SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

Aim

- To ensure that all students aged under 18 are protected from potential abuse from hosts, staff and other suppliers and fellow students.
- To inform British Study Centres staff of their responsibilities when working with children and vulnerable adults in order that staff can implement this policy using the guidelines provided. This will protect the safety and well-being of children attending courses and staff employed to work on courses at British Study Centres language schools and residential centres.
- To offer a variety of social activities of interest to the needs of younger students
- To practice our commitment to safe recruitment, selection and vetting of staff, accommodation providers and other suppliers.
- To ensure that all members of staff are aware if any student is under 18 and that staff are also aware of any consequent special procedure(s) which are applicable.

Approved by

School Directors, Heads of School, Managing Director, Accommodation Managers/Officers

Responsibility for update

School Directors, Heads of School, Managing Director, Accommodation Managers/Officers

Applies to

British Study Centres staff, including students and volunteers, who work with children and vulnerable adults

Date of approval

March 2017

Proposed date of review

March 2018

INTRODUCTION

British Study Centres firmly believe in having detailed and rigorous control measures in place to safeguard children and vulnerable adults.

Our policies aim to follow relevant legislation and guidelines which includes:

- The Education Act (2002) Section 175
- The Children Act (1989 and amendments)
- The Children Act 2004
- Sexual Offences Act 2003
- Working Together to Safeguard Children Updated 2015
- Safeguarding Vulnerable Groups 2006
- Safeguarding of Vulnerable Adult Schemes
- Aimsafer: A Framework for Safeguarding Children & Young People in Higher Education Institutions 2005
- Information Sharing 2015
- National Minimum Standards for Private Fostering
- Keeping Children in Education Safe Updated September 2016
DEFINITIONS

Safeguarding
Safeguarding is the process by which we protect children and vulnerable adults’ health, wellbeing and human rights, enabling them to live free from harm.

Children
The Children Act 1989 states the legal definition of a child is “a person under the age of 18”. (The Children Act 1989 and the Vetting and Barring Scheme 2009).

Vulnerable Adults
Section 115(4) of the Police Act 1997 states that a person can be considered to be vulnerable if they are “substantially dependent upon others in performing basic physical functions, or his ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result, he would be incapable of protecting himself from assault or other physical abuse, or there is a potential danger that his will or moral well-being may be subverted or overpowered”.

Definition of Abuse
Abuse is any behaviour towards a person that deliberately or unknowingly causes harm, endangers life or violates their rights. Abuse may be:

- Physical
- Sexual
- Psychological – repeatedly being made to feel unhappy, humiliated, afraid or devalued by others
- Financial or material – stealing or denying access to money or possessions
- Neglect
- Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender, disability or cultural background

Abuse may involve one or a combination of these factors. Please see Appendix C Recognising Abuse.

Types of Abuse and Neglect can also be found in “Keeping Children Safe in Education (2016).

PRINCIPLES

At British Study Centres we are committed to safeguarding children and vulnerable adults and we expect everyone who works in our schools to share this commitment.

British Study Centres believes that children/young people have rights as individuals and should be treated with dignity and respect. British Study Centres will strive to provide a safe and caring environment for any young people (under 18) and vulnerable adults in its care while they are studying at British Study Centres, visiting British Study Centres or participating in British Study Centres activities.

A caring environment is one in which and where:

- The health, safety and welfare of young people has been assessed and catered for.
- Staff are alive to the possibility of abuse and take measures to prevent that possibility.
- There is a sound and known reporting system for any incident
- Staff take reasonable and practical precautions to avoid any suspicions of abuse being brought against them.

This policy and procedures are based on the following principles:

- The welfare of young people and vulnerable adults is of primary concern.
- All young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identify have the right to safeguarding from abuse.
• It is everyone’s responsibility to report any concerns about abuse to the Designated Safeguarding Officer, and the responsibility of the Social Services Department and the Police to conduct, where appropriate a joint investigation.
• All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
• British Study Centres has a duty to refer to the appropriate person any person who has
  • Harmed or poses a risk of harm to a child;
  • Satisfied the ‘harm test’ (i.e. no action or inaction occurred but the present risk that it could be significant); or
  • Received a caution or conviction for a relevant offence.
• All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.
• British Study Centres will foster a culture where safeguarding is taken seriously through regular staff training and commitment to safeguarding procedures.

ROLE OF DESIGNATED SAFEGUARDING OFFICER

The Designated Safeguarding Lead will have Advanced Safeguarding training (Level 3).

The role of the Designated Safeguarding Officer is:
• To receive information about events that are planned in British Study Centres that may involve young people or vulnerable adults, and plans that indicate how safeguarding will be covered.
• To receive information from any staff, volunteers, children, parents or carers who have child safeguarding concerns and record it.
• To assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate
• To consult initially with a statutory child safeguarding agency to test out any doubts or uncertainty
• To make a formal referral to a statutory child safeguarding agency or the police
• To record statements from any member of staff who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.

The named Safeguarding Officers at British Study Centres are:

<table>
<thead>
<tr>
<th>School</th>
<th>Designated Safeguarding Lead</th>
<th>Safeguarding Deputy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brighton</td>
<td>Barbara Lewin</td>
<td>Richard Turnbull</td>
</tr>
<tr>
<td>Edinburgh</td>
<td>Sarah Muir</td>
<td>Rachelle Tansley</td>
</tr>
<tr>
<td>BSC Juniors</td>
<td>Matt Simmonite</td>
<td>Edward Carden</td>
</tr>
<tr>
<td>London Central</td>
<td>Claudia Gonzalez</td>
<td>James Baker</td>
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<td>London Hampstead</td>
<td>James Birrell</td>
<td>Jane Galloway</td>
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<tr>
<td>Manchester</td>
<td>Joelle Kirkham</td>
<td>Clare Sargeant</td>
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<tr>
<td>Oxford</td>
<td>Laura Murray-White</td>
<td>Clive Brown</td>
</tr>
<tr>
<td>York</td>
<td>Rebecca Mason</td>
<td>Kirsti Sawyer</td>
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CHILD SAFEGUARDING PROCEDURES

Where under-18s are concerned there are statutory responsibilities for any organisation to follow regarding the safety of young people.

British Study Centres has a Designated Safeguarding Officer to be the lead person with regard to child safeguarding issues.
All school staff must contact the Designated Safeguarding Officer or the School Director/ Head of School if they have any cause to believe the student or young person involved in any activity in British Study Centres, covered by this policy is in any way at risk. The Designated Safeguarding Officer will follow the relevant procedures.

Records will be kept of all such incidents and their outcomes and held by the Designated Safeguarding Officer in accordance with the Data Protection Act.

All staff should be aware that in accordance with statutory requirements where child safeguarding issues are involved, it is not possible to offer confidentiality to a person under 18 as any disclosures must be reported.

VULNERABLE ADULTS

Where possible British Study Centres will identify vulnerable adults and ensure that there are appropriate support measures in place. This is most likely to be when the student presents to, or is referred to, Student Services and clearly has mental health difficulties or a disability that puts them into the legal definition of ‘vulnerable’.

Any member of staff across British Study Centres with concerns regarding an adult student whom they believe or know to be vulnerable must contact the Designated Safeguarding Officer.

REPORTING AND MONITORING PROCEDURES

All members of staff working closely with children have to be alert to possibilities of abuse and any concerns about the behaviour of any adult with respect to that child should be reported to the Designated Safeguarding Officer who will decide what further action to take. Guidance will be available in each school with the appropriate reporting documentation available.

It is the duty of staff to inform only not to investigate – this is the role of the Police and Social Services.

If staff, in the course of their work at British Study Centres, have a child safeguarding issue brought to their notice, this must be treated as a priority over all other work.

Guidance with regard to a specific incident may be obtained from the Designated Safeguarding Officer.

An oral, and then written report should be provided to the Designated Safeguarding Officer who will keep a confidential record of any such incidents.

OUR RESPONSIBILITIES

The School Director / Head of School has responsibility for the oversight of the school’s Safeguarding Children and Vulnerable Adults Policy with delegated responsibility to relevant members of the Management Team. Each school has a senior member of staff responsible for child and vulnerable adult safeguarding issues within the school and they will liaise directly with the School Director/Head of School as deemed necessary.

STAFF

All British Study Centres staff are required to take shared responsibility for the safeguarding and safety of any young people and vulnerable adults in school. Staff are in a position of trust, in particular those staff who teach, support, guide or in any way interact with students, young people and vulnerable adults visiting the school. It is incumbent all staff to be aware of this and to act accordingly at all times.

British Study Centres has a rigorous recruitment process that includes safeguarding measures to ensure that candidates have been suitably vetted. (Please also refer to the British Study Centres Recruitment Policy).
Staff responsible for recruitment will have completed an online Safer Recruitment training course. Safer recruitment of British Study Centres staff working with children and vulnerable adults will be ensured by checking their suitability to work with children:

- At initial stage an application form is completed which will elicit information about the applicants past
- To ensure that all existing and new staff including all unpaid interns sign and return a copy of the Children’s Act 1989 (Part 1X), declaring any convictions of offences against children.
- Two satisfactory references will be required for all contracted staff
- To ensure that all staff have a current and enhanced DBS disclosure or PVG check (Scotland) Should a new recruit start their employment before results of any DBS or ‘Certificate of Good Conduct’ are received, British Study Centres will ensure that they will not be left in sole care of any student under-18 and will always be accompanied by another member of staff while at school. The disclaimer which all staff sign now states:
  - I understand that if my employment starts without DBS or ‘certificate of good conduct’ results being in place, I will not be left in sole care of any student under 18 and will always be accompanied by another member of staff while at school.
- Foreign Nationals: all contracted foreign nationals (unless they have lived in the UK for more than 6 months) will be required to provide a Police Check, from their country of residence, conducted within the past year. If the document is not in English, it must be accompanied by a certified translation.
- To ensure that all teaching staff are checked against the Prohibited List.
- To ensure that a central register of all staff DBS checks is kept up to date. The list should include the following:
  - Identity – name, address, date of birth, evidence of check made and date
  - Start date
  - Role in organisation
  - Qualifications – required, evidence of check made and date
  - DBS certificate – disclosure number, evidence of check and date
  - Barred list check (part of enhanced DBS) – evidence of check and date
  - Right to work in UK – evidence of check and date
- Making known to all staff the policies and procedures in place that promote the safety and welfare of children including: health and safety, Prevent Extremism and Radicalisation policy, anti-bullying, the code of conduct of staff.
- All staff will complete online Safeguarding and PREVENT training courses.
- All staff should be aware that it is inappropriate to exchange phone numbers, interact on social media or meet privately with students who are under the age of 18. A professional attitude must be maintained at all times, both in and out of school.
- A staff counsellor is nominated for all under-18s. They are introduced during the welcome induction in the first week when the counsellor introduces themselves and their role (primarily as a nominated point of contact for any issues). The counsellor will also go through the rules and check everything is OK with them.

ACCOMMODATION

- To visit and vet all applicants before accepting as a homestay. All members of the family and any regular visitors to the household must be declared to the school on the initial application.
- To ensure that there is a bank of DBS-checked (or PVG in Scotland) homestays that can be used for under-18s.
- The main carer in each homestay for under-18s must have a current and enhanced DBS or PVG (Scotland) disclosure. The check will have included that the work happens in their home so that the DBS will check the address, including all adult members of the household.
- To re-visit homestays who host under-18 year olds annually.
- To check host details and profile annually to ensure that details have not changed.
- To ensure that all under-18s and their hosts follow the school’s agreed evening curfew: 22:00.
- Homestays, which prove to be unsuitable for whatever reason, are to be removed from the homestay register. Serious concerns will be immediately reported to the local authorities or Local Authority Designated Officer (LADO).
To ensure that the main carer in homestays sign and return a copy of the Children’s Act 1989 (Part 1X), declaring any convictions or offences against children on behalf of all other adults in the home.

To ensure that the main carer in homestays is informed in writing about British Study Centres’ commitment to safeguarding children and our procedures.

To ensure that the main carer in homestays is provided with training on “Basic Awareness in Child Protection” and “PREVENT” awareness.

To ensure that there is a risk assessment available for the journey to and from school.

To ensure that students’ parents or guardians provide written consent for activities outside of the agreed curfew. The school has the right to amend or refuse such requests in accordance with school policy, ISI and British Council guidelines.

All parents’ contact numbers from the consent letter must be entered on the school database before the student arrives. If an under-18 does not arrive within 1 hour of their expected arrival time, the host is instructed to call the school emergency phone and our staff member will then contact the parent and if necessary report them as a missing person to the police.

To offer only homestay half or full board homestay accommodation to under-18 year olds to ensure that they are not forced to eat take-away or cook for themselves in the evenings.

To provide guidance to hosts, residential staff, group leaders about how they should behave around under-18s where privacy is important especially regarding bedrooms and showers/bathrooms.

To ensure that the accommodation staff are aware of the procedure for private fostering arrangements and informing local authorities. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (18 years if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

To ensure that residential accommodation (including student houses) is not made available to under-18s except as part of the BSC residential junior programmes.

**ADMINISTRATION**

- To ensure that all class registers list the students’ age in order that teachers are able to inform the safeguarding officer immediately of any absences of any student under 18.
- To meet with under 18 year-old students to check that they are happy and safe.

**SOCIAL PROGRAMME**

The managerial responsibility for any programme or activity rests with, firstly, the Social Programme Coordinator and secondly the individual who is directing or organising the activity.

Staff are expected:

- To ensure that the activity is planned, organised and delivered in accordance with the Safeguarding Children and Vulnerable Adults Policy.
- To arrange the checking, training, induction and guidance for all staff and volunteers.
- To inform the British Study Centres Designated Safeguarding Officer and complete the appropriate documentation if any under-18s are involved in their activity.
- To complete a health and safety risk assessment for each activity.
- To ensure that there is a variety of social programme activities suitable for under-18s.
- To ensure that students are familiar with 24 hour emergency telephone number, and that they feel happy to be able to call this number at any time.
- To take all allegations of abuse seriously and to respond appropriately.
- Members of staff that participate in the social programme must ensure that under-18s adhere to curfews, do not drink alcohol and are protected from potential harm.
UNDER 16s

On occasion, British Study Centres Adult schools will welcome closed groups of students under the age of 16 but with a minimum age of 12. When welcoming these groups, the school will apply the following policies:

The group will be accompanied by a group leader or teacher with a minimum ratio of one leader per 15 students.

- The school/CRT team (for Experience English schools) will obtain a background check or letter of conduct for each group leader. Agents sending Group Leaders to accompany students will be required to provide a signed agreement stating that they hold records of current police checks or certificates of good conduct for Group Leaders from their country of domicile stating that they are suitable to work with children and that they have no outstanding criminal convictions that would affect their suitability to accompany students in a supervisory role in the UK.
- The group leader will be available to assist school staff manage and communicate school policies and procedures to the students.
- The group leader will assist as a supervisor on any external trips and activities for their group and will not be requested to assist with any other activity for students not from their group.
- BSC will provide all accommodation and meals for the groups.
- A responsible adult will always be present overnight in the accommodation.
- Under 16's are only allowed out on school organised activities which finish by 2130 home in order that students are home by 2200.
- Students under 16 will not be accommodated with those over 18s.
- Students under 16 will not be placed in the same classes as those with over 18s. Closed groups of U16s will be placed in classes with different break times to regular classes so students do not mix in the common areas or if break times are at the same time, they will be kept in a separate area away from adult students.

SUPPLIER CONTACT AND ACCOMMODATION

- To ensure that all suppliers (taxi drivers, excursion company staff) who are contracted for under-18 students have also signed disclaimer forms with their employers.

ONLINE COURSES

British Study Centres offers English language tuition to students via video conferencing to students who may be in any location around the world. For all students that are under 18:

- Parent/Guardian asked for their consent for the student to take part in these lessons
- The lessons will be delivered securely via the British Study Centres Adobe Connect platform
- Lessons may be recorded for compliance purposes
- Further guidelines can be found in the Online Teacher’s Manual

DBS/PVG (Scotland) CHECKS

A ‘satisfactory’ check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. Should the school be informed of a previous conviction which does not indicate a direct threat to the safety of the students, British Study Centres will interview the homestay provider or staff member to garner more information.

British Study Centres will consider any convictions which have been recorded in terms of the following:

- Nature, seriousness and relevance of the offence
- How long ago the offence occurred
- If the offence was a one-off or part of a history
- Circumstances of the offence being committed
- Country of conviction
- Decriminalisation

If the DSO or School Director / Head of School consider that there is no threat, a rationale will be provided and kept on file stating the reasons.

All staff or host families still employed to look after children must report any subsequent criminal convictions to the School Director / Head of School. Failure to do so will result in disciplinary action being taken.

RADICALISM & FUNDAMENTALISM

Tolerance and diversity are promoted and explained to all students during their induction. Should individual students exhibit intolerance or prejudice against other students or staff based on race, culture, gender, religion, socio-economic status, age, or sexuality, their behaviours will be addressed by the school disciplinary policy.

Should a member of staff suspect that any student is the focus of attempts to radicalise them to a set of fundamentalist religious or political beliefs, the staff member should inform the School Director / Head of School and Designated Safeguarding Officer immediately who will report the suspicions to the relevant authorities.

FEMALE GENITAL MUTILATION (FGM)

At British Study Centres will believe that all our pupils should be kept safe from harm. Female Genital Mutilation affects girls particularly from north African countries, including Egypt, Sudan, Somalia and Sierra Leone. Although our school has few children from these backgrounds and consider girls in our school safe from FGM, we will continue to review our policy annually.

CHILD SEXUAL EXPLOITATION (CSE)

At British Study Centres staff we believe that our pupils should be kept safe from sexual exploitation. Child Sexual Exploitation (CSE) is defined as “the exploitation of children and young people under 18 [involving] exploitative situations, contexts and relationships where young people (or a third person or persons) receive ‘something’ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. We will continue to review our policy annually.

ALLEGATIONS OF ABUSE OR INAPPROPRIATE BEHAVIOUR INVOLVING STAFF

Allegations involving a member of staff and a person under 18 or a vulnerable adult should be reported to the School Director / Head of School and to the Designated Safeguarding Officer.

Consideration will be given as to whether the situation falls within the definition of abuse. If the School Director / Head of School and Designated Safeguarding Officer believe that the allegations constitute abuse, they will contact the Local Authority Designated Officer immediately and follow their instruction. These allegations are to be kept completely confidential by all staff involved at all times.
ALLEGATIONS OF ABUSE OR INAPPROPRIATE BEHAVIOUR INVOLVING STUDENTS

Allegations involving a person under 18 and another student should be reported to the School Director / Head of School or Designated Safeguarding Officer.

Consideration will be given as to whether the situation falls within the definition of abuse. If the School Director / Head of School and Designated Safeguarding Officer believe that the allegations constitute abuse, they will contact the Local Authority Designated Officer immediately and follow their instruction. These allegations are to be kept completely confidential by all staff involved at all times.

WHISTLE-BLOWING POLICY

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- An legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the Home Office, the number is 0808 800 5000.

TRAINING

In accordance with good practice British Study Centres will ensure that the Designated Safeguarding Officer, officers deputed to act on their behalf and other staff likely to be in regular contact with under-18s and vulnerable adults receive appropriate training provided within our sector.

British Study Centres will also provide information to raise awareness to ensure that all staff understands what to do if a student or visitor covered by this policy discloses abuse or any other safeguarding issue.

RELATIONSHIPS WITH YOUNG PEOPLE AGED UNDER 18

It should be noted that whilst a young person can consent to sexual activity once they reach the age of 16, the Sexual Offences Act 2003 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under 18 where the adult is in a position of trust.

MEDIA RELATIONS

For any British Study Centres activity involving young people, parents or guardians must be given the opportunity to refuse permission for photographs, videos or other images to be made of their children and for the children to be interviewed by press, broadcasters or other media.
HEALTH AND SAFETY

All users of British Study Centres must be made aware of Health and Safety requirements and be prepared to abide by them.

CODE OF PRACTICE FOR STAFF

All staff must be familiar with British Study Centres’ Code of Practice for Staff attached as Appendix A.

CODE OF BEHAVIOUR FOR YOUNG PEOPLE

All staff must be familiar with British Study Centres’ Code of Behaviour attached as Appendix B.

Parents/carers of children participating in British Study Centres activities must be made aware of the Code of Behaviour.

DATA SAFEGUARDING

It should be noted that although technically a “child”, consent is still required from young people in the same way as for an adult with regard to matters of data protection.

REVIEW

This policy and procedures will be regularly monitored and reviewed:

- In accordance with changes in legislation and guidance on the safeguarding of children and vulnerable adults or any changes within British Study Centres.
- Following any issues or concerns raised about the safeguarding of children or vulnerable adults within British Study Centres.
- In all other circumstances, at least annually.
APPENDIX A: CODE OF GOOD PRACTICE FOR STAFF, STUDENTS AND VOLUNTEERS

The following guidelines are intended to be a common sense approach that both reduce opportunities for the abuse of young people and vulnerable adults and help to protect staff, students and volunteers from any false allegation.

YOU SHOULD

- Treat all young people and vulnerable adults with respect and respect their right to personal privacy
- Ensure that, whenever possible, there is more than one adult present during activities or that you are within sight or hearing of others
- Exercise caution when discussing sensitive issues with children or vulnerable adults
- Exercise caution in initiating any physical contact with a young person or vulnerable adults
- Operate within the guidance offered by this Code
- Challenge all unacceptable behaviour and report all allegations or suspicions of abuse
- Avoid becoming personally involved in a student’s personal affairs.
- Be aware that their personal web profiles on social media can be viewed by anyone and therefore should be especially cautious about their public web profiles and privacy settings

YOU SHOULD NOT

- Establish or seek to establish social contact with under 18s/pupils during or after the course.
- Give personal email addresses or personal phone numbers to students under 18.
- Communicate via email, text, phone, social networking sites, blogs, web pages or messaging services with under 18s.
- Post photos or videos of students under 18 on any social networking sites.
- Distribute (by any means) images or information about students of any age.
- Spend excessive time alone with young people or vulnerable adults away from others.
- Take young people or vulnerable adults alone in a car journey, however short.
- Take young people or vulnerable adults to your home.
- Engage in physical or sexually provocative games including horseplay.
- Allow or engage in inappropriate touching of any form.
- Make over-familiar or sexually suggestive comments or approaches to a young person or vulnerable adult even as a ‘joke’.
- Let allegations, over familiar or sexually suggestive comments or approaches made by a young person or vulnerable adult go unchallenged or unrecorded.
- Do things of a personal nature that young people or vulnerable adults can do for themselves.
- Take photographs, videos or other images of a young person without the express permission of their parents.

UNDER 18S SEEKING CONTACT WITH STAFF

- If an under 18 seeks to establish social contact, the member of staff must exercise his/her professional judgement and be aware that such social contact could be misconstrued.
- Staff must seek advice from a line manager if students do try to establish contact and copy such communications to the line manager.
- Appropriate social contact (electronic or otherwise):
- Staff must maintain neutral, friendly relationships with pupils while avoiding exclusivity or overfamiliarity.
- Staff must resist any attempt by a pupil to develop an overfamiliar or exclusive social relationship.
- If a pupil confides sensitive personal information staff have a duty to listen and respond in a professional manner in accordance with organisational guidelines.
ELECTRONIC CONTACT

- Staff must only use the school VLE for any electronic contact with a pupil before, during or after a course.
- In any electronic contact with pupils staff must pay particular attention to use neutral, unemotive language that will not be misconstrued.
- Staff must not exchange any information with a pupil that they would not be happy to share with the child’s parent or carer.
- Staff must avoid the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.
- Staff should be aware that personal information about them may be available in various forms online. Staff should be particularly cautious about their public web profiles and privacy settings.
- Staff should attempt to find ways of setting up and maintaining separate ‘personal’ and ‘professional’ electronic profiles.

SOCIAL NETWORKING SITES

- Any use of social network sites with under18s is forbidden. Any staff wishing to set up a facebook page for students must ensure that there are no under18s involved. Any page must be a closed group under the aegis of the company and be administered and monitored by the Safeguarding Officer.
- Staff and pupils must not share the same social networking group, other than those adults necessary to monitor and administer the group.
- Staff who monitor or administer social networking sites for pupils should use professional accounts that are as far as possible devoid of personal information.
- Staff must not initiate or agree to ‘friendship’ requests or similar with pupils that will result in the sharing of personal information, photos, status updates, etc.

DUTY TO REPORT

- Staff have a duty to report to the employer any actual or perceived inappropriate development of the relationship between pupil and staff, electronic or otherwise.
- Any sensitive information communicated by a pupil to a member of staff, electronic or otherwise, must be reported to the employer.

FAILURE TO COMPLY

- Non-compliance with the above policy will result in disciplinary procedures.
- Employers have a duty to remove an individual from regulated activity where there is risk of harm to children.
- Employers have a ‘duty to refer’ to external authorities* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children. (*ISA, police, local child protection authorities).
APPENDIX B: CODE OF BEHAVIOUR FOR YOUNG PEOPLE & VULNERABLE ADULTS

British Study Centres is a language school for the education of students, including children aged under 18. All people visiting British Study Centres, either privately or with an organised group, are expected to respect British Study Centres, its staff, students and its buildings and grounds.

British Study Centres seeks to offer visitors a safe and caring environment. In return, you must:

- Respect the rights and dignity of each other and of the staff and other helpers
- Respect the rules of British Study Centres which include:
  - Purchase, sale and consumption of alcohol, recreational/nontherapeutic drugs and substances for abuse is forbidden.
  - Smoking is banned in all buildings at British Study Centres and is only allowed within outdoor areas specifically designed for this practice.
  - All rules and safety/emergency procedures such as fire drills must be followed
  - Participants in organised events are expected to attend all timetabled activities unless they have been granted specific leave of absence.
  - Inappropriate physical intimacy among participants is not permitted.
  - Serious incidents of misbehaviour such as fighting, racial/sexual abuse, damage to property, indecent language and failure to obey instructions will normally lead to expulsion from the activity and British Study Centres.
APPENDIX C: RECOGNISING ABUSE

Abusers can be anyone and anywhere.

SEXUAL ABUSERS

Sexual activity with or directed toward a person under 18 by an adult who is in a position of trust with under 18 year olds is a criminal offence (Sexual Offences Act 2003)

Some arrive in a job with a pre-mediated desire to abuse children; others develop it while in the job. Therefore safer recruitment alone is not enough to provide adequate safeguarding for children.

A sexual abuser typically goes on a journey:

- Feeling emotionally connected to children and having few adult relationships / pastimes
- Overcoming his/her own conscience, by, for example, seeing that child porn is available on the Internet so it must be OK and/or by re-interpreting children’s behaviour to be sexual and flirtatious when it isn’t
- Grooming adults so they see the abuser as normal / respectable / responsible
- Grooming children, especially needy ones, testing their boundaries in minor ways at first, so that should there be any complaint, it would be easy to explain away.
- Slowly develop a relationship with the child, pushing the boundaries of sexual behaviour gradually further
- Therefore, to be checked at interview:
  - If applicant can recognise / respect boundaries of physical contact with children
  - If applicant can understand or describe appropriate boundaries for a professional relationship with children

PHYSICAL ABUSERS

- Are not usually pre-mediated (unless sadists) but are usually reactive abusers.
- They typically lack self-restraint and don’t have appropriate strategies for managing
- Conflict and/or difficult children
- Therefore, to be checked at interview:
  - Applicant’s attitude to managing conflict and dealing with difficult children
  - Applicant’s attitude to displays of violence

EMOTIONAL ABUSERS

- All sexual abusers are emotional abusers
- Other forms of emotional abuse include failing to provide support to children needing it, and through constantly directing negative attention to a particular child.
- Bullying is the classic form of emotional abuse
- Therefore, to be checked at interview:
  - Applicant’s attitude to staff responsibilities in protecting children
  - Applicant’s attitudes to using positive reinforcement

OTHER ABUSERS

Abusers can use a combination of different types, physical and sexual abuse