



Safeguarding and Child Protection Policy

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1. Introduction

PLUS (Professional Linguistic and Upper Studies Ltd.) organises General English Language study holidays for teenagers in the UK and Ireland. Students are offered a choice of family or residential accommodation and typically stay for 2 weeks and have 30 hours of tuition with sporting, cultural and leisure activities.

This policy applies to all members of teaching and non-teaching staff, volunteers and anyone else who is working with children. All PLUS staff will be issued with a copy of this policy during the recruitment process. Copies will also be provided to any other individual (e.g. hosts, group leaders and other adults) working with the students. In the event that any other third party requests a copy of this policy, they should be referred to Rosario Russo at Head Office.

This policy describes PLUS Ltd.'s approach to child protection and safeguarding, which are paramount in our company and it has regard to the statutory guidance; 'Keeping Children Safe in Education'; 'Working Together to Safeguard Children' and 'Prevent Duty Guidance'.

Safeguarding is:

- The company's duty of care to look after children from adults or from other children.
- Ensuring safe systems are in place for the well-being of under 18s.

Child protection:

- Involves protection from the threat of direct harm.
- Is concerned with abuse that includes neglect, sexual, physical, or psychological and emotional abuse.
- Involves procedures for dealing with abuse when it arises.

2. Rationale

Children have a right to be safe and happy in the activities that they, or their parents and carers, choose. Parents have a right to believe that the organisations to which they entrust their children are safe. We have a duty of care to ensure the safety and well-being of every child who studies with us and we are committed to safeguarding and promoting the welfare of children and young people and we expect all staff and volunteers to share this commitment.

This policy applies to all children in our care, regardless of age, gender, ethnicity, nationality, language, disability, sexuality, religion or religious belief. They all have equal entitlement to be protected.

For the purposes of this policy a child is defined as a person under the age of 18.

This policy was updated in November 2016 and we are committed to reviewing it at regular intervals and draws on feedback from staff, homestay providers and students.

3. Associated Policies

Specific policies that should be read in conjunction with this document are:

- PLUS Home Stay Guidelines
- PLUS Emergency Action Plan
- PLUS Quality Control Plan
- PLUS Fire Safety Policy

4. Staff and student responsibilities

“Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child” (*“Keeping children safe in education”*, September 2016).

Students are encouraged to be responsible and vigilant in looking out for each other and raise concern with an adult if necessary.

4.1 Named person at PLUS centres

At PLUS there is a Named Person at each of our centres. The Named Person is the Campus Manager. PLUS will ensure that all centre staff, students and group leaders are aware of who this person is and what his/her role is. The role of the Named Person is to:

- Receive information from staff, children, group leaders, parents or carers who have child protection concerns and record it.
- Assess the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate.
- Report it to the Designated Safeguarding Lead at PLUS Head Office.

4.2 Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) at PLUS is **Laura Pombo, Operations Manager**.

P: + 44 (0)20 7730 2223

The Designated Safeguarding Lead (DSL) at PLUS has received Child Protection training for the role as DSL and will take lead responsibility for safeguarding and child protection. He will:

- Ensure the PLUS’ child protection policies are known, understood and used appropriately by both teaching and non-teaching staff alike.
- Act as a source of support, advice and expertise for staff.
- Liaise with the local authority and work with other agencies in line with *“Working together to safeguard children”*.
- Coordinate any reports of alleged or suspected abuse or complaints that are made by pupils.
- Manage and refer cases of suspected abuse to the local authority children’s social care as required.
- Refer all and any allegations made against a member of the teaching or non-teaching staff to a Director of PLUS.
- Keep records of all and any concerns or allegations that have been reported and ensure that such records are stored securely.
- Monitor the effectiveness of this policy and ensure that it is kept up to date.

5. Recruitment

PLUS applies a comprehensive and strict recruitment and selection process. To ensure that candidates are suitable to work with children, the following measures will be followed:

- All applicants must submit a CV with their application and all gaps in CVs must be explained satisfactorily.

- Proof of identity and (where applicable) qualifications will be required.
- At interview applicants are asked specific safeguarding questions to assess their suitability to work with children and young people.
- Campus Managers undertake an interview with at least two representatives of the organisation.
- All job offers are conditional on a successful DBS check (or equivalent).
- At least two written references are requested and PLUS asks specifically whether there is any reason that prospective employees should not be employed in situations where they have responsibility for, or substantial access to, persons under 18.
- Successful candidates are asked to undergo a DBS check (or local equivalent according to the staff member's usual country of residence) before starting work at PLUS.
- If an adult is required to commence work before the result of the DBS Disclosure has been received, PLUS may at its absolute discretion, permit the individual to start work before it receives the results of the DBS Disclosure. If it does so, PLUS will ensure that the individual is appropriately supervised and that all other checks have been completed. In such circumstances, PLUS will conduct a risk assessment to determine the level of risk posed to the welfare of the students by the individual in question. Any decision to allow an individual to commence employment before the results of the DBS Disclosure have been received shall be by a Director of PLUS alone.
- If an applicant's disclosure had a criminal record, PLUS will review the applicant in the light of the information relating to the criminal record and make a decision on the applicant's suitability accordingly.

PLUS will also ask for written confirmation from its partners and contractors that they will only employ staff who have been DBS checked and ask agents to provide confirmation that they have obtained a Certificate of Good Conduct for Group Leaders escorting groups that include under-18 students.

In order to comply with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information, PLUS will ensure that the following:

- Storage and Access - Disclosure information will be kept securely in lockable, non-portable storage containers with access strictly controlled and limited to those who are required to see it as part of their duties.
- Handling - In accordance with s124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. PLUS will maintain a record of all those to whom certificates or disclosure information has been revealed. It is a criminal offence to pass this information to anyone who is not entitled to see it.
- Usage - Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.
- Retention - Once a recruitment (or other relevant) decision has been made, disclosure information is not kept any longer than is required for the particular purpose. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so.
- Disposal - Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, i.e. by shredding, pulping or burning.

While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the certificate

or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

5.1 Staff training

All staff members will undergo Safeguarding and Child Protection training at induction ensuring that they can recognise the signs and symptoms of possible abuse and will sign to confirm that they have received this training. They will also receive a copy of this Safeguarding Policy and any other policies referred to in this document (where applicable).

The PLUS DSL will ensure that each member of staff is aware of, understands and has been provided with a copy of this policy. When signing their Statement of Personal Terms, each member of staff will be required to declare that s/he has read and understood the content of this policy.

6. Code of conduct

At PLUS we believe that children should be:

- Listened to and heard.
- Valued and treated as individuals.
- Respected for their identity and uniqueness.
- Encouraged and praised.
- Involved in decisions, as appropriate.

Staff must ensure that their conduct does not pose any risk to the safeguarding or welfare of students and refrain from any behaviour or action which might be misconstrued. They also should be role models by setting a good example. They should therefore at all times:

- Avoid being alone with a child. If this is unavoidable, for example if a child wants to talk to them privately, they need to find a public place where they can talk without being heard but can still be seen by other people. Alternatively, they can talk in a place where a colleague is discreetly present.
- Use appropriate language with children.
- Treat all pupils with respect.
- Encourage positive, respectful and safe behaviour amongst pupils.
- Understand the content of this policy and all other policies and codes of conduct that may be issued by PLUS.
- Be aware that someone might misinterpret their actions.
- Never flirt with a student or make sexually suggestive or provocative comments, even in fun.
- Try to recognise if a student is developing a 'crush' on them and do nothing that might be construed as encouraging this. If appropriate, they need to inform the Campus Manager if this is suspected.
- Maintain an appropriate standard of conversation and interaction with and between pupils.
- Maintain professional standards of pastoral care and avoiding the use of sexualised, derogatory or over familiar language in the company of pupils.
- Be aware that The Sexual Offences Act 2003 states that it is an offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.
- Report any sensitive incidents as soon as possible after they happen to the Campus Manager.

- Never use any drugs, introduce or consume alcohol on campus at any point during their employment with PLUS.
- Never smoke in front of the students and abide by the host institutions smoking policy.
- Ensure their manner of dress and appearance are appropriate to their professional role.
- Be aware that the breaking of the above-mentioned rules may result in disciplinary actions which could include summary dismissal.

6.1 Communication with students

As a general rule, staff should avoid unnecessary contact with students and under no circumstances may staff give pupils their home address, e-mail address, mobile or home phone number without the prior consent of the PLUS Head Office. Further details of the Company's IT and Social Media policy are set out in the Contract of Employment.

6.2 Physical contact

Staff should:

- Avoid inappropriate touching of any kind. If they are compelled to – for example if someone is injured (see below *First Aid & Medical Care*) or if they have to separate two fighting children – they need to ensure the contact is the minimum necessary for the purpose and that there are other students or adults present.
- Never hit, throttle, push, kick or otherwise act aggressively either physically or verbally towards a child even in pretence.
- In certain activities - such as drama classes, academy or dance sessions – where staff may need to initiate some physical contact with the students, physical contact should take place only when it is necessary in relation to the specific activity, in an open area and the extent of the contact should be made clear and undertaken with the permission of the student.

6.3 Accommodation

Staff should never:

- Enter a student's room unless it is strictly necessary. In this event they should knock before opening the door and need to keep the door open or have another staff member with them.
- Allow students in their room.

6.4 Bathroom

PLUS will make the appropriate arrangements for separate bathroom facilities for students and staff. Under no circumstances may cameras, mobile phones or any other type of equipment with a recording device be used in a toilet or bathroom areas that are used by students.

7. Safeguarding

In order to ensure the safety and well-being of the students, PLUS follows these safeguarding measures.

7.1 Student Handbook & Welcome Night

Prior to their arrival all students receive a Student Handbook. On arrival, all students attend the “Welcome Night” where they are fully briefed on the academic and leisure programme as well as welfare and safety rules.

Campus Managers meet with the chief of security on campus as part of their campus set up and, wherever possible, they organise a meeting between security and the students.

7.2 Feedback questionnaires

Students are required to complete a weekly questionnaire where they are asked for their feedback about the course and its services. Any complaint or concern expressed by students is followed according to the *PLUS Quality control plan procedures*.

7.3 Lanyards

Upon arrival, all students are provided with a lanyard and ID card with the 24-hour emergency number and are requested to wear them at all times.

7.4 Fire drills and Fire Safety

PLUS will ensure, so far as reasonably practicable, to minimise the risks to staff and students, which may arise from fire whilst attending its courses. This will be achieved by:

- Carrying out a fire risk assessment of the premises and reviewing it regularly.
- Putting in place, and maintain, appropriate fire safety prevention measures and plans for emergencies.
- Ensuring that all staff, group leaders and students are aware of this policy and know how to behave in case of emergencies.

Please refer to PLUS Fire Safety Policy set out in the Manual for further details..

7.5 Emergency Numbers

PLUS has a 24/7 emergency phone number for agents, parents, students and group leaders should an emergency occur.

PLUS emergency number can be found on the PLUS website, the Student Handbook, the Group Leader Manual and the student ID card. At the “Welcome Night” students are asked to store the emergency number on their mobile phones.

7.6 Transport

PLUS uses several coach and taxi companies for transfers and excursions and require written confirmation that they will only use drivers who have been DBS checked.

Staff are not requested to transport students as part of their job and advised not to offer lifts to them, unless this has been agreed with the Campus Manager. Such being the case, it is advisable that there is at least one adult additional to the driver acting as an escort.

7.7 Airport Transfers

When requested, PLUS arranges a transfer service on arrival and departure. On arrival, an airport representative will meet the students and accompany them to the coach bay. The Campus Manager, or another member of PLUS staff, will meet the students at the campus on arrival.

All students under the age of 18, who are travelling to or from a centre, must be accompanied by an adult. In case of individual students, PLUS will arrange a transfer ensuring the driver has been DBS checked.

If a group doesn't request a transfer service, PLUS will provide specific information and directions on how to reach the centre and an emergency phone number.

7.8 First Aid & Medical Care

At each of our centres at least one staff member, usually the Campus Manager, is first aid trained and there are at least two suitably equipped first aid boxes.

Campus Managers are provided with details for the nearest medical centre and hospital and all excursion walking tours include information about the nearest A&E.

If emergency when treatment is required, staff will not have to feel constrained from acting immediately to prevent harm even if this involves body contact. However:

- Any procedure used must have a First Aid purpose only and should not involve more contact than is necessary
- Any procedure should be undertaken by a person of the same sex as the student whenever possible
- Ensure that there are other students or adults present taking into account the student's requirement for dignity and privacy.

7.9 Homestay

Homestay families are generally recruited by external providers, some of which are registered with the British Council. PLUS will ensure that all providers have clear policies for under-18s and are responsible for screening their host families in this regard, including DBS checks, where appropriate.

Providers will ensure that students under 16 lodged in homestay accommodation will not be lodged with students of 18 years or older unless specifically requested in writing by the agent, students' parents or legal guardians.

Host families are requested to ensure that any adult visitors to the home should not be left alone with under 18 homestay students at any time.

Providers are requested to inform families of rules for curfew and PLUS will ensure they are familiar with PLUS procedure in cases where a child does not return by the curfew.

Full details regarding homestay safeguarding and welfare practices and provisions can be found in "PLUS Homestay Guidelines".

7.10 Student Behaviour and Discipline

PLUS students are expected to follow our rules while attending our courses. They are fully briefed on these and on the relevant disciplinary procedures at the “Welcome Night”.

Any incident or misbehaviour will be reported to the Campus Manager. After investigating the matter properly, together with Head Office the Campus Manager will deal with the incident in different ways, depending on how serious it is.

Students will be warned and possibly excluded from participation in our courses and more serious incidents might be reported to the authorities.

7.11 Student supervision

PLUS will ensure there is sufficient adult supervision for all scheduled activities both on-site and off-site, taking into account the nature of the activity and its level of risk identified in the risk assessment, students’ age, premises.

Group Leaders are the ultimate responsible for the students in their own group. At the General Meeting, Group Leaders receive clear instructions on what is expected of them.

If a Group Leader is unable to supervise one or more students, he/she needs to name another person in charge with the students’ supervision and must fill in the “Foster Care Form”.

7.12 Individual students

All the students come in groups accompanied by one or more Group Leaders. However, in some centres individual students are accepted.

PLUS will locate at least one adult to be responsible for individual students throughout their stay and request parents and agents to complete the “Individual Student Emergency Contact Form” prior to students’ arrival.

7.13 Risk assessment

Risk assessment templates are sent to all Campus Managers who are then asked to draw up more specific risk assessments for their own centres taking into account specific activities, excursions and students’ age.

Risk assessment templates are read during their inductions by Group Leaders and PLUS staff, who sign to confirm this, and are then displayed in the Campus Manager’s office.

7.14 Emergency Action Plan

The Emergency Action Plan (EAP) is for Grade A emergencies that involve serious incidents, injury or worse. Both staff on campus and at Head Office need to have clear procedures to follow and there must always be one appointed staff member in the event of an emergency.

The appointed staff member on campus is the Campus Manager, while the appointed staff members at PLUS Head Office are the Operations Manager.

PLUS Operations Manager is Laura Pombo

P: + 44 (0)20 7730 2223

7.15 Visitors

Visits to PLUS centres are generally arranged with and authorised by Head Office that will then inform the Campus Manager and state the purpose of the visit. All visitors must:

- Report to the Campus Manager, once on site.
- Wear an identification badge throughout their visit, indicating that no background check details are recorded.
- Be accompanied at all times, unless they provide a DBS check or equivalent.
- Abide by any specific policy or practise for visitors of the host institution.

7.16 Unknown/uninvited visitors

Any visitor to PLUS centres who is not wearing a badge should be politely challenged to enquire who they are and their business on the centre site. For example, “Can I help you? “Can I direct you to the Campus Manager office. Who are you here to visit?”.

They should then be escorted to the Campus Manager office who will investigate the purpose of the visit and, together with Head Office, decide if to allow the visitor and issue a badge.

If an unknown/uninvited visitor becomes abusive or aggressive, they will be asked to leave the site immediately and warned that if they fail to leave the campus grounds, security or police assistance will be called for. The incident must immediately be reported to the Campus Manager and PLUS Head Office. It is the responsibility of all employees to verbally and respectfully challenge any unknown visitor.

7.17 Missing Students

It is the responsibility of PLUS staff to search actively for students who are missing, including working with the authorities where appropriate. For the purposes of this policy, the term 'missing' refers to a student not being present without authorisation or explanation.

On occasions when a staff member identifies a student as missing, immediate action is required as outlined in the procedures below.

Class absence

Group Leaders are required to communicate beforehand to the Course Director the name of students not attending lessons. However, in case of a student missing from lesson staff are required to follow the following procedure:

- No later than 10 minutes after the beginning of the lesson, a Course Director and/or Assistant Course Director must go around all classrooms and get the names of the absent students.
- The Course Director will inform the Group Leader who will investigate the absence.
- If the student is found, in absence of valid reasons the student will be requested to attend the lesson.
- If the student is not found, the Course Director has to immediately inform the Campus Manager.

- Together with the Group Leader the Campus Manager will attempt to make contact with the student.
- If unsuccessful, together with the host institution security the Campus Manager will initiate and oversee a search of the site. If the student resides in a hall of residence in the centre, their room is to be entered and searched. If the student stays in homestay, the Campus Manager will call the student host family.
- The Campus Manager and Group Leader might speak to other students who may have been with the missing student prior to their disappearance to determine at which point the student was last seen.
- A whole centre fire alarm practice may be considered at any time to help to try to locate the student.
- Depending on circumstances or if the student is not found within a reasonable time, the Campus Manager has to inform PLUS Head office and the authorities. The Campus Manager and the Group Leader should then make a decision to inform the parents or guardians of the missing student.
- If the above stage is reached, a full record of all actions taken will need to be made using the "Incident report form".
- All parties need to be informed as soon as the student is found.

Missing student during excursions

When on excursion, staff are requested to ensure the students have understood the meeting points and times. If a student is lost, staff must:

- Ensure all other children are present and supervised.
- Ask other members of the group and the Group Leader when the student was last seen.
- If there is an appropriate number of adults, send one to look for the missing student.
- Inform the Group Leader and the Campus Manager who, if the student is not found within a reasonable time, will inform PLUS Head Office and the authorities too.
- Wait at the designated meeting point for as long as they can and if they are compelled to depart make sure another staff member stays there.
- Inform all parties as soon as the child is found.
- Write a report for the Campus Manager.

Missing student during activities

Group Leaders are required to communicate beforehand to PLUS Staff the name of students not attending activities. However, in case of a student missing staff are required to follow this procedure:

- No later than 10 minutes after the beginning of the activity, PLUS staff will inform the Group Leader who will investigate the absence.
- If the student is found, in absence of valid reasons the student will be requested to join the activity.
- If the student is not found, together with the Group Leader, the Campus Manager will attempt to make contact with the student.
- If unsuccessful, together with the host institution security the Campus Manager will initiate and oversee a search of the site. If the student resides in a hall of residence in the centre, their room is to be entered and searched. If the student stays in homestay, the Campus Manager will call the student host family.
- The Campus Manager and Group Leader might speak to other students who may have been with the missing student prior to their disappearance to determine at which point the student was last seen.
- A whole centre fire alarm practice may be considered at any time to help to try to locate the student.

- Depending on circumstances or if the student is not found within a reasonable time, the Campus Manager has to inform PLUS Head office and the authorities. The Campus Manager and the Group Leader should then make a decision to inform the parents or guardians of the missing student.
- If the above stage is reached, a full record of all actions taken will need to be made using the “Incident report form”.
- All parties need to be informed as soon as the student is found.

Student not returning to homestays by curfew time

Students are expected to return to their homestay by the curfew time. However, in case of a student not returning home by the curfew time staff and families are required to follow this procedure:

- No later than 10 minutes after the agreed curfew time, the family has to contact the student to find out where they are.
- If the student is too far away to walk or got lost, families are required to pick the student up, or arrange a taxi communicating name and position of the student. Families need to ensure the student only accepts a taxi driver who knows their name. The student will have to pay for the taxi.
- If the family is unable to get in touch with the student, they are request to contact their Group Leader who may be able to contact the student.
- If unsuccessful, the Group Leader has to inform the Campus Manager who will initiate and oversee a search of the PLUS campus, including halls of residence and campus facilities.
- The Campus Manager and Group Leader might speak to other students who may have been with the missing student prior to their disappearance to determine at which point the student was last seen.
- Depending on circumstances or if the student is not found within a reasonable time, the Campus Manager has to inform PLUS Head office and the authorities. The Campus Manager and the Group Leader should then make a decision to inform the parents or guardians of the missing student.
- If the above stage is reached, a full record of all actions taken will need to be made using the “Incident report form”.
- All parties need to be informed as soon as the student is found.

8. Child protection

8.1 Identifying abuse

Identifying abuse can be difficult as the term is used to describe a wide range of ways in which people could harm children. Abuse is usually described as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

“Working Together to Safeguard Children” (March 2015) identifies four types of abuse:

- Physical
- Emotional
- Sexual
- Neglect.

In the “London Safeguarding Children Board Child protection procedures”, “Organised and Complex Abuse” is described as “abuse involving one or more abusers and a number of related or non-related abused children and may take place in any setting. The adults concerned may be acting in concert to abuse children, sometimes acting in isolation or may be using an institutional framework or position

of authority such as a teacher, coach, faith group leader or be in a celebrity position to access and recruit children for abuse”.

Some typical signs of abuse are:

- Unexplained injuries
- Sexually explicit behaviour in games or activities
- Serious distrust of adults or other students
- Difficulty in making friends
- Personality changes and behavioural changes
- Changes in dress which may be covering up bruises
- Avoiding attending lessons or joining activities
- Homesickness

8.2 Responding to a child who makes a disclosure

If a child reports abuse to a member of staff, it is critically important that the child is listened to and heard whatever form their attempts to communicate may take. Under no circumstances should suggestions be made to a child that there may be an alternative explanation for their concerns. The most important and immediate things to do if a student makes a disclosure of an abuse are:

- Maintain a calm appearance.
- Reassure the child that telling you was the right thing to do. Things to say: “I’m glad you told me”, “It’s OK to tell”, “You’re brave to tell”, “I’m sorry that it happened”.
- Use the words Tell, Explain, Describe (TED) to avoid asking leading questions.
- Take notes if possible.
- Record dates and times as well as details of anyone else who was present and use the child’s exact words whenever possible.
- Avoid challenging or interrogating the child.
- Do not promise confidentiality.
- Children sometimes fear repercussions. Because of this, they might ask an adult to promise secrecy before disclosing. Such a promise should not be made, but students should be encouraged to speak out about the abuse.
- Report immediately to the Campus Manager and the Designated Safeguarding Lead.
- Nobody else needs to know – the child’s privacy should be respected.
- Do not confront the person believed to be an abuser.
- Do not make assumptions about what the child is saying or make any interpretations or decisions about whether or not abuse has or is likely to have occurred.

It is not only the duty of PLUS staff but a legal requirement to disclose cases of abuse or allegations of abuse without delay.

PLUS employees are encouraged to bring such matters to our attention at any time, without fear of any repercussion or adverse action being taken against them for doing so.

8.3 Allegations against an adult

If a child or any member of staff makes a complaint of abuse against a member of staff, the person receiving the complaint has to immediately inform the Campus Manager who, in turn, will inform the Designated Safeguarding Lead.

A thorough investigation will be undertaken and staff will always be given the opportunity to explain the situation and their actions. As PLUS’ primary concern is the students’ welfare, it may therefore be

considered necessary to suspend the staff member throughout the investigation. This will not be regarded as an indication of guilt but a necessary step that may be required to safeguard a child in the circumstances.

8.4 Recording incidents and allegations

Any allegation should be immediately recorded and reported to the Designated Safeguarding Lead. All records will be kept by the Designated Safeguarding Person in secure electronic files and will be shared only with those who need access to it, whether to enable them to take appropriate steps to safeguard the pupil, or to enable them to carry out their own duties.

All records must contain the following:

- Date of the incident
- Date and time of the record being made
- Name and date of birth of the child(ren) concerned
- A factual account of what happened and the location where the incident took place (include the actual words spoken by the child where possible)
- Witnesses' reports
- Action taken
- Printed name, signature and job title of the person making the record

Under no circumstances should any handwritten notes be destroyed or altered. Copies of all notes (in whatever format) should be retained.

8.5 Whistleblowing

Whistleblowing is the term used when someone who works in or for an organisation wishes to raise concerns about malpractice or wrongdoing. It is regulated by The Public Interest Disclosure Act of 1998, also known as Whistleblowing Act.

“To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things. The first is that they are acting in the public interest. This means in particular that personal grievances and complaints are not usually covered by whistleblowing law.

The second thing that a worker must reasonably believe is that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:

- Criminal offences (this may include, for example, types of financial impropriety such as fraud)
- Failure to comply with an obligation set out in law
- Miscarriages of justice
- Endangering of someone's health and safety
- Damage to the environment
- Covering up wrongdoing in the above categories.”

(WHISTLEBLOWING, Guidance for Employers and Code of Practice. MARCH 2015)

Whistleblowing is very different from a complaint or a grievance, which are not usually covered by whistleblowing law.

8.6 Bullying

Bullying of any kind and in whatever form is unacceptable and will not be tolerated at our campuses.

Bullying is the use of aggression with the intention of hurting physically or emotionally another person. It is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation (etc.) and it can occur in any of the following forms:

- Emotional – exclusion, unfriendliness, tormenting
- Physical – any use of physical force or inappropriate touching
- Racist – taunts, graffiti, gestures
- Homophobic – actions or verbal comments because of or about sexuality
- Verbal – name-calling, teasing, spreading rumours
- Cyber – sending hurtful or abusive messages; enticing or pressurising someone to engage in unwanted activity; or misuse of internet and social networking sites

PLUS aims at preventing bullying by:

- Ensuring that all staff know how to recognise bullying and understand the causes of bullying.
- Ensuring that all staff know how to deal with incidents of bullying.
- Ensuring that students know that bullying will not be tolerated.
- Raising awareness: all students are shown an Anti-Bullying video at the Welcome Night.

Identifying Victims of Bullying

Staff should be aware of these possible signs and should investigate if a student:

- | | |
|---|--|
| ▪ is unwilling to go to classes | ▪ becomes aggressive, disruptive or unreasonable |
| ▪ becomes withdrawn | ▪ starts to bully others |
| ▪ cries him/herself to sleep at night | ▪ stops eating |
| ▪ has repeated nightmares | ▪ stops using the internet or mobile |
| ▪ reports feeling ill in the mornings | ▪ is nervous when a text or email is received |
| ▪ has damaged clothes or books | ▪ does not want to travel on a coach |
| ▪ has unexplained cuts or bruises | ▪ gives improbable excuses for any of the above |
| ▪ has possessions which are damaged or 'go missing' | |
| ▪ continually 'loses' money | |

These forms of behaviour may well be indicators of other issues, but could be the result of bullying.

If any member of staff believes that a student is being bullied, they must report this immediately to the Campus Manager. Following an investigation, depending upon the nature and circumstances of the bullying, the Campus Manager and Head Office will address the bullying. In serious cases, this could result in the perpetrator being expelled from the course.

8.7 Female Genital Mutilation

Female Genital Mutilation (FGM) includes any mutilation of a female's genitals, including the partial or total removal of the external genitalia for so-called cultural or other non-medical reasons. It is illegal in England and Wales under the FGM Act 2003.

The Serious Crime Act 2015 introduced the duty for health and social care professionals and teachers in England and Wales to report to the police 'known' cases of FGM in under 18s which they identify in the course of their professional work.

If you encounter a case of FGM or have reason to believe that a girl might be at risk of FGM, you must inform the PLUS DSL immediately.

8.8 Child sexual exploitation

Child sexual exploitation (CSE) is a type of sexual abuse which involves exploitative situations, contexts and relationships where young people receive something (money, gifts, drugs, alcohol) as a result of engaging in sexual activities.

Young people who are being sexually exploited may:

- Go missing for periods of time from home, care or education
- Have unexplained gifts or possessions that can't be accounted for
- Use drugs or alcohol
- Have older boyfriends or girlfriends
- Be involved in petty crime such as shoplifting
- Have unexplained physical injuries and a changed physical appearance, for example lost weight

8.9 E-Safety

Most of the host institutions computing systems are protected by software that prevents anyone accessing inappropriate content online.

8.10 Vulnerable Students

PLUS staff will be informed beforehand of any students with medical conditions or special educational needs and are encouraged to be particularly vigilant to their well-being and needs.

9. Preventing Extremism and Radicalisation

9.1 Introduction

Preventing extremism and radicalisation is part of PLUS' commitment to keeping students safe. In line with section 26 of the Counter-Terrorism and Security Act 2015, schools are under a duty to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the "Prevent duty". Being drawn into terrorism includes not just violence extremism but also non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views which can be exploited by others

9.2 Aims

PLUS' aim is to ensure that all staff are aware of the importance of preventing extremism and radicalisation and that they have an understanding of what radicalisation and extremism are and understands their risks. The PLUS courses are intended to be safe spaces in which children and young people can understand and discuss sensitive topics including terrorism and extremist ideas that are part of terrorist ideology and learn to challenge those ideas.

9.3 Definitions

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

(Taken from "Prevent duty guidance").

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

(Taken from "Prevent strategy, June 2011").

9.4 Prevention Measures

PLUS recognises that there are a number of different measures that can be adopted to help prevent extremism radicalisation and extremism:

1. Risk Assessment

Risk assessment in the context of the Prevent duty means:

- Identifying the risks relevant to PLUS centres or courses including specific risks related to the students' country of origin.
- Assessing the nature and extent of the risk.
- Proposing measures to mitigate and manage these risks.

2. Counteracting risks

- Promoting a safe environment for debate.
- Promoting core British values through lessons and activities.

3. Recognising extremism

There is no typical profile for a person likely to become involved in extremism and those involved in extremism come from a range of different backgrounds and experiences. However, it is vital that PLUS staff are aware of these possible signs which could include (but might not be limited to) the following:

- | | |
|---|---|
| ▪ Religious conversion. | ▪ Being in possession or accessing materials or symbols associated with an extremist cause. |
| ▪ Change in behaviour or personal appearance. | ▪ Showing sympathy for violence, especially to other faiths or cultures. |
| ▪ New friends, distance from old friends. | ▪ Secretive behaviour. |
| ▪ Attempts to impose own beliefs on others. | |

4. Working in partnership

Where necessary, PLUS will establish effective partnerships with parents, families and local authorities.

5. Staff training

Through effective staff training that will be provided to all PLUS staff prior to the commencement of their employment, PLUS believes that staff will be better equipped to identify any issues and concerns at an early stage.

9.6 Roles and Responsibilities

The Designated Safeguarding Lead (DSL) is responsible for:

- Ensure that all staff are aware of the Prevent duty; are able to recognise the signs of vulnerability of radicalisation; and know how to refer their concerns.
- Make referrals to appropriate agencies with regard to concerns about radicalisation.
- Offer support and advice to staff.

It is paramount that any concerns or incidents, however small, are reported immediately to the DSL. Any report will be dealt with sensitively and carefully, with confidentiality assured for the person reporting the concern.

10. LADO (Local Authority Designated Officer) Contact Details

The LADO (Local Authority Designated Officer) provides advice and guidance to employers, organisations or individuals who have concerns relating to an adult who works with children and young people or who is in a position of authority and having regular contact with children (for example religious leaders or school governors). You should always report matters initially to the PLUS DSL before any contact is made with a LADO.

Canterbury

Local Authority Designated Officer

Tel: 03000 410 888

Email:

GCSXsafeguardingunit@kent.gcsx.gov.uk -
kentchildrenslado@kent.gov.uk.

Chelmsford

Local Authority Designated Officer

Tel: 03330 139 797

Email: childrens.safeguarding@essex.gov.uk

Chester

Katherine Appleton

Tel: 0151 33 74570

Email:

katherine.appleton@cheshirewestandchester.gov.uk

Effingham

Tel: 0300 123 1650

Email: LADO@surreycc.gov.uk

Liverpool

Ray Said

Tel: 0151 225 8101/225 8103

Email: ray.said@liverpool.gov.uk

London Greenwich

Ken Palmer

Tel: 0208 921 4438

Email: Ken.Palmer@royalgreenwich.gov.uk

London Kingston

Kingston Single Point of Access (SPA)

Tel: 020 8547 5008

Tel: 020 8770 5000 (out of hours)

Email: spa@kingston.gcsx.gov.uk

London Twickenham

Richmond Single Point of Access (SPA)

Tel: 020 8891 7969

Tel: 020 8770 5000 (out of hours)

Email: spa@richmond.gcsx.gov.uk

Loughborough

Mark Goddard

Tel: 0116 305 7597
Karen Browne
Tel: 0116 305 4532

Windsor (Wellington College)
Tel: 01344 352020
Email: LADO@bracknell-forest.gov.

11. LSCB (Local Safeguarding Children Board) Contact Details

Canterbury

Kent Safeguarding Children Board
Tel: 03000 421126
Email: kscb@kent.gov.uk

Chelmsford

Essex Safeguarding Children Board
Tel: 03456037627
Email: escb@essex.gov.uk

Chester

Cheshire West and Chester Local Safeguarding Children Board
Tel: 0300 123 7047
Tel: 01244 977 277 - Emergency Duty Team (EDT) – Out of hours

Edinburgh

Social Care Direct
Tel: 0131 200 2324
Tel: 0800 731 6969 (Out of hours)
Email: socialcaredirect@edinburgh.gov.uk

Effingham

Multi-Agency Safeguarding Hub (MASH)
Tel: 0300 470 9100
Tel: 01483 517898 (out of hours, emergency duty team)
Email: mash@surreycc.gov.uk

Liverpool

Tel: 0151 233 3700 (24/7)

London Greenwich

Multi-Agency Safeguarding Hub (MASH)
Tel: 020 8921 3172
Tel: 020 8854 8888 (Out of hours)

Email: mash-referrals@royalgreenwich.gov.uk

London Kingston

Kingston Single Point of Access (SPA)
Tel: 020 8547 5008
Tel: 020 8770 5000 (out of hours)
Email: spa@kingston.gcsx.gov.uk

London Twickenham

Richmond Single Point of Access (SPA)
Tel: 020 8891 7969
Tel: 020 8770 5000 (out of hours)
Email: spa@richmond.gcsx.gov.uk

Loughborough

Tel: 0116 305 0005
Email: childrensduty@leics.gov.uk

St Andrews

Social work
Tel: 03451 551503
Tel: 03451 550099 (out of hours)
Email: sw.contactctr@fife.gov.uk

Stirling

Child Protection Committee
Tel: 01786 471177
Tel: 01786 470500 (out of hours)

Windsor (Wellington College)

Bracknell Forest Local Safeguarding Children Board
Tel: 01344 352005
Multi-Agency Safeguarding Hub (MASH)
Tel: 01344 352005 Tel: 01344 786543 (Out of hours duty team)

Resources

[Sexual Offences Act 2003](#)

[Keeping children safe in education, Statutory guidance for schools and colleges, *September 2016*](#)

[Guidance for safer working practice for those working with children and young people in education settings, *October 2015*](#)

[Working together to safeguard children,](#)

[A guide to inter-agency working to safeguard and promote the welfare of children, *March 2015*](#)

[British Council, Care of Under 18s guidance document, 2016](#)

[Serious Crime Act 2015](#)

[Mandatory Reporting of Female Genital Mutilation – procedural information](#)

[Record Keeping & Management of Child Protection Information - including guidance on consent Issued *September 2011*](#)

[London Safeguarding Children Board Child protection procedures, 5th Edition 2016](#)

[Counter-Terrorism and Security Act 2015](#)

[DBS Code of Practise](#)

[Prevent Duty Guidance](#)

[Prevent Strategy, June 2011](#)