

DIRECTORY & QUICK REFERENCE

If there is a risk of serious injury, or danger to life, or you believe a crime is in progress ring the police on 999 before doing anything else.

If you want to report a concern to the police but an immediate response is not required, call
101

Safeguarding concerns can be raised with ISCA's DSL, who will then seek advice and support from the NSPCC

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You can also seek advice at any time from the NSPCC helpline:

National Society for the Prevention of Cruelty to Children	+44 (0) 800 1111 help@nspcc.org.uk
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ISCA Safeguarding and Child Protection Policy

Scotland 2024/25

Guidance for adults working with children during ISCA

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Introduction

The purpose of this policy is to provide ISCA staff with a framework they need to keep students safe during the ISCA programme. The policy is openly available to anyone. ISCA staff are obliged to read it, and the Directors of ISCA must ensure it is followed by all staff. The policy also offers information to students, parents and others about how safeguarding and child protection works.

Part One: Our Commitment to Safeguarding

Every student should feel safe and protected from any form of abuse. The staff at ISCA are committed to safeguarding and promoting the welfare of young people and expects all staff to share this commitment.

As is stated in ***Keeping Children Safe in Education (2021)***: *“Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child”.*

The aim of this policy is to safeguard and promote the welfare, safety, health and guidance of our students and adults by fostering an honest, open, caring and supportive climate. The welfare of our students and adults is of paramount importance.

ISCA fully recognises the contribution it must make to protect and support students during the programme. ISCA follows all the procedures and policies detailed on the Scottish government website:

[National Guidance for Child Protection in Scotland 2021 - updated 2023](#)

ISCA recognises that, due to the day-to-day contact with students throughout the programme, ISCA staff are well placed to observe the outward signs of abuse. This policy applies to all staff working on the programme.

ISCA fully recognises the contribution it can make to protect and support students during the programme.

Part Two: ISCA's Safeguarding Policy

ISCA will take all reasonable measures to:

Adopt a student-centred approach, ensuring that there is a 'listening culture' to empower young people to speak out about any concerns that they might have and that their wishes and feelings are actively sought when addressing any concerns or liaising with other agencies.

Ensure that we practice **safer recruitment** in checking the suitability of staff to work with young people and maintain an up-to-date **Single Central Record** in line with ***Keeping Children Safe in Education (2021)***;

Ensure that where staff from another organisation are working with our students, we require written confirmation that appropriate child protection checks and procedures have been completed on those staff.

Be alert to signs of abuse and neglect, both at the hotel and from outside, and to protect each student from any form of abuse, whether from an adult or another student.

Deal appropriately with every suspicion or complaint of abuse and to support students who have been abused or considered to be at risk, in accordance with any agreed Child Protection Plan, Child in Need Plan or Early Help/Team around the Child (or equivalent plan).

Design and operate procedures which, so far as possible, ensure that staff and others who have not done wrong are not prejudiced by false allegations.

Be alert to the medical needs of students with physical and mental health conditions.

Operate robust and sensible health and safety procedures and operate clear policies on drugs, alcohol and substance misuse.

Take all practicable steps to ensure that the premises are as secure as circumstances permit.

Consider and develop procedures to deal with any other safeguarding issues which may be specific to individual students during our programme.

Statutory and Regulatory Framework

This policy has regard to regulations and standards issued by the Secretary of State for Education (DfE) in accordance with:

- Section 94 of the Education and Skills Act 2008
- Keeping Children Safe in Education 2021
- The Education (Independent School Standards) (England) Regulations 2014
- Statutory Framework for the Early Years Foundation Stage 2017
- The Children Act 1989
- Section 175 of the Education Act 2002
- The Children Act 2004
- The Children and Families act 2014
- The Designated Teacher for Looked After and Previously Looked After Children February 2018
- Working Together to Safeguard Children 2018
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018
- What to do if you are worried a child is being abused: advice for practitioners 2015
- Child Sexual exploitation: Definition and guide for practitioners 2017
- Children Missing Education 2016
- Disqualification under the Childcare Act (2006) July 2018
- Sexual Violence and Sexual Harassment between children in schools May 2018

Keeping Children Safe in Education (2021) defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing the impairment of children's mental or physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

There are three main elements to our Safeguarding and Child Protection Policy:

- **Prevention** – e.g. positive atmosphere, pastoral support to students.
- **Protection** – by following agreed procedures, ensuring staff are appropriately recruited, trained and supported to respond appropriately and sensitively to safeguarding concerns.
- **Support** – to support students whose welfare has been compromised.

ISCA will therefore (Prevention):

- Establish and maintain an ethos where students feel secure and are encouraged to talk, to question and are listened to.
- Ensure robust record keeping in every case including electronic and paper copies of documents and notes that are stored appropriately to ensure confidentiality.
- Ensure that students know that there are adults on the programme who they can approach if they are worried or are in difficulty.

ISCA will follow the procedures set out by the Local Safeguarding Children Board to (Protection):

- Ensure we have a designated team of people including senior leaders for safeguarding who have received appropriate training and support for this role.
- Ensure every member of staff (including international chaperones) knows the name of the Designated Safeguarding Lead responsible for safeguarding, their role and how to contact them.
- Ensure all staff understand their responsibilities in being alert to the signs of abuse, and for referring any concerns, to the Designated Safeguarding Lead.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters.
- Keep written and/or electronic records of concerns about students, even where there is no need to refer the matter immediately.
- Ensure all records are kept securely – safeguarding records are kept electronically with only safeguarding team members having access to the records. Staff with access are the staff on the safeguarding team.
- Follow the Local Authority policy and procedures where an allegation is made against a member of staff in line with guidance from the Department for Education.
- Use physical restraint by staff as a last resort. It will only be used in a circumstance outlined in the restraint guidance. This will be used when necessary: to avert potential danger and to prevent students from harming themselves or others, seriously damaging property; committing a criminal offence; from engaging in any behaviour which may detrimentally affect good order and discipline during the programme.

ISCA will (Support):

- Follow the procedures set out in by the Safeguarding Children Board where it is believed that a student is suffering, or is at risk of, significant harm or there are concerns about a parent/carers well-being.
- Support students who are identified as being in need by designating an adult with whom they can build a positive relationship of trust.
- The Designated Safeguarding Lead will decide who needs to know and be involved in further investigations.
- The Designated Safeguarding Lead will attend all meetings wherever possible.
- The Designated Safeguarding Lead will decide who needs to be aware of the situation and be involved to support the student.
- A member of the safeguarding team will complete any requests for information.

Safeguarding ISCA Staff:

As part of our duty of care to staff we will:

- Be sensitive to changes in the behaviour of and/or circumstances of colleagues and notify the Managing Director so that appropriate support can be given.
- Collect and securely store information pertaining to colleagues next of kin and any medical needs.
- Provide photo ID and update colleagues DBS checks in line with ISCA policy.
- Uphold local authority policies relating to staff welfare.
- Ensure international chaperones have student records which include at least two contact names and addresses.

Staff will be aware that:

- They should share concerns with the Designated Safeguarding Lead at the earliest opportunity.
- Safeguarding concerns are recorded, electronically or in writing.
- Concerns regarding safeguarding are recorded by the member of staff who has the concern, and this is shared with the Designated Safeguarding Lead.
- Confidentiality is an issue which needs to be discussed and fully understood by all those working with young people, particularly in the context of safeguarding. The only purpose of confidentiality in this respect is to benefit the student.
- Students must NOT be told that any disclosures will be kept secret because information may need to be reported to the Child Protection Committee in Edinburgh, Social Care or the Police, however, the adult dealing with a concern

should not discuss the matter with anyone other than the Designated Safeguarding Lead.

- Students should know that someone else may need to be told in case further action needs to be taken, to keep them safe.
- Factual information is essential and should be recorded i.e.:
 - Know the date and time of the alleged incident and/or when the concern was initiated.
 - Know the nature of the concerns and what gave rise to them.
 - Know the action they have taken and the nature of involvement by others.
 - If a disclosure has been made – have factual recording of the content of the disclosure and any responses that were made.
 - It is essential that the member of staff does not ‘question’ the student as this may prevent other services from being able to interview the student at a later date.
 - If signs of injury/marks – complete body map.

Safeguarding Training:

- Designated staff will receive training on an annual basis.
- All staff will have an update of their basic safeguarding training every year.
- All staff will be reminded of the procedures at the beginning of the programme.
- All staff will participate in safeguarding and child protection refresher training before the programme.

The Managing Director will be informed of any safeguarding issues arising during the programme. General information only will be used in order to maintain confidentiality for the sake of the student and to protect evidence that may be needed for any future prosecutions.

Part Three: Types of Child Abuse

Physical Injury

Physical abuse 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. Most children suffer accidental cuts and bruises as part of growing up, but staff who work with children should always be professionally curious about fresh injuries. A conversation with a child about a recent absence or injury may initially be light-hearted, but staff should be concerned if:

- A student's explanation does not seem to match an injury.
- A student is evasive or appears reluctant to discuss the matter.
- A student tries to cover up a bruise, wound or scar.
- A student's explanation is muddled or alters in re-telling.
- A student appears to have avoided changing for sports or seeking treatment for an injury.

Unless members of staff are absolutely satisfied by the evidence or explanation, they should treat the matter as a cause for concern and report it. Staff considering the possibility of intentional harm (by an adult or another student) should not take pictures or ask a student to remove clothing.

Neglect

Neglect is 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 as a result of substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-givers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect is not a function of social and economic disadvantage, although in affluent families it can be difficult to recognise and address. At ISCA, staff should be particularly alert to any suggestion that a child:

- Has been left unsupervised or with an inappropriate carer for long periods of time.
- Has not had medical, dental, food, clothing or other basic needs met.
- Has been exposed to dangerous or illegal behaviour.
- Is exhibiting dangerously reckless behaviour (including sexual and/or online).

Detailed lists of the symptoms, indicators and behaviours associated with child abuse and neglect which are used by health and social care professionals can be found here:

[Child maltreatment: when to suspect maltreatment in under 18s](#)

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the child's developmental capacity, as well as overprotection and limitation of exploration and learning, or preventing the child 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, though it may occur alone. Staff should be especially alert to children who:

- Seem to have low self-esteem or put themselves down ("I'm student, ugly, useless").
- Appear to blame themselves for problems at home or within a peer group.
- Offer inappropriate responses to challenging situations ("I deserve this").
- Seem unusually withdrawn, fearful, or anxious about doing something wrong.
- Suggest that their parents or carers turn affection on and off at a whim, or blame their children for their own problems, or make negative comments about them.

Sexual Abuse

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 (also known as child-on-child abuse) in education. Staff should be particularly alert to children who:

- Use sexual language or have knowledge you wouldn't expect them to.
- Ask others to behave sexually or play sexual games.
- Display knowledge or interest in sexual acts inappropriate to their age.

Child Sexual Exploitation ('CSE')

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group (adult or child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. It can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Children who are being groomed often resent what they perceive as interference by other adults, and rarely self-report CSE, meaning staff must be particularly vigilant to potential indicators of risk such as a child:

- Acquiring money, clothes, mobile phones etc. without plausible explanation.
- Becoming isolated from peers and social networks, and/or secretive.
- Forming relationships with controlling or older individuals or groups.
- Going missing from home or school without explanation.
- Regularly returning home late, perhaps under the influence of drugs or alcohol.

- Exhibiting age-inappropriate sexualised behaviour, or sexually transmitted infection.
- Suffering from mood swings or changes in emotional wellbeing.

How to report concerns about abuse and neglect

Members of staff, parents, students or other persons with concerns about children in any of the above contexts – physical, emotional or sexual abuse, or neglect – should report them as follows:

If there is a danger to life, or a risk of serious injury, or a crime is in progress or about to happen – ring the police on 999 before doing anything else.

Members of ISCA staff are expected to intervene if there is an immediate risk of harm to a child, although staff are not expected to put themselves unreasonably in harm's way. Otherwise, staff must report any concerns they have about the welfare of students to ISCA's Designated Safeguarding Lead (DSL) immediately, using the contact details on the first page of this policy. Staff should not wait until they are actually told by the child or have their suspicions confirmed by someone else. Parents, students and others are asked to contact the DSL promptly.

Some specific safeguarding issues: in addition to the varieties of abuse and neglect just described, there are a number of specific forms of abuse and safeguarding issues which people who work with children are required to know about. These are explained next. They are covered separately because some involve particular guidance or have special reporting requirements:

Acute Mental and Physical Health Problems

Acute mental and physical health problems are primarily health matters and must be reported urgently to the ISCA Medical Officer (and perhaps emergency services). However, they also often meet the threshold as safeguarding concerns, either because they are potential indicators of abuse and neglect, or because they are significantly harmful in themselves. Thus, after involving health professionals as appropriate, staff who become aware of any of the following must also report them to the DSL immediately:

- A student who is considering, has a plan for, or has made an attempt at suicide.
- A student who has self-harmed (cutting, burning, picking, scratching, banging, hitting etc.).

- A student who has experienced a psychotic episode.
- A student with an eating disorder.
- A student missing all or most immunisations.
- A student with emergent serious physical health issues, but without a diagnosed medical problem.

Child-on-Child Abuse

People under the age of 18 are capable of physically, sexually or emotionally abusing other people under the age of 18. It can happen anywhere, both at the hotel or out exploring, but since students at a residential camp may spend proportionately more time in each other's company, staff at ISCA need to be particularly alert to any signs of inappropriate student relationships. It can also happen online, or have an online element which facilitates, threatens and/or encourages physical or sexual abuse. Activities involving harassment, abuse or humiliation can be used as a way of initiating a person into a group. Students are sometimes reluctant to report child-on-child abuse, but the absence of reports does not mean it is not happening. Especially where inappropriate sexual behaviour is concerned, the evidence suggests girls are more likely to be victims, and boys perpetrators. Students with disabilities, special educational needs or certain health conditions may also be more vulnerable. Child-on-child abuse includes, but is not limited to:

1. Sexual violence and sexual harassment can occur between children of any age and sex, and can involve individuals or groups. It can occur between young people who are (or have been) in an intimate personal relationship, and it can relate to those who are (or are perceived to be) either heterosexual or homosexual. 'Sexual violence' means criminal behaviour such as rape or assault as defined by the Sexual Offences Act 2003. It exists on a continuum and may be accompanied by other forms of abuse. In particular, it may well overlap with 'sexual harassment', which refers to conduct of a sexual nature which is unwanted by the person on the receiving end, and to which they do not consent, either in the physical world or online. 'Harassment' usually implies repetition, but in child-on-child relationships can relate to single incidents:

- Calling someone sexualised names, or telling sexualised stories or jokes about them;
- Making sexualised comments about their clothes, appearance or behaviour;
- Displaying sexualised images (including graffiti);
- Making sexualised gestures or threats;

- Physical behaviour such as touching or squeezing bottoms, breasts and genitalia, interfering with someone's clothing, or brushing against someone in a sexual manner. Staff should be aware that sexualised touching can very easily cross the line from harassment into sexual assault;
- Upskirting (now a crime under the Voyeurism Act 2019) typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause them humiliation, distress or alarm;
- 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.

Any and every report of sexual violence or harassment should be taken seriously. Staff should be aware that students abused in any of these ways may hide it well, but are likely to be profoundly affected by their experiences. ISCA cannot allow its students to suffer in this context, and it cannot send young people out into the world believing this kind of behaviour is acceptable.

2. Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also called sexting or Youth Produced Sexual Imagery ('YPSI')): people under the age of 18 sometimes create and/or share sexualised images, generally using mobile phones and social media sites or direct messaging such as 'Snapchat' or 'WhatsApp'. If two older children of similar age freely choose to share images of themselves, it may not be abusive. However, making, viewing or sharing an indecent image of someone under 18 (even for a child) is a criminal offence and can easily become abusive, since (amongst other things) there is always the potential for coercion and/or sharing the image more widely than was originally agreed. Thus the sharing of nudes and semi-nude images is always a safeguarding issue, and every instance must be referred to the DSL. ISCA's approach will generally be in line with the [UKCIS guidance](#). Staff who suspect a sexualised image of a child is contained on an electronic device should not view or forward the image, but should consider confiscation (while bearing in mind that the confiscation of one student's device may quickly affect the circulation of images amongst other children). Information for ISCA staff on confiscation from students is given in the government's document [Searching, screening and confiscation](#).

- 3. Violence and physical abuse** — single or multiple instances of punching, hitting, jabbing, kicking, shaking, slapping, gripping, biting, hair pulling (etc.) may well be abusive in the sense they cause harm, and staff should ensure they report every instance as a possible safeguarding issue. Staff should also be alert to potentially harmful initiation or 'hazing'-type violence and rituals, especially amongst boys, such as bed-flipping or the football-based game 'bums'.

- 4. Prejudice-based and discriminatory bullying: racial abuse, and abuse based on gender, religion, culture, disability, a special educational need or health condition** (including online bullying through social networks, online gaming or mobile phones). Any form of bullying can become emotionally harmful, and thus abusive, in that — like racial and other forms of abuse — it can quickly have a profound effect on a young person's development or mental health.

Child-on-child abuse is never acceptable and ISCA has a zero-tolerance approach to it.

Each concern will be approached individually, on a case-by-case basis, and 'zero tolerance' should not be taken to imply that ISCA has a fixed response. Rather, 'zero tolerance' means ISCA will take seriously, investigate and respond appropriately to every single instance of child-on-child abuse brought to its attention.

Thus it is crucial that staff becoming aware of any of these forms of behaviour do not downplay them as "just part of growing up" or "boys being boys", or accept students' excuses that they are just "banter" or "only meant as a joke". This is because if staff fail to recognise the potential scale of the issue, or dismiss sexual harassment or tolerate other forms of abuse, it can lead to a culture in which unacceptable behaviour is normalised and students cannot see any point in coming forward to report it, thus leading to an unsafe environment for children. Conversely, addressing even an apparently minor instance of inappropriate behaviour can be an important intervention that helps prevent abusive or violent behaviour in the future.

Thus (without putting themselves in harm's way), staff should intervene to challenge any and all instances of inappropriate behaviour between peers. However, staff should not believe their own intervention to be an end to the matter. Abuse by young people must be taken as seriously as abuse by adults, meaning that when they are talking to the victim or the perpetrator, staff should follow the procedures for listening to and recording students' concerns. Staff should always reassure victims of child-on-child abuse that they are being taken seriously (regardless of how long it has taken them to

say something), and will be supported and kept safe. A victim should never be made to feel ashamed for making a report, or given the impression they are creating a problem by coming forward.

Staff must report every potential instance of child-on-child abuse to the DSL. Staff are asked to avoid imposing their own sanctions before consideration by the DSL. It is true there will sometimes be a grey area between, on the one hand, incidents which should be regarded as abusive, and on the other, incidents which are more properly dealt with on residential camps such as (for example) children fighting or experimenting sexually, but the DSL will be able to advise staff on thresholds.

If it is suspected a child has suffered or is in danger of suffering harm at the hands of another child, or a crime has otherwise been committed, the DSL will promptly assess and address any immediate risks (including risks to other children who may be involved or impacted), and refer the matter to the local authority and the police, whose directions ISCA will follow. At the point of referral to the police, ISCA will seek guidance on what information can be disclosed (in particular, to the alleged perpetrator(s) and their parents), and also discuss the best way to protect the victim and their anonymity. At the point of referral to Children's Services, ISCA will generally inform the parents of victim(s) and alleged perpetrator(s) of child-on-child abuse. The local authority may decide to oversee further safety plans for the children involved.

The victim may be traumatised and is likely to need careful support, especially within a boarding environment. By the very nature of child-on-child abuse, and especially sexual violence and harassment, a power imbalance is likely to have been created between the victim and perpetrator(s). A priority for ISCA will be creating a safe situation in which the victim, if they wish, can continue in their normal routine. ISCA will seek to avoid any action that could have the effect of isolating the victim, but will provide an option to withdraw from activities if that is what the victim chooses, along with a named 'trusted adult' to whom they can turn in times of need. ISCA will aim to do whatever it reasonably can to protect the victim from bullying and harassment as a result of a report they have made.

A student against whom a serious allegation has been made may continue to pose a risk of harm to the victim or others, and ISCA will consider carefully how best to keep the victim and perpetrator(s) a reasonable distance apart by, for example, moving them out of particular activities, or isolating them from ISCA during an investigation or sending

them home. In addition, the perpetrator may have unmet needs, since harmful behaviour towards others may be an indication that the child him or herself is a victim of abuse. It is important that the perpetrator is supported to address any underlying reasons for their behaviour, since this can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Part Four: Safeguarding Information for all ISCA Staff

Safeguarding Procedures at ISCA

- We will ensure that we have a person directly leading safeguarding to oversee the care and provision for all students.
- All concerns, incidents and referrals will be recorded in writing and will be shared with the Designated Safeguarding Lead and other appropriate staff.
- ISCA's Designated Safeguarding Lead will devise a plan of action and, where appropriate, seek advice and support from the NSPCC +44 (0) 800 1111.
- The Designated Safeguarding Lead will ensure that information is stored safely and shared with the appropriate child services or the police if necessary.
- The Designated Safeguarding Lead, where appropriate, will share their concerns with the student's parent/carers and the Managing Director. However, ISCA reserves the right to contact the Child Protection Committee in Edinburgh, Social Care or the Police without notifying parents or seeking their consent if it believes that to do so is in the child's best interest or might:
 - Place the child or any other person at risk (or increased risk) of harm.
 - Affect or impede an investigation.
 - Lead to an unjustifiable delay in reporting.

In such cases ISCA will not notify parents of a referral, but instead seek the directions of the local authority or the police regarding communication on the matter.

- Staff will be trained and kept up-to-date on current safeguarding procedures.

Reporting Procedures for ISCA Staff

Upon the receipt of any information from a student, or if any person has suspicions that a student may be at risk of harm, or if anyone observes injuries that appear to be non-accidental, or where a young person makes a direct allegation or implies that they have been abused, or makes an allegation against a member of staff. Staff must;

- Offer the child a safe and confidential context in which to speak, and to reassure them that they will be taken seriously and supported. Even if not immediately apparent, the child may have been struggling with the decision for days, and may have had to summon up great courage to speak. Children should never be told to go away and speak to someone else. However, neither must the child be promised that the information will be kept confidential and go no further. This may not be in his or her best interests. Instead, as part of their reassurance, the adult should make it

clear that information may well need to be shared with one of the safeguarding staff, who are discreet, caring, experienced people.

- Students should be assured that when safeguarding staff speak with them, they will take their wishes and feelings into account. This is especially important in the context of sexual violence and sexual harassment, where victims should be given as much control as is reasonably possible over decisions regarding how any investigation will proceed and any support that they will be offered. However, this does need to be balanced against ISCA's duty to protect other children.
- The member of staff should listen calmly and carefully to whatever the child has to say. Some issues are likely to be intensely personal and traumatic and will need an especially sensitive response. Adults should allow children to speak freely, without interruption, and should not be judgemental by reacting with strong emotions or blaming the perpetrator, since this can cause children to feel even more uncomfortable.
- As a basic principle children should always be given a fair hearing and taken seriously. Even if the adult has suspicions about the truth of the child's disclosure, they should continue to listen without challenging the child or betraying suspicion. It is helpful to get clarification of basic facts such as "what?", "when?", and "where?" However, adults must not ask leading questions or invite the child to speculate, as this can prejudice investigations. Apart from specific details which might otherwise be lost, it is best practice not to write notes while the child is speaking.
- At the end of the disclosure, the adult should reassure the child that he or she has done the right thing, and explain what will happen next. The child should be advised not to discuss the matter with anyone else for the time being. No member of staff is in a position to tell a child not to speak to his/her parents, so children should only be advised about discretion in the broader community, including social media. However, if the subject of the allegation is a parent, the advice of the DSL, local authority or police must be sought as a matter of urgency.
- In rare cases of immediate danger the adult will need to stay with the child. In particular, staff should be aware that disclosures about child-on-child abuse put all of the young people involved 'at risk'. This means it is important to think carefully

about what might happen when the child leaves the room, and to act quickly in sharing information so that risks can be assessed.

- Immediately share concerns with the Designated Safeguarding Lead (or the Managing Director if there is an allegation about a member of staff) and agree action to take.
- Staff should record what they have seen, heard or know accurately at the time the event occurs, in writing. Staff should write down safeguarding concerns without including opinion, and using the child's words wherever possible.
- Records must include the date, including the year and the full name of the person reporting the allegations and the records must be signed.
- A member of the safeguarding team will contact the NSPCC for advice and support - +44 (0)800 1111
- If the child is in serious danger or a crime appears to be taking place, the police should be informed. If any part of the child's disclosure raises a concern about the conduct of the member of ISCA staff, the procedures in Part Five below should be followed.

Confidentiality

ISCA, and all members of staff at ISCA, will ensure that all data about students is handled in accordance with the requirements of the law, and any national and local guidance. Any member of staff who has access to sensitive information about a student or the student's family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know. Regardless of the duty of confidentiality, if any member of staff has reason to believe that a student may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the Designated Safeguarding Lead. Strict confidentiality must be maintained: the matter should not be discussed with persons other than those mentioned, unless failure to do so would put the child at greater risk.

Conduct of Staff

ISCA has a duty to ensure that professional behaviour applies to relationships between staff and students, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. At all times, members of staff are required to work in a professional way with students. All staff should be aware of not working alone with a student, guidance around physical interventions, avoiding cultural and gender stereotyping, confidentiality and dealing with sensitive information, personal use of social media and the need for privacy settings.

At ISCA, we recommend the following policies to our staff:

DON'T...

- Instigate physical contact with students unless it is appropriate and a part of an agreed reason in your job description (i.e. to administer emergency first aid).
- Respond to physical contact from students. If this occurs, or you have any other concerns about student behaviour then report it immediately to Luke Liddle, who will then report to the Designated Safeguarding Lead.
- Give personal information to any student - for example your address, telephone or mobile phone numbers, email address, Facebook, Instagram, TikTok or Snapchat details.
- Do not accept or respond to a student attempting to give you their personal information - for example their address, telephone or mobile phone numbers, email address, Facebook, Instagram, TikTok or Snapchat details.
- Have a photo taken of you with a single student. Always ensure there are a number of students in the photo with you.
- Accept physical or verbal abuse from a student. Do not respond yourself but report it immediately to Luke Liddle.

DO...

- Be aware that verbal interaction with students may be interpreted by them as being offensive or inappropriate, even if this was not your intention.
- Be aware that our student body comes from a diverse range of cultural backgrounds. Therefore, what may seem appropriate in one culture or language may not be in another.
- Report any unacceptable behaviour from a student.

- Be aware that contact made outside of ISCA with a student may also be considered inappropriate by that individual and could lead to your interaction being misinterpreted.
- Keep the door open at all times when interacting with students in their hotel room.

Physical Contact and Restraint

Members of staff may have to make physical interventions with students. Members of staff should only do this where:

- If it is necessary to protect the student, or another person, from immediate danger. All staff would do what is reasonably proportionate and necessary to protect the student.
- Staff should explain to the student/other students in the area what they are doing and why - this prevents misunderstandings.

Site Security

- Students are never allowed to leave the hotel without adult supervision during the programme.
- Unknown adults in the ISCA allocated space in the hotel must always be challenged by a member of staff.

Part Five: Concerns about, and allegations against, members of staff

During ISCA, staff care for children 24 hours a day, and the number of contexts in which adults might legitimately engage with students on a less formal basis is higher than a day camp. For these and other reasons ISCA has clear expectations about the manner in which staff should conduct themselves around children. All staff are required to read this when they become part of the ISCA team, and the policy is reviewed and re-circulated in the lead up to the programme.

Members of staff need to be aware that, under the Sexual Offences Act 2003, it is an “abuse of a position of trust”, and thus a criminal offence, for someone working in a residential camp environment to ‘groom’ or engage in sexual activity with a student aged under 18. The consent of the student (or the agreement of the parents) is irrelevant. Staff should also note that, under the Serious Crime Act 2015, it is an offence for an adult to communicate with a child under 16 if the communication is sexual or intended to elicit a sexual response.

There is a difference between allegations about the behaviour of ISCA staff which might meet ‘the harms threshold’, and allegations about their conduct which would not. An allegation may meet the threshold if it is suspected or alleged that anyone working at ISCA has:

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

Yet in addition, allegations may be made, or concerns raised about the conduct of colleagues relating to questionable professional practices or minor indiscretions (including inappropriate behaviour outside of work). ISCA is committed to responding constructively to these lower-level concerns or allegations, principally in order to identify any potential patterns of inappropriate behaviour and support individual members of staff in addressing them at an early stage.

For these reasons, all staff working at ISCA are encouraged to raise allegations and concerns, however apparently minor, and not to ignore them, cover them up or delay reporting them. It is made clear to staff that, where the welfare of children is concerned, it is not their job to investigate, or address matters personally, or make judgements about the character of colleagues, or decide what ought not to matter in a residential camp environment: it is their job to share allegations and concerns appropriately.

All allegations and concerns about the behaviour of current members of staff towards children must be taken directly and immediately to the Managing Director of ISCA, in his absence, the Designated Safeguarding Lead. This includes involvement in incidents outside of ISCA which did not involve children but could have an impact on their suitability to work with children (e.g. involvement in domestic violence at home). They should not be discussed or shared with other colleagues first. If the subject of the concern or allegation is the Managing Director himself, the Chairman of the Board must be informed. The Chairman's contact email address is given on the front page of this policy. His phone number will be provided on request by the Designated Safeguarding Lead, Freya Liddle (who can be contacted on +44 (0) 7808 058 779). Staff who raise concerns about colleagues will be offered confirmation that the issue has been addressed, but otherwise staff should expect such matters to be handled by the smallest number of people possible, and with professionalism and confidentiality.

If the Managing Director judges that the allegation or concern is valid but minor, he may decide on (for example) the provision of re-training, or a reminder by him on good working practice. If the Managing Director decides to look into the issue further, he will investigate. Written records of such concerns and the resulting actions are kept securely by the Managing Director and (where students are concerned) cross-referenced in the DSL's safeguarding records. Lower-level concerns which relate exclusively to safeguarding children will not be included in employment references, although at the discretion of the Managing Director they may be shared with future employers if they also include (for example) poor performance, or are part of a wider pattern of behaviour.

If the Managing Director or the Chairman of the Board judges that the allegation is of high-level concern, and that the member of staff could pose an immediate risk to children or could have committed a criminal offence, he may contact the police. A member of staff (including the Managing Director) must not be informed of any allegation against him or her until advice has been sought from the police or the local authority.

The Managing Director or the Chairman of the Board will consult the local authority's designated officer if he believes that a member of staff has behaved in a way that meets (or could meet) any of the four criteria listed on page 24. Discussion will be recorded in writing. Before doing so, the Managing Director (or the Chairman of the Board) may take the initiative in gathering information and establishing basic facts which will be helpful in such discussions, but otherwise investigations will not be undertaken except on the advice of the designated officer, whose statutory function is to provide guidance and to ensure that an allegation directed against anyone working at ISCA is appropriately investigated.

Thereafter, in consultation with the NSPCC, ISCA will follow the procedures laid out in *Keeping Children Safe in Education*. In addition to informing the child, the Managing Director will quickly and formally tell the child's parents and the member of staff against whom the allegation has been made (provided that, in cases in which they are involved, the police agree the timing and context of what is to be disclosed and to whom). Where an allegation relates to a member of contracted staff provided by an agency or a member of hotel staff, the contractor, agency or hotel will be involved.

Where an allegation or concern about the behaviour of a member of staff involves (or might involve) children, ISCA's priority will be the welfare of the child. The Managing Director or Chairman of the Board will consult the DSL with a view to supporting the child, considering any immediate risk to him or her, and consulting Children's Services as appropriate.

ISCA recognises that members of staff against whom allegations have been made will be in need of support themselves, and that ISCA owe a duty of care towards them, especially if they appear to have behaved in accordance with guidance on professional conduct. The Managing Director will consider the possible effect upon the adult against whom the allegation has been made, with recommendations for support as appropriate.

The Managing Director will make every effort to guard against unwanted publicity and ensure confidentiality, and will advise children and their parents appropriately. Legal restrictions prevent the publication of anything that may lead to the identification of a member of staff against whom an allegation has been made by (or on behalf of) a student. This applies up to the point the member of staff waives their right to anonymity or is charged with an offence.

The Managing Director may decide to suspend the member of staff while the matter is investigated, although alternatives to suspension will always be considered. A member of staff suspended in such a context will be provided with a named contact. He or she must not remain on the programme.

Ultimately, and in consultation with the NSPCC, the Managing Director will decide upon one of five outcomes. If the allegation is judged to have been (1) malicious, (2) false, (3) unsubstantiated, or (4) unfounded, the decision will not affect the member of staff's employment, and it will not be mentioned in any reference for employment elsewhere. A confidential record of unsubstantiated or unfounded allegations will be kept by the Managing Director. Allegations found to have been malicious or false will not be recorded, unless the member of staff consents to retaining the information.

If the allegation is (5) substantiated, and the member of staff is either redeployed into work which is not 'regulated activity', or resigns, or is asked to leave ISCA on the grounds that he or she:

- Has harmed (or poses a risk of harm) to a child or vulnerable adult; or
- Has received a caution or conviction for a relevant offence; or
- Is reasonably believed to have committed a listed relevant offence; or
- Has been removed from working in regulated activity;

Then the Managing Director, working with the DSL, will (as soon as possible after redeployment, resignation or dismissal) notify the Disclosure and Barring Service (PO Box 3963, Royal Wootton Bassett SN4 4HH (+44 (0) 300 200 190)

'Ceasing to use a person's services' includes:

- Dismissal;
- Non-renewal of an employment contract;

Where a substantiated allegation indicates that a person is not suitable to work with children, ISCA will not enter into settlement or compromise agreements to prevent a referral being made to the DBS when it is legally required, and will refer to the facts of substantiated allegations in any reference provided for employment involving children or vulnerable adults.

At the end of any process of consultation with the NSPCC, the question “what lessons can be learned from this?” is asked. ISCA will work with the NSPCC to arrive at specific recommendations (where appropriate) on improving its practice, and implement those promptly. These recommendations (without names) are likely to be recorded in the DSL’s annual report to the ISCA Board.

Part Six: The Management of Safeguarding and Child Protection

One of the ISCA Directors takes on the role of Designated Safeguarding Lead. They undergo the necessary training to provide them with the knowledge and skills required to carry out the role. The DSL is responsible for ensuring the Safeguarding and Child Protection Policy and procedures are in place throughout the ISCA Scotland Programme.

This Safeguarding and Child Protection Policy supports action being taken in a timely manner to safeguard and promote children's welfare. This policy is provided to all staff before the ISCA programme, together with the Staff Code of Conduct and Risk Assessment.

ISCA recognises that information sharing between practitioners and local agencies is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare; and is aware that data protection provisions place duties on ISCA to keep personal information securely and process it fairly and lawfully, while also ensuring that staff have due regard to the special condition under which practitioners may share or withhold information in a safeguarding context.

The wishes and feelings of children are taken into account when determining what action to take and what services to provide, and ISCA has in place systems for students to report abuse confidently (including child-on-child abuse) and express their views safely, knowing their concerns will be treated seriously.

ISCA's policy on safeguarding and child protection reflects both the fact that additional barriers can exist when recognising abuse and neglect in children with disabilities, special educational needs or certain health conditions, and the fact that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.

The same policy recognises that child-on-child abuse may be taking place, even when no instances are reported within ISCA; includes information on the different kinds of child-on-child abuse and procedures to minimise the risk of it; sets out how allegations of child-on-child abuse will be investigated and dealt with, and measures which will be taken to support any children involved; reflects the different gender issues that can be prevalent in it; and includes a clear statement that child-on-child abuse will never be

tolerated, since it can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Safeguarding and child protection files for students are maintained.

At the beginning of the programme, all staff members undertake safeguarding and child protection training.

All ISCA staff have provided an approved DBS check before the start of the programme. All new ISCA staff go through a thorough interview process and references are always followed up to ensure everyone recruited is safe to work with children.

ISCA has in place procedures to manage concerns about and allegations against ISCA staff (including the Managing Director).

Where an allegation against a member of staff is judged to be substantiated, ISCA works to determine whether any improvements can be made to help prevent similar events in the future.

A review of ISCA's Safeguarding and Child Protection Policy is undertaken annually, together with an annual review of the effectiveness of its procedures and their implementation.

The Designated Safeguarding Lead (DSL) will:

- a. Take lead responsibility for safeguarding and child protection at ISCA, including online safety.
- b. Act as a point of contact and liaise closely with safeguarding partners, referring cases of suspected abuse as required, contributing to the assessment of children, and taking part in strategy discussions and inter-agency meetings. The DSL will refer cases where a crime may have been committed to the police.
- c. Keep the Managing Director informed in cases which concern a member of staff. The DSL (working with the Managing Director and Chairman of the Board) will ensure that cases where a member of staff has been dismissed or left due to risk or harm to a child are reported to the Disclosure and Barring Service, as required.
- d. Liaise with staff on safeguarding matters, and when deciding whether to make a referral.

- e. Act as a source of advice and expertise for all staff on safeguarding and child protection matters, and support staff who make their own referrals or are required to take part in meetings with local authority children's services or the police.
- f. Maintain an overview of safeguarding within ISCA and monitor the effectiveness of policies and procedures in practice; in particular, working with the Managing Director to ensure that the Safeguarding and Child Protection Policy is known, understood and used appropriately by staff, and updated regularly and reviewed annually.
- g. Ensure that the Safeguarding and Child Protection Policy is available publicly.
- h. Undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated at least every two years.
- i. Refresh their knowledge and skills at regular intervals, but at least annually by taking time to read safeguarding developments, so as to allow them to keep up with any developments relevant to their role. These will include:
 - i. Understanding the referral, assessment and inter-agency arrangements for statutory intervention.
 - ii. Ensuring each member of staff has access to and understands ISCA's policy and procedures on safeguarding and child protection.
 - iii. Being alert to specific needs of 'children in need', those with special educational needs and young carers.
 - iv. Understanding the provisions of the Data Protection Act 2018 and the General Data Protection Regulation.
 - v. Understanding the importance of information sharing, both within ISCA and with safeguarding partners, other agencies and practitioners.
 - vi. Being able to keep detailed, accurate, secure written records of concerns and referrals.
 - vii. Understanding the risks associated with online safety and being confident they have the up-to-date knowledge required to keep children safe whilst online at ISCA.
 - viii. Recognising the additional risks that children with SEN and disabilities face online and being confident they have the capability to support SEND children to stay safe online.
 - ix. Obtaining access to resources and attending any relevant or refresher training courses.
 - x. Encouraging among all staff a culture of listening to children and taking account of their wishes and feelings.

Where staff training is concerned, the DSL will ensure that:

- a. All members of staff are provided with policies and information about safeguarding and child protection before the start of the programme.
- b. All members of staff will take part in safeguarding and child protection training before the start of the programme.
- c. ISCA's DSL will lead an online session with all international chaperones before the start of the programme, ensuring chaperones are aware of ISCA's safeguarding and child protection policies and procedures.

Part Seven: International Chaperones

International chaperones should also follow their own school's safeguarding procedures and report any incidents when they return to their home country and school.

International school policies and reporting procedures should be followed in conjunction with ISCA's Safeguarding and Child Protection Policy.

Policy written by Freya Liddle

Designated Safeguarding Lead

December 2024