**Safeguarding Policy**

**Introduction**

INTO University of Gloucestershire recognises our responsibility to protect children and vulnerable adults in the course of their studies at the centre. This policy has been compiled to ensure all staff, students and persons working with under 18 students are provided with a safe environment in order for them to carry out their duties, responsibilities and successfully complete their studies. All students and members of staff working within the centre are required to abide by this policy.

This policy is reviewed annually by the Student Welfare and Exams Manager and/or whenever a change of condition or requirement is made.

INTO University of Gloucestershire Student Welfare and Exams Manager and Student Experience Team provides welfare advice and guidance within the centre. They are in charge of the daily practical operation of safeguarding and where required reporting matters to the Centre Director, who is the designated safeguarding lead within the centre. If a member of staff has a concern, suspicion or belief that a safeguarding situation has arisen a report should be made to the Centre Director immediately.

Definitions

* A “child” refers to a person under the age of 18.
* A “vulnerable adult”, broadly speaking, is someone aged 18 or over and may need community support services because of a disability, age or illness.
* “Safeguarding” is used as a generic term meaning “looking after” someone; “child protection” means to protect someone under the age of 18 from direct harmful behaviour.

All children regardless of age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse. All persons working with under 18 students have a crucial role to play in helping identify welfare concerns, and indicators of possible abuse or neglect, at an early stage. It is expected that everyone working with under 18 students will raise concerns about a childs welfare or where there are indicators of possible abuse or neglect. We recognise that children cannot be expected to raise concerns in an environment where those working with under 18 students fail to do so.

INTO University of Gloucestershire will ensure all staff are provided with sufficient training and support in relation to safeguarding and child protection.

INTO University of Gloucestershire will provide this policy document:

* To new staff during induction.
* To homestay providers on every occasion a student under the age of 18 is placed with them.
* To prospective students and parents/guardians prior to application

<https://www.intostudy.com/en-gb/terms/university-of-gloucestershire>

* To contractors and volunteers prior to their start date.

Associated policies and documents

Other policies and documents, such as U18s policy, Child Protection Policy, Alcohol and Drugs Policy,Missing Student Policy, Staff Handbook may be referred to within this policy. They are available from the Student Welfare and Exams Manager or can be accessed on the Administration Network Drive.

**Code of Conduct**

INTO University of Gloucestershire does not tolerate inappropriate behaviour from staff, volunteers, homestay providers and students and believe everyone should be treated with respect and should not be subject to any kind of abuse. The below lays out guidelines and areas that all adults working with children and vulnerable adults at the centre need to be aware of in order to create a safe education culture and environment. More details can also be found in INTO Staff Handbook and Student Code of Conduct.

In all interactions with children and vulnerable adults, INTO University of Gloucestershire expect all staff, including homestay hosts, and students to:

* Respect people’s rights and their personal privacy;
* Use appropriate and respectful language;
* Be aware of and respect possible cultural differences;
* Challenge inappropriate or unacceptable behaviour and/or report such instances to the designated senior member of staff;
* Report any concerns, allegations or suspected safeguarding cases to the designated senior member of staff;
* Maintain professionalism and keep clear boundaries;
* Be aware of company guidelines and policies set out for protecting both staff and students.

Please note that this list is not exhaustive and all staff, volunteers, homestay providers and students should conduct themselves in a sensible and appropriate way in all circumstances.

Personal interaction

* Physical contact should be avoided and is usually considered unacceptable, except in some special cases, where consent is given in an open environment and the purpose is clear.
* If engaging in sporting activities, it should be in accordance with the national governing body (NGB) guidelines. More details can be found on <https://thecpsu.org.uk/help-advice/>.
* All staff and students should dress appropriately to avoid any misrepresentation or misinterpretation from others.
* Any contacts on social networks or social media platforms should maintain professionalism and clear boundaries. Please also refer to the Social Media Policy set out in the IUP Staff Handbook.
* Staff and students should not share accommodation or be involved in private social events.
* If alone with a child or vulnerable adult, doors should be kept open if possible and/or a room used which is transparent, for example see-through glass windows or doors.
* In situations where a member of staff does not feel comfortable or shows concerns at meeting a child or vulnerable adult alone, the meeting should be conducted with a third party present, ideally, either the Student Welfare and Exams manager or the designated senior member of staff.
* If circumstances require a member of staff to use their own vehicle with a child or vulnerable adult, the designated senior member of staff should be informed.
* If arranging taxis or coaches for children or vulnerable adults, certified companies and DBS checked drivers must be used.
* All staff and students should be aware of the rules and regulations around alcohol, drugs and smoking either on the premises, in accommodation or in other public areas, especially when there are children present. Further details can be found in INTO University of Gloucestershire Alcohol and Drugs Policy.

**Child Protection**

INTO University of Gloucestershire have implemented a Child Protection Policy, which details the following:

* INTO’s commitment to ensure that centres function with a view to safeguarding and promoting the welfare of children receiving education at the centre;
* The designated senior member(s) of staff with responsibility for child protection at the centre and their contact details;
* Definitions of abuse and procedures for identifying and reporting cases or suspected cases;
* How to deal with a child telling a member of staff about possible abuse, including allegations against another member of staff;
* How records are kept and being in line with data protection and confidentiality;
* Procedures and actions to take if a member of staff is accused.

**Training**

* INTO University of Gloucestershire will ensure all staff are provided with sufficient training and support in relation to safeguarding and child protection.
* All staff will receive a copy of this policy as well as Child Protection Policy.
* All staff will have information accessible to them regarding appropriate behaviour and conduct, which is also included in the IUP Staff Handbook.
* All staff will be provided with Level 1 Safeguarding and Prevent training either online or face-to-face. Designated Safeguarding Persons will be trained to Levels 2 or 3. Safeguarding and Prevent training at Level 1 will be updated every year.

**Safer Recruitment**

INTO University of Gloucestershire staff recruitment is the responsibility of relevant line management and is supported by HR for IUP UK. The processes undertaken aim to ensure all staff working in the centre will:

* Have appropriate and satisfactory\* DBS checks prior to their start date;
* Have been interviewed and their references checked as far as practically possible to a satisfactory level before start date;
* Have their identity checked before their start date;
* Have shown documentary evidence of their qualifications prior to their start date.

Furthermore, all offers of employment are conditional upon meeting the above requirements.

*\*In cases where the member of staff’s disclosure identifies that they have a criminal record, the centre director and/or designated senior member of staff will consult HR and make the final decision on whether the person is suitable for the post.*

In the rare circumstance that a member of staff does not hold an appropriate DBS check prior to their commencement of working with children/vulnerable adults, for example they are awaiting their result, they will have a Children’s Barred List check carried out to confirm their suitability to begin work.

**Welfare/Implementing Safeguarding**

INTO University of Gloucestershire aims to ensure that appropriate and suitable arrangements are in place for safeguarding children and vulnerable adults at the centre.

All students who are under the age of 18 upon arrival at the centre are met by a designated senior member of staff or another trained member of staff to explain what support arrangements are in place and what is expected from them.

INTO University of Gloucestershire has implemented detailed process and procedures to monitor the welfare of our students. In particular the Missing Student Policy and Procedure which also covers the processes should a student under the age of 18 not meet their curfew within homestay.

Risk assessments

INTO University of Gloucestershire ensures risk assessments for the below are carried out where appropriate and necessary and records are kept on file.

* INTO University of Gloucestershire centre;
* Fire Safety;
* In-house social activities and events;
* Off-site social activities, events and excursions;
* Group airport transfers by coach.
* Homestay accommodation
* Medical conditions that deem them as a vulnerable child or adult

Risk Assessments of the INTO University of Gloucestershire building and accommodation are undertaken by the University of Gloucestershire who the centre lease the buildings from. These are undertaken at annual or where there is a fundamental change to the building or activity carried out in it.

Supervision ratios

For any activity or event, risk assessments are carried out in advance and the number of students under the age of 18 or vulnerable adults will be identified. Staff in charge will then make sure the staff and children/vulnerable adults ratio is kept at 1 – 10.

Missing students

INTO University of Gloucestershire has a Missing Student Policy and Procedure that details the processes for managing a case where a student is considered missing. The document also covers the processes should a student under the age of 18 not meet their curfew.

Welfare provision

Students are asked at application stage to disclose their age, any disability or medical condition that may deem them as either children or vulnerable adults. Further opportunities to disclose are provided when they arrive in centre.

If students are identified that they will be a child at the point of entry onto their courses, the INTO University of Gloucestershire Under 18 Policy will be applied and explained to both the child and their parents/appointed guardian prior the student’s arrival. Upon arrival at the centre, a designated senior member of staff or another trained member of staff will arrange to meet with all students under the age of 18 and explain the Under 18 Policy, what the centre has put in place for them and what is expected of them. They will be asked to sign a copy to confirm that they have understood the requirements.

INTO University of Gloucestershire will also provide an airport transfer service, which is compulsory for all students under the age of 18, for their arrival pick-up and departure. If students wish to opt out of the service, a written confirmation from their parent(s)/appointed guardian is required with details of the person meeting the student at the airport and their arrival date and time.

Students may at any time disclose information that deems them as a vulnerable adult. Usually, it is more advisable for them to disclose before they arrive if conditions are known, so that the centre can make suitable adjustment and arrangement in advance. The centre also understands in certain cultures or some circumstances, students may not realise their conditions, which may be noticed by their tutors or other staff after they start their study programme. A detailed referral procedure can be found in INTO University of Gloucestershire Policies and Procedures administration drive. In both scenarios, INTO University of Gloucestershire will be able to utilise the resources and advice available from the University of Gloucestershire to assess and support students.

Under 18 curfew management and supervision

Unless there are exceptional circumstances, under 18 students will be placed in homestay. Homestay Hosts are DBS checked as per the British Council Guidelines (main person in each household). This will ensure the safety of our students and hosts will be responsible for curfew management and supervision.

Students under the age of 18 are expected to comply with a daily curfew until they reach 18 years of age. Students are expected to be in their Homestay Accommodation by 22:30 Sunday to Thursday and 23:00 Friday and Saturday.

The Host will contact the member of staff covering the emergency phone to advise if a student has not returned in time for curfew. The member of staff should then follow the processes outlined in the Missing Student Policy and Procedure.

Overnight absences must be authorised by the parent or guardian and the INTO University of Gloucestershire Designated Safeguarding Lead. If permission is granted the Homestay provider will be notified. If it is not possible to contact the parent or guardian permission will not be granted.

On campus bar

Whenever an under 18 year old student begins their course, the Student Welfare and Exams Manager will provide their name, date of birth and their photograph to the Student’s Union bar in order to prevent them from being served.

Under 18 behaviour and Discipline

Please see Under 18 Policy and Code of Conduct for details of their expected behaviour and procedures if any disciplinary action is taken against them.

Prevent

INTO University of Gloucestershire recognise the important role we have in safeguarding all our students from radicalisation. Radicalisation is defined as the process by which an individual comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject and undermine the status quo or contemporary ideas and expressions of freedom of choice. This can lead to both violent and nonviolent reactions in individuals.

In order to best protect our students from radicalisation the Head of Student Experience will ensure that a Prevent Risk Assessment is undertaken and that a Prevent Action Plan is implemented. These documents will be held in the INTO University of Gloucestershire Policy and Procedures Operational Manual.

Designated senior members of staff will attend the University of Gloucestershire Prevent Update Group chaired by the Director of Student Services in order to keep up to date on University actions and to share best practice.

The Head of Student Experience will ensure that all staff in Centre are Prevent trained. This will ensure staff awareness of their responsibility to raise any concerns regarding any student in respect of Radicalisation to a designated person, in order that the appropriate action can be taken.

Information will be shared with the Director of Student Services in order that the University are aware of any concerns regarding an INTO student.

Health and Safety

A Health and Safety Policy, which includes fire safety and first aid provision, is included in INTO University of Gloucestershire Policy and Procedures.

**Reporting Concerns**

If a child or young person reports possible abuse you should treat the matter seriously and keep an open mind. Do listen carefully and stay calm, try not to interview them, although it may be necessary to seek clarity using open questions. Reassure the child that by telling you they have done the right thing. Inform the child you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter. Do not try to investigate concerns yourself. Report the matter as soon as possible to the designated safeguarding person who will take the matter forward.

**Contact Details**

The Designated Safeguarding Lead (DSL) with first point responsibility for child protection issues at INTO University of Gloucestershire is the Centre Director, Rhona McDonald (01242 714891 or rmcdonald@glos.ac.uk).

Mark Sharrock (Head of Student Experience, 01242 714915 or msharrock@glos.ac.uk) and Sandra Myers (Student Welfare and Exams Manager, 01242 715072 or sandramyers@glos.ac.uk) act as Deputy Designated Safeguarding Leads in the absence of the DSL.