

Total Care Education (London Ltd. Anti-Bullying (including Cyber-Bullying) Policy

Policy Statement

The purpose of this policy is:

- to help prevent bullying from happening to students in our care
- to make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need
- to provide information to all staff, homestays, volunteers, students and their parents about what we should all do to prevent and deal with bullying.

Total Care Education (London) Ltd. believes that:

- children and young people should never experience abuse of any kind;
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

We recognise that:

- bullying causes real distress. It can affect a person's health and development and, at the extreme, can cause significant harm;
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse;
- everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to it.

Contact Details

Nominated anti-bullying lead

Name: Maria Pink

Phone/email: 07718662748

Designated lead for safeguarding and child protection

Name: Maria Pink

Phone/email: 07718662748

NSPCC Helpline: 0808 800 5000

Policy

What is bullying?

Bullying may be repeated over time and intentionally hurts a student or group physically or emotionally and is often motivated by prejudice against particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or because a child is adopted or is a carer– it may occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email).

Bullying includes a range of abusive behaviour that is:

- repeated;
- intended to hurt someone either physically or emotionally.

The NSPCC explains that bullying can take different forms. It could include:

- physical bullying: hitting, slapping or pushing someone;
- verbal bullying: name calling, gossiping or threatening someone;
- non-verbal abuse: hand signs or text messages;
- emotional abuse: threatening, intimidating or humiliating someone;
- exclusion: ignoring or isolating someone;
- undermining, constant criticism or spreading rumours;
- controlling or manipulating someone;
- making silent, hoax or abusive calls;
- racial, sexual or homophobic bullying;
- bullying someone because they have a disability.

The NSPCC explains that no single sign will indicate for certain that a child is being bullied, but watch out for:

- belongings getting 'lost' or damaged;
- physical injuries, such as unexplained bruises;
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school;
- not doing as well at school;

- asking for, or stealing, money (to give to whoever is bullying them);
- being nervous, losing confidence, or becoming distressed and withdrawn;
- problems with eating or sleeping; bullying others.

Total Care Education (London) Ltd. will seek to prevent bullying by:

- developing a code of behaviour that sets out how everyone involved in our organisation is expected to behave, in face-to-face contact and online, and within and outside of our activities;
- holding discussions with staff, homestays, volunteers and students in our care about bullying and how to prevent it. These discussions will focus on:
 - group members' responsibilities to look after one another and uphold the behaviour code;
 - practising skills such as listening to each other;
 - respecting the fact that we are all different;
 - making sure that no one is without friends;
 - dealing with problems in a positive way;
 - checking that our anti-bullying measures are working well.
- providing support and training for all staff, homestays and volunteers on dealing with all forms of bullying, including cyber bullying, racial, sexist, homophobic and sexual bullying;
- making sure our response to incidents of bullying takes into account:
 - the needs of the person being bullied;
 - the needs of the person displaying bullying behaviour;
 - needs of any bystanders;
 - our organisation as a whole.
- reviewing the plan developed to address any incidents of bullying at regular intervals, in order to ensure that the problem has been resolved in the long term;
- Making parents fully aware of our procedures by providing them with a copy of this policy.

Cyber Bullying

Total Care Education (London) Ltd. **Staff**

The Code of Conduct for Staff provides staff with information on how to minimise the risks attached to digital and video images of students.

Homestays

Homestays play a crucial role in ensuring that the students who stay with them use the internet and mobile devices in accordance with the guidance contained within the Homestay Manual. *Total Care*

Education (London) Ltd. will take every opportunity to help homestays understand the issues through *initial interview and monthly update contact with host family.*

Students

Students are responsible for using the internet and mobile devices in accordance with the guidance in the Student Handbook. Students must know the importance of adopting good online safety practice and reporting misuse, abuse or access to inappropriate materials and know how to report these concerns. *Total Care Education (London) Ltd.* further supports students in raising their awareness of how to stay safe online through our social media updates and policies.

Online Safety – Areas of risk

An effective approach to online safety empowers a school, college, guardian or homestay to protect and educate students in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material, for example web pages, indecent images of children or pro-eating disorder or self-harm websites;
- contact: being subjected to harmful online interaction with other users, for example cyberbullying or grooming; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.

What is online abuse?

The NSPCC define online abuse as any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying (bullying that takes place using technology including social media sites, mobile phones, gaming sites), grooming (building an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking), sexual abuse, 'sexting' or youth produced imagery, sexual

exploitation, county lines gang recruitment, radicalisation or emotional abuse from people they know as well as from strangers.

Total Care Education (London) Ltd. clearly has a role to play in reporting signs of possible online abuse early so that prompt action can be taken to protect any children who are found to be at risk.

Possible signs of online abuse:

The NSPCC list possible signs of a child experiencing abuse online if they demonstrate a change in behaviour or unusual behaviour:

- Being upset after using the internet or their mobile phone;
- Unwilling to talk or secretive about their online activities and mobile phone use;
- Spending much more or much less time texting, gaming or using social media;
- After texting or being online they may seem withdrawn, upset or outraged;
- Not wanting to go to school and/or avoiding meeting friends and school mates;
- Avoiding formerly enjoyable social situations;
- Difficulty sleeping; Low self-esteem.

The possible signs of abuse could be seen through reports from students or schools, incident reporting by staff, and/or Local Co-ordinator reports. In response to a safeguarding report the matter would be dealt with in accordance with the 'Managing Incidents' Policy and Process.

Set Boundaries

Total Care Education (London) Ltd. encourage staff and homestays to set an appropriate agreement with students in order to supervise internet access and set boundaries about what they can and cannot do online. If a child breaks the rules, we would ask the homestay to restrict internet access for an agreed period of time.

Below is some suggested advice for talking to children about online safety:

<https://www.thinkuknow.co.uk/parents/articles/having-a-conversation-with-your-child/>

<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/talkingyour-child-staying-safe-online/>

Homestays are asked to use privacy settings, parental controls and built in internet safety features provided by the major internet service providers. The UK Safer Internet Centre has guides for parental controls (homestays).

<https://www.saferinternet.org.uk/advice-centre/parents-and-carers/parental-controlsoffered-your-home-internet-provider>

For parents and carers (homestays) experiencing any internet safety issues with their children, O2 and the NSPCC have set up a helpline: 0808 800 5002.

Filters and monitoring

Total Care Education (London) Ltd. asks homestays to be doing all that they reasonably can to limit children's exposure to the above risks from the IT systems at the home. As part of this process,

homestays should ensure appropriate filters and monitoring systems are in place. Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, homestays should consider the age range of their pupils, the number of pupils, and how often they access the IT system.

The NSPCC website 'Online Safety' outlines controls that homestays can implement to filter and monitor what a child in their house can see, including checking that parents know how to use privacy settings and reporting tools:

<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/>

The NSPCC provide advice for homestays on parental controls which allow a number of different things to happen including filtering and blocking content, setting different profiles so that each family member can access age appropriate content and restricting information that can be shared:

<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/parentalcontrols/>

Staying safe on mobiles, smartphones and tablets

The NSPCC advice for tracking children's online activity via devices includes location tracking, taking and sending pictures, setting up parental controls, public Wi-Fi and parent protection apps.

Full details can be found on the website:

<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/>

Social network sites

Children and young people connect online with friends, make new friends and browse the internet for information, chat with others and play games. This may include using search engines, sharing images, watching videos, using social network sites, playing games and chatting with people through online gaming.

Homestays are advised to ensure that their own children and/or *Total Care Education (London) Ltd.* students know where the reporting functions are on each of the sites they use, how to block someone and how to keep information private.

The NSPCC encourage talking to children about social networks using 'Net Aware' to stay up to date with the social network sites and what you need to know about for example reporting and privacy settings:

<https://www.net-aware.org.uk/>

The NSPCC encourage talking to children about online privacy and being 'Share Aware':

<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/share-aware/>

Further reading on online safety:

NSPCC Online Safety: <https://www.nspcc.org.uk/preventing-abuse/keeping-childrensafe/online-safety/>

Child Exploitation & Online Protection Centre – internet safety (CEOP) Thinkuknow: <https://www.thinkuknow.co.uk/>

UK Safer Internet Centre: <https://www.saferinternet.org.uk/>

Disrespect Nobody – find out about healthy relationships and respecting each other: <https://www.disrespectnobody.co.uk/>

Internet matters – helping parents keep their children safe online: <https://www.internetmatters.org/>

How social media is used to encourage travel to Syria and Iraq: A briefing note <https://www.gov.uk/government/publications/the-use-of-social-media-for-onlineradicalisation>

Procedures

We will take seriously and investigate any bullying or cyber-bullying concerns that are reported to us:

- Students will be made aware that they can talk to their parents, teachers, homestay, or a member of *Total Care Education (London) Ltd.* staff about any bullying concerns they may have;

- *Total Care Education (London) Ltd.* staff member may receive a report of suspected online abuse from a student, parent or other source by face-to-face disclosure, email or telephone call. This disclosure will be recorded in writing by the member of staff (using the 'Tell Explain Describe' model if the information is being given by a student);
- Any concerns raised by a student, parent, homestay, member of staff or other source will be reported within 24 hours to *Maria Pink and Pam Fei*. The written record (see above) must be submitted at this time, and sent to the agents in China to inform child's parents.
- The DSL will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the student (including any relevant facts about the child which may affect their vulnerability including age and ability), implement an action plan and continue to review the situation until a resolution has been achieved. Written notes will be kept securely of this meeting by the DSL;
- The DSL will arrange for the young person to be helped and supported in recognition of the pressures (and possible vulnerabilities) they may have been under as a result of the suspected abuse;
- Any concerns that bullying (including cyber-bullying) has taken place at a student's school will be referred to the DSL of the school concerned;
- If the alleged bullying incident involves a member of the homestay family, or another student staying at the homestay, *Total Care Education (London) Ltd.* will investigate fully as outlined above and if necessary find alternative accommodation for the student;
- In most cases parents will be kept informed about the situation and the actions that the *Total Care Education (London) Ltd.* is taking unless there is good reason to believe that involving these parties would put the young person at risk of harm;
- We will support the victim and the perpetrator (if they are a student in our care) and monitor students well-being following a bullying incident for as long as necessary;
- Where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' due to bullying, we will refer the matter to local agencies;
- Strong sanctions such as termination of our contract may be necessary in cases of severe and persistent bullying;
- Full records will be kept of any bullying concerns and of any actions taken. These will be held confidentially by *Maria Pink and Pam Fei*.
- Whilst it is acknowledged that bullying may be repeated over time, we will take action in response to a single incident and make an appropriate record.

Specific cyber-bullying procedures in addition to the above

- In the case of cyber-bullying support for the student could include helping them to understand how to recognise the early signs of online abuse, the wider issues and motivations of online abuse and making available relevant information and material. This help and support could be provided by accredited organisations such as the

school, National Society for the Prevention of Cruelty to Children (NSPCC), ChildLine and National Crime Agency (NCA) – Child Exploitation and Online Protection Centre (CEOP) websites and helplines;

- The DSL will ensure that viewing of the images or other content is only made where there are good and clear reasons to do so (unless unavoidable because the student has willingly shown a member of staff), basing incident decisions on what the DSL has been told about the content of the imagery or other content. The DSL will ensure that staff members do not search through devices and delete imagery unless there is a good and clear reason to do so;
- The DSL will consider the need to ask for the student to produce the device as evidence. The viewing of any images, other content or seizing of any devices will be recorded including those present, date and time;
- The incident will be referred to a statutory agency (Children’s Services on the Local Authority telephone number or the police by dialling 101) immediately if there is a concern a young person has been harmed or is at immediate risk of harm (telephone the police by dialling 999). This would include information coming to light if at the initial stage:
 - The incident involves an adult;
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
 - What you know about the imagery or other content suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent;
 - The imagery or other content involves sexual acts and any pupil in the imagery is under 13;
 - You have reason to believe a student is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming;
 - Where the material or activities found or suspected are illegal and there is no immediate risk to the child, The Child and Exploitation Online Paedophile Unit should be informed;
 - If none of the above apply, the DSL may decide (with input from key stakeholders if appropriate) to respond to the incident without involving the police or children’s social care. The DSL can choose to escalate the incident at any time if further information/concerns come to light. The decision should be recorded in line with the Safeguarding Policy and Child Protection Policy, and regularly reviewed throughout the process of responding to the incident;
 - The decision to respond to the incident without involving the police or children’s social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved, and the

risks can be managed within *Total Care Education (London) Ltd.* support framework and network for the child.

- The DSL will advise to the young person to delete imagery or other content, and to confirm they have deleted the imagery. Young people should be given a deadline for deletion across all devices, online storage or social media sites on the basis that possession of youth produced sexual imagery is illegal. Where a young person refuses or is later discovered to have not deleted the images or other content, they are committing a criminal offence and the police may become involved. A record will be made of these decisions as per the Safeguarding Policy including decisions, times, dates and reasons. *Total Care Education (London) Ltd.* may wish to invoke their own measures to discourage young people sharing, creating or receiving images in line with behaviour policies;
- Where the DSL is aware that youth produced sexual imagery or other content has been unavoidably viewed by a member of staff, the DSL should ensure that the staff member has appropriate support. Viewing youth produced sexual imagery or other content can be distressing for both young people and adults and appropriate emotional support may be required;
- Where police action has been instigated for an incident involving a member of staff or volunteer, *Total Care Education (London) Ltd.* internal procedures will take place at the conclusion of the police action. A suspension will be likely to take place before the internal procedures begin.

Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures including:

- Child protection/safeguarding policy
- Code of conduct for staff and volunteers Student behaviour code of conduct

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 12/04/2026

Signed:

