our professional network. Job descriptions clearly and accurately set out the duties and responsibilities of the job role. The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to fulfil the role.

### **References**

Two references will be required for every applicant.

### **Right to Work**

As part of our background checks, we undertake the UK Government 'Right to Work' check to see if an applicant is eligible to work legally in the UK. More information is available here: <https://www.gov.uk/prove-right-to-work>

### **Interviews**

There will always be a face-to-face interview for short-listed applicants. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the recruiter to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant is a bona fide applicant and can meet the demands and expectations of our services and safeguarding criteria.

Any information in regard to past disciplinary action or allegations, cautions or convictions, will be discussed and considered in the circumstance of the individual case during the interview process.

All staff involved in staff recruitment will have received Level 2 Safeguarding training and the Designated Safeguarding Lead (DSL) will have received level 3 safeguarding training. All applicants who are subsequently appointed are required to show evidence of their identity, right to work & address. Original documents will only be accepted and photocopies will be taken.

### **Offer of Appointment and New Employee Process**

The appointment of all new employees is subject to the receipt of a satisfactory Enhanced DBS Certificate, references, and copies of qualifications and proof of identity. All new employees will receive training before commencing.

### **Enhanced DBS (Disclosure and Barring Service) Certificate**

It is our policy to undertake an Enhanced DBS check on all employees on appointment and every three years after.

### **Background Checks for Overseas Applicants**

Regency Education must and will undertake background checks for all employees, even if they have been resident overseas.

### **Proof of identity, Right to Work in the UK**

All applicants will be required to show identification such as a passport, national insurance number, driving licence, utility bills etc. as proof of identity/eligibility to work in the UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations.

### **Recruitment of Host Families/ Ex-offenders Recruitment in a Homestay**

No host families will be used if any of the members of the household have:

- any convictions involving
- violence within the last 10 years
- crimes of a sexual nature
- any offence involving a child;
- had a child removed from their care by order of a court;
- had their parental rights removed;
- had an order made against them refusing or cancelling registration under the Nurseries and Childminders Registration Act 1948.

Similarly to Regency Education staff It is our policy to undertake an Enhanced DBS check on all members of a host family 16 years and older, on appointment and every three years after.

**Policy Updated**  
12th September 2024