

EMBASSY ENGLISH BRIGHTON - CHILD PROTECTION AND SAFEGUARDING POLICY

Updated January 2018 . Review date February 2019.

*Policies and
procedures for the
safeguarding of
students*

Policy:	Child Protection and Safeguarding
Version:	2.4
Synopsis:	This policy describes Embassy English student safeguarding and welfare principles and approach, the child protection roles and responsibilities of staff and the procedures for identifying and managing child protection concerns and issues and for mitigating risks to the safety and welfare of students
Policy Owner:	Regional Director
Relevant to:	All members of staff (including all contracted, agency and volunteer staff); students, parents and agents; homestay providers; third party contractors and anyone else who comes onto study centre premises
Date introduced:	14 th April 2014
Next review date:	February 2019
Related documents:	<p>All study centre policies support <i>Embassy English Child Protection and Safeguarding Policy</i>; however, specific policies that should be read in conjunction with this document are:</p> <ul style="list-style-type: none"> • Study Group Health and Safety Policy • Embassy English Policy on Enabling Students to Raise Problems and Concerns • Embassy English Policy on Reporting of Concerns or Allegations of Harm to Students • Embassy English Plans for Foreseeable Events • Embassy English Equality and Diversity Policy • Embassy English Anti-Bullying Policy • Embassy English E-Safety Policy • Embassy English Alcohol and Drugs Policy • Study Group Recruitment Policy • Embassy English Excursions Policy • Study Group Data Protection Policy <p>It is mandatory for the centre to be familiar with the latest <i>Department for Education</i> statutory guidance on <i>Keeping Children Safe in Education</i></p>
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Signed Off	<ul style="list-style-type: none"> • Mark Freidberg

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1. Introduction

This policy and its associated procedures describe Embassy English student safeguarding and welfare principles and approach, the child protection roles and responsibilities of study centre staff, and the procedures for identifying, managing and mitigating risk of child protection issues and concerns.

This policy focuses on the special measures in place for students under 18 years of age; however, most of the principles and practices outlined in this policy are applied to all of our students, unless specifically stated otherwise.

This policy supports Embassy English statutory duty to safeguard and promote the welfare of children and gives due regard to *Keeping Children Safe in Education, September 2016* and *Working Together to Safeguard Children, March 2015*; and is pursuant to *The Education (Independent School Standards) (England) Regulations 2014*. Those who work with children and senior leaders are required to read Annex A of Keeping Children Safe in Education.

Embassy English Brighton falls under the Brighton Safeguarding Children Board and is in accordance with locally agreed inter-agency procedures.

Local Agency Contact

For students in need of help or who are the focus of concern, the points of contact are:

- Concerns about the welfare of a child can be passed to the appropriate local agency by contacting the Multi-Agency Safeguarding Hub (MASH) on FrontDoorforFamilies@brighton-hove.gcsx.gov.uk or 01273 290400.
- For staff related concerns, the Local Authority Designated Officer (LADO) for Brighton and Hove City Council can be contacted via telephone on 01273 295643 or 07795 335879.

In an emergency dial 999 and ask for the Police.

Study Centre Contacts

The Designated Safeguarding Lead is Sarah Bakhtiari, Director of Welfare, on sbakhtiari@studygroup.com or 01273 339260.

The Deputy Designated Safeguarding Leads are:
Sally ann Reed sareed@studygroup.com or 01273 339571
Nicky Robins nrobins@studygroup.com

The Centre Director ensures that the study centre complies with its duties under the legislation below:

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Education and Inspections Act 2006

- Children and Young Persons Act 2008
- School Staffing (England) Regulations 2009
- Equality Act 2010
- Education Act 2011
- Protection of Freedoms Act 2012
- Police Act 1997
- Police Act 1997 (Criminal Records) Regulations 2002
- Police Act 1997 (Criminal Records) (No. 2) Regulations 2009.
- Prevent Strategy HM Government
- Counter Terrorism and Security Act 2015

2. Application of this policy

This policy applies to all permanent, contracted, agency and volunteer staff, including those who do not have cause to come into direct or regular contact with students in order to carry out their daily duties.

This policy also applies to those who provide homestay accommodation for our students, third-party contractors, group leaders, visitors to the study centre and anyone else who has cause to be on study centre premises whilst students are present.

3. Policy aims

The purpose of the child protection policy is to set out the policies, practices and provisions in place to ensure all possible steps are taken to:

- Provide a safe environment for our students
- Swiftly and efficiently identify and manage cases where students are at risk or have unmet welfare needs
- Promote the importance of student safeguarding and welfare across all activities
- Regularly evaluate our approach and practices and audit our records with regard to child protection and make any improvements needed.

4. Embassy English child protection principles

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

- Academic study centre buildings provide a safe and secure environment for all students
- Homestay and residential accommodation provide a safe and secure environment for all students
- All students feel safe and secure and protected from harm
- All students know who to turn to for help, advice or support, can access services confidentially, quickly and easily, and have access to 24 hour support
- A *Designated Safeguarding Lead* is appointed in the study centre and has responsibility for the safeguarding and welfare of all students.
- The Centre Director has overall accountability for the safeguarding and welfare of students

- All staff share in the responsibility to protect students from harm, which includes being vigilant in identifying possible child protection issues and following study centre policies and procedures relating to safeguarding and welfare
- Students and staff have effective means by which they can raise child protection concerns or report issues and are enabled to give their views frequently on the effectiveness of child protection provisions and practices in the study centre
- All staff and students are aware of members of the safeguarding and welfare team and know who to turn to if they need help or advice or have concerns
- Staff have at least one reliable means to contact all students quickly and directly
- All relevant study centre staff are aware of the special needs or particular vulnerabilities of individual students
- The whereabouts of all students under 18 is known during the study centre day and after evening curfews
- In cases where a student under the age of 18 is unaccounted for, procedures to locate the student are immediately invoked
- The study centre has procedures in place that enable child protection concerns and incidents to be dealt with promptly and effectively and in line with relevant legislation.

5. Embassy English approach to child protection

Embassy English approach to child protection follows *Department for Education* guidance set out in *Keeping Children Safe in Education*, which defines the role we should take in protecting the children in our study centre.

Excerpt 1 from *Keeping Children Safe in Education*, Sept 2016

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals 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.

Excerpt 2 from *Keeping Children Safe in Education*, Sept 2016

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's 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.

Excerpt 3 from *Keeping Children Safe in Education*, Sept 2016

Role of school and college staff

School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

All school and college staff have a responsibility to provide a safe environment in which children can learn.

Each school and college should have a designated safeguarding lead who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

Any staff member who has a concern about a child's welfare should follow the referral processes set out in paragraphs 21-27. Staff may be required to support social workers and other agencies following any referral.

The Teachers' Standards 2012 state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

What school and college staff need to know

All staff members should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction.

This should include:

- The child protection policy;
- The staff behaviour policy (sometimes called a code of conduct); and
- The role of the designated safeguarding lead.

Copies of policies and a copy of Part one of this document (Keeping children safe in education) should be provided to staff at induction.

All staff members should receive appropriate safeguarding and child protection training which is regularly updated. In addition all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the designated safeguarding lead and children's social care. Staff should never promise a child that they will not tell anyone about an allegation- as this may ultimately not be in the best interests of the child.

Study centre policies, practices and provisions have been developed and are audited, evaluated and revised to ensure that we meet or exceed these requirements.

6. Staff roles and responsibilities

6.1 Governance

Embassy English is owned by a single proprietor, Study Group Limited, and has its own board of governors. The four study centres are run autonomously day-to-day by their own senior management/leadership teams and follow a set of shared policies and procedures specifically developed to ensure that their provisions meet the needs of students. Policies are tailored by individual study centres where this is needed to reflect individual circumstances.

6.2 Designated Safeguarding Lead and Deputy

Each Study Centre has a *Designated Safeguarding Lead*, and *Deputy Designated Safeguarding Lead* who takes over duties and responsibilities when the *Designated Safeguarding Lead* is away from the study centre. The *Designated Safeguarding Lead* has responsibility for the safeguarding and welfare of students, supported by other members of study centre staff.

Overall accountability for the safeguarding and welfare of students lies with the Centre Director.

The *Designated Safeguarding Lead*, and *Deputy Designated Safeguarding Lead* (and Centre Director if not one of the above) thus form the most senior safeguarding group within the study centre and in the event of one of these members of staff being implicated in a child protection enquiry/incident, another member of this senior team would lead the investigation. However, where it is not appropriate for any of these members of staff to lead an investigation, and in the absence of a Board of Governors, the *Designated Safeguarding Lead*, *Deputy Designated Safeguarding Lead* and/or Centre Director of another Study centre would be asked to step into this role. Any matter that required external, independent investigation outside of Embassy English staff would be passed to an appropriate third party.

The *Designated Safeguarding Lead* in this study centre is: Sarah Bakhtiari, Director of Welfare

The *Deputy Designated Safeguarding Leads* in this study centre are : Sally ann Reed and Nicky Robins

The *Designated Safeguarding Lead* is responsible for:

- Ensuring that all staff are aware of and understand the role of the Designated Safeguarding Lead
- Ensuring that all staff are conversant with and follow the procedures outlined in this policy and those that directly support it

- Ensuring that all staff have read, understand and signed the Department for Education guidance set out in Keeping Children Safe in Education and all updates as they are published
- Providing advice and support to all staff on issues relating to child protection
- Ensuring all staff have completed and hold an up-to-date certificate for Safeguarding Awareness training which is updated every 3 years
- Ensuring all staff complete Prevent training, either face-to-face or online
- Ensuring all staff receive frequent (at least annual) safeguarding briefings and updates so that their safeguarding practices are current
- Ensuring that they and their Deputy have completed and hold an up-to-date certificate for level 3 child protection training (or equivalent) which is updated every 2 years
- Ensuring that all staff training required and completed in relation to child protection is recorded in a central training log and audited regularly to identify training needs and any recording gaps
- Ensuring that all new staff, including temporary staff and volunteers, receive induction which includes the *Child Protection Policy*, the *Staff Handbook and Code of Conduct*, and the identity of the DSL
- Ensuring that all students receive a full induction and timely updates on matters relating to safeguarding and welfare
- Ensuring that all students have sufficient and appropriate means to report concerns, issues and incidents
- Maintaining a complete and up-to-date record of all child protection-related concerns, issues, incidents, reports, referrals and complaints
- Reporting children at risk to the *Local Authority Designated Officer (LADO)*, *Local Safeguarding Children Board (LSCB)* and the police. See Appendix 1 for details.
- Ensuring that children in need are getting appropriate individual support, advice and access to services
- Working holistically and in partnership with other agencies that can provide welfare and safeguarding support and information to students
- Ensuring that literature and information from agencies who provide welfare and safeguarding services to students are readily available and students are aware of the range of services on offer
- Ensuring that this policy is made available to students and to their parents/guardians
- Ensuring that this policy is reviewed, evaluated and revised, as needed, annually, in collaboration with the Regional Director

6.3 The Deputy Designated Safeguarding Lead

The *Deputy Designated Safeguarding Lead* is responsible for supporting the *Designated Safeguarding Lead* in their duties and responsibilities day-to-day, and for assuming these duties and responsibilities in their absence.

6.4 Welfare Officer

The study centre *Welfare Officer* provides support and information to colleagues and students on welfare matters. The *Welfare Officer* is a source of support for disciplinary matters and where there is a particular concern about a student's welfare.

6.5 All staff

All staff are responsible for monitoring for signs and symptoms of physical and psychological abuse and neglect and reporting any concerns in accordance with *Embassy English Policy on Reporting of Concerns or Allegations of Harm to Students*. Indicators of abuse can be found in Appendix 3.

All staff are responsible for reporting any concerns they have about staff, Group Leaders, or students whose actions may harm students, in accordance with *Study Group Whistleblowing Policy* (contained in the *Global Code of Conduct*)

All staff should enable students to raise concerns in accordance with *Embassy English Policy on Enabling Students to Raise Problems and Concerns*.

All staff should be vigilant to other potential risks to the welfare of students and report any concerns or incidents to an appropriate member of staff as soon as possible. High risk situations should be dealt with immediately and staff should inform a member of the security team if welfare and safeguarding staff cannot be located quickly. Such risks could include the presence of persons on study centre premises not wearing a study centre visitors' badge or lanyard, the presence of suspicious persons near to study centre premises, and evidence of illegal or damaging activity by students or staff.

Staff are expected to promote positive behaviour in students, encourage them to follow *Embassy English Code of Conduct for Students*, follow disciplinary procedures in cases of misconduct, set an appropriate example to students and help and encourage them to stay safe.

7. Child protection policies, practices and provisions

This section describes study centre's policies and procedures, practices and provisions put in place to keep our students safe.

7.1 Staff recruitment

The study centre employs permanent and temporary full-time, part-time and voluntary staff as well as agency and contract staff and third party contractors. At least one staff member on the interview panel is Safer Recruitment Trained.

Please refer to the *StudyGroup Staff Recruitment Policy* for the full recruitment process.

Applicants for temporary and permanent posts are subject to the following steps before a decision is made regarding recruiting them to the study centre staff:

- References are followed up with a specific focus on child protection and safeguarding matters
- Application form is completed, which includes explaining any gaps
- Verification of professional qualifications
- Identity verification (including current photographic ID and proof of address)
- Enhanced DBS check
- A separate barred list check if an individual will start work in a regulated activity before the DBS certificate is available. Such cases will also be referred to the Study Group DBS panel to confirm that employment may commence.
- Verification of right to work in the UK
- Overseas checks and reference checks if staff have lived or worked abroad. If these are unavailable, such cases will be referred to the Study Group DBS panel to confirm that employment may commence.
- Staff on the interview panel are Safer Recruitment trained

Agency and contract staff, including part-time, ancillary and voluntary staff

All agency and contract staff working on study centre premises regularly must have/or have recently had a verified enhanced DBS check. All must have verified references and qualifications, either provided directly to the study centre or assured by their employment agency.

Third party contractors

All third party contractors must either have a verified DBS check in place or be supervised at all times whilst on study centre premises.

Further details of the safer recruitment process can be found in the *Study Group Staff Recruitment Policy*.

7.2 DBS referral when staff leave the college

The college has a duty to inform the DBS if a member of staff who leaves the college has been involved in a substantiated child protection allegation, or any other incident about which the DBS should be made aware, and will do this promptly. The referrals team can be contacted on 01325 953 795 or at PO Box 181, Darlington DL1 9FA. Please refer to the *Staff Recruitment Policy* for further information.

7.3 Staff induction

All temporary and permanent full-time and part-time staff, including voluntary staff, and agency and contract staff receive a full study centre induction and a copy of Embassy English Staff Handbook.

Staff induction includes a detailed description of our policies, procedures, practices and provisions in relation to the safeguarding and welfare of our students. Evidence that all induction procedures have been conducted is retained in personal staff files.

Staff are familiarised with relevant reporting lines and communication channels within the study centre to enable them to effectively raise concerns or issues.

Safeguarding awareness and internal training on security and health and safety is given as part of the induction of all staff. Further training is role-dependent.

Staff are informed about the contents of student inductions, Embassy English Code of Conduct for Students, and expectations for their own conduct.

7.4 Staff training

All staff regularly receive Safeguarding Awareness training from the point of their induction which is updated regularly, every two years at a minimum, so that they are confident about:

- The study centre's legislative responsibility
- Their personal responsibility
- The study centre's policies and procedures
- The need to be alert to the signs and indicators of possible abuse, including radicalisation
- The need to record concerns
- How to support and respond to a child who tells of abuse

All staff will receive regular safeguarding briefings and updates, at least annually, to ensure that their knowledge and practice is current.

7.5 Staff conduct

Staff should ensure that their conduct does not pose any risk to the safeguarding or welfare of students and should set them a good example. In addition, staff will not enter into a personal relationship with students, including a friendship online, or take photographs or videos that include students other than for authorised purposes. Authorised photographs and videos of students should never be posted online except where staff have been given permission to do so for the purposes of marketing and official authorisation has been received from the relevant student(s).

Staff should follow the global Study Group Staff Code of Conduct which is available via <https://my.studygroup.com/people/global/Managed%20Documents/Global%20Code%20Of%20Conduct.pdf>

7.6 Visitors to the study centre

Prior authorisation for visitors, including third party contractors, to the study centre should be arranged whenever possible. When this is not possible, the study centre Centre Director and other relevant staff should be informed of the visit as soon as possible after the visitor arrives.

Staff who bring visitors, including third party contractors, onto the premises are responsible for them throughout their visit and must sign them in, ensure that they receive and wear a study centre visitors' badge and lanyard, and chaperone them during their visit. Visitors who have a verified DBS check in place do not need to be chaperoned.

Staff must ensure that visitors/third-party contractors carrying out works in the study centre, for whom they are responsible, wear the appropriate safety clothing and equipment and display the appropriate safety signage. Staff are also responsible for ensuring that all related risk assessment requirements are met.

7.7 Group Leaders

There will be a systematic process to ensure adults accompanying students on Embassy courses have undergone appropriate suitability checks in their home country in line with Accreditation U.K. guidance.

Accompanying adults will be required to declare their suitability to work with children on arrival. They will also receive a copy of the Code of Conduct for students.

7.8 Residential supervision

The Head of Boarding is responsible for the safeguarding and welfare of boarders whilst they are or should be in residential boarding accommodation, unless it has been agreed that the accompanying adults will take responsibility for their own students. Any such arrangement will be agreed in writing with the Centre Director.

7.9 Homestay accommodation

Homestay accommodation is provided by local host families, managed by the Accommodation Manager and Homestay Organiser.

All homestay accommodation is assessed for suitability.

Homestay providers receive information and training regarding the safeguarding and welfare of the students they host and all members of the homestay household over 16 years of age have an enhanced DBS check, which is verified by the study centre. All homestay providers are requested to provide details of any regular visitors which are also subject to an Enhanced DBS check.

Full details regarding homestay safeguarding and welfare practices and provisions can be found in *Study Group Homestay Guidelines*.

7.10 Off-site visits

Off-site visits are planned and managed in accordance with Government advice provided in *Health and Safety: Advice on Legal Duties and Powers, 2014*.

A risk assessment in relation to each visit must be completed, where possible, at least 72 hours before the visit takes place. This procedure must be followed for every single visit, even if the circumstances or destination of a visit appear to be the same as those of a previous visit.

Staff taking students off-site should inform the Centre Director and the Academic Manager of the details of the visit, including the names of all students involved.

7.11 Student induction

All students are given information via My Embassy English pre-arrival and have a series of inductions when they first arrive at study centre.

My Embassy English and First Day Inductions cover the following areas:

- Embassy English Code of Conduct for Students
- Expectations of student behaviour and attitude to their studies
- Specific rules, guidelines and procedures relating to general welfare and safeguarding, security, health and safety and to study centre residences
- Information on other key study centre policies and procedures
- A guide to who's who in the study centre
- Information about study centre facilities and resources, and extra-curricular activities
- Information relating to their academic programme and studies
- Information about the local area, use of local facilities and activities and places of interest outside of the study centre
- Information on study centre-based and independent services available to offer advice on safeguarding and welfare matters and to support safeguarding and welfare needs that may arise
- Information and assistance to support their financial, medical, social, cultural and religious needs.

7.12 Students' attendance and whereabouts

Staff should know the whereabouts of all students during the study centre day and during the hours of curfew.

In addition, homestay providers should be aware of the whereabouts of the students they host during the study centre day and the hours of curfew.

The following rules apply to students with regard to attendance and whereabouts:

- All students should attend all of their timetabled study centre activities and require advance authorisation for absence unless they are unwell or unable to attend due to an accident/incident and have reported this to study centre staff
- All boarders and homestay students should be in their residence in accordance with age-specific curfews during term-time weekdays and weekends unless permission for absence has been given
- Any boarder who needs to go away in term time for any reason requires advance permission, although circumstances may mean that very short notice is given

Monitoring attendance and whereabouts

Study centre staff conduct morning and afternoon roll-calls and take a register within 15 minutes of the start of each lesson. In addition, students swipe their identity card to enter and exit study centre buildings where access control is in operation.

Residential Supervisors conduct checks on students' whereabouts where a curfew is in place and in accordance with individual students' care plans or disciplinary-related sanctions. In addition, students swipe or sign in and out of study centre residences where access control is in operation.

Homestay providers check that their students are back in their home by curfew.

Further information can be found in *Embassy English Attendance Policy and Procedures*.

Any student whose whereabouts cannot be accounted for immediately invokes *Embassy English Missing Person Procedures*, further information about which can be found in section 7.13.

7.13 Missing person procedures

If staff or homestay providers cannot account for the whereabouts of a student, *Embassy English Missing Person Procedures* are immediately invoked.

Early stages include attempting to contact the student and any known friends or local guardians, and searching study centre premises, including the student's bedroom, and surrounding areas, if applicable. If a student cannot be found, the situation is escalated to the Centre Director, their deputy or to the person holding the emergency phone if the incident occurs outside of study centre hours.

Police will be contacted if the student cannot be contacted within a 4-hour window, or earlier if there is reason to be particularly concerned about the student's welfare.

Please refer to *Embassy English Plans for Foreseeable Events* for further details.

7.14 Student conduct and discipline

All students are encouraged to behave in a positive way, and responsible behaviour is noticed and acknowledged by staff. As guidance for all students, they are asked to follow a student code of conduct. Students who choose not to follow the code will be subject to *Embassy English Disciplinary Policy and Procedures*.

This code and the associated behaviour policies are rigorously upheld by staff to safeguard the welfare of all students and staff and to prevent potentially harmful behaviour from escalating.

Please refer to *Embassy English Code of Conduct for Students*.

In the event that changes of behaviour cause a safeguarding concern then the student will be referred to the Designated Safeguarding Lead. Further information can be found within the Embassy English Policy on *Reporting Concerns or Allegations of Harm to Students*.

7.15 Online safety

The study centre recognises that e-safety is an area of growing concern. Whilst the study centre cannot exert full control over how students choose to conduct themselves online and using electronic devices, maximum effort is made to guide students in making good choices. In addition, both IT filtering and IT monitoring is in place to prevent the use of electronic devices and the internet for specific potentially harmful purposes.

All students receive guidance on E-Safety as part of their induction and E-Safety posters are in place around the Study Centre.

Please refer to *Embassy English E-Safety Policy* for further details.

7.16 Anti-bullying

The study centre has a zero-tolerance policy on bullying, which applies to students and staff. Steps are taken to prevent it from occurring as well as to eradicate it if it does. Any bullying incident (including cyber-bullying) will be treated as a child protection concern when there is reasonable cause to suspect the student is suffering or likely to suffer significant harm.

There is a well-developed programme of activities and provisions in place to promote social development and integration and equality and diversity amongst the student population.

Staff are encouraged to look out for signs of bullying and report any concerns or issues to the study centre *Designated Safeguarding Lead*.

Staff encourage students to report any concerns they have about themselves or fellow students to any member of staff they feel comfortable confiding in.

Please refer to *Embassy English Anti-Bullying Policy* for further details.

7.17 Equality and diversity

All members of the study centre community are expected to be familiar with our policy on equality and diversity and to uphold the principles set out within it. In addition, everyone is encouraged to take a role in promoting equality and embracing diversity.

Please refer to *Embassy English Equality and Diversity Policy* for further details.

7.18 Honour based violence

Excerpt from *Keeping Child Safe in Education, September 2016*

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

In the event a student is identified as possibly being a victim of honour based violence, this should be referred to the Designated Safeguarding Lead who will refer the student to the Brighton Children's Services via the FDFH hub (Appendix 1).

7.19 Female Genital Mutilation (FGM)

Excerpt from *Multi-agency statutory guidance on Female Genital Mutilation, April 2016*

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways.

The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death. The age at which FGM is carried out varies enormously according to the community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy.

The centre is committed to ensuring that female students are safeguarded against FGM so staff who suspect that FGM has been carried out, or could potentially be carried out, must report these concerns to the Designated Safeguarding Lead or their Deputy who will immediately seek further advice from the FDFH hub (Appendix 1)

In the event that a member of staff suspects that FGM has been carried out, or could potentially be carried out, then they must inform the police as part of their mandatory reporting duty.

The Front Door for Families (FDFH) hub can be contacted on FrontDoorForFamilies@brighton-hove.gcsx.gov.uk or 01273 290400. (Appendix 1)

In the event that a student has been observed to have undergone FGM or the student informs staff that this is about to happen, the Police will be notified immediately.

7.20 Child Sexual Exploitation

Excerpt from Child Sexual Exploitation, Feb 2017

Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually 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. Children rarely self-report child sexual exploitation so it is important that practitioners are aware of potential indicators of risk, including:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, College or work;
- Leaving home/care without explanation and persistently going missing or returning late; Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

In the event a student is identified as possibly being a victim of child sexual exploitation, this should be referred to the Designated Safeguarding Lead who will refer the student to the Brighton Children's Services via the FDFP hub (Appendix 1).

7.21 Alcohol use and illegal substances

The student code of conduct gives students specific rules with regard to the use of alcohol and is clear that illegal substances should not be solicited, sold, used or brought onto study centre premises at any time. Student misconduct with regard to alcohol and illegal substances is dealt with through *Embassy English Student Disciplinary Policy and Procedures*.

Students are enabled to raise issues or concerns with staff, about themselves, fellow students or members of staff, through *Embassy English Policy on Enabling Students to Raise Problems and Concerns*.

Staff can report any concerns they have about students in accordance with *Embassy English Policy on Reporting of Concerns or Allegations of Harm to Students*.

Please refer to *Embassy English Alcohol and Drugs Policy* for further details.

7.22 Monitoring for and recognising signs and symptoms of abuse and neglect

All staff complete Safeguarding Awareness training.

Staff are expected to be able to recognise signs of physical, sexual and emotional abuse and neglect and report these as soon as possible to the *Designated Safeguarding Lead*.

Excerpt from *Keeping Children Safe in Education, September 2016*

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 nonpenetrative 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care- 18 givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Staff should also be able to identify signs of other potential child protection issues, such as bullying, gang violence, children running away, child exploitation, and children forced to undergo arranged marriage or female genital mutilation. When such issues are discovered, it is mandatory for staff to report them. Failure to do so can be a criminal offence. Staff should also be aware that peer-on-peer abuse exists and that it should be considered when identifying potential issues. Information on these and other issues can be found in the latest *Department for Education* guidance set out in *Keeping Children Safe in Education*.

Indicators of abuse can be found in Appendix 3.

7.23 Raising and reporting concerns – students

The study centre has put in place a range a means through which students in need can seek help, support, advice or information on any safeguarding or welfare matter.

All students have a main class teacher with whom they will have tutorials if they are here for 5 weeks or more and with whom they can talk 1:1 on request. Residential Supervisors are also on hand in study centre residences to listen to and direct students concerns appropriately. Homestay providers are considered for their ability to provide a safe and nurturing environment for students and encouraged to listen if a student wishes to talk to them about their experiences or any concerns they have.

Student communal areas and notice boards provide students with up-to-date information on independent sources of information, support and advice.

Further details can be found in *Embassy English Policy on Enabling Students to Raise Problems and Concerns*

7.24 Raising and reporting concerns – staff

If there is a concern that another member of staff (including volunteers and Group Leaders) has behaved in a way that

- Has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children,

This must be reported to Principal of the Brighton Centre, who will act in conjunction with the Centre Director. If the Principal is unavailable then report to the Designated Safeguarding Lead. If there is a concern with the Centre Director then this should be reported to the Principal. If there is a concern with respect to the Principal, this should be reported to the NSSL, Durell Barnes; durellbarnesconsult@gmail.com

Where a student is at risk of harm, the police should be informed. Staff should also immediately remove a student from a harmful situation when it is safe and practical to do so.

Please refer to *Embassy English Policy on Reporting of Concerns or Allegations of Harm to Students* and *Study Group Whistleblowing Policy* for further details.

7.25 Reporting students at risk

If a child is believed to be at risk of harm, staff are trained to report this to the *Designated Safeguarding Lead* immediately. The *Designated Safeguarding Lead* escalates this straight away to the Multi-Agency Safeguarding Hub, LADO and local police as appropriate.

If the *Designated Safeguarding Lead* or their *Deputy* cannot be reached immediately, for example if the risk is identified outside of study centre hours, the member of staff involved should report the case to the Regional Director straight away.

Contact details for the LADO covering this study centre can be found in [Appendix 1](#). The LADO should only be informed if the concern is about a member of staff.

7.26 Supporting students in need

We recognise that our students are, in general, more likely to need additional support due to the fact that the vast majority are a long way from home and experiencing a new culture and environment.

The study centre arranges lots of activities around the students' timetables to promote integration and a community feeling for students. Provisions are put in place to accommodate specific needs and we ensure that opportunities to forge friendships with other students are plentiful and accessible.

Staff monitor for potential issues and report any concerns they have. Students are also enabled to identify any needs they have that are not being met by talking to any member of study centre staff, providing feedback via student surveys.

Student communal areas and notice boards provide students with up-to-date information on other independent sources of information, support and advice.

Further details can be found in *Embassy English Policy on Enabling Students to Raise Problems and Concerns*.

7.27 Supporting vulnerable students

Some students may be more vulnerable to harm than others, for example students under the age of 16 and students with special educational needs, disabilities or chronic medical conditions, including students who are adults.

All students are requested to complete a pre-arrival health declaration. Advice and support is also available for students with identified or possible special educational needs.

Students who are vulnerable or who have additional needs, including adults, as well as students under 16, have additional care plans in place as a measure to ensure that they are protected from potential harm. Additional measures may include regular meetings with the Welfare Officer, more frequent meetings with teachers, or earlier residential and homestay curfews.

7.28 Prevent – awareness and referral

Excerpt from The Prevent duty, Departmental advice for schools and childcare providers, June 2015

In order for schools and childcare providers to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of schools' and childcare providers' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Schools and childcare providers can also build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The Prevent duty is entirely consistent with schools' and childcare providers' existing responsibilities and should not be burdensome.

Embassy English recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. To minimise the risk of this eventuality, Embassy English promotes:

- mutual respect and tolerance of those with different faiths and beliefs
- tolerance and harmony between different cultural traditions by enabling students to acquire an appreciation of and respect for their own and other cultures
- respect for other people
- an acceptance that other people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour

- understanding of the importance of identifying and combatting discrimination

The *Designated Safeguarding Lead* undergoes regular training on Prevent. If there are concerns that a student, through changes in behaviour and language, is at risk of becoming radicalised, then these need to be reported to the Designated Safeguarding Lead or their deputy immediately and they will seek advice from the DFF or Brighton Safeguarding Children Board. If you think a child is in immediate danger you should call the police on 999.

The local Prevent Lead for Bellerbys Brighton is Nahida Shaikh on 01273 290584
nahida.shaika@brighton-hove.gcsx.gov.uk

DfE Prevent helpline 020 7340 7264 or counter-extremism@education.gsi.gov.uk

The police non-emergency number 101

Crimestoppers 0800 555 111

Anti-Terrorism Hotline 0800 789 321

7.29 Working with parents/guardians

Parents/guardians are consulted about the specific needs of students who are chronically unwell, have special educational needs or disabilities, or are identified as being vulnerable in some other way.

In addition, parents /agents are contacted early on in disciplinary procedures, especially where there is an issue with a student's attendance, if a student is missing residential curfews, or for any other issue that poses a risk to a student and/or their peers.

7.30 Wider safeguarding and welfare support

Study centre provisions and practices, outlined in this section, are bolstered by the external networks and support the study centre has put in place for students.

The study centre has established working relationships with local police, GP practices, Social Care/Children's Services, and ensures that students are aware of how to access external services that can offer additional or specialist support.

In addition, the study centre *Designated Safeguarding Lead* quickly engages the support of Front Door for Families and the police when they are concerned that a child is at risk.

Contact details for Front Door for Families covering this study centre can be found in [Appendix 1](#).

7.31 Supporting staff involved in child protection cases or the subject of allegations

The study centre takes seriously its duty of care to all those who are involved in child protection issues, whether it is reporting a concern, acting as a witness or indeed being the subject of an allegation. Staff members who are directly implicated or involved in a reported issue, will be

provided with a named contact, obtainable from Human Resources, who will provide each individual with confidential support, and progress updates where appropriate.

If a staff member is the subject of an allegation, the study centre's primary duty of care must be to protect all students. It may therefore be considered necessary to transfer a staff member to alternative duties, or to suspend an individual, in the short-term, whilst a thorough investigation is undertaken. Where accused of inappropriate behaviour, staff will always be given the opportunity to explain the situation and their actions. Staff and students can be assured that decisions will never be taken lightly.

There will be no detrimental action taken against staff who raise or are the subject of genuine concern that turns out to be unfounded. If staff are subject to malicious allegations, then they can be assured that this will be dealt with under the disciplinary procedure.

Guidance on addressing allegations against members of staff is found in the college's *Reporting of Concerns or Allegations of Harm to Students*.

7.32 Confidentiality and reporting and recording information

Records and reports pertaining to child protection issues are stored securely by study centre staff with access restricted to those who need to know their content in order to ensure an holistic approach to the management of student safeguarding and welfare.

Students are advised that information they share may need to be shared with appropriate third parties where there may be a risk of harm to others.

7.33 Data protection

As part of Study Group, the study centre needs to collect and use certain types of information about people with whom it deals in order to operate. This includes personal information about current, past and prospective employees, suppliers, clients/customers, professional advisors and administrators, and other organisations with whom it communicates.

In addition, it may occasionally be required by law to collect and use certain types of information to comply with the requirements of Government departments for business data. This personal information should be dealt with properly in the matter it is collected, recorded and used, and this will be in line with UK data protection legislation.

Further details can be found in *Study Group Data Protection Policy*.

7.34 Study centre self-evaluation

The study centre monitors the implementation and outcomes of each of its policies and procedures on an annual basis and carries out critical reviews and revisions to ensure that they are fit for purpose and that areas for improvement are identified. In reviewing the document, we will also take into account feedback from staff and students, including those students Under 18 years of age. As part of the safeguarding governance structures, policies and procedures are also reviewed by the Study Group UK Safeguarding Management Group.



Appendix 1: Front Door for Families Contact Information

Contact information for this study centre:

Name	Front Door For Families (FDFF)
Address	c/0 Whitehawk Community Hub 179A Whitehawk Road Brighton BN2 5FL
Telephone number	01273 290400
Emergency telephone number	
Other information	FrontDoorForFamilies@brighton-hove.gcsx.gov.uk

Appendix 2: Indicators of Abuse

Taken from the NSPCC Child Protection fact sheet

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks, multiple burns with a clearly demarcated edge

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behavior
- Running away from home

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress

The physical signs of sexual abuse may include:

- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease
- Vaginal discharge or infection

- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults
- The physical signs of neglect may include:
- Constant hunger, sometimes stealing food from other children
- Constantly dirty or 'smelly'
- Loss of weight, or being constantly underweight
- Inappropriate clothing for the conditions.

Changes in behaviour which can also indicate neglect may include:

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- having few friends
- Mentioning being left alone or unsupervised.

Further information is available from: <https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>

EMBASSY English Brighton

STAFF DECLARATION

I have received and read the EMBASSY ENGLISH Brighton – Child Protection and Safeguarding document and the Welfare policies and procedures..

Name _____

Job title _____

Date _____

Signature _____