

Safeguarding Policy

Policy Statement

The Children's Act 1989 states the legal definition of a child is a person under the age of 18.

The aim of this Policy is to provide guidance, rules and procedures designed to protect all students, employees, accommodation providers and transport providers. Totnes European School wishes to create and foster a welcoming and secure environment for all students and staff members.

We recognise that:

- The welfare of the child/young person is paramount
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- Working in partnership with children, young people, their parents/guardians, accommodation providers, agencies and teachers is essential in promoting young people's welfare. We believe that we must value, listen to and respect all students, including those Under 18.

Context

Totnes European School (TES) welcomes foreign students through agents, partners and direct application. We offer English courses in Totnes in addition to arranging unpaid work placements for students in companies across the South West of England. We only offer adult courses however in exceptional circumstances we may accept 17 year old students. Unless they have arranged their own accommodation students are accommodated in homestay accommodation on a half-board basis (breakfast and evening meal are included).

We think it important that parents / guardians of prospective students under the age of 18 are aware of the limitations of our care and that additional difficulties which may be encountered by the student in an all-adult environment have been considered and discussed with the student. Parents, guardians and students are provided with a 24 hour contact number and an additional handbook providing extra information relevant to students under 18 and their families.

Parents and Guardians must sign an agreement with their child to say that they have read and understand the limitations of care and additional rules which U18s must adhere to.

We recognise that we have a fundamental duty of care to all students as they are living away from home and without their normal support networks. We also recognise the additional duty of care for all students under the age of 18. This safeguarding policy represents our belief that it is always unacceptable for a child or young person to experience abuse of any kind and it is the responsibility of all adults in contact with young people to safeguard their welfare.

The Designated Safeguarding Lead has carried out the Advanced Safeguarding for Designated Lead (formerly Level 3) Course through English UK. All Totnes European School staff have completed Safeguarding Training Level 1 (online). All staff with direct student contact hold DBS checks. We are registered with British Council.

On registration, all homestays are provided with a manual which includes safeguarding guidance. Any homestay which is hosting a student who is under the age of 18 is provided with an additional manual including more expansive guidance.

Terminology

- Safeguarding: caring for children appropriately and protecting them from that which is not in their best interests
- U18s: any person under the age of 18. This includes students, interns, accommodation providers family members
- Child Protection: Protecting children from abuse
- Abuse: all forms of physical and/or emotional ill treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power
- Designated Safeguarding Lead (DSL): Member of staff with overall responsibility for child protection and safeguarding issues
- LADO: Local Authority Designated Officer
- TES: Totnes European School
- This Policy applies to all Totnes European School staff including directly employed staff, accommodation and transport providers, volunteers, interns and any other person working on behalf of Totnes European School. Adults are expected to read and abide by the policies and procedures set out in this document.

Roles and responsibilities

The Designated Safeguard Lead and the General Manager will oversee the standards and practices across the business. They will liaise with the Director of Studies, teachers, office staff, interns and accommodation providers to enable the implementation of these standards and practices.

Recruitment

The purpose of the TES recruitment policy is to provide protection for students, with particular attention to Under 18s, enrolled with TES.

This policy will be reviewed annually.

We also aim to provide staff and accommodation providers with guidance on procedures they should adopt if they suspect a child or young person may be experiencing, or be at risk of harm.

We seek to safeguard U18s through the following recruitment measures:

- adopting child protection guidelines through procedures and a code of conduct for all employees
- recruiting staff and accommodation providers safely, ensuring all necessary checks are made, references followed up and any gaps in employments accounted for
- sharing information about child protection and good practice with U18s, their parents and all adults
- sharing information about concerns with relevant agencies and involving parents and under 18s appropriately
- providing effective management for all adults through recruitment policies, supervision, support and training

Safer Recruitment

Totnes European School follows Safer Recruitment guidelines set down in all recruitment interviews. References are always followed up for new staff members. Every reference request contains a specific question asking if there are any concerns about this person working with U18s. Recent DBS checks are required for staff working with U18s.

Applicants are informed that:

- References will be followed up
- All gaps in CVs must be explained satisfactorily
- Proof of identity and (where applicable) qualifications will be required
- Reference requests will ask specifically whether there is any reason that they are not suitable for work with persons under 18
- Appropriate suitability checks will be required prior to confirmation of appointment

Employing staff from overseas

- As above
- A police check from country of residence
- Organise a DBS on arrival

Accommodation Provider Recruitment

- Students under the age of 18 will not be placed in accommodation where there is another student who is over the age of 18 unless permission has been obtained for 2 specific students of similar age and the same gender to be placed together
- All Accommodation providers sign self-declaration forms
- Two references are obtained by TES for new accommodation providers
- Accommodation providers hosting U18s will be DBS checked

Applicants awaiting suitability checks

In the event that a DBS check has not been completed by the start date of a new employee, commencement of employment can take place only with restrictions. The decision will be made by the General Manager, with the agreement of the DSL. This judgment will be based on an assessment of the risk compared to the consequences of the decision. If the employee does commence work, they must have signed a self-declaration and their access to U18s must be supervised at all times e.g. Classroom doors open/ an additional member of staff person present at meetings with students.

Applicants with a criminal record

In the event that a disclosure shows that a potential employee or member of staff has a criminal record, the situation will be judged by the General Manager and DSL who will take into account the seriousness and nature of the offence, the nature of appointment, the age of the offence and the frequency of the offence. The disclosure will be discussed with the prospective employee and any decisions made must be in writing and signed by the recruiter and the DSL.

Training

The DSL and General Manager have overall responsibility for ensuring all adults have appropriate training and that this is updated appropriately. Additional sessions will be organised where deemed appropriate by the DSL.

- Adults employed by TES must complete a minimum of the Level 1 Online Safeguarding training and be fully aware of the TES Safeguarding Policy
- All adults will sign the Self Declaration Form and those with access to U18s must also be in possession of a recent DBS check
- The DSL must have Level 3 Safeguarding training

Code of Conduct

Overview

TES is committed to creating a safe culture where trust is built between all staff and students, including Under 18's and both are protected from any behaviour which runs contrary to this culture. We achieve this through adherence to the policies laid out in this document and a genuine environment of care fostered by robust procedures and recruitment policies.

Any U18 enrolments are clearly marked and all staff made aware. Details of all students U18, current and forthcoming are kept by the DSL and shared with relevant staff members. U18s are discussed in the weekly Academic meeting from the week before their arrival in order to remind teachers to ensure all teaching materials are age appropriate and to be vigilant for any signs of abuse or the need for extra support. U18s are clearly marked on the door of classrooms to ensure that other students are aware of their age.

Setting standards

We expect all adults working on behalf of TES to provide an excellent role model for all students in their care and to cultivate a respectful, safe and secure environment for staff and students.

Interaction

- Maintain professional physical and relationship boundaries, and act in a way appropriate to your Duty of Care
- Do not make suggestive or inappropriate remarks to or about any student, either adult or U18
- (Inappropriate remarks include innuendo, swearing and discussing their, or your own, intimate relationships)
- Other than in exceptional circumstances, do not communicate directly with students from a personal account. All email or text messages must be via the school telephones or email accounts. Any exception must be reported to the Designated Safeguarding Lead or General Manager (e.g. additional private English tuition arranged directly with the student)
- Do not engage in behaviour that may be construed as 'grooming' an U18 e.g. giving money, presents or favours or behaving in an inappropriate or unprofessional manner
- Avoid putting yourself in a situation where you are on your own with an under 18 wherever possible
- Conduct all interactions in a calm manner, and avoid shouting at students, including U18s, unless there is a Health and Safety risk
- Ensure that any physical contact is within clear boundaries to avoid any allegations of inappropriate touching
- If you are required to be in a one-to-one setting with an U18, consider how this can be managed e.g.. leaving a door open, using a room that has a window, using a room next to the General Office or Reception, positioning yourself within sight of the door and considering if the one-to-one setting is really necessary

Appropriate appearance

Adults should present an appearance which:

- promotes a positive and professional image
- is appropriate to their role
- is not likely to be viewed as offensive, revealing or sexually provocative
- does not distract, cause embarrassment or give rise to misunderstanding
- is absent of any political or otherwise contentious slogans
- is not considered to be discriminatory

Alcohol, drugs and smoking

- Do not consume, or allow U18s to consume any alcohol, drugs, cigarettes or intoxicating substances

- Do not provide alcohol, drugs, cigarettes or intoxicating substances to U18s
- Do not work under the influence of alcohol, intoxicants or drugs

IT and social networks

- Do not share your personal email or social media details with any under 18s
- Do not take any images or videos of under 18s on your personal recording equipment
- Do not access or share any inappropriate material or websites with students
- All employees and students must adhere to the terms of the IT policy terms which are included in the Teachers Handbook, Staff Handbook and Student Handbook.
- Report any suspected misuse by staff or students to the General Manager/ DSL immediately

Transport

Students and their parents / guardians are made aware before enrolment that Totnes European School does not arrange transport for students to Totnes. They are advised that there is the possibility that unaccompanied U18s may be stopped by the Border Agency if there is any concern for their welfare. They are advised that it is possible to arrange for specialist companies to meet and transfer students. They are also advised of the possibility of delays during travel to Totnes and to consider problems which might arise

Should students request students ask for TES to arrange for a taxi transfer to Totnes or should TES arrange transport for students then suitability checks must be carried out.

Emergency Contacts

All students, including U18s and the parents / guardians of U18s are provided with a 24 hour emergency contact number +0044 (0) 7931881609.

This number is also given to all accommodation providers.

The member of staff with the emergency telephone will have access to emergency contact details for students U18 and will also have contact details for the General Manager / DSL.

Child Protection

Totnes European School has a Designated Safeguarding Lead who works to ensure a safe environment for our staff and students. This person is made known to all staff and students.

We meet our child protection responsibilities by:

- Creating policies and procedures to comply with all regulatory requirements and guidelines
- Reviewing these policies and procedures annually
- Training all staff to an appropriate level of awareness and procedural competence with periodic review
- Making policies and procedures available to all our staff members and accommodation providers.

How to respond to concerns

Scenarios which may cause an adult to have safeguarding concerns about an U18 are:

- An U18 tells an adult they are worried about another U18
- An U18 tells an adult of an issue that concerns themselves
- Anyone from outside Totnes European School reports a potential issue
- An adult witnesses behaviour of another adult which cause concern
- An adult sees in an U18 non-verbal indications of safeguarding concerns
- In the event of any one of the above adults should:
- Follow the Guidelines outlined below
- Report immediately to the Designated Safeguarding Lead or General Manager
- Explain your concerns and the reasons behind them
- The Designated Safeguarding Lead or General Manager will advise you on the next step. Do not discuss the matter with other members of staff or students.

Recognising symptoms of abuse

Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm.

It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race or ability.

Abusers can be adults (male or female) and other young people, and are usually known to and trusted by the child and family.

There are four main types of child abuse: physical abuse, sexual abuse, emotional abuse and neglect. The abuser may be a family member, or they may be someone the child encounters in a homestay situation or during classes, sports and leisure activities. An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child.

There is no textbook list of signs and signals. Being alert to abuse means:

- Thinking about what you are seeing and asking if it is acceptable practice
- Taking seriously what you are told
- Responding to the stresses behind requests for help or other problems the person may present with
- Being alert to signals e.g. non-verbal communication, over-sexualised or challenging behaviour
- Reporting any doubts to the Designated Safeguarding Lead or General Manager

How to respond to a child or young adult telling you about abuse

When someone talks to you about alleged abuse, remember you are not investigating the situation, just listening.

If a child discloses abuse, remember that this may be the beginning of a legal process, as well as a process of recovery for the child. Legal action against a perpetrator can be seriously damaged by any suggestion that the child's words have been influenced in any way by the person they told.

The following guidance should be followed as far as possible:

- Rather than directly questioning the child, just listen and be supportive
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
- Do not promise to keep the information a secret. Rather you must inform the child that you will have to share this with the person responsible for their safety
- Write an account of the conversation immediately afterwards, as close to verbatim as possible. Make a note of what they actually said, using his or her own words and phrases
- Describe the circumstance in which the disclosure came about
- Where physical harm is being reported use a body map to indicate the location of cuts, bruises and abrasions, noting the colour of any bruising
- Hand your record to the Designated Safeguarding Lead or General Manager, who will contact the Local Authority Designated Officer / Multi Agency Safeguarding Hub where appropriate

Response to Reports of Abuse

The DSL or General Manager will contact the LADO and complete a notification form. This is obtained by telephoning 01392 384964 or email to: ladosecure-mailbox@devon.gcsx.gov.uk

The DSL will take advice from the LADO to agree the following:

- Who needs to know and, importantly, exactly what information can be shared
- How to manage speculation, leaks and gossip
- What if any information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if and when it should arise

If a staff member is accused the DSL will then work with the LADO for advice on appropriate actions to take to ensure the safety of the child.

Keeping Records

- All serious concerns communicated to the DSL or General Manager will be responded to on the same day
- Access to reports is only available to the DSL, General Manager and any official outside agency as appropriate
- Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, a clear and comprehensive summary of the allegation is kept on the person's confidential personnel file, and a copy provided to the person concerned. This would include details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached. The record will be retained at least until the person has

reached normal retirement age or for a period of 3 years from the date of leaving employment at Totnes European School if that is longer.

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Date of next scheduled review: June 2019