



Richard Language College Safeguarding Policy

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Section 1 Safeguarding Policy Statement 2018

Section 1.01 Context

Richard Language College, 43-45 Wimborne Road Bournemouth BH3 7AB.

Student population ages 12-17 and 18+. Homestay accommodation is provided through the College Accommodation & Welfare Department.

For CLAS programmes (12-17) a full afternoon activity programme is provided. The Integra (16-20) programme is full day education with some optional activities. The General English programme (16+) is full day education with optional activities.

This document applies to all adults working with children – that is but not exclusively RLC staff, National Group Leaders and Homestay Hosts.

This document serves to cover both Safeguarding and Child Protection. Safeguarding or looking after children includes Child Protection which is protecting under 18s from direct harmful actions.

The College's Designated Safeguarding Lead (DSL) is Phil Williams (Academic Management) and the Deputy DSL is Eg Aberson (Academic Management).

The Designated Safeguarding Officers (DSO) are Amanda Powis (Client Services Manager) and Debbie Castle (Accommodation and Welfare Officer)

Section 1.02 Terminology

Abuse: Child abuse happens when a person – adult or child – harms a child. It can be physical, sexual or emotional, but can also involve a lack of love, care and attention. Neglect can be just as damaging to a child as physical or sexual abuse.

Adult: One who is aged 18 years or more and, for our purposes, is assumed to have substantial or unsupervised access to children and vulnerable adults.

Child: The UN Convention on the Rights of the Child defines a child as everyone under 18 (Office of the High Commissioner for Human Rights, 1989). The UK has ratified this convention so anyone under the age of 18 in the UK is a child irrespective of their status in their own country.

Child protection is the protection of children from violence, exploitation, abuse and neglect and forms a part of Safeguarding.

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. Safeguarding means: protecting children from abuse and maltreatment, preventing harm to children's health or development, and ensuring children grow up with the provision of safe and effective care.

Young person: At Richard Language College children aged 16 & 17 may integrate more with those aged 18 and over and are allowed freedom and responsibility appropriate to this age. The term Young person is used to distinguish them from under 16 year olds. There is, however, no distinction in law between them and under 16 year olds. A Young person is still a child.

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Vulnerable adult: A vulnerable adult is defined as one “who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”. (The Care Act 2014). This definition includes for our purposes those rendered vulnerable by unfamiliarity with this country and a restriction in their ability to communicate or understand.

Section 1.03 Statement

Richard Language College has a duty of care to safeguard all children and 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.

Richard Language College 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 when visiting our centre.

We will do this by:

- Developing a culture of trust and responsibility within the organisation
- Ensuring our staff are carefully selected
- Taking all reasonable steps to ensure the health, safety and welfare of any child or vulnerable adult in contact with the College
- Not physically, emotionally or sexually abusing an child or vulnerable adult in contact with Richard Language College
- 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 and safety
- Taking all reasonable steps to prevent any staff member, person working for us or member of the public from physically, emotionally or sexually abusing any child or vulnerable adult
- Allowing all staff to make informed and confident responses to specific child protection issues
- Reporting to the appropriate manager any evidence or reasonable suspicion that a child or vulnerable adult has been physically, emotionally or sexually abused in contact with Richard Language College
- Referring to statutory authorities any incidents of this nature reported to senior staff
- Implementing this policy in conjunction with the health and safety guidelines
- Ensuring that all visitors and interested parties are aware of this policy and have access to copies
- Providing children with appropriate safety and protection while in the care of the Richard Language College

Section 1.04 Under 18s Entitlement

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 and Homestay hosts and any other adults (e.g. coach drivers etc.) working with children and vulnerable adults, whether paid or unpaid, have a responsibility to report concerns to the appropriate officer.

Section 1.05 Adults' responsibilities

It is the responsibility of all adults working with or having contact with under 18 year olds to safeguard them. They must be vigilant for any signs or symptoms of abuse and they must know to report any concerns or allegations to the Designated Safeguarding Team (DSLs) within the College or the Local Safeguarding Children Board (LSCB), NSPCC or Police {for full list of contacts see pp19/20}.

It is also their responsibility to have undergone Basic Safeguarding Training (Online). (see Section 4 Training - p29 <https://galleryteachers.com/service/safeguarding-basic-awareness-course/>)

Section 1.06 Associated Policies (available on www.rlc.com or in Appendix)

- Absence Policy
- Exclusion policy
- First Aid Policy
- Laws in the UK
- Parental consent form (under 18s)
- Prevent Policy
- College Rules for under 18s

Section 1.07 Review:

This policy will be reviewed on an annual basis or following any incident or any change in legislation by the Designated Safeguarding Leads (DSLs) – currently Principal (1) and Academic Manager (2). The review will involve feedback from DSOs and any other adults or under 18s who have been involved in the previous year

Section 1.08 Roles and responsibilities

This policy recognises that all, including the under 18 year olds themselves, have responsibilities in this field. Under 18s should watch out for their fellow under 18s for signs of distress, altered behaviours, and so on and raise their concerns with a trusted adult.. Adults including Designated Staff have a responsibility for observing the Codes of conduct and being equally alert to any

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behavioural changes and reporting any concerns or allegations to the Designated Staff or the relevant agency.

Section 1.09 Documents & legal framework

- British Council guide to writing a safeguarding policy
- Sexual Offences Act 2003
- Sexual Offences Act 1997
- Health and Safety of Pupils on Educational Visits, DfEE 1998
- The Office of the Children’s Commissioner’s Inquiry into Child Sexual Exploitation in Gangs and Groups 2012
- The Children Act (1989) and (2004)
- Safeguarding Vulnerable Groups Act 2006.
- United Nations Convention on the Rights of the Child
- Working Together to Safeguard Children (2013, 2015) 2018
- Keeping Children Safe in Education 2018

Section 1.10 Policy availability and formats

This policy is made available to all adults working with children both in and out of the College. It is available in .pdf format.

It is also available in .pdf format on the College website: www.rlc.co.uk/

A condensed version is made available to staff, hosts and group leaders

Section 2 Code of Conduct for all Adults

Section 2.01 Overview and principles

It is the aim of Richard Language College to create a happy, safe and trusting environment in which each individual irrespective of age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity can thrive and progress toward their full potential as a human being. Part of this is the need to protect both under and over 18 year olds from any behaviours intentional or unintentional which might be misunderstood or harmful.

Section 2.02 Position of Trust (Sexual Offences Act 2003)

It is important for all adults working with children (Juniors and Young Adults) to understand that this law covers 'Abuse of a position of trust' and considers all children under the age of 18 as minors in this case.

Abuse of 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'. Such a scenario is gross misconduct and the individual may be committing a sexual offence.

A copy of the Sexual Offences Act can be provided to you or found online at <https://www.legislation.gov.uk/ukpga/2003/42>

Section 2.03 Standards

This code of conduct must be followed by all Richard Language College employees, clients, contractors and third party suppliers over the age of 18.

Section 2.03.i Dos and Don'ts for Working with Children

Do:

- Remember the child's welfare comes first
- Behave professionally
- Treat everyone with respect and communicate at their level
- Listen to children
- Be aware of policies and procedures
- Report any suspicion within Richard Language College guidelines
- Be aware, approachable and understanding
- Observe the College dress code

Do Not

- Touch inappropriately
- Use inappropriate language or bad 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

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- Force a child to do something they do not want to do
- Let a child expose him/herself to danger
- Take photos or videos of children without the consent of Richard Language College senior staff and, therefore, their parents
- Smoke, drink alcohol or take drugs in the presence of under 18s.
- Show favouritism

Remember – you should set an example of good behaviour – be an excellent role model.

All under 18 students must remain under varying degrees of supervision depending on their age of Richard Language College staff or nominated persons who have undergone a similar screening process that can be sufficiently evidenced while on College activities or College property or at their Homestay hosts. (See 'What they may do')

Section 2.03.ii Risk Assessments

The College will conduct Risk Assessments and regularly review these for all activities conducted by the College and on the premises with particular reference to under 18 year olds.

Section 2.03.iii Absence

Students under 18 are identified on the attendance sheet by the age being in contrasting colours. Teachers are required to inform Reception of any missing students within 15 minutes of the lesson starting. Students on CLAS and Integra programmes will have a Group Leader checking the classes within 10 minutes of the lesson beginning for any absent students under 18. Accommodation and Welfare will then follow up the missing student with the homestay host or the student themselves. (see Appendix B).

Section 2.03. iv Supervision ratios etc.

Students under 16 will be supervised throughout activities and excursions on a minimum ratio of 1:20. In some cases this will be increased to meet increased risk. International Group Leaders will only be responsible for their own group of students while on excursions. Activity Leaders will deal with those international students without their own International Group Leaders.

Section 2.04 Interaction between adults and under 18s.

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
- Slap a child
- Hold a child in such a way that it causes pain, or to shake them
- Physically restrain a child **except** to protect them from causing harm to themselves or others
- Take part in noisy, rough behaviours or rough games
- Allow or engage in inappropriate touching of any kind
- Do things of a personal nature for children that they can do for 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

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- Give or show anything to a child that could be interpreted as being pornographic
- Seek or agree to meet a child outside of their visit/stay with Richard Language College without the 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 with Richard Language College without the full prior knowledge and consent of Richard Language College and the child's parents/guardians

You should provide an excellent role model, be positive and use praise and be even-handed when dealing with under 18 year olds and be vigilant to any signs of abuse.

Section 2.05 Standards of dress

The College has a Dress Code for staff. This should be adhered to by all staff within the College. Presenting oneself appropriately will earn the respect and trust of the students. (See Appendix D)

The Dress Code does not apply strictly to activities but the rule of presenting oneself **appropriately** still applies.

In the accommodation situation the watchword is again 'appropriate' especially at night time. What one might wear if alone in the house cannot be the same if you have a guest, especially an under 18 year old guest. This is, for example, ensuring that at minimum you wear a dressing gown over your night attire if leaving your room when you might encounter a student. For example ensuring you are fully dressed when moving between bathroom and bedroom after bathing or showering.

Similar standards of appropriate dress should apply to students.

Section 2.06 Alcohol, drugs and smoking

Smoking in the school buildings or being under the influence of drugs or alcohol on the premises is strictly forbidden.

There is a designated smoking area provided and staff and students who may legally smoke under UK law are encouraged to use this if they smoke.

The use of drugs, alcohol or smoking is not acceptable in the presence of under 18s whether in school or on activities.

The law in the UK is that individuals over the age of 16 may smoke but may not buy tobacco products until they are 18.

Alcohol consumption in the UK is governed by strict laws.

It is against the law:

- *To sell alcohol to someone under 18 anywhere.*
- *For an adult to buy or attempt to buy alcohol on behalf of someone under 18.*
- *For someone under 18 to buy alcohol, attempt to buy alcohol or to be sold alcohol.*

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- *For someone under 18 to drink alcohol in licensed premises.*
- *For an adult to buy alcohol for someone under 18 for consumption on licensed premises, except as above.*

Illegal Drugs and drinking

If there appears to be illegal drinking in or around our College, or you see anyone apparently taking drugs, giving them to others or being given them you should:

In the event that they are a student

- Immediately deliver them to the relevant Manager
- Complete a detailed concern report
- Be alert and aware to any other similar incidents amongst their peers

In the event that they are a member of the public whether on the premises with reason or without.

- Not apprehend the person but...
- Stay within reasonable distance as a barrier between them and the children
- Usher away any students discreetly
- Contact your line manager
- Contact the police

In the event that they are a staff member

- Similarly to that of the above scenario, stay within reasonable distance, preventing them from contact with any students
- Immediately contact their line manager

Section 2.07 Online safety

The College has a number of PCs which are only used by under 18s under teacher supervision. However, most students have their own device which allows them open access to the internet unless their parents have installed parental controls.

- Adults must in no circumstances seek or agree to have any electronic form of contact with a child during or after their visit/stay with Richard Language College without the full prior knowledge and consent of Richard Language College and the child's parents/guardians

We inform all under 18s of the following:

It is against the law to make, pass around, have or show any sexual images of anyone aged under 18, even if it was created with the permission of that young person.

If someone is pressuring a student to do this to do this, they must tell the DSL.

There is essential and personal information that should never be shared online such as address, photos and video footage.

- 1) Personal information must never be posted online – such as addresses, email addresses or mobile numbers.

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- 2) Careful thought should be given before a student posts pictures or videos of themselves. Once they have put a picture of themselves online most people can see it and may be able to download it, it is not just theirs anymore.
- 3) They should keep their privacy settings as high as possible
- 4) They should never give out your passwords
- 5) They should not make friends with people they do not know online
- 6) They should not meet up with people they have met online. They should speak to their parent or carer about people suggesting they do
- 7) They should remember that not everyone online is who they say they are
- 8) They should think carefully about what they say before they post something online
- 9) They should respect other people's views, even if they do not agree with someone else's views it does not excuse being impolite.
- 10) If they see something online that makes them feel uncomfortable, unsafe or worried: they should leave the website, turn off their computer if they want to and tell a trusted adult immediately.

Section 2.08 Accommodation

Privacy. Under 18 students have the right to privacy in both the bedroom and the bathroom. Also see Sections 2.2, 2.3,2.4,2.5 & 2.6.

- Hosts will have an initial inspection and subsequent re-inspections of their home. During this inspection, the host will be home and will meet and be interviewed by the Accommodation Visitor
- Hosts will provide an original copy of their identification which will be checked by our Accommodation visitor.
- DBS Checks - for details see Section:
- All adults present in the household must sign a declaration that they are fit and proper persons to be with under 18 year olds..
- Homestay hosts cannot accommodate students under 18 years old before a DBS certificate has been received.
- Applicants with a criminal record will not be automatically deemed unsuitable for the role of accommodating students. The DBS will be reviewed by senior management and a judgement will be made on a case by case basis. The nature of the offence, its seriousness, the date it occurred and the frequency of any offences will all be taken into consideration. Disclosures will be discussed with potential hosts and clear records will be kept.

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- Hosts and any other adult in the household will sign a self-declaration 'Children's Act' form which will be kept on file. The host will be asked to declare if they, their partners or their children have had involvement with Children's services and if so to provide details of their involvement.
- All adults within the home will agree to and sign our code of conduct for hosting under 18s.
- All hosts (recruited after 1 Jan 2016) will provide two suitable references of good character. The references will be given in writing and verified either in person or by telephone.
- All hosts will have completed at least level 1 safeguarding basic awareness and 'prevent' training. We have a copy of their certificate on file.
- Hosts will have read this child protection policy and will provide verification they have read and understood it, e.g. a signed copy will be kept on file/an email verifying they have read and understood it has been sent and received.

Students under 16 years old should never be accommodated with students of 18 years or older unless part of the same school year group and previously agreed. If we suspect a host is breaking this rule and accommodating an older student from an alternative provider, we will immediately remove the younger student and will launch an investigation which may (if the complaint is upheld), result in the host being excluded as a provider.

Hosts are expected to be at home to greet students upon arrival. If a host is unable to meet the student at a group arrival, the College will send the under 18 by taxi to the homestay host having first established that they are at home to receive them.

No more than one student will be accommodated in the same bedroom unless specifically requested in writing by the College i.e.. the booking is confirmed as a twin booking.

Hosts are responsible for taking steps to ensure under 18s receive privacy when they use the bathroom or they are in their bedrooms.

They should be supportive and fair to all students, use appropriate language and show patience and understanding when dealing with all students/guests but especially with under 18s.

Hosts should maintain an open, tolerant, supportive and friendly environment within their home.

Hosts will take time to explain how their home 'works' including laundry routines, meal times and basic house rules.

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Hosts need to ensure that any entertainment shown in their house is age appropriate and not harmful in any way, so as to not cause any offence. This includes TV shows, movies, music and get-togethers or parties.

Although it is obvious, hosts and members of their household **MUST NEVER** engage in sexual activity or any kind of inappropriate touching with students under 18. According to the Sexual Offences Act 2003 any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law. **Any** incidents will be **immediately reported** to the police and the Local Authority Designated Officer (LADO).

Section 2.09 Transport

College based transport. The company car should be used to transport the student. If transporting one student that student should be seated in the rear seat - not alongside the driver.

If another vehicle urgently needs to be used in place of the company car it must have class 2 business use insurance and a current MOT. Otherwise a taxi must be used.

College booked taxis and coach companies only employ drivers who have been DBS (Disclosure and Barring Service) checked.

The parents of students under 16 must arrange for their journey to be supervised by the airline if the student is travelling unaccompanied. They must also arrange for the College to meet them at the airport or arrange them to be met by another responsible person.

Section 2.10 Whistleblowing

All adults (staff and Homestay hosts etc.) are legally obliged to inform the management of any concerns about colleagues not following the Code of Conduct or of any concerns regarding students or allegations from students.

Staff who report this (or any other problems) will (a) not be penalised and (b) their report will remain confidential.

Please note confidentiality applies to the whistle blower as well as management in terms of disclosing to friends and family and the like - it is not only to colleagues.

If you have any fears or concerns about this within the organisation, you may contact the NSPCC Whistleblowing helpline on 0800 0280285 or email help@nspcc.org.uk

Section 3 Child Protection

Section 3.01 Overview

Richard Language College recognises that:

- 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 working for Richard Language College have a responsibility to report concerns to the Designated Child Protection Leads. (DSL)

College policies with regard to the care of under 18s are required to be adhered to.

Section 3.02 Designated persons

Designated Safeguarding Lead (DSL)

24 hour DS Staff emergency line:

44 (0) 7712 965 925

Phil Williams (Academic Management)

Email: acadman@richardlanguage.eu

Tel. 01202 555932

Deputy DSL

Eg Aberson - Academic Management

office@richardlanguage.eu

tel. 01202 555932

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Designated Safeguarding Officers: (DSO)

Amanda Powis

Email: enrol@richardlanguage.eu

Tel: 01202 555932

Debbie Castle

Email: accomm@richardlanguage.eu

Tel: 01202 555932

NB If the subject of any allegation/concern is one of the above then it should be reported to the Designated staff not involved.

Section 3.03 When adults need to respond

Any adult noting something themselves or being told something by another person (Under 18 or above) or being disclosed to by the student themselves is responsible for reporting this to the DSL or in their absence a DSO.

If within the college, make verbatim notes using a 'Child Safeguarding Concern Reporting Form' should be completed. See Register or Reception or Staff room document racks. (see Appendix A)

If outside the college, for example as a Homestay host, make verbatim notes and contact the Designated Safeguarding Leads/Officers at the College.

Section 3.4 Definitions of Abuse

- Abuse is a violation of an individual's human and 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 the unintended consequences of a person's actions

Primary Abuse

The four main categories of abuse

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

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

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

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

Recognising possible signs of Abuse

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.

Signs of possible physical abuse

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games
- Injuries which have not received medical attention
- Reluctance to change for, or participate in, games or swimming
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation
- The child gives inconsistent accounts for the cause of injuries
- Frozen watchfulness

Signs of possible sexual abuse

- Any allegations made by a child concerning sexual abuse
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age
- Sexual activity through words, play or drawing
- Repeated urinary infections or unexplained stomach pains
- The child is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- Eating disorders such as anorexia or bulimia.

Signs of possible emotional abuse

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not mixing well with other children
- Sleep or speech disorders
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity
- Running away, stealing and lying

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Signs of possible neglect

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to
- Frequently hungry
- Overeating junk food

Section 3.05 Disclosure

Responding to Allegations or Suspicions

It is not the responsibility of anyone working in Richard Language College in a paid or unpaid capacity to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate authorities.

Richard Language College 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. (See B10 Whistleblowing)

If you notice any suspicious signs, report this to your line manager or the person responsible for welfare.

GUIDANCE ON HANDLING A DISCLOSURE FROM A CHILD

What should you do if a child comes to you and tells you that they are being abused? It's normal to feel overwhelmed and confused in this situation. Child abuse is a difficult subject that can be hard to accept and even harder to talk about. Children who are abused are often threatened by the perpetrators to keep the abuse a secret. Thus, telling an adult takes a great amount of courage. Children have to grapple with a lot of issues, including the fear that no one will believe them. So, care must be taken to remain calm and to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

Receive:

- Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.
- Accept what is being said without judgement.
- Take it seriously.

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Reassure:

- Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously.
- Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React:

- Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions.
- Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions.
- Do ask open questions like "Is there anything else that you want to tell me?"
- Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English.
- Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to. Refer directly to Phil Williams or Eg Aberson.
- Do not discuss the case with anyone outside the child protection team.

Record:

- Make some very brief notes at the time and write them up in detail as soon as possible.
- Do not destroy your original notes in case they are required by Court. (See DSL/DSOs for form if needed)
- Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang.
- Record statements and observable things, not your interpretations or assumptions – keep it factual.
- If there is, or seems to be, immediate risk to a child or children, contact the police directly. The parents/guardian or carers of the child will be contacted as soon as possible following advice from the relevant local authority department.
- The manager responsible should only notify other members of Richard Language College staff of events on a need to know basis, see confidentiality below.

Incidents that must be Reported / Recorded

If any of the following occur you should report this immediately to an appropriate member of Richard Language College staff and record the incident.

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- If you accidentally hurt a child or young person
 - If he/she seems distressed in any manner
 - If a child or young person appears to be sexually 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 parent/guardian should be notified of the incident at an appropriate time.
 - The accident/concern report should be completed.
 - A member of Richard Language College staff should be informed immediately.

Section 3.06 Records

Any records of concerns, allegations and disclosures and action taken will be retained securely and will only be accessible to the DSLs and any official outside agency involved.

The record of this will be held for 10 years or until the subject reaches State Pension Age, whichever is the longer. in line with NSPCC guidelines.

Storing records relating to adults:

Records relating to concerns about an adult's behaviour will be kept in the person's confidential personnel file (not in a central 'concerns log') and a copy should be given to the individual.

Retention periods: concerns about adults If concerns have been raised about an adult's behaviour around children, we shall keep the records in their personnel file either until they reach the age of 65 or for 10 years - whichever is longer (IRMS, 2016). This applies to volunteers and paid staff. For example: If someone is 60 when the investigation into the allegation is concluded, the record will be kept until their 70th birthday. If someone is 30, it will be kept until they are aged 65. These records must be kept for the same amount of time regardless of whether the allegations were unfounded.

However if it is found that allegations are malicious we shall destroy the record immediately.

Information should be kept for this length of time even if the person stops working or volunteering for the organisation.

adapted from [<https://www.nspcc.org.uk/globalassets/documents/information-service/child-protection-records-retention-and-storage.pdf>]

Section 3.07 In the case of allegation against adult(s)

- Ensure the child is safe, supported and reassured.
- Inform the DSL immediately (or the other DSL or a DSO if the DSL is the accused).
- When appropriate, return the child to their normal routine.

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- Ensure a clear written record has been made by using the Child Safeguarding Concern Reporting Form.(Available in Registers and from Reception and Staffroom)
- The DSL (or a DSO/other DSL if the DSL is the accused) must contact the relevant local authorities.
- The School Principal must contact the child’s parents, informing them of the allegation.
- Respecting confidentiality and professionalism at all times, take the accused out of regulated activity.
-
- Depending on the outcome, the School will follow standard disciplinary procedures if allegation is against a staff member.

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

- Report your concerns to the DSL or if not available the DSO, who should contact the local authority or the police as soon as possible.
- See below for the information that social services or the police will need.
- If the relevant manager is not available, the person being told of or discovering the abuse should contact social services or the police immediately.
- The local authority and the person responsible for welfare or relevant line manager will decide how to involve the parents/carers.
- Maintain confidentiality, disseminating information on a need-to-know basis only.

Allegations of previous abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child, or by a member of staff who is still currently working with children).

Where such an allegation is made, the College will follow the procedures as detailed above and report the matter to the local authority or the police. This is because other children, either within or outside the organisation, 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. This is reinforced by the details of the Protection of Children Act 1999.

Section 3.08 In the case of an allegation against a child

- Ensure **all** children are safe, supported and reassured.
- Inform the DSL immediately.
- When appropriate, return the children to their normal routine.
- Ensure a clear written record has been made by using the **Child Safeguarding Concern Reporting Form**.
- Respecting confidentiality and professionalism at all times, ensure the accused is safe and monitored.
- The accused must be supported at all times by a DSO/L.

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- Gather as much factual evidence as possible from the accused, remaining neutral and not making any accusation.
- Ensure a clear written record has been made by using the Child Safeguarding Concern Reporting Form.
- The DS Staff must contact the relevant local authorities these being:
- Local authority children's social care (For all referrals to Children's social care, the child should be regarded as potentially a child in need, and the referral should be evaluated on the same day that it was received. A decision must be made by a qualified social worker within one working day about the type of response that is required.) and:
- The designated officer(s) (LADOs) for child safeguarding concerns (all cases which concern a staff member),
- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
- Police (cases where a crime may have been committed).
- The School Principal must contact both children's parents, informing them of the allegation.
- Depending on the outcome, the College will follow standard disciplinary procedures

Action if bullying is suspected

If bullying is suspected, the same procedure should be followed as that 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. Help the victim to speak out and tell the person in charge or someone in authority.
- Investigate all allegations and take action to ensure the victim is safe.
- Speak to the victim and 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 DSL or if not available the DSO.

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 College will inform the parents/guardian of the bully(ies) and of the victim(s).
- The College will impose sanctions as necessary.
- Encourage and support the bully(ies) to change their behaviour.
- The College will hold meetings to monitor progress.
- The College 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.

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- Further incidents of bullying may result in the bully(ies) being sent home (see discipline policy).

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 the 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 opinion or 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/guardian 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 said
- Whether anyone has been alleged to be the abuser, and if so, the relevant details
- Where possible, referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact social services (Bournemouth: 01202 458101 / Poole: 01202 735046) or the police direct (01202 222222), or the *NSPCC Child Protection Helpline on 0808 800 5000, or ChildLine on 0800 1111.*

Confidentiality

Confidentiality shall be maintained at all times. Information shall be handled and disseminated on a need-to-know basis only. The matter **must not** be discussed with family, friends or colleagues other than those listed below:

This includes the following people:

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

Social services will advise on who should approach the alleged abuser. This will rarely be someone from the company itself.

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Information will be stored in a secure place with limited access to designated people, in line with data protection laws (e.g. the information must be accurate, relevant, secure and, where necessary, regularly updated).

Section 3.09 Child sexual exploitation (CSE)

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs..

Child sexual exploitation is a hidden crime. Young people often trust their abuser and do not understand that they are being abused. They may depend on their abuser or be too scared to tell anyone what is happening.

It can involve violent, humiliating and degrading sexual assaults, including oral and anal rape. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Child sexual exploitation does not always involve physical contact and can happen online.

Child sexual abuse online (See Section 17 B7)

When sexual exploitation happens online, young people may be persuaded, or forced, to:

- send or post sexually explicit images of themselves
- take part in sexual activities via a webcam or smartphone
- have sexual conversations by text or online.

Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity.

Images or videos may continue to be shared long after the sexual abuse has stopped.

Section 3.10 Female Genital Mutilation (FGM)

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision or cutting.

Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It is dangerous and a criminal offence.

There are no medical reasons to carry out FGM. It does not enhance fertility and it does not make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

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FGM is illegal.

FGM has been a criminal offence in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation.

Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.

Reporting requirements

Regulated health and social care professionals and teachers in England and Wales must report 'known' cases of FGM in under 18s directly to the police and the Designated Safeguarding Lead.

Honour based violence and Forced Marriage

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

Women and girls are the most common victims of honour based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

A forced marriage is one that is carried out without the consent of both people. This is very different to an arranged marriage, which both people will have agreed to. There is no religion that says it is right to force you into a marriage and you are not betraying your faith by refusing such a marriage.

[Section on Honour based violence from: https://safe.met.police.uk/crimes_of_honour/get_the_facts.html]

Any such incidents should be reported to the Police and the DSL

Concern Contacts - see Appendix E

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Section 3.11 Good Practice

Support to deal with the aftermath of abuse

Consideration should be given to the kind of support that children, parents/guardian 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, Fax: 01788 562189, E-mail: bac@bacp.co.uk, Internet: www.bacp.co.uk

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

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 accusation. 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 concern reports – any inappropriate behaviour of any nature should be recorded on a concern report

Use of photographic/filming equipment

Richard Language College staff are strictly prohibited from taking photographs or film footage of under 18 year old students unless authorised by a senior staff member. This includes taking photographs as keepsakes. Photographs and film footage may be required by Richard College Marketing Department for publicity purposes but permission from parents or guardians will have been obtained for this..

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

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 telephone calls.

Richard Language College staff are in a position of authority and, therefore, the relationships with the students is, and should remain, a professional one only. You are role models to the students and not friends regardless of age.

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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 the home, College 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.

Section 4 Training

The DSL (Designated Safeguarding Leads) will provide training for staff and Homestay Hosts who host under 18s..

All staff to take Level 1 (Basic Awareness). DSOs to take Level 2 Advanced and DSLs to take Level 3.

Frequency of Training

Level 1 training is delivered online. This will be supported by face-to-face training in-house. This will be done on a yearly basis..

Level 2 and 3 training will be delivered face-to-face primarily via English UK. This will be done on a two yearly basis.

Section 4.01 Recruitment and Training of Staff

All reasonable steps are taken to ensure unsuitable people are prevented from working with children.

Section 4.01.1 Pre-selection Checks

All adults working with children should provide two referees. References must be taken up in writing.

For staff applying to work at RLC those completing a successful interview will be subject to a List 99 check.

All staff working with children should complete an enhanced Disclosure and Barring Service (DBS) check application form.

On the decision to employ an individual a List 99 (barred list) check will be conducted. On receipt, usually within 24 hours, of a clear List 99 check a DBS will be commissioned. If the DBS is delayed, the prospective employee should sign a declaration that they have had no convictions or detail any they have had. Any delay in the provision of the DBS will result in the potential employee being limited in their contact with under-18s : i.e. under supervision of a DBS certified individual, with open door near main office or the start of employment being delayed or cancelled.

If the prospective employee has not provided the details to make the application, they will not be permitted to start work.

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- Homestay hosts will not be permitted to host under 18s until the main carer's DBS has cleared.
- **DBS returned showing a criminal record**
- If a DBS is returned and shows a criminal record, the following process will be followed.

Judgements will be made taking into account

- i. The seriousness and nature of the offences: in general, serious convictions for sexual, violent or drug offences will be particularly strong contra-indicators for work with children
- ii: Nature of appointment : for example drink driving convictions would not be especially relevant in a classroom but would be if the appointment involved transporting children
- iii Age of offence/s: a judgement balancing rehabilitation against child safety would be made
- iv Frequency of the offence/s – a series of offences over a period of time is more likely to generate cause for concern than an isolated minor conviction.

The disclosure will then be discussed with the applicant a) to establish it is correct and b) to discuss any other factors regarding the offence .

Non UK nationals Criminal records checks

In the case of non-UK nationals (Group leaders etc.) where a DBS or its equivalent is not available or obtainable additional care will be taken to confirm identity and establish that the individual is considered a suitable person to work with under 18s. (References etc.). For example, an assurance from the head of an organisation or school sending students to the UK in the care of certain individuals that they are satisfied that these individuals are satisfactory for that role. The College will then conduct its own online checks on those individuals involved. If the original of another country's police check is held by an agency or school, we would seek a letter confirming that the head of that organisation has seen it and that they are satisfied that the subject is a fit and proper person to work with under 18s.

Section 37 E8 Homestay checks

The College will commission an initial (enhanced) DBS certificate for the main carer for working at home with children. ~~and the Homestay host will subscribe to the Update system or the host will provide an original (enhanced) DBS of the same type but commissioned by another organisation and supported by the Update system.~~

The College will check the Homestay host. Since July 2017 the DBS commissioning body have made additional checks on any adult aged over 18 resident or frequently visiting the homestay location. ~~The subjects of these additional checks are not able to subscribe to the Update Service.~~ The other adults are checked against Police National Computer (PNC) records and if anything arises from this check we are informed and required to perform a full DBS on that individual. ~~Since January 2018 the main carers in the homestay applying for a DBS have been required by the College to subscribe to the DBS update system allowing the College to allow us check that the DBS status has not changed since the DBS was commissioned.~~

~~The update service applies only to the main carer and not the other adults in the household.~~

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The Accommodation and Welfare department holds a central record of all homestay hosts DBS obtained and at which stage in the process the DBS is.

The Academic department holds a central record of all other College employees' DBS status.

Section 4.01.2 Interview and Induction

All employees and volunteers will be required to attend an interview carried out to acceptable protocol and recommendations. During the recruitment process:

- The individual's identity should be verified and copies of proof of identity taken
- A check should be made that the DBS (Disclosure & Barring Service certificate) check application form has been completed in full. If applicant is from abroad, the equivalent check is required.
- 2 references will be required asking specifically about suitability to work with under 18s.
- Their qualifications should be substantiated where necessary.
- Interview will include questions on Safeguarding. (See Appendix C)
- Explanation of any gaps in c.v. will be sought
- If claiming Qualified Teacher Status (QTS), staff will be checked for being on the Prohibited list via the Teacher Regulation Agency (see Appendix E) and will be required to provide 3 of the following:
 - Full name (including any previous surnames used);
 - Date of birth;
 - National Insurance Number;
 - University/ITT Provider where you gained QTS;
 - Course you undertook to gain QTS
 - Teachers reference number;
- If an applicant is considered for employment an initial Barred list (List 99) check will be conducted.

In the case of a Homestay host a visit will be arranged and the necessary checks carried out by the Accommodation & Welfare department in conjunction with a DSL.

All employees should receive a formal or informal induction, during which they should receive, or be directed to, copies of the following documents, policies and procedures:

- Health & Safety
- Risk assessments
- Prevent Policy
- Company Employee Handbook
- Staff Notes for Guidance
- Relevant job description

The job description and responsibilities will also be clarified during this induction.

Section 4.01.3 Training

All College staff must receive training in child protection covering all aspects laid out in the child protection guidance. Access to additional training in relation to safeguarding and child protection must be available at all times. Staff should request such training as and when necessary.

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Richard Language College 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.
- This training to be repeated annually
- Senior coordinating staff to have sufficient and up-to-date knowledge on child protection legislation and issues.
- Relevant, nominated personnel to hold recognised and appropriate first aid qualifications.
- Staff to sign to say that they have read and understood this Safeguarding Policy and agree to the Code of Conduct.
- All staff will undertake an online training course from Gallery: <https://galleryteachers.com/course/safeguarding-basic-awareness-training-and-prevent/> And provide the certificate earned to the Academic Manager
- Further clarification on Safeguarding / Child Protection is given at induction.

Section 4.01.4 Disqualification by association

The minimum age for students at the College is 12 and disqualification by association does not apply.

Section 5 Welfare / Implementing Safeguarding

Section 5.01 Risk Assessments

Risk assessment are produced regularly to cover the premises where classes take place and any activities that students might attend.

These are issued to the Leaders and signed off and subsequently checked for any changes needed. They are also regularly reviewed by a member of the management team.

Section 5.02 Supervision ratios

The recommended ratios (DfEE) of 1:20 are adhered to and enhanced if the activity requires it.

The ratios will generally be higher as International Group Leaders can only supervise their groups and RLC employed Group leaders supervise non-Group students.

Section 5.03 Absence (see Absence policy)

All under 18s presence is checked at the beginning of the day and Reception informed within 15 minutes in cases of absence. Reception will then contact a) the student b) Homestay host to establish where the student is. In case of CLAS & Integra students their presence will be checked by an assigned member of administrative staff. In addition it is a requirement on all Register sheets for Reception to be informed within 15 minutes of an under 18 year olds non arrival. This latter is intended particularly for those 16/17 year olds on adult courses.

Risk assessments include procedures for students missing on excursions. Students under 16 must stay with a Group Leader (GL) at ALL times in manageable groups. If a student becomes lost: they should telephone GL / be telephoned by the GL who will direct them to a Landmark Meeting Point. A GL will be sent to meet them. If no contact, friends of the missing student should be asked

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where he/she was last seen and a GL should backtrack on the route to find the missing student. The College and the Police should be informed if the student is not found.

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Section 5.04 Welfare provision

The Accommodation and Welfare department is composed of the Client Services Manager, Accommodation Officer and Homestay Host Visitor.

The Client Services Manager (CSM) takes a lead role in this and the open office policy facilitates contact between the student body and Welfare staff.

All aspects of welfare are dealt with initially by this group. They provide assistance and support for medical matters, leisure programmes, accommodation issues and general welfare as well as providing a warm and personal welcome.

Section 5.05 First Aid and medical (See First Aid Policy [www.rlc.co.uk])

The College complies with the UK government First Aid at work requirements and has 2 qualified First Aiders and 2 appointed First Aiders.

First Aid kits are provided within the College and also on excursions to Group Leaders.

The College also assists students with illness to see doctors or pharmacists or in extremis to attend hospitals. The College provides support in terms of transport and language as well as arranging appointments.

Section 5.06 Behaviour and discipline (see Laws in the UK 2018 & Exclusion Policies & Absence Policies [www.rlc.co.uk] and Rules for Under 18s)

Students are expected to attend all lessons, be respectful and follow in house rules as well as UK law.

Section 5.07 Fire safety

Homestay hosts are expected to conduct a Fire Risk Assessment and review this annually. They are also expected to provide Smoke alarms within the home and provide an annual gas safety certificate.

Fire drills within the college are held monthly in the College but weekly after every intake in buildings occupied by under 18s.

Emergency lighting within the College is checked monthly

Reviewed: 12/04/2018 EA/CB : 24/07/2018 EA/CB : 31/07/18 EA/CB/KO : 17/11/2018 EA
Next review date: 24/07/2019

All systems are maintained and serviced annually.

Section 5.08 Airport transfers

Parents are expected to ensure that under 16s are in an airline child support scheme when they travel to the UK or are accompanied by a responsible adult and that they are met at the airport by a responsible person arranged by themselves or the College or, in other cases, such as groups, that they are escorted throughout the journey.

Students aged over 16-17 may travel independently with their parents' permission.

Section 5.09 E-Safety (see Section 2.9)

Advice on E-safety is included in Welcome documents.

Section 5.10 Radicalisation & Extremism

All adults concerned take the online Safeguarding & Prevent course.

The 4 core values (democracy, the rule of law, the freedom of the individual and respect for and tolerance of other beliefs and faiths) are essential within the College.

The teaching staff are Prevent trained and are encouraged to promote tolerance and respect and challenge extremist statements and views whenever encountered,

See **Appendix G** for Prevent Policy

Richard Language College understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations.

Section 5.11 More vulnerable students

The College is sensitive to disabilities and will endeavour to provide a safe environment for all students. The under 18's parental consent form asks specifically for information on this matter. The College staff are also sensitive to various disabilities and will alert the Accommodation and Welfare staff if any unexpected problem is detected.

Section 5.12 Private Fostering

It is College policy **not** to arrange homestay provision for students aged under 16 for more than 27 nights

Appendices

Appendix A: Child Safeguarding concern reporting Form

Please complete if there are any safeguarding issues that concern you about an under 18 student.
You must complete the boxes in **bold**; the other information can be filled in by Designated Staff

Date	
Student first name	
Student family name	
Gender	
Date of birth	
Nationality	
Group / individual	
Student ID	
Name of person noting concern	
Role/connection with school	
Date and time concern noted	
Location	
Concern <i>(please provide as much detail as possible)</i>	
<p>NB: If reporting a disclosure / allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more.</p>	
Signed	

This section to be filled in by the DS.

Do parents / group leader / agent / homestay / other need to be informed

Response to concern. **Response & follow up. By whom (full name) . When (date & time)**

Reviewed: 12/04/2018 EA/CB : 24/07/2018 EA/CB : 31/07/18 EA/CB/KO : 17/11/2018 EA

Next review date: 24/07/2019

Degree:

QTS:

TRIN/CAMB CELTA

Diploma

DBS: List 99 pre check Enhanced Current Children Passport

Safeguarding Qs

...how...attitudes to safeguarding developed over time?

...describe...procedures needed to protect children ?.....

..how ... deal with any concerns about a colleague..?

GEN

Reviewed: 12/04/2018 EA/CB : 24/07/2018 EA/CB / 31/07/18 EA/CB/KO

Next review date: 24/07/2019

		CONCL
IGE	<input type="text"/>	
Swiss	<input type="text"/>	
CLAS	<input type="text"/>	
Integra	<input type="text"/>	

Appendix D

Dress Code – Richard Language College

RLC works with people of all nationalities and religions and we must be very careful not to cause offence to anyone as this may deter students coming to the college. Agents and visitors see staff when they are at RLC so the dress code will operate during all opening hours. RLC want to project a professional image RLC also takes its responsibilities regarding health & safety in the work place very seriously and every effort must be made to prevent trip hazards which are a major cause of accidents in the work place.

Thank you for your cooperation.

Footwear

Shoes or sandals (not trainers or pumps) must be worn at all times (no bare feet) and the footwear should be “attached” to the foot i.e. not strapless, flip-flops or mule type footwear.

Women - Low heels, no stilettos.

Clothes

No shorts.

No jeans (of any colour)

Reviewed: 12/04/2018 EA/CB : 24/07/2018 EA/CB / 31/07/18 EA/CB/KO

Next review date: 24/07/2019

Your body should be covered at all times during RLC working hours. This includes shoulders, cleavage, back, and upper arms. No see-through tops covering bare arms etc. should be worn. These clothing items should be opaque.

Women - No leggings, jeggings or other tight fitting trousers are permitted.

Blouses/tops/shirts should come to the hip . No bare midriffs.

Dresses and skirts should be at least knee length, and no longer than to the top of the ankle

Other

Hair should be combed and look tidy

No tattoos should be visible.

No body piercings should be visible except for discreet ear ones and very discreet nose ones.

All clothes must be clean and ironed.

All clothes must be in a good state of repair, no rips or tears.

NB No chewing gum.

Appendix E: Local and National contacts

Richard Language College

24 hour Designated Staff emergency line: 44 (0) 7712 965 925

Phil Williams – Academic Management Designated Safeguarding Lead (DSL)

Email: acadman@richardlanguage.eu Tel. 01202 555932

Deputy DSL

Eg Aberson - Academic Management office@richardlanguage.eu tel. 01202 555932

Designated Safeguarding Officers: (DSO)

Amanda Powis Email: enrol@richardlanguage.eu Tel: 01202 555932

Debbie Castle Email: accomm@richardlanguage.eu Tel: 01202 555932

Local Area

Poole Local Area Designated Officers (LADOs)

Julie Murphy (01202 633694),

Reviewed: 12/04/2018 EA/CB : 24/07/2018 EA/CB / 31/07/18 EA/CB/KO

Next review date: 24/07/2019

John McLaughlin (01202 714677),
Jill Aiken (01202 714747)

Bournemouth LADO:

Laura Baldwin (01202 456744)

Social services

Bournemouth 01202 458101

Local Safeguarding Children Board (LSCB), Bournemouth Learning Centre, Ensbury Avenue,
Bournemouth, Dorset, BH10 4HG tel: 01202 458873 <https://bournemouth-poole-lscb.org.uk/>

National:

The NSPCC (National Society for the Prevention of Cruelty to Children) 0207 825 2500 Helpline: 0808
800 5000 www.nspcc.org.uk

ChildLine UK 0800 1111 www.childline.org

Samaritans: 08457 909090 www.samaritans.org.uk

Disclosure and Barring Service (DBS)

Teacher Regulation Agency (TRA) Employer.ACCESS@education.gov.uk

Appendix F: Legal duty to refer to the DBS: the two conditions that must be met

If you are a regulated activity provider or fall within the category of personnel supplier, you must make a referral when both of the following conditions have been met:

Condition 1

- you withdraw permission for a person to engage in regulated activity with children and/or vulnerable adults. Or you move the person to another area of work that isn't regulated activity.

This includes situations when you would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made.

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Next review date: 24/07/2019

Condition 2

You think the person has carried out 1 of the following:

- engaged in relevant conduct in relation to children and/or adults. An action or inaction has harmed a child or vulnerable adult or put them at risk or harm or;
- satisfied the harm test in relation to children and / or vulnerable adults. e.g. there has been no relevant conduct but a risk of harm to a child or vulnerable still exists or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

Relevant conduct in relation to children

A child is a person under 18 years of age.

Relevant conduct is:

- endangers a child or is likely to endanger a child
- if repeated against or in relation to a child would endanger the child or be likely to endanger the child
- involves sexual material relating to children (including possession of such material)
- involves sexually explicit images depicting violence against human beings (including possession of such images)
- is of a sexual nature involving a child

A person's conduct endangers a child if they:

- harm a child
- cause a child to be harmed
- put a child at risk of harm
- attempt to harm a child
- incite another to harm a child
- <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#legal-duty-to-refer-the-two-conditions-that-must-be-met>

Reviewed: 12/04/2018 EA/CB : 24/07/2018 EA/CB / 31/07/18 EA/CB/KO
Next review date: 24/07/2019

Appendix G: Prevent Policy

No	Involving	Policy	item
1	<p>Statement</p> <p>Richard Language College understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways shown below, after setting the context.</p>		Everyone
2	<p>Context</p> <ul style="list-style-type: none"> • Richard Language College accepts students aged 12 upwards all year from around the world. • In its busiest weeks it may have 200 students, 40 staff and work with 200 homestay providers • The College has always promoted a multi-cultural environment where respect for and tolerance of others beliefs is required • is located in Bournemouth with a multi- cultural local population 		Everyone
3	<p>Strong Leadership</p> <ul style="list-style-type: none"> • Responsibility for ensuring Prevent Duty is met lies with the Owner/ Board members. • Responsibility for the Prevent risk assessment / action plan (see point 4 below) and policy lies with the designated safeguarding lead. • Their duties are to ensure delivery of an effective risk assessment/ action plan and policy as outlined here. • 		<p>Lead person for Prevent</p> <p>Eg Aberson Patrice Leclerc</p>
4	<p>Risk Assessment of current situation and Action Plan for future</p> <ul style="list-style-type: none"> • A risk assessment / action plan has been produced showing what is already being done and what still needs to be done; it will be reviewed and updated at least annually 		Lead person

5	<p>Working with local partners</p> <ul style="list-style-type: none"> • Make and maintain contact with the local police/ local authority Prevent coordinator to understand their role and the support available, (e.g. via the Channel process) • Make contact with local authority to ascertain other useful local agencies • Develop local area Prevent links with other similar organisations • Share information with all local organisations as appropriate 	Lead person
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No	Policy item	Involving
6	<p>Understanding terminology</p> <ul style="list-style-type: none"> • Radicalisation: act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of mind • Extremism*: holding extreme political or religious views which may deny right to any group or individual. Can be expressed in vocal or active opposition to • Core British values: including <ul style="list-style-type: none"> (i) democracy (ii) the rule of law (iii) individual liberty (iv) respectful tolerance of different faiths or beliefs. <p>*NB: extremism can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as any religious extremism.</p>	<p>To be transmitted to staff, students, homestays, group-leaders and any other adults</p>

7	<p>Understanding risk of extremism</p> <ul style="list-style-type: none"> • Staff, students and other adults (group leaders, homestays etc.) may arrive at the College already holding extremist views. Or, whilst attending the College, they may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials (hardcopy or online), inspirational speakers, friends or relatives being harmed, social networks, and more • People who are vulnerable are more likely to be influenced • Their vulnerability could stem from a range of causes, including: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime or discrimination, and bereavement. 	<p>To be transmitted to staff.</p> <p>Foundation training courses online</p>
	<p>Ways to counteract risks</p> <ul style="list-style-type: none"> • Promote a safe and supportive international environment via clear expectations of accepted behaviours and those, including radicalisation and extremism, that will not be tolerated • Promote core British values through documents given to students, notices around the College via stand-alone classes on British culture and traditions on arrival and via curriculum. Approach is to educate that this is how things are in UK; although it may be different to your country. • Where possible, develop critical awareness and thought to counter accepting extremism without question, especially of online material • Challenge radical or extremist views in any context (formal or informal) via stated procedures. In most situations this would require an immediate response, referring to international environment of the College, and tolerance expected, then reporting concerns (see section 10) • Be ready to react when world or local events (e.g. Manchester attack) cause upset and the likelihood of conflicting feelings being expressed. Prevent lead to take initiative in these situations. • Have strong filters on IT equipment and clear rules on accessing extremist/ terrorist websites/ uses of social networks to exchange extremist/ terrorist views • Staff and homestays get to know students, their home circumstances and friendship groups, making it easier to spot changes in behaviour • Staff and homestays to be observant and vigilant in noticing any signs of radical or extremist behaviour • Welfare, all staff and homestays to work hard supporting any 	<p>Lead person to ensure:</p> <p>a) training for all staff, students, homestays, group leaders, sub-contractors so that</p> <p>b) delivery is</p>

8	students identified as vulnerable.	<p>effective</p> <p>Visiting speakers not permitted other than Police.</p> <p>Stay lengths 2018:</p> <p>2 wks or fewer</p> <p>518</p> <p>3-4 wks : 165</p> <p>5-9 wks: 91</p> <p>10+ wks : 46</p> <p>Flier provided to all hosts.</p>
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No Involving	Policy	item
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<p>9</p>	<p>Training</p> <p><i>(aim is to provide more knowledge and confidence to all. Generic online training can be provided by Education and Training Foundation. Police/local authority also provide free face-to-face training called WRAP – Workshop Raising Awareness of Prevent. Generic training must be supplemented by each ELT organisation giving their own information to stakeholders, ensuring everything fits their context)</i></p> <ul style="list-style-type: none"> • Documents and face-to-face training ensure staff understand this policy: <ul style="list-style-type: none"> a) context and expectations of Prevent b) their duty to implement the policy c) terminology and risks associated with radicalisation and extremism d) how to identify and support vulnerable students e) ways the College will counteract the risks <p><i>(sharing ideas and specific training may be required e.g. exactly how are core British values going to be promoted and critical awareness developed and encouraged? Maybe use role-plays to practice how to challenge extreme views calmly and firmly without getting dragged into argument)</i></p> <ul style="list-style-type: none"> f) signs to notice that may cause concern g) know the lead Prevent person and procedures for communicating concerns h) know the importance of their own behaviour and professionalism in <ul style="list-style-type: none"> i) being exemplars of British values, and ii) not discussing inflammatory subjects with students (Code of Conduct) • Training materials are adapted to ensure that homestay hosts understand the sections of the policy they need to be aware of. • Students and group leaders must be made aware of key parts of the policy: <ul style="list-style-type: none"> a) understanding terminology b) importance of maintaining a supportive and tolerant society in the [centre/ department] c) what core British values are and why they are considered important d) any changes to rules, particularly those regarding IT e) that they must report concerns/ incidents and understand the procedure to do so 	<p>Lead person to prepare materials to suit each group being trained;</p> <ul style="list-style-type: none"> a) all staff (including cleaners etc.) b) students c) homestays d) group leaders e) sub-contractors
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	<p>Signs that may cause concern</p> <ul style="list-style-type: none"> • Students talking about exposure to extremist materials or views outside the College. <i>(in this event, information must be shared with relevant local authorities)</i> • Changes in behaviour, e.g. becoming isolated • Fall in standard of work, poor attendance, disengagement • Changes in attitude, e.g. intolerant of differences/ having closed mind • Asking questions about certain topics (e.g. connected to extremism) • Offering opinions that appear to have come from extremist ideologies • Attempts to impose own views/ beliefs on others • Use of extremist vocabulary to exclude others or incite violence • Accessing extremist material online or via social network sites • Overt new religious practices • Drawings or posters (e.g. in accommodation) showing extremist ideology/ views/ symbols • Students voicing concerns about anyone <p>NB: Any concerns relating to a person under 18 are safeguarding issues and should be dealt with by safeguarding staff (if different from Prevent staff) and, where necessary, the LSCB contacted</p>	<p>Lead person to ensure all other adults are aware of signs</p>
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No	Policy	item
10	<p>Involving</p> <p>How and when to react to concerns</p> <ul style="list-style-type: none"> • Everyone given name of who to contact (lead person/persons), how to contact them (email, phone etc.) and contact details • Confidentiality assured for the person reporting a concern • Everyone told to report any concern or incident, however small. • Reassurance that all will be dealt with sensitively and carefully 	<p>Lead person to ensure everyone has necessary information</p>

11	<p>Policy preparation and review</p> <p>Policy prepared by Eg Aberson (after consultation with staff/ associated outside agencies) on 14/12/2015 Reviewed 05/06/2016 / 12/07/2017 / 06/05/2018</p> <p>Policy will be reviewed after 12 months or earlier if there are changes in relevant legislation or in response to any significant incidents or changes in circumstances</p>	Lead person(s)
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