



Victoria School of English Child Protection and Safeguarding Procedures

Introduction

The procedures detailed in this document are for all staff working for Victoria school of English (VSE) and details both the legal and moral requirements about working with children and young people. Children and young people are defined as those who are under 18 (U18). Whilst parents have ultimate responsibility for their children, while attending school and engaging in school related social activities, we are fully committed to a practice that creates a safe environment and protects students U18 from harm and also the influence of radicalisation.

Although this document is clearly focussed on Under 18's, there may also be a vulnerable adult at the school where the same criteria are valid, especially in relation to Duty of Care.

Safeguarding is the school's duty of care to look after students U18, create a safe and professional learning environment in order to help them to achieve their learning potential. **Child protection** involves protecting students U18 from abuse, such as physical, emotional, neglect and sexual harm and what to do should allegations of abuse be made.

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1. General Statement

VSE has a duty of care for students U18 during their time at VSE. VSE are responsible for students U18 during class time. During break times, all reasonable efforts will be made to ensure the students U18 are safe while in the school building. The garden area outside the school is not supervised during break times, during the lunch break and outside of school hours. When outside of the school premises, travelling to and from school, outside of school hours and at weekends, VSE is not responsible for the safety of students U18. Before U18 students arrive in the UK, we ask them to read and sign a "Code of Conduct" which highlights the potential risks in travelling around London. On their first day, they are given a 'Your Time in London' welcome pack to advise them of the dos and don'ts of London life.

On occasion, students U18 may attend a social activity that takes place off the school premises. The member of staff in charge of the group has responsibility for ensuring that all reasonable care and attention is given to keeping the students U18 as safe as possible. All social activities are risk assessed to minimise potential harm. The person in charge is trained to Safeguarding Level 1 and will have specific safeguarding training related to off-site excursions. With off-site excursions the ratio of group leaders to students aged 16 and over is 1:15-20 as suggested by Department for Education 1998 Health and Safety of Pupils on Educational Visits guidelines. Therefore, if there is a group with 15+ students who are 16 and 17 years old, additional staff will be used. Leaders are also trained to recognise potential threats of radicalisation and they are aware of the need to intervene and report any incidents which occur.

A student U18 staying with a host family has to agree to rules agreed between the student and their parents/guardian. Before placing an Under 18 in a host family, we action a risk assessment of the area and train the host regarding their "Duty of Care". If the host family have any concerns about the young person, whether a Safeguarding issue or a Prevent Issue, they will communicate this to VSE. More information about this is detailed in the 'Host Family' procedures suite of documents.

Teachers are notified about all students U18s who will attend their class. The teacher takes a register at the beginning of every class and if a student U18 is absent on any day without prior notice, we will contact the host family or parents/guardian on that that same day. The teacher will inform the Welfare Office if any U18 who is absent within 30 minutes of the class starting.

2. Policy Review and Distribution

This policy is reviewed and updated regularly by the Welfare Office. An updated copy will be distributed to all teachers and on display in the staffroom. We also post a copy on the Victoria School web-site.

3. Definitions

Duty of Care

Duty of care is the legal obligation that adults have to ensure the safety and well-being of others and in particular with adults who are working with Under 18's or vulnerable adults who are dependent on them for their safety and well-being. The duty extends both within and outside Victoria School of English

Safeguarding

The definition of safeguarding is taken from the Children Act 2004 and in "Working Together to Safeguard Children." This can be summarised as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development

- Ensuring that children have a provision of safe and effective care
- Acting to enable children to have the best outcomes

Safeguarding also relates to all aspects of life at Victoria School.

- Health and Safety
- Use of reasonable force
- Meeting the needs of Under 18's with medical conditions
- Providing first aid
- School social trips
- Internet and e safety
- Appropriate arrangements made to ensure the safety and security in the school and whilst travelling to and from accommodation

Safeguarding can involve:

- Bullying, including cyberbullying through emails and social media
- Racism, disability, transphobic or homophobic behaviour
- Radicalisation (see Prevent Policy)
- Sexual exploitation
- Sexting
- Substance abuse
- Issues specific to a local area or population i.e. gang activity
- Issues of domestic violence, sexual exploitation, FGM and forced marriage

Child Protection

This involves protecting students U18 from abuse, such as physical, emotional, neglect and sexual harm and what to do should allegations of abuse be made.

Abuse is any form of maltreatment of a child. Somebody can abuse or neglect a child by inflicting harm or by failing to prevent harm.

Child Abuse

Child Abuse is a term to describe a range of ways in which people harm children. Often the person is known and trusted by the child. All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs. Child abuse, as defined by the NSPCC is defined as, neglect, physical injury, sexual abuse or emotional abuse inflicted or knowingly not prevented, which causes significant harm or death.

Bullying

Bullying is a form of abuse by mental, physical or verbal actions by either an individual or a group with the purpose of exploiting or intimidating others. This could take the form of cyber-bullying.

Under 18's

Under 18's refers to a student who is 16 or 17 and who is taking mixed classes with adults.

Vulnerable Adult

This refers to a person who may be at greater than normal risk of abuse. This person may be over 18 who is unable to care for themselves or unable to protect themselves against harm or exploitation by reason of age, trauma, disability, mental illness. Vulnerable adults may become isolated and lonely and have difficulty communicating with others.

DLS- Designated Safeguarding Lead

The DSL is the person within an organisation who takes responsibility for the organisation delivering proper levels of safeguarding to its Under 18 students. In the absence of a Senior DSL (through holidays or illness), there is a Deputy DSL who would take over the duties. Both the Senior DSL and Deputy DSL are trained in Advanced Safeguarding.

4. Recognising symptoms of actual or likely abuse

Cases of abuse become apparent in many ways:

- A child may directly tell someone they are being abused (this is defined as 'disclosure')
- Someone may disclose that a child has told them that they are being abused, or they believe another child is or has been abused
- A child may show signs of physical injury with no satisfactory explanation for its cause
- A child's behaviour may indicate that it is likely he / she is being abused
- A member of staff's behaviour or way he / she relates to a child causes concern

Signs of neglect or abuse

There are a number of ways that may indicate that a child is being abused. The following is not exhaustive nor are the signs a guarantee that a child is being abused. Signs may include: eating disorders, being withdrawn, aggression, being disruptive, absence, self-harm, change of conduct, homesickness, not wanting to return home, being inattentive, lack of hygiene, clinging to staff and hyper-vigilance.

5. Safer Recruitment Guidelines

Victoria School is committed to the safeguarding of Under 18's or vulnerable adults. We have recruitment policies in place to ensure that we recruit the most suitable teachers and support staff.

- All teachers and support staff are subject to DBS and identity checks.
- DBS from another provider will be accepted until the VSE DBS checks have been completed.
- Safeguarding is written into the job description.
- References are requested.
- Any gaps in CV's are investigated at interview stage and questions about suitability to work with U18's will be part of the job interview.
- All staff must undergo Safeguarding level 1 training with periodic update training completed.
- The Senior Designated Safeguard lead undergoes Advanced Safeguarding training as does the Assistant Designated Safeguarding Lead.
- All staff must read and sign the Safeguarding and Child Protection Policy and Procedures at induction.

6. Code of conduct

We are committed to creating a safe environment in which U18s can feel comfortable and secure while on the school premises, in class or engaged in off-site social activities. At all times, staff should show respect and understanding to all students (whether U18 or not), respect their rights,

safety and welfare, and conduct themselves appropriately as an excellent role model. With specific regard to students U18, we adopt a code of conduct to be followed by all staff:

Attitudes

Staff should be committed to:

- Treating U18s with respect and dignity
- Listening to what a student U18 is saying and not be dismissive because of their age and lack of experience
- Valuing each U18
- Recognising the unique contribution each individual can make
- Encouraging and praising U18s who may be more sensitive to criticism than older students

By Example

Staff should endeavour to:

- Provide an example which we would wish others to follow.
- Promote British values through the lessons (as appropriate, please refer to Prevent Policy and Procedures)
- Support UK Laws in regards to smoking, drinking alcohol and drugs.
- Use appropriate language and challenge any inappropriate language used by a student U18 or an adult working with student U18
- Respect a young person's right to privacy as you would an adult

One-to-one contact

Staff should:

- Not spend excessive amounts of time alone with a student U18, away from others
- In the event of having to meet with an individual student U18, make every effort to keep this meeting as open as possible
- If privacy is needed, ensure that other staff are informed of the meeting and its whereabouts
- Staff are strongly advised against meeting a child alone in a closed space, especially of the opposite sex. Should there be a one-to-one lesson with a student U18, all efforts will be made to choose a teacher of the same sex. When students U18 are interviewed by a teacher to determine their language level, all efforts will be made to choose a teacher of the same sex. Where this is not possible, the front desk will be notified about where the lesson / meeting will take place.

Physical contact

Staff should never:

- Engage in sexually provocative behaviour or rough physical games
- Do things of a personal nature for a student U18 that they can do for themselves
- Allow, or engage in, inappropriate physical contact of any kind

The Sexual Offences Act 2003 states that any person in a Position of Trust who engages in sexual activity with any person under 18, is breaking the law.

General

Staff should:

- Be aware that someone might misinterpret their actions no matter how well intentioned
- Never draw any conclusions about a situation with U18s without first checking the facts
- Never allow themselves to be drawn into situations such as tantrums or crushes
- Never exaggerate or trivialise child abuse issues or make suggestive remarks or gestures about, or to a student U18, even in fun.

- Never socialise with U18's outside of school unless on a scheduled social event organised and controlled by Victoria School.

Any breach of the Code of Conduct for Employee could lead to disciplinary action being taken.

7. Electronic contact with students under 18

Electronic contact is defined as the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment and computers. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.

Staff must request permission from the employer for any electronic contact with a student U18 which is of a non-professional nature before, during and after a course. Such contacts may be necessary when needing mobile phone numbers from students for an excursion, but social-networking on Facebook, Whatsapp, etc is strictly prohibited.

In any electronic contact with students, staff must pay particular attention to use neutral, un-emotive language that will not be misconstrued. Staff must not exchange any information with a student that they would not be happy to share with the young person's parent or guardian.

8. Anti-bullying policy

We are committed to anti-bullying. We have a written policy on anti-bullying for staff, and one for students in the "Your Time in London" welcome pack, which is given out on their first day.

9. Health and Safety

We have the following measures in place to ensure the safety of our students. These include

- Risk Assessments
- Regular testing and maintenance of fire equipment such as smoke detectors, alarms, fire extinguishers, fire doors, six monthly fire drills
- PAC testing for electrical appliances
- Checks for hazards
- Induction "What to do in case of a fire"
- 2 first aid trained staff
- First aid kits appropriate for the number of students in situ.

10. Monitoring Under 18's in school

U18's are highlighted on the teachers register. Teachers are required to report an absence of an U18 within 30 minutes of the class start. Teachers are required to report any concerns they may have over the welfare or behaviour to the DSL or Welfare manager. On the first day the DSL will meet all the U18 students to:

- Introduce themselves so that they know who to approach if they have any problem
- Re-iterate the information contained in the U18 Code of Conduct
- Check understanding of what they can/cannot do
- Check that they feel confident with getting to the school and returning home
- Check that they have the Emergency contact details and know that this is a 24-hour number
- Check that the students are happy with their accommodation and classes
- Introduce them to other U18's or students of a similar age.

- Follow up on any medical conditions which may have been declared by the parents/guardian in the Pre-arrival medical questionnaire.

11. Accommodation

Victoria School has some accommodation with Hosts. Before a host is accepted to Host Under 18's, we action a risk assessment of the area to make sure that it is suitable and there are no significant risks. We also require all members of the family who are over 18 to have an enhanced DBS checks, renewed every three years. We have a set of guidelines which the Host must adhere to and these are in summary:

- The host is expected to help the student to the school on the first day at school and also help in the purchase of travel cards
- The host is expected to give the student due care and attentions and speak to the Welfare Manager if they have any concern at all about the student
- The host must communicate the rules of the house in a clear and positive manner ie use of bathroom, breakfast and dinner arrangements.
- Hosts are expected to make sure that the student adheres to the curfew times agreed by the parents.
- The host must do a weekly wash for the student unless they deem the student competent to do this independently
- The host must supply the student with a nutritious and balanced diet and ensure that the U18 has enough food to eat.
- U18's should not have any unsupervised contact with any Over 18
- Parental consent must be obtained for any planned absences from the school or for any overnight stays with friends.
- Hosts must be mindful of over-use of the internet or gaming. Parental controls must be activated to block any content which may be unsuitable.
- Hosts must phone the school before 0930, if the U18 is sick and cannot attend school. If necessary, the host must accompany the U18 to the doctors or drop in clinic.
- Hosts must be aware of promoting, if necessary the Core British values as defined in the Prevent Strategy.
- Host will be required to sign the Homestay Code of Practice.

12. Designated Safeguarding Lead

The "Designated Safeguarding Lead" is the person who has ultimate responsibility for child protection and safeguarding for an organisation. **Jill Hooton** is the **Senior Designated Safeguard lead** for VSE. In her absence, the **Director of Studies, Lisa Barry** will perform this role as Deputy Designated Safeguard Lead. Any safeguarding and child protection issues must be reported to the Designated Person, no matter how seemingly trivial the issue. In the scenario that both Jill Hooton and the DoS are both unavailable, VSE's **Principal** will adopt the role of Designated Person. All students U18 attending school will be told that **Jill Hooton** (and her absence, the DoS) will be available to support them with any issues they might have. The school has a 24-hour telephone number which are given to the students U18 on a laminated card on their first day.

13. How to respond to allegations, suspicions or disclosure of abuse

Responsibility of staff to report

It is the duty of all of VSE staff to disclose cases of abuse or allegations of abuse to the Designated Person without delay. All suspicions or allegations of abuse must be taken seriously. It is not for staff to decide whether or not a suspicion or allegation is true.

If a member of staff has suspicions of abuse to a student U18, or if they are told by someone else that they suspect a student U18 is being abused, they should contact the Designated Person in confidence. The Designated Person will follow the matter up immediately.

If there is a risk of immediate serious harm to a child and no Designated Safeguarding Lead is available, then a referral should be made directly to the LADO contact. Anybody can make a referral.

If a student U18 starts to talk to the staff member directly, they should allow that person to disclose and allow them to continue talking following the guidelines below. They should then tell the Designated Person immediately and in confidence.

What to do if a student U18 discloses directly to a member of staff or host

A student U18 may choose to disclose to any member of staff or host, so they need to know how to respond. Be aware that disclosure may be about a child being abused by another child. The process to follow is identical.

Receive

Listen to what is said

Reassure

Reassure the child that they did nothing wrong and that you take what they say seriously

React

Listen carefully and patiently

Record

Write notes of what is actually said. Keep it factual and do not make any assumptions or put anything in your own words.

- Never guarantee absolute confidentiality, as child protection procedures and law will always have precedence over any other issue
- Endeavour to meet the child in a semi-public or visible space if possible
- Listen to the child, rather than question him / her directly
- Offer him / her reassurance without making promises, and take what the child says seriously
- Allow the child to speak without interruption
- Accept what is said – it is not your role to investigate or question
- Do not overreact
- Do not pass judgment
- Advise that you will listen and possibly takes notes (if appropriate) but that you must pass the information on
- Explain what you have to do and who you have to tell
- Record the discussion accurately at the time or as soon as possible after the event
- Use the child's words or explanations – do not translate into your own words in case you have misconstrued what the child was trying to say
- Arrange to meet the Designated Person without delay to share the disclosure
- If the student U18 is unable to explain their problem owing to language problems, every effort will be made to find an appropriate person to help translate.

14. Keeping records and sharing information

Any information concerning allegations (electronic, handwritten notes, printed documents, etc) are the responsibility of the Designated Person. This information will be in filed separately in a locked draw or protected by password if held electronically. This information is only accessible to the Designated Persons and Principal. Information about allegations of abuse will be kept for 50 years, as determined by the Data Protection Act 1998. Further details about data protection is detailed in the schools Data Protection Policy. If requested this information will be made available to official outside agencies.

The Records

In any case where an allegation is made, or someone in VSE has concerns, a record should be made. Details must include, as far as practical:

- Name of the student U18
- Age
- Home address (if known)
- Date of birth (if known)
- Name/s and address of parent/s or legal guardian
- Telephone number (if available)
- Is the person making the report expressing their own concerns, or passing on those of somebody else? If so, record details
- What has prompted the concerns?
- Include dates and times of any specific incidents
- Has any individual been identified in the allegation? If so, record details
- Who has this been passed on to, in order that appropriate action is taken? E.g. Principal, local social services, police, etc.
- Has anyone else been consulted? If so, record details
- ACTION TAKEN: this must be recorded.

Further Action

- Once a statement has been collected from a student further questioning should be avoided apart from important clarification of factual detail.
- The Designated Person and the Principal will meet at the earliest possible opportunity to consider an appropriate course of action in response to the information revealed by the student and consider any other relevant information.
- The Principal and DSL will decide if it is appropriate to involve other members of the school staff and also whether to inform the student's host family and parents. There may be no need to take any further action in which case this decision should be recorded in writing.
- Further action may include the immediate removal of any imminent threat of danger (such as removing them from a host family), seeking advice from the Local Authority Designated Officer, contacting the police or making a referral to the Independent Safeguarding Authority (ISA) depending on the severity of the allegation.

Dealing with allegations made against a child

It may be that the person accused of abusing a child is a child. In such circumstances the school has a duty of care to both children involved. The procedure is the same for dealing with an allegation against an adult but the school will take particular care to offer support and confidentiality to the alleged perpetrator.

Dealing with allegations against a Victoria School Student.

It may be that the person accused of abusing a child is a child or adult student attending the school. In such circumstances the school has a duty of care to both parties involved. The procedure is the same for dealing with an allegation against an adult, but the school will take particular care to offer support and confidentiality to the alleged perpetrator. The school will ensure that the alleged victim is kept safe and the alleged perpetrator may be excluded from the school or asked to change class or homestay in order to avoid further contact with the alleged victim.

Referrals to Local Authority Designated Officer (LADO)

If you want to report any abuse or discuss concerns in relation to children or young people you can also contact- accesstochildrens-services@westminster.gov.uk or tel: 020 7641 4000.

A full list of contacts is available on Pages 11 and 12.

Hilary Shaw, the Tri-borough LADO has responsibility for the oversight and management of individual cases. The LADO provides advice and guidance to employers, liaises with the police and other agencies and monitors the progress of the case to ensure that matters are dealt with in a thorough and timely manner.

Her contact details are: Hilary Shaw 020 75984876 Mob: 07817 365 519 Email:

hilary.shaw@rbkc.gov.uk

Referrals to the Independent Safeguarding Authority (ISA)

A referral must be made to the ISA when VSE withdraws permission for an individual to engage in work with under 18s or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which does not involve contact with under-18s, because they think that the individual has:

- engaged in conduct, action or inaction that has caused: neglect, emotional/psychological, sexual, or physical harm
- satisfied the Harm Test. This is to cause harm, put a child at risk, attempt to harm or incite others to harm a child
- received a caution or conviction for a relevant offence

If any of these conditions have been met the information must be referred to the ISA. The referral should be made to the ISA when the provider has gathered sufficient evidence as part of their investigations to support their reasons for withdrawing permission to engage in work with under 18s and in following good practice, consulted with their Local Authority Designated Officer (LADO).

15. Training

All members of staff will be formally trained on the processes and procedures contained in this document during their induction by the designated Person to Level 1 Safeguarding. They will sign and date that they have read and understood the policy and procedures for child protection and safeguarding. Any updates in child protection legislation will be communicated to staff at the earliest available opportunity and the training will be updated to reflect any changes. The training will be reviewed and if necessary, updated annually.

16. Prevent duty responsibilities

All staff including management and hosts within our organisation, including hosts families are given training to understand their Prevent related responsibilities, especially in the context of Safeguarding. This ensures the welfare of students and staff.

All staff, management and hosts:

- undertake appropriate Prevent duty training.
- understand the risk of radicalisation
- implement the Duty effectively
- know how to refer an individual who is vulnerable within our organisation to The Prevent Manager

Refer to the Prevent Policy and Procedures for further guidelines

Further contact Details

Consultation and Advice about a child/young person resident in the City of Westminster

To report a concern about a child or young person in Westminster please contact:

Westminster Access Team – Tel: 020 7641 4000
(Out of hours – 020 7641 6000)
Email: AccesstoChildrensServices@westminster.gov.uk

For case consultations or follow-up enquiries please contact the Duty Child Protection Adviser in the first instance on 020 7641 7668.

Leonie Bingham

Child Protection Adviser
Telephone: 020 7641 4199
Email: lbingham@westminster.gov.uk

John Griffin

Child Protection Adviser
Telephone: 020 7641 1615
Email: jgriffin@westminster.gov.uk

Gabby Bernard

Child Protection Adviser
Telephone: 020 7641 3195
Email: gbernard@westminster.gov.uk

Cathy Smith (Tues, Wed only)

Child Protection Adviser
Telephone: 020 7641 7675
Email: cjsmith@westminster.gov.uk
*Specialism: Child Sexual Exploitation

Chris Luke

Head of Social Work
Telephone: 020 7641 5341
Email: cluke@westminster.gov.uk

For LADO consultations and referrals please contact the duty Child Protection Adviser on:

Telephone: 020 7641 7668
Email: LADO@westminster.gov.uk

If you cannot reach a duty CP Adviser you can reach:

Kembra Healy

Safer Organisation Manager and Local Authority Designated Officer (LADO)
Telephone: 07823 532 538
Email: kembra.healy@rbkc.gov.uk

Tri-borough Safeguarding and Child Protection Training, Consultation and Advice for Schools and Education:

Hilary Shaw

Tri-borough Safeguarding and Child Protection Schools and Education Officer

Telephone: 020 7598 4876

Mobile: 07817 365 519

Email: hilary.shaw@rbkc.gov.uk

Marissa Asli

Tri-borough Safeguarding and Education – Liaison and Training Co-ordinator

Telephone: 020 7598 4886

Mobile: 07739 315 432

Email: marissa.aslibangura@rbkc.gov.uk

Tri-borough FGM

Gourita Gibbs

Child Protection Adviser

Telephone: 020 7641 1610

Email: ggibbs@westminster.gov.uk

*Specialism: Tri-borough Lead for Safeguarding Across Faith and Culture and FGM

PREVENT

Mark Chalmers

Prevent Programme Manager, Westminster enquiries only

Telephone: 020 7641 6032

Email: mchalmers@westminster.gov.uk

Tri-borough Multi-Agency Safeguarding Hub (MASH)

Karen Duncan

Tri-borough MASH Business Support Officer

Telephone: 020 7641 3991

Email: kduncan1@westminster.gov.uk

In an emergency call the police on 999.

I have read and understood the Victoria School Child Protection and Safeguarding Procedures.

Name

Signed

Date