

City School of Languages, Swansea Safeguarding Policy

Index

1.1.1. Introduction

1.1.2. Policy Statement

1.1.3. Policy Aims

1.1.4. Definitions of Abuse

1.1.5. Sexual Offences Act 2003

1.1.6. Code of Conduct for all adults

1.1.7. Incidents that must be reported/recorded

1.1.8. Responding to allegations / suspicions

1.1.9. Other Welfare Considerations

1.1.10. Promoting Good Practice

1.1.11. Recruitment and Training of Staff

1.1.12. Recruitment and Training of Homestay Providers

1.1.1. Introduction

The welfare of the child is paramount. All children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have the right to protection from abuse. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately. All staff & Group Leaders working with children and vulnerable adults, whether paid or unpaid, have a responsibility to report concerns to the appropriate officer.

Designated Safeguarding Officer: Ismara Antunes
Deputy Safeguarding Officer: Neil Harris / Carla Cajado

1.1.2. Policy Statement

City School of Languages has a duty of care to safeguard all children & vulnerable adults in its care. All children have a right to protection, and the needs of disabled children and others who may be particularly vulnerable must be taken into account.

City School of Languages will ensure the safety and protection of all children and vulnerable adults enrolled on its programmes through adherence to the Safeguarding guidelines that we have adopted.

A child is defined as a person under the age of 18 (The Children Act 1989).

We will endeavour to ensure that children are protected from harm whilst at the school by:

- Ensuring good practice in safe recruitment in checking the suitability of staff or accommodation providers to work with children and vulnerable adults.
- Establishing and maintaining an environment where under 18s and vulnerable adults feel secure, are encouraged to talk and are listened to.
- Ensuring under 18s and vulnerable adults know that there are adults in the school whom they can approach if they are worried.
- Ensuring we have a Designated Safeguarding Officer & Deputy Safeguarding Officer. Both of whom will have completed Level 3 Safeguarding training.
- Ensuring that the Accommodation Manager will have completed Level 2 Child protection training.
- Ensure that every member of staff with significant access to under 18s has completed the minimum level 1 Child Protection training.
- Ensuring that every member of staff knows the name of the Designated Safeguarding Officer & Deputy.
- Not physically, emotionally or sexually abusing a child or vulnerable adult.
- Taking all reasonable steps to prevent any staff member, person working for us or member of the public from putting any child in a situation where there is unreasonable risk to their health & safety.
- Taking all reasonable steps to prevent any staff member, person working for us or member of the public from physically, emotionally, sexually abusing any child or vulnerable adult.
- Ensuring that all staff and volunteers report to the Designated Safeguarding Officer (or Deputy) any evidence of reasonable suspicion that a child or vulnerable adult has been physically, emotionally or sexually abused.
- Referring to statutory authorities any incidents of this nature that have been reported.
- Ensuring that all visitors and interested parties are aware of this policy and have access to copies.

1.1.3. Policy Aims

The aim of this policy is to promote good practice by:

- Providing children with appropriate safety and protection whilst in the care of City School of Languages.
- Allowing staff to make informed and confident responses to specific child protection issues.

'Safeguarding' refers to reducing risk and providing appropriate general care for children and vulnerable adults.

'Child Protection' refers to protecting children from any kind of abuse.

1.1.4. Definitions of Abuse

- Abuse is a violation of an individual's human & civil rights by any other person or persons.
- Abuse may consist of a single act or repeated acts.
- Abuse can be seen as an act of negligence or omission to act and may be unintended.

The four main categories of abuse are:

Physical abuse – this includes hitting, kicking, slapping, pushing, the misuse of medication, undue restraint or inappropriate sanctions.

Sexual abuse – this includes inappropriate physical contact, taking indecent images or sexual acts which the child or vulnerable adult has not or could not consent, for the purpose of adult gratification.

Emotional abuse – this includes threats of harm, abandonment, humiliation, verbal or racial abuse, isolation, persistent lack of affection, verbal bullying or cyber-bullying. Updated May 2017

Neglect and acts of omission – this includes failure to access medical care or services, negligence through risk-taking, failure to give prescribed medication, poor nutrition or lack of heating.

1.1.5. Sexual Offences Act 2003

It is important for all staff to understand that legislation covers 'Abuse of a position of trust' and considers children under 18 as minors in this case.

Abuse of a position of trust is defined as '*causing or inciting a child to engage in sexual activity*' and includes '*sexual activity in the presence of a child*'.

A copy of the Sexual Offences Act can be found online.

1.1.6. Code of Conduct for All Adults

This code of conduct must be followed by all employees of City School of Languages, clients, contractors and third party suppliers over the age of 18.

Do:

- Behave professionally at all times.
- Treat everyone with respect and communicate at their level.
- Remember the child always comes first.
- Listen to children.
- Be aware of all policies and procedures.
- Report any suspicion within City School of Languages guidelines.
- Be aware, approachable and understanding.

Do not:

- Touch inappropriately.
- Use inappropriate language.
- Harm or frighten a child.
- Be alone with a child, if avoidable.
- Threaten, shout or be aggressive.
- Mistreat, demean, ignore or make fun of a child.
- Force a child to do something they do not want to do.
- Let a child expose him/herself to danger.
- Take photos of children without the consent of City School of Languages management.

Additionally, all students must remain under the supervision of City School of Languages or nominated persons who have undergone a similar screening process that can be sufficiently evidenced.

You have a strict duty never to subject any child to any form of harm or abuse. Failure to honour this will be treated as gross misconduct. This means that it is unacceptable, for example, to:

- Distress a child by shouting at them or calling them derogatory names.
- Hit a child.
- Hold a child in such a way that it causes pain, or shake them.
- Physically restrain a child unless it is to protect them from causing harm to themselves or others.
- Take part in horseplay or rough games.
- Allow or engage in inappropriate touching of any kind.
- Do things of a personal nature for children that they can do themselves. This includes going to the toilet with a child unless another adult is present.
- Allow or engage in sexually suggestive behaviour within a child's sight or hearing, or making suggestive remarks to or within earshot of a child.
- Give or show anything to a child that could be construed as pornographic.
- Seek or agree to meet a child outside of their visit/stay at City School of Languages without full prior knowledge and consent of the parents/guardians.

- Seek or agree to have any electronic form of contact with a child during or after their visit/stay at City School of Languages without the full prior knowledge of the school and the child's parents/guardians.

1.1.7. Incidents that must be Reported / Recorded

If any of the following occur, you should report this immediately to the Designated Safeguarding Officer:

- If you accidentally hurt a child or young person.
- If he/she seems distressed in any way.
- If a child or young person appears to be aroused by your actions.
- If a child or young person misunderstands or misinterprets something you have done.

If a child has an accident which does not require hospital treatment:

- Management should be notified and monitor the individual.
- The child's parents should be notified of the incident at an appropriate time.
- The accident/incident log should be completed.

1.1.8. Responding to Allegations or Suspicions

It is not the responsibility of anyone working at City School of Languages to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns through contact with appropriate authorities.

City School of Languages will assure all staff/volunteers that it will fully support and protect anyone who in good faith reports his/her concern that a colleague is, or may be, abusing a child.

If you notice any suspicious signs, report this to the Designated Safeguarding Officer or the Deputy Safeguarding Officer immediately.

If a child tells you they are being abused, react as follows.

Do:

- Stay calm
- Listen & be child-focused
- Give the person the chance to say what they want to say.
- Reassure them that informing you was the right thing to do. Explain that you will need to inform the Designated Safeguarding Officer in order to provide the best possible help.
- Act immediately in accordance with the procedure in this policy.
- Record in writing exactly what the student has said as soon as possible.

Do not:

- Panic or over-react. It is unlikely that the alleged victim is in immediate danger.
- Probe for more information or ask leading questions. Questioning the participant may affect how the disclosure is received at a later date.
- Assume, paraphrase or offer alternative explanations.
- Promise to keep secrets or that everything will be OK. You cannot guarantee this.
- Wait or try to deal with it yourself: listen and refer.
- Make negative comments about the alleged abuser.
- Gossip with colleagues what has been said to you
- Make a child repeat a story unnecessarily.

If there is, or seems to be, immediate risk to a child or children, contact the police directly. The parents or carers of the child will be contacted as soon as possible following advice from the relevant local authority department.

Other members of staff should only be notified on a need to know basis.

Internal enquiries and suspension

The manager responsible will immediately remove the adult from contact with students pending further police and social services inquiries. In accordance with the findings of those inquiries, the Designated Safeguarding Officer & Principal will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. The welfare of the child should remain of paramount importance throughout.

Allegations of previous abuse

Allegations of abuse may be made some time after the event. Where such an allegation is made, the school will follow the procedures detailed above and report the matter to the local authority or the police as other children, either within or outside the school, may be at risk from this person.

Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children.

Action if bullying is suspected

If bullying is suspected, the same procedure should be followed as set out above

Action to help the victim and prevent bullying

- Take all signs of bullying very seriously.
- Encourage all children to speak and share their concerns. If anyone talks about or threatens suicide, seek professional help immediately.
- Investigate all allegations and take action to ensure the victim is safe.
- Speak to the victim & the bully(ies) separately.
- Reassure the victim that you can be trusted and will help them, although you cannot promise to tell no-one else.
- Keep records of what is said (what happened, by whom, when).
- Report any concerns to the Designated Safeguarding Officer (Deputy in his/her absence)

Action towards the bully(ies)

- Talk with the bully(ies), explain the situation and try to get the bully(ies) to understand the consequences of their behaviour. Seek an apology for the victim(s) with a staff member present to keep a written record.
- The school will inform the parents of the bully(ies) and of the victim(s).
- The school will impose sanctions as necessary.
- Encourage and support the bully(ies) to change their behaviour.
- The school will hold meetings to monitor progress.
- The school will inform all relevant staff members of action taken.
- Keep a written record of action taken.
- Look at supporting the bully(ies) with any issues they may have.
- Further incidents of bullying may result in the bully(ies) being sent home.

Concerns outside the immediate environment (e.g. about a parent or carer)

- Report your concerns to the Designated Safeguarding Officer (or Deputy), who should contact the local authority or the police as soon as possible.
- If both the Designated Safeguarding Officer and the Deputy Safeguarding Officer are not present, report your concerns to the Principal who will contact the local authority or the police.
- See below for the information that social services or the police will need.
- The local authority and the Designated Safeguarding Officer (or Deputy) will decide how to involve the parents/carers.
- Maintain confidentiality, disseminating information on a need-to-know basis only.

Information for Social Services or the Police about suspected abuse.

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of disclosure/concern, which should include the following:

- The child's name, age and date of birth.
- The child's home address and telephone number
- Whether or not the person making the report is expressing their own concerns or those of someone else.
- The nature of the allegation. Include dates, times, any special factors and other relevant information.
- Clear distinction made between what is fact and what is hearsay.
- A description of any visible bruising or other injuries, and also any indirect signs, such as behavioural changes.
- Details of witnesses to the incidents.
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred
- Whether the parents have been contacted, and if so, what has been said.
- Whether anyone else has been consulted, and if so, the relevant details
- If the child was not the person who reported the incident, whether the child has been spoken to, and if so, what was discussed.
- Whether anyone has been alleged to be the abuser and their relevant details.
- Where possible, referral to the police or social services should be confirmed in writing within 24 hours and the name of the person who took the referral should be recorded.

A form for recording the necessary details can be found in the Teachers' Room and every office in the school.

Confidentiality

Confidentiality shall be maintained at all times. Information shall be handled and disseminated on a need-to-know basis only.

This includes:

- The line manager responsible for the alleged abuser.
- The parents of the student who is alleged to have been abused.
- The person making the allegation.
- Social Services / Police
- The alleged abuser (and the parents if the alleged abuser is a child)

Social Services will advise who should approach the alleged abuser. This will rarely be someone from the school.

Information must be stored in a secure place with access limited to the Designated Safeguarding Officer, Deputy Safeguarding Officer and Principal. Information must be stored in line with data protection laws (e.g. the information must be accurate, relevant, secure and, where necessary, regularly updated).

Support to deal with the aftermath of abuse

Consideration should be given to the kind of support that children, parents and members of staff or volunteers may need. Use of help-lines, support groups and open meetings will maintain an open culture and help the healing process. The British Association for Counselling directory is available from the British Association of Counselling, 1 Regent Place, Rugby, CV21 2PJ, Tel: 01788 550899, Email: bac@bacp.co.uk, Internet: www.bacp.co.uk

Consideration should also be given to what kind of support may be appropriate for the alleged perpetrator.

1.1.9. Other Welfare Considerations

Illegal drugs and alcohol

If there appears to be illegal drinking in or around the school, or you see anyone taking drugs, giving them to others or being given them you should follow the procedures below:

If they are a student

- Immediately deliver them to the Director of Studies or the Principal.
- Complete a detailed incident report.
- Be alert and aware to any other similar incidents amongst their peers.

If they are a visitor

- Do not apprehend the person.
- Stay within reasonable distance as a barrier between them and the children.
- Usher away any students discreetly.
- Contact the police.
- Inform the Principal immediately.

If they are a member of staff

- Stay within reasonable distance, preventing them from contact with any students.
- Immediately contact their line manager.

Protecting yourself from false accusation

It is important, when working with children, to also ensure your own personal safety. This includes protecting yourself from false accusations. The following guidelines exist to protect you:

Avoid being alone with a child wherever possible.

- Never enter a student's room without reasonable cause
- Never enter a student's room without another member of staff. At least one staff member must be of the appropriate gender.
- Never agree to keep a secret for a student.

- Complete incident reports – any inappropriate behaviour of any nature should be recorded on an incident report.

Communication with students including use of mobile phones, email, social media, etc.

Staff may join the company Facebook group and other company social media and message the students collectively. However, no personal messaging of any kind is allowed during or following employment. This includes, but is not limited to, texting, emailing, messaging through social media and telephones.

City School of Languages are in a position of authority and therefore the relationships with the students is, and should remain, a professional one. You are role models to the students and not friends regardless of age.

1.1.10. Promoting Good Practice

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgment about the appropriate action to take.

Abuse can occur within many situations including home, school and other youth sector environments. Some individuals will actively seek employment or voluntary work with young people in order to harm them.

All suspicious practice shall be reported following the guidelines in this document.

1.1.11. Recruitment and Training of Staff

All reasonable steps are taken during the recruitment process of all staff to ensure unsuitable people are prevented from working with children and vulnerable adults.

Pre-selection checks

All staff should complete the City School of Languages application form, giving two referees. Both references must be taken up in writing. One of which (the most relevant to the position being applied for / most recent) will then be followed up verbally.

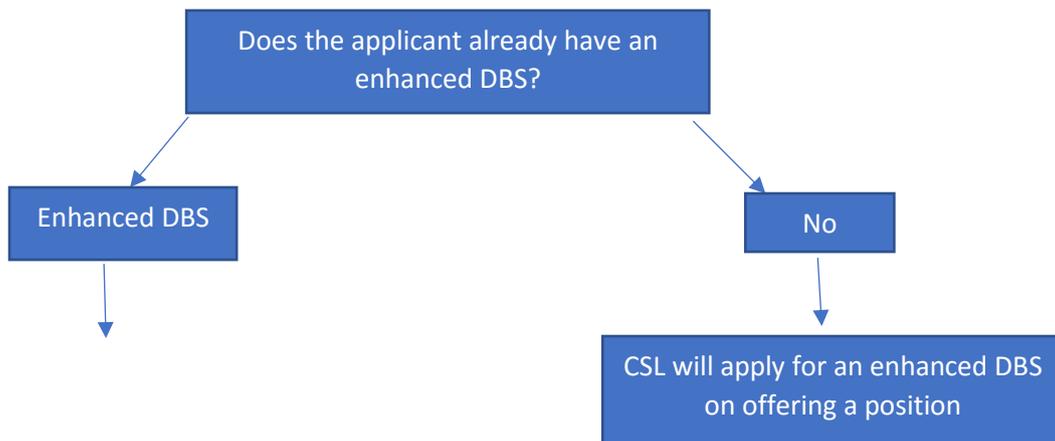
Interview & Induction

All employees and volunteers will be required to undergo an interview. During the interview process:

- The individual's identity should be verified and copies of proof of identity taken.
- Qualifications should be substantiated and copies of relevant certificates taken.
- An enhanced DBS or a police 'Certificate of good conduct' (applicant applying from outside the UK) will be requested.

Criminal Record Checks

The following process will be followed during the recruitment of all staff to ensure possession of a valid enhanced DBS or police check.



Should any new employee not be in receipt of their enhanced DBS by the time they are scheduled to start employment at City School of Languages, the following safeguards will be put into place.

Teachers

- The Director of Studies will ensure that the new teacher will be timetabled to teach (where possible) classes where all students are over 18.
- The new employee will be timetabled to teach in either Room 1 or 2 (next to the Director of Studies Office) with the door open at all times.
- The Director of Studies or another member of the teaching team will escort the new employee from the Teachers' Room to classes and vice versa at break & lunch times.
- At other times the new employee must be accompanied by another member of the teaching team (e.g. if they wish to go to the Student Room). The Director of Studies will inform the teaching team as and when required.

Non-academic staff

- The new employee's workstation must be in an office with at least one other member of staff.
- The new employee must be accompanied at all times when in the school (e.g. going to the W.C. / Student Room)

All employees should receive an induction, during which they should receive, or be directed to, copies of the following documents:

- Staff Handbook
- Teachers' Handbook
- Prevent Policy
- Safeguarding Policy & Guidelines
- Emergency Action Plan
- Health & Safety Policy
- Job description

Training

All staff must receive regular training in child protection covering all aspects laid out in the child protection guidance.

City School of Languages requires:

- Employees to attend in-house child protection awareness training, to encourage good practice and to facilitate the development of a positive culture towards good practice and child protection.
- 3 members of staff to hold a recognised and appropriate first aid qualification.
- All staff to undertake an online training course at www.kirkleessafeguardingchildren.co.uk. This course must be repeated every two years.
- There is both a Designated Safeguarding Officer and Deputy Safeguarding Officer that have both completed a level 3 safeguarding course. This course must be repeated every two years.
- All staff must sign that they have read and understood this Safeguarding Policy and agree to the Code of Conduct.

1.1.12. Recruitment and Training of Homestay Providers

All reasonable steps are taken during the recruitment process of all homestay providers to ensure unsuitable people are prevented from accommodating children and vulnerable adults.

Pre-Selection

All applicants for homestay providers for students of City School of Languages must fill out an application form, giving the details of any person living at the property and two referees. Both references must be taken up in writing.

Inspection

The homestay will be inspected by a member of City School of Languages staff (usually the accommodation manager). During the inspection process:

- The individual's identity should be verified and copies of proof of identity taken.
- An enhanced DBS will be requested.
- Copies of the Gas Safety Certificate for the property and the driver's licence of the individual.
- The accommodation manager will provide basic child protection training.

Criminal Record Checks

All homestay providers must possess an enhanced DBS check. City School of Languages will help hosts apply for an enhanced DBS for an individual working from home which will check both the individual & any member residing at the household over 18. This DBS must be renewed yearly.

First students and Re-inspection

City School of Languages will ensure that the first student to be housed with a new homestay will be over 18. Should the homestay receive positive feedback, then future students under the age of 18 can be housed there.

All homestays are inspected every two years.

Information and Training

All homestay providers will be issued the following documentation upon being accepted as a homestay provider by City School of Languages:

- Guideline Booklet
- Fire Regulations information sheet
- Gas Safety Certificate information sheet
- Student room rules
- Safeguarding Policy
- Prevent Policy

1.1.13. Useful Contact Details

Local Authority Designated Officer (LADO)

Damian Rees
01792 635537

Child and Family Information, Advice
and Assistance Service
<http://www.swansea.gov.uk/safeguardingchildren>

01792 635700
access.information@swansea.gov.uk

Emergency Out of Hours Duty Team

01792 775501
edt@swansea.gov.uk

NSPCC

www.nspcc.org.uk

Childline

UK 0800 1111
www.childline.org

1.1.14. Associated Documents

Anti-Bullying Policy and Procedure

Building Security Policy

Homestay Guidelines for Hosting Under 18s (individuals)

Homestay Guidelines for Hosting Under 18s (groups)

Junior Groups in an Adult School Policy

Safeguarding Guidelines for Staff

Safeguarding Guidelines for Homestay Providers

16 and 17 year olds in Adult Classes Policy