

SAFEGUARDING POLICY



BRITISH STUDY CENTRES
English for Juniors
Incorporating **Experience English**

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INTRODUCTION

This policy applies to all staff employed by British Study Centres (BSC) who work with or come into regular contact with children in the course of their duties.

- A child is defined as a person under the age of 18. (The Children Act 1989 and the Vetting and Barring Scheme 2009)
- 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)
- All BSC staff working with children has a duty to make arrangements for safeguarding and promoting the welfare of children.
- BSC staff should 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 BSC language schools and residential centres.
- At least one senior member of staff at BSC centres will be known to all staff as the Safeguarding Officer. The Safeguarding Officer will raise awareness of this policy and its guidelines with staff and group leaders and children in our care. In most centres this person will be the Centre Manager or designated Welfare Officer.
- All BSC staff members have a responsibility to report concerns to the named Safeguarding Officer.
- BSC has a duty to refer 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 was significant) ; or
 - Received a caution or conviction for a relevant offence.
- The named Safeguarding Officers at BSC Juniors HQ are: Samantha Atkins, Matthew Simmonite, Roland Sharp

STATEMENT OF INTENT

BSC is committed to safeguarding children from harm and believe that:

- The welfare of the child is paramount.
- All children without exception have the right to protection from abuse regardless of age, gender, ethnicity, disability, sexuality or beliefs.

BSC will ensure that:

- All concerns and allegations of abuse will be taken seriously and responded to appropriately.
- The BSC Safeguarding Policy will be reviewed and updated regularly.
- As members of BSC English UK; at least one member of central office permanent staff will attain Child Protection training at level 2.
- As members of BSC English UK; at least one member of the central office human resources staff will have completed the Safer Recruitment training course.

BSC has a commitment to:

- Safe recruitment, selection and vetting of staff
- Making known to all staff the policies and procedures in place that promote the safety and welfare of children including; health and safety, Preventing Extremism and Radicalisation Policy, anti-bullying, the code of conduct for staff working with under 18s and contact with children under 18

POLICY AIMS

The aim of BSC Safeguarding Policy is:

- To promote good practice by providing children with appropriate protection and safety whilst in our care
- To provide BSC staff with clear guidelines and appropriate ongoing child protection training for working with children in their care
- To allow staff to make informed responses to specific child protection issues

POLICY IMPLEMENTATION

The BSC Safeguarding Policy will be implemented by adhering to the guidelines within this document. All BSC staff must comply with this policy in conjunction with BSC Code of Conduct for Staff Working with Under 18s. The guidelines cover three main areas:

1. Staff recruitment, support and training
2. Staff conduct
3. Child protection procedures

STAFF RECRUITMENT, SUPPORT AND TRAINING

1.1 Safer recruitment of BSC staff working with children 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
- All applicants will complete a Children Act 1989 declaration form
- Two satisfactory references will be required for all contracted staff
- Employees must have an up to date PVG check (Scotland) or a DBS check; staff commencing employment while awaiting their check will never be in sole charge of students
- 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.
- Contracted foreign nationals resident in the UK for more than 6 months will be required to provide an up to date PVG check (Scotland) or a DBS check

1.2 Homestay organisers / Accommodation Officers

- Have completed the 'Basic Awareness In Child Protection' and 'PREVENT' (anti-radicalisation) on-line certificate as a minimum requirement
- Attend meetings at BSC Office and are briefed and updated on BSC Safeguarding Policy and procedures
- Are regularly updated on the Disclosure and Barring Service, British Council Accreditation requirements and any other external accrediting or regulatory bodies with respect to the recruitment of homestay hosts and safeguarding requirements
- Are sent updated versions of the BSC Safeguarding Policy and Preventing Extremism and Radicalisation Policy

BSC 'main' homestay hosts are:

- Required to complete a Children Act 1989 declaration form stating their suitability to host children under 18
- Required to provide an up to date PVG check (Scotland) or a DBS check
- Visited regularly by Homestay Organisers
- Informed in writing about BSC commitment to safeguarding children and our Child Protection Procedures. And are issued with Child Protection guidelines

† The 'main' homestay host refers to the person who receives the payment for Hosting

Other adults residing, or staying overnight in the homestay accommodation where under 18s are accommodated will be:

- Required to complete a Children Act 1989 declaration
- Required to provide evidence of an up to date PVG check (Scotland) or a DBS check, as per above

1.3 BSC central office and language schools

All senior staff and managers will attend departmental child protection meetings for updates

- All staff will complete online Safeguarding and PREVENT training course

1.4 BSC centres staff

All staff will complete online Safeguarding and PREVENT training course

At the senior staff induction for BSC, central staff will:

- Brief all senior managers about requirements and responsibilities of their roles
- Explain child protection procedures
- Ensure staff are aware of their responsibilities to uphold the BSC Code of Conduct for Staff Working with Under 18s, The Safeguarding Policy and the Young Learners Preventing Extremism and Radicalisation Policy

- Ensure appropriate staff receive a copy of the BSC Safeguarding Policy
- Ensure appropriate staff receive a copy of the BSC Preventing Extremism and Radicalisation Policy
- Brief all Centre Managers to run local induction sessions, for all staff employed at centres, on the Code of Conduct for Staff working with Under 18s, The Safeguarding Policy and the Preventing Extremism and Radicalisation Policy
- Make sure copies of the Safeguarding Policy and the Preventing Extremism and Radicalisation Policy are available for all staff to consult
- Address awareness of child protection issues through on-going training at staff meetings

1.5 Group Leaders accompanying students

Group Leaders accompanying students will be asked to sign a disclosure form prior to arrival stating that they are suitable to work with under 18s.

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.

STAFF CONDUCT

All BSC staff is expected to demonstrate exemplary behaviour in order to protect themselves from allegations of misconduct. The Code of Conduct for Staff Working with Under-18s below provides clear guidelines for staff and should be adhered to at all times

CODE OF CONDUCT FOR STAFF WORKING WITH CHILDREN UNDER 18

The BSC Code of Conduct is in place to protect students under 18 in our care. It equally provides protection for BSC staff working with children under 18.

The law in England and Wales identifies a child as a person under the age of 18 (Safeguarding Vulnerable Groups Act 2006). In Scotland this is also the case under the Protection of Vulnerable Groups (Scotland) Act 2007.

Relationships with students

- Maintain a professional relationship with students at all times.
- Sexual activity with or directed towards under 18s by an adult in a position of trust is a criminal offence (Sexual Offences Act 2003).
- Do not socialise with students under 18 outside your working hours unless you are on a scheduled activity or work-related mission.
- Report any inadvertent/inappropriate/accidental conduct as soon as possible.
- Do not put yourself in a compromising position.

Staff contact with students

Electronic and 'social' contact with students under 18 (phone, text, email, social networking forums, photos, gaming sites, 'clans' etc.)

Staff working with children (under 18s) must 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 or social networking sites, blogs, web pages, gaming sites or instant messaging services with under 18s.

- post photos or videos of students under 18 on any social networking sites without official prior permission from senior managers.
- distribute (by any means) images or information about students of any age.

Staff working with children (under 18s) must:

- avoid becoming personally involved in a student's personal affairs.
- be aware that their personal web profiles can be viewed by anyone and therefore should be especially cautious about their public web profiles and privacy settings.

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.

Duty to report

Staff has a duty to report any allegation or suspicion of inappropriate contact with under 18s to line/senior managers.

Failure to comply

Non-compliance with the policy on contact with students under 18 will result in disciplinary procedures.

Employers have a duty as well, and will remove an individual from regulated activity where there is risk of harm to children.

Employers have a 'duty to refer' the suspicion or allegation of an individual engaged in regulated activity having inappropriate contact to external authorities* where there is risk of harm to children.

*(DBS, PVG, local police, local Child Protection authorities)

Physical contact with students

- Staff should avoid all unnecessary physical contact with under-18s at all times.
- On rare occasions staff may need to use physical intervention to control or restrain pupils to prevent them from injuring themselves or others, however physical intervention must only be used as a last resort.
- In the event that a child is hurt, injured or upset; staff are encouraged to act with caution and to exercise common sense when deciding on their course of action. Whilst the Care Commission have advised that there is currently no legislation in place which forbids a member of staff from consoling a child (e.g. putting an arm around the shoulder of an upset child) or assisting a child who has hurt themselves (e.g. cut their knee), it is expected that the member of staff will act professionally in all circumstances.
- BSC strongly advise all staff to always ensure that a second staff member/colleague is present when dealing with an injured or upset child. Such policies exist to protect the interests of both our staff and clients.
- In the case of a medical emergency, the appointed first-aider should be contacted.
- In the case of demonstrating something that involves touching a student (i.e. sports), tell the student exactly what you are going to do before you demonstrate.

Transporting under 18s

If you are accompanying under 18s by car (e.g. to the hospital), make sure another person is with you. If this is not possible, make sure the child is seated in the back of the car.

Privacy

Never put yourself in a position where you will be alone with an under 18. Make sure someone else is present. If you need to talk to a student privately, use a quiet corner of a public space (e.g. the refectory or common room)

Never enter students' accommodation on your own.

Teaching one-to-one

In a classroom situation where there is a one-to-one teaching environment the classroom door should be left open and the teacher should be in full view from the door. Managers should make occasional 'walk by' checks.

Alcohol and drugs

- No alcohol or drugs are permitted on campus.
- Never consume alcohol with under-18s or buy alcohol for them.

Appropriate language

- Never swear in front of students.
- Teachers should not teach swear words in class.
- Challenge inappropriate language from students.
- Select suitable topics when teaching under-18s. If in doubt, seek advice from your line manager.
- Ensure that any films or material shown to children and young people are age appropriate.
- The use of inappropriate language whilst on duty is not acceptable and in the most serious of cases may lead to disciplinary action.

Radicalisation

BSC will not tolerate extremist views of any kind in the school, whether it is from students, staff or external sources.

All staff must be fully engaged in being vigilant about radicalisation; you must overcome professional disbelief that such issues will not happen here and ensure that our students are safe from harm. Our Preventing Extremism and Radicalisation Policy must be read, understood and referred to by all staff.

Equality

BSC respects everybody irrespective of age, gender, nationality, race, religion and sexual orientation. Please demonstrate cultural sensitivity and awareness at all times.

Whistle blowing (the mechanism by which a person can voice their concerns, made in good faith, without fear of repercussion).

Staff must report any behaviour by colleagues that raises concern regarding under-18s regardless of the source and understand that their concerns will be taken seriously.

Staff proven to be in non-compliance of the code of conduct may face disciplinary procedures.

Online

We understand that students will spend time online as it can be a great way to socialise, explore and have fun. Staff must not socialise online with students in a personal capacity, during or after employment with BSC. BSC can help students 'keep safe' when online by ensuring that they follow the guidelines as stated in the student handbook. Students must;

- Make sure they know who they are speaking to
- Never give out personal details
- Never arrange to meet someone they don't know
- Never look at images or content that make them feel uncomfortable
- Never engage in Bullying
- Limit their time online – they are here to speak English!

If they have any concerns about the above they must tell a member of staff immediately

BULLYING

We recognise that bullying is an international problem and we aim to take steps to prevent the incidence of bullying in our centres. BSC does not tolerate bullying in any form. Bullying is deliberate, hurtful behaviour. It is often repeated and it is difficult for those being bullied to defend themselves.

There are three main types of bullying:

- Physical; hitting, kicking, taking belongings
- Verbal; name-calling, insulting, racist remarks
- Indirect/emotional; spreading nasty stories, excluding from groups—including on social media

3.1 Profile of a bully

- They are often attention seekers. They will establish their power base by testing the response of the less powerful members of the group, watching how they react when small things happen.
- They find out how the teacher/staff member reacts to minor transgressions of the rules and wait to see if the 'victim' will complain. It is important that staff is vigilant and consistent.
- They may bully because they believe they are popular and have the support of others.
- They keep bullying because they incorrectly think the behaviour is exciting and makes them popular.

3.2 Recognising signs of bullying; profile of a victim

- They often have poor social skills
- They lack the confidence to seek help
- They don't have the support of the teacher/staff member or classmates who may find them unappealing
- They blame themselves and think it's their own fault
- They are desperate to 'fit in'
- It is unlikely that they will seek help

3.3 What can we do to prevent bullying?

- The students' environment must be free from ridicule, harassment and isolation
- Make sure students' possessions are not stolen from classrooms/bedrooms
- Make sure learning and activities take place in a supportive environment
- Encourage the 'telling of tales'
- Ensure students can report bad behaviour without fear of retribution
- Notice when a student is isolated and sad
- Ensure basic codes of behaviour are enforced
- Don't encourage the victim to ignore it or hit back
- Take action immediately if bullying is suspected – tell your line manager

3.4 Taking action against bullies

- Isolate the bully and inform the staff member responsible for child protection
- Ensure they know why they are being excluded
- Tell the bully to reflect on why he/she is being excluded
- Tell them to write a letter home explaining why they have been isolated
- Provide a safe place for the victim and ensure a senior staff member is available to listen
- Concentrate on the immediate problem
- Ask peers to help the victim
- Ensure the Group Leader is aware of the problem and gives support to the victim and any action you have taken
- Contact BSC Safeguarding Officer who will advise you on what subsequent action to take. (*See 'Bullying Notice' for classroom display)

WHAT IS ABUSE?

Child Abuse

A term to describe a range of ways in which people, usually adults, harm children. Often the adult is a person who is known and trusted by the child.

Child abuse includes neglect, physical injury, sexual abuse or emotional abuse inflicted or knowingly not prevented, which causes significant harm or death. (NSPCC 1999)

Awareness of Actual or Likely Abuse

Cases of abuse may become apparent in a number of ways:

- A child may tell someone they are being abused
- Someone else may disclose that a child has told them, or they believe a child is or has been abused

Recognising Signs of Abuse

- A child may show signs of physical injury such as bruising, with no satisfactory explanation for its cause
- A child's behaviour may indicate that it is likely he or she is being abused (like being emotionally withdrawn or aggressive or showing sudden changes in behaviour or performance)
- A member of staff's behaviour or way he/she relates to a child may cause concern

Duty to Report the Disclosure of Abuse or Allegation of Abuse

- It is the legal duty of BSC staff to report disclosure or allegation of abuse.
- It is not for staff to decide whether or not a suspicion or allegation is true.
- All suspicions or allegations of abuse must be taken seriously.

CHILD PROTECTION PROCEDURES

BSC staff will follow the procedures set out below:

- Ensure that all staff know the name of the local staff member responsible for child protection
- Ensure all staff understand their responsibilities of being alert to the signs of abuse and responsibility to refer any concerns to the staff member responsible for child protection
- Remember that staff are not trained to deal with situations of abuse or to decide if abuse has occurred
- Be aware of relevant local agencies and co-operate as required regarding child protection matters arising (see 'Local Safeguarding Children Boards' list of contacts)
- Keep written records of concerns about children and ensure they are kept securely
- Follow procedures where an allegation is made against a member of staff or other adult

WHAT TO DO IF ABUSE IS SUSPECTED OR DISCLOSED

What to do	What not to do
Stay calm.	Don't panic. Don't over-react. It is unlikely that the child is in immediate danger.
Listen, hear and believe.	Don't probe for more information. Questioning the child may affect how the child's disclosure is received later.
Give the child time to say what they want to say.	Don't make assumptions, don't paraphrase and don't offer alternative explanations.
Reassure and explain that they have done the right thing in telling you.	
Explain that only people whose job it is to deal with these situations will be informed.	Don't promise confidentiality, or to keep secrets or say that everything will be OK. (It might not.)
Act immediately in accordance with the procedure in this policy.	Don't try to deal with it yourself.
Record in writing what was said as accurately as possible and as soon as possible.	Don't make negative comments about the alleged abuser. Don't 'gossip' with colleagues about what has been said to you. Don't make the child repeat the story unnecessarily.
Report to the Safeguarding Officer at your centre, school or BSC Central Office. Report to your Local Homestay Organiser and Centre Manager if the suspicion or disclosure involves a homestay host or other adult in the home.	
Record your report.	

REPORTING SUSPECTED, ALLEGED OR ACTUAL INCIDENTS OF ABUSE

The welfare of the child must be paramount and you have a legal duty to report suspicions, allegations or actual incidents to the designated member of staff at your centre/school, who will then take the appropriate course of action as detailed here.

If the allegation is about a member of staff, senior staff or the safeguarding officer all staff and students must be aware that they can report directly to the Safeguarding Officer at Central Office.

If reported to staff at centre then, in the first instance, the designated member of staff must report to the Safeguarding Officer at Central Office. If you are unable to reach him, report to a BSC Operations Manager.

If the suspicion, allegation or actual incident involves a homestay host or other adult in the home, you should report to the local organiser or accommodation officer and inform head office that you have done this.

If the allegation concerns another under 18 then staff must be aware that both students require support during any investigation.

Once your initial report has been made the designated member of staff may be instructed to consult with the relevant statutory safeguarding agency (please see 'Local Safeguarding Children Boards – BSC Summer Centres')

The following information may be required:

- Staff name, address, telephone number, position/role at BSC. As many details as possible about the child, e.g. name, date of birth, address (centre/homestay address, home country address), passport/identity card number, group leader name and telephone number.
- What the reasons are for telephoning, e.g. the suspicions, allegations, what has been said, details of times and dates, the child's emotional state. Make it clear what is fact and what is opinion or hearsay.
- What has been done so far.
- Where possible confirm this in writing within 24 hours and record the name of the contact who took the referral.

The statutory agency will then give you instructions as to what to do next and will take responsibility for any further action. Keep head office informed at all times of any developments.

Thank you for taking the time to read this policy. Please keep it in a place where you can refer to it easily.