



Safeguarding and Child Protection Policy

2019

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1. Introduction

PLUS (Professional Linguistic and Upper Studies Ltd.) organises 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 PLUS Safeguarding Panel 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 protect 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. 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 2018 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 Quality Control Plan
- PLUS E-Safety Policy
- PLUS DBS Policy
- PLUS Emergency Action Plan
- PLUS Fire Safety Policy
- PLUS Prevent Policy



4. Scope

The Safeguarding policy applies to everyone working at or attending PLUS Junior Centres

4.1 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.

4.2 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.

4.3 Designated Safeguarding Panel

PLUS has a Safeguarding Panel in place made up of 3 designated safeguarding leads who have overall accountability and strategic responsibility for safeguarding the welfare of young people. The Designated Safeguarding Leads (DSL) at PLUS is **James McConville, Director, Mubeen Ahmed, Summer Strategy & Planning Executive** and **Patrizia Pisano, Academic Manager**.

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The Designated Safeguarding Leads (DSL) at PLUS have received Level 3 Safeguarding and Child Protection training and are committed to:

- Ensure PLUS’ Safeguarding & 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 relevant investigating agencies and local authority children’s social services as required.
- Refer all and any allegations made against a member of the teaching or non-teaching staff to a Director of PLUS.
- Maintain confidential records of all concerns or allegations that have been reported and action taken.
- Monitor and review the policy on an annual basis in light of new recommendations and guidance in this area.

5. Safer 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 qualifications will be required.
- At interview applicants are asked specific safeguarding questions to assess their suitability to work with children and young people.
- All job offers are on the condition of successful Enhanced DBS checks or relevant international police checks for non-British nationals or for those who have lived abroad for more than 12 months.
- At least two written references are requested from within the last 12 months 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 shows 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 police check 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 is kept in a single, central record (this is a password protected spreadsheet) and records the following:
 - ❖ Identity: name, address, DoB, evidence of check made & date
 - ❖ Start date:
 - ❖ Role in organisation
 - ❖ Qualifications, evidence of check made & date
 - ❖ Enhanced DBS Certificate: disclosure number, evidence of check made & date
 - ❖ Barred list check
 - ❖ Overseas police check: check required (y/n) evidence of check made & date
 - ❖ Right to work in the UK
 - ❖ Prohibited list check
 - ❖ Disqualification by association

- **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. We will not keep any photocopy or other image of the certificate

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. Staff 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.
- Avoid displays of affection between staff members.
- PLUS operates a zero- tolerance policy on drug taking.
- Never 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.

Use of Social Media

- Do not accept friend requests or initiate contact with minors on social media platforms.
- When in photos with students, keep both hands visible (thumbs up!)

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.
- Sleep in the same bedroom as a student and/or a fellow member of staff.

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 **+44 07956 218226**

PLUS emergency number can be found on the PLUS website, the Student Handbook, the Group Leader Manual, the student ID card and the PLUS app. 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 the 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 together with an emergency phone number.

7.8 First Aid & Medical Care

If students are unwell in residence, staff and Group Leaders should take responsibility for ensuring the student is supervised appropriately. We recommend checking in on them every hour and ensuring they know to contact the emergency phone if their condition worsens.

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

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

If emergency 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.
- In case of an incident, this must be logged in the incident report form.

There is no legal age limit for the sale of over the counter medicine (OTC). If a student wants to buy OTC, it is advisable that a staff member/Group Leader checks the packaging to find out whether it is suitable for a minor.

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.

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 Meeting" and are asked to sign the Student Code of Conduct.

Attendance

All students are informed at induction that they are expected to attend 100% of their classes. They are advised that by attending all of their lessons they will receive maximum benefit from their time at the school and gain optimum improvement in their English language skills.

Any incident or misbehaviour will be reported to the Campus Manager. After a thorough investigation of the matter, together with Head Office the Campus Manager will deal with the incident in different ways, depending on its severity.

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



Expulsion

As a last resort PLUS may expel or suspend any student whose behaviour does not comply with centre rules and/or local laws. Every attempt will be made to manage the student's behaviour at the centre. In the rare circumstances of expulsion, no refund will be given.

Offences resulting in expulsion include but are not limited to:

- Purchase, attempted purchase or consumption of alcohol, cigarettes (including e-cigarettes, vapes) or tobacco.
- Possession of illegal substances
- Damage to property of any kind
- Unsatisfactory attendance at lessons/activities
- Violent or threatening behaviour to other
- Theft

In case of expulsion:

Agents, parents, guardians must be informed and arrangements made for the return journey home as soon as possible, ideally on the next available flight. This includes a PLUS transfer which must be paid for by the student's parents.

Students must be removed from the programme and separated from other students until arrangements can be made to fly home.

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 have the ultimate responsibility 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 of the students' supervision and must fill in the "Foster Care Form".

7.12 Individual students

All students arrive 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' ages.



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 Director and the Summer Strategy & Planning Executive.

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PLUS Summer Strategy & Planning Executive
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7.15 Visitors

Visits to PLUS centres are generally arranged with and authorised by Head Office who 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 actively search 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 a 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 behind.
- Inform all parties as soon as the child is found.
- Write a report for the Campus Manager.
- 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 activities

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

Students not returning to homestays by curfew time

Students are expected to return to their homestay by the curfew time (Appendix A). 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 Guidelines for identifying abuse

Identifying abuse can often be difficult as the term is used to describe a wide range of ways in which a child can be harmed. 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. Abuse can take place within a family, in an institutional setting, by telephone or on the internet.

“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”.

Physical Abuse

Physical abuse can involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, and suffocating. It can also result when a parent or carer deliberately causes the ill health of a student in order to seek attention; this is called fabricated illness. Symptoms that indicate physical abuse include:

- Bruising in or around the mouth, on the back, buttocks or rectal area
- Finger mark bruising or grasp marks on the limbs or chest of a small minor
- Bites
- Burn and scald marks; small round burns that could be caused by a cigarette
- Fractures to arms, legs or ribs in a small minor
- Large numbers of scars of different sizes or ages

Emotional Abuse

Emotional abuse happens when a student’s need for love, security, praise and recognition is not met. It usually co-exists with other forms of abuse. Emotionally abusive behaviour occurs if a parent, carer or authority figure is consistently hostile, rejecting, threatening or undermining. It can also result when the student is prevented from social contact with others, or if developmentally

inappropriate expectations are imposed upon them. It may involve seeing or hearing the ill-treatment of someone else. Symptoms that indicate emotional abuse include:

- Excessively clingy or attention-seeking behaviour
- Very low self-esteem or excessive self-criticism
- Excessively withdrawn behaviour or fearfulness; a 'frozen watchfulness'
- Despondency
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders

Sexual Abuse

Sexual abuse involves forcing or enticing a minor or young person to take part in sexual activities, whether or not the child/person is aware of what is happening. This may include physical contact, both penetrative and non-penetrative, or involve no contact, such as watching sexual activities or looking at pornographic material. Encouraging minor/young people to act in sexually inappropriate ways is also abusive. Under the Sexual Offences Act 2003, any sexual activity – contact or non-contact – with a minor under the age of 16 is a crime. Symptoms of sexual abuse include:

- Allegations or disclosure
- Genital soreness, injuries or discomfort
- Sexually transmitted diseases; urinary infections
- Excessive preoccupation with sexual matters; inappropriately sexualized play, words or drawing
- A child/young person who is sexually provocative or seductive with adults
- Repeated sleep disturbances through nightmares and/or wetting

Older minors and young people may additionally exhibit:

- Depression
- Drug and/or alcohol abuse
- Eating disorders; obsessive behaviours
- Self-mutilation; suicide attempts
- College/peer/relationship problems

Neglect

Neglect is the persistent failure to meet a child/person's basic physical and/or psychological needs, causing damage to their health and development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect a child/person from harm or danger, or failing to access appropriate medical care and treatment when necessary. It can exist in isolation or in combination with other forms of abuse. Symptoms of physical and emotional neglect can include:

- Inadequate supervision; being left alone for long periods of time
- Lack of stimulation, social contact or education

- Inadequate nutrition, leading to ill-health
- Constant hunger; stealing or gorging food
- Failure to seek or to follow medical advice such that a child's life or development is endangered
- Inappropriate clothing for conditions

If you are worried about a student, it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

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 discloses abuse are:

- Listen carefully and stay calm.
- 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."
- Communicate that she/he has a right to be safe and protected.
- 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. Assure her/him that you will try to help but let the minor know that you will have to pass the information on, but only those who need to know about it.
- 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 the attention of the management staff at head office, without fear of any repercussion or adverse action being taken against them for doing so and must complete a Disclosure/Allegation/Concern Form (Appendix B)

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 minor, 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

Please use the form in Appendix B

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

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.

Please read the accompanying PLUS Anti-Bullying Policy

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.

Please refer to PLUS' E-Safety Policy

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 violent 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 is and the associated risks.

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 radicalisation and extremism:

1. Staff training

All PLUS staff participate in Level 1 Safeguarding and Prevent training 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.

If staff do become aware of or see signs of conflict, aggressive or extreme behaviour or opinions held by a student or group of students, they are to consult with the Campus Manager who will in turn refer to the Designated Safeguarding Panel at HO.

2. 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.

3. Counteracting risks

- Promoting a safe environment for debate.
- Promoting core British values through lessons and activities.
- Being aware of the online risk of radicalisation through the use of social media and the internet.

4. 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.
- Change in behaviour or personal appearance.
- New friends, distance from old friends.
- Attempts to impose own beliefs on others.
- Being in possession or accessing materials or symbols associated with an extremist cause.
- Showing sympathy for violence, especially to other faiths or cultures.
- Secretive behaviour.

5. Working in partnership

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

9.5 Roles and Responsibilities

PLUS takes safeguarding very seriously, therefore to ensure that we adhere to and achieve the Prevent Duty we will:

- Provide appropriate training to 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 ongoing 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.



Appendix A

Curfews

All Centres	22:30
Light out	23:00

Free time allowance

12-13 year olds	No allowance
14-17 year olds	2 hours maximum

Free time allowance (hours outside of the scheduled activity times) should be risk assessed according to the age of the students and location of their accommodation. Students must always sign in and out.

The above is a *suggested* allowance for residential students to go offsite in groups of 3 or more and authorisation is dependent on the campus and is at the sole discretion of the Campus Manager.



Appendix B

Disclosure/Allegation/Concern Form

Please complete if you have any (safeguarding) concerns about an under-18 student. You must complete the boxes in bold; the other information can be filled in by Designated Safeguarding Lead later if you do not know

Date and time noted	
Student first name	
Student family name	
Gender	
Date of birth	
Nationality	
Group / individual	
Student ID	
Name of person noting concern	
Role/connection with school	
Name and Address of parents/ guardians/ carers	
Date of the incident	
Location	
Details of the alleged incident NB: If reporting a disclosure / allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more.	
Describe any visible injuries and concerning behaviour if applicable	
Name and address of witnesses	
Signed	



Response to concern. This section to be filled in by the Designated Safeguarding Lead

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

Action taken (Response & follow up)	By whom (full name)	When (date & time)



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](#)