

Safeguarding and Child Protection Policy



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Key Contacts

Internal

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|--|-------------------|--|-------------------------|
| Designated Safeguarding Lead | Dorothy Pickthall | Emergency Number: +44 (0) 7393075140 | d.pickthall@plus-ed.com |
| Assistant Designated Safeguarding Lead | Richard Ellis | Head Office Number: +44 (0) 20 7730 2223 | r.ellis@plus-ed.com |

External

| | | | |
|--|---|---|---|
| Head Office Local Safeguarding Children Board | LSCP Team for Hammersmith & Fulham, Kensington & Chelsea, Westminster | Emergency Number: +44 (0) 7739315388 Office Number: +44 (0) 20 7641 4000 | Website: https://www.rbkc.gov.uk/lscb/about-us Email: accesstochildrenservices@westminster.gov.uk |
| Ardingly West Sussex Safeguarding Children Partnership | LADO - Local Authority Designated Officer | Emergency Number: 01403 229900 Office Number: 0330 222 7799 | Website: https://www.westsussexscp.org.uk/ Email: WSChildrensServices@WestSussex.gov.uk |
| Bath Safeguarding Bath & North East Somerset | LADO - Local Authority Designated Officer | Emergency Number: +44 (0) 1454 614165 Office Number: +44 (0) 1225 396312 or 396313 or 396810 | Website: https://www.safeguarding-bathnes.org.uk/children# |
| Brighton Brighton & Hove Safeguarding Children Partnership | LADO - Local Authority Designated Officer | Emergency Number: +44 (0) 1273 335905 Office Number: +44 (0) 1273 295643 | Website: https://www.bhscp.org.uk/p/venting-abuse-and-neglect/reporting-concerns/ |
| Chelmsford | LADO - Local Authority Designated Officer | Emergency & Office Number: +44 (0) 3330 139 797 | Website: https://www.escb.co.uk/ |

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| Essex Safeguarding Children Board | | | Email: childrens.safeguarding@essex.gov.uk |
| Chester Cheshire West and Chester Safeguarding Children Partnership | iART - Integrated access and referral team | Emergency Number: +44 (0) 1244 977 277 Office Number: +44 (0) 300 123 7047 | Website: https://www.cheshirewestscop.co.uk/ Email: i-ART@cheshirewestandchester.gcsx.gov.uk |
| Dublin TULSA – Child and Family Agency | Dublin South Central -Social Worker | Emergency Number: +353 (0) 76955749 | Website: https://www.tusla.ie/ Address: Child and Family Agency, Bridge House, Cherry Orchard Hospital Dublin 10 |
| Edinburgh Public Protection in East Lothian and Midlothian | Social Care Direct – Child Services Duty Team | Emergency Number: +44 (0) 131 200 2324 Office Number: +44 (0) 131 271 3413 | Website: https://emppc.org.uk/home/ Email: socialcaredirect@edinburgh.gov.uk |
| Epsom Surrey Children's Single Point of Access (SPA) | C-SPA - Children's Single Point of Access | Emergency Number: 01483 517898 Office Number: 0300 470 9100 | Website: https://www.surreycc.gov.uk/social-care-and-health/childrens-social-care/contact-childrens-services Email: cspa@surreycc.gov.uk |
| Hatfield Hertfordshire Safeguarding Children Partnership | HSCP | Emergency Number: +44 (0) 300 123 4043 | Website: https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Hertfordshire-Safeguarding-Children-Partnership/hscp.aspx |

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| Kingston Kingston and Richmond Safeguarding Children Partnership | Kingston Single Point of Access (SPA) | Emergency Number: +44 (0) 20 8770 5000 Office Number: +44 (0) 20 8547 5008 | Website: https://kingstonandrichmond Safeguarding Children Partnership.org.uk/ Email: lscsb-support@kinrichlscb.or.uk |
| Loughborough Leicestershire and Rutland Safeguarding Children Partnership | LADO - Local Authority Designated Officer | Emergency Number: +44 (0) 116 305 7597 or 5641 Office Number: +44 (0) 116 454 2440 | Website: www.lrsb.org.uk Email: lado-allegations-referrals@leicester.gov.uk |
| Stirling Stirling Council Child Protection Committee | Social Worker | Emergency Number: +44 (0) 1786 470500 Office Number: +44 (0) 1786 47117 | Website: www.stirling.gov.uk |
| Uxbridge Hillingdon Safeguarding Children partnership | MASH – multi-agency safeguarding Hub | Emergency Number: +44 (0) 1895 250 111 Office Number: +44 (0) 1895 556 633 | Website: https://hillingtonlscb.org.uk/ |
| Windsor Bracknell Forest Local Safeguarding Children Board | Duty Team | Emergency Number: +44 (0) 1344 786 543 Office Number: +44 (0) 1344 352 005 | Website: https://bflscb.org.uk/ Email: MASH@bracknell-forest.gov.uk |

Policy Statement

Context

Professional Linguistic and Upper Studies Ltd. (PLUS) organises English Language study holidays for under 18s in the UK, Ireland, the USA, and Canada. Students are offered a choice of homestay (family stay) or residential accommodation and typically stay for two weeks, although student stays can range from one to four weeks. Students are accommodated residentially in boarding schools, colleges and/or universities, and at times may be placed in alternative accommodation such as hotels, hostels, and lodges. PLUS programmes typically include fifteen hours of English tuition per week in, [wherever reasonably possible], internationally mixed groups, and occasionally in closed groups. In addition, PLUS programmes include sports sessions, cultural experiences, and leisure activities.

Multi-Centre Organisation

PLUS operates its programmes out of multiple locations and as such, the Campus Manager and Activity Manager at each campus are the Safeguarding Officer and Assistant Safeguarding Officer respectively. They are trained to Level 2 and have the knowledge and skills to recognise and act on safeguarding incidents and concerns. All staff, which includes Course Directors, Teachers, Activity Leaders, Group Leaders, Sports Coaches, and campus host institution staff should report any concerns to one of the two Campus Safeguarding Officers. If any third-party or external provider has any allegations or concerns, they should contact either the Campus Manager, Activity Manager or the company DSL or ADSL whose 24/7 emergency number is documented at the beginning of this policy.

What is Safeguarding?

- The company's duty of care to look after under 18s.
- Ensuring safe systems are in place for the wellbeing of under 18s.

What is Child Protection?

- 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.

Statement

PLUS is committed to safeguarding (looking after children), child protection (protecting children from abuse), and promoting the welfare of all its students. PLUS aims to always act in the

best interests of the child regardless of gender, age, ethnicity, nationality, religion or disability as all children have a right to safety and protection from any harm or potential harm (behaviour that causes physical or psychological damage). 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 wellbeing of every child who studies with us and we are committed to safeguarding and promoting the welfare of children and young people. For the purposes of this policy a child is defined as a person under the age of 18. This policy was updated in March 2020 and we are committed to reviewing it at regular intervals, drawing on feedback from students, staff, homestay providers and hosts, external providers, and third parties.

Adults' responsibilities

All adults (any one aged 18 or over) associated with under 18s have a legal duty of care, and a responsibility to safeguard children and protect them from harm. All staff, third-party providers and/or external providers who come into contact with any of PLUS' under 18s should read and follow this policy, share PLUS' commitment to safeguarding, undertake relevant training, report all concerns, incidents or allegations internally and/or externally. All internal and external contact details can be found on the first two pages of this document.

Structure, Roles & Responsibilities

The role of the Campus Safeguarding Officer and Assistant Safeguarding Officer is to:

- **Receive information** from staff, children, group leaders, parents or carers who have child protection concerns and record it as clearly and accurately as possible.
- Assess the information promptly and carefully, clarifying or obtaining more information about the matter as appropriate.
- **Report it to the DSL and/or ADSL at PLUS Head Office.**

The Campus Safeguarding Officers (CSOs) are trained, guided and supported by PLUS' DSL and ADSL, and have access to 24/7 direct communication with the leads whenever they need support and guidance. The DSL and ADSL are a source of expertise and advice, who are trained to Specialist level. The Safeguarding Officers at each campus are made known to all students and staff. At least one CSO will be available, on each site, **at all times** and each campus, guided by the DSL and ADSL, makes appropriate safeguarding adjustments according to the student demographic, course type(s) booked, and relevant local safeguarding information. The facilities and accommodation are risk assessed, and procedures are put in place to minimise and mitigate those risks (such as procedures to be followed and precautions put in place in the case of open campuses). All on site campus staff must read all the completed risk assessments for the campus that they are based at, and it is their duty to ensure that they are familiar with campus specific practices and procedures.

Aims

PLUS aims to achieve a safe environment for all and uphold all students' rights to safety and protection through the following action:

- Taking best practice advice from policies, accreditors, government bodies, and charities (including

but not limited to: *Keeping Children Safe in Education*, the British Council, English UK, the Department of Education, and NSPCC).

- Promoting a culture of vigilance and maintaining an attitude of 'it could happen here' to avoid complacency.
- Having a Designated Safeguarding Lead (DSL) and an Assistant Designated Safeguarding Lead (ADSL), trained to Advanced level with updated training every two years, making it clear to all staff who is the DSL and ADSL. The Director will ensure that there is always someone at this level available to speak to regarding any concerns.
- Face-to-face safeguarding training for all Safeguarding Officers.
- Online safeguarding training for all staff, unless they are able to provide us with a valid certificate.
- All staff understand their duty to report any child protection concerns to a Safeguarding Officer or the Safeguarding Leads.
- Following safer recruitment procedures. All staff involved in recruitment are trained in safer recruitment and have the knowledge and skills required to verify the suitability of all staff to work with under 18s including requiring all staff to provide a valid DBS or other valid check, such as a police check, relevant to all countries they have lived in in the past ten years.
- All students have a clear channel of communication in times of need, and all staff know how to respond to a student who makes or wishes to make a disclosure.
- Ensuring that all staff receive and read a copy of this policy, and sign to say they have done so.
- Periodically reviewing and updating safeguarding procedures and guidance outlined in this policy each Autumn, and in light of any concerns, allegations and/or incidents over PLUS' peak summer period.
- Concern/Allegation forms are made available to all staff to make written disclosures.
- Verbal reports are recorded in writing, word-for-word, and sent to the DSL and or ADSL.
- Records of incidents are kept in a company Safeguarding file which is only accessible by the Director, the Human Resources Manager, and the DSL and ADSL.
- The DSL and ADSL update all members of PLUS Head Office via email of any changes and/or updates to Safeguarding and the protection of children. All staff must confirm that they have read and understood the changes in writing and are given an opportunity to ask any questions face-to-face.
- Homestay Hosts accommodating under 18s complete an Enhanced DBS with Question 66 being answered Yes, to confirm that the activity is taking place in their home and all adults in the household will be checked.
- Any member of staff whose DBS is being processed and not currently complete will always be accompanied by a verified member of staff and will not be accommodated in a place where they have unrestricted access to under 18s.
- All child protection concerns are referred to the relevant local Safeguarding Partnership/ Safeguarding Partners for advice.
- Any member of staff found not to be suitable to work with children will be notified to the Disclosure and Barring Service for consideration for barring following resignation or dismissal.
- External sites and third-party providers are risk assessed and vetted to ensure they have the appropriate level of access to under 18s.

[Legal Framework Consulted in this Policy](#)

[Keeping Children Safe in Education, September 2020.](#)

[Working Together to Safeguard Children, July 2018.](#)

[Disqualification under the Childcare Act 2006, August 2018.](#)

[Information Sharing, July 2018.](#)

[National Minimum Standards for Private Fostering, 2005.](#)

[Regulated Activity in Relation to Children, 2012.](#)

[Searching, screening and confiscation, January 2018.](#)

[Use of reasonable force, July 2013.](#)

[Sexual Offences Act, 2003, April 2021](#)

[Sexting in schools and Colleges, August 2016.](#)

[Mandatory Reporting of Female Genital Mutilation – procedural information, November 2016.](#)

[Child protection records retention and storage guidelines, September, July 2020.](#)

[Safeguarding Children Partnership Arrangements \(Westminster\), June 2019.](#)

[DBS Code of Practice, November 2015.](#)

[Revised Prevent duty guidance: for England and Wales, April 2021.](#)

[Whistleblowing, March 2015](#)

[Information sharing: advice for practitioners providing safeguarding services, July 2018.](#)

Associated Policies

All of the below PLUS policies are within or at the end of this policy.

- Staff Code of Conduct
- Student Code of Conduct
- Student Behaviour & Discipline Form
- Equal Opportunity Policy
- Anti-Bullying Policy
- Emergency Action Plan
- Homestay Guidelines
- Quality Control Plan
- E-safety Policy
- Online Safety Agreement
- Photography and Filming Policy
- Photography Release Form
- DBS Policy
- Employment of Ex-offenders Policy
- Individual Student Emergency Contact Form
- Acknowledgement of Receipt and Acceptance of PLUS Safeguarding and Child Protection Policy

Under 18s Involvement

Within 48 hours of arrival on campus various steps are taken to ensure students are aware of PLUS Safeguarding practices:

- All PLUS students, Group Leaders, and Activity Leaders take part in a Welcome Presentation lead by the CSOs. It is the duty of the Campus Manager and the Activity Manager to inform all students and Group Leaders, in an open and approachable manner, that if stu-

dents have any concerns about their safety or wellbeing, or have any allegations to report, they as CSOs are available at all times. It will also be made clear that if students do not feel comfortable speaking to the CSOs, they can speak to any Activity Leader or their Group Leader who will then relay the information to the CSOs. It is the duty of all staff to report any concerns or allegations to the CSOs, who must then report all safeguarding related incidents to the DSL and/or ADSL at PLUS' Head Office. Campus generic and campus specific Health and Safety procedures are also relayed to students during welcome presentations. These include but are not limited to, what to do if you get lost, how to safely use electrical equipment, the importance of wearing a lanyard, how to use public transport in London, and emergency contact numbers – such items also come under the branch of contextual safeguarding at the end of this document.

- Students are given a Student Behaviour Form, in addition to their pre-signed Online Safety Agreement, which they must read and sign. It is the duty of the Group Leader to ensure that students understand the contents of the Behaviour Form so that students know what is expected of them and what their responsibilities are to help keep themselves safe.

In addition, all PLUS students are given the opportunity to give qualitative feedback as outlined in the PLUS Quality Control Plan. On the weekly feedback form, students are asked if they feel there is anything PLUS can do to make them feel safer. Feedback is reviewed by the PLUS Safeguarding Panel (DSL & ADSL) after each PLUS summer and considered when reviewing and updating this policy.

[Policy Availability](#)

The full version of this policy is available on the PLUS website: www.plus-ed.com as a self-contained document. Some stakeholders may be sent a simplified, pared down version, relevant to them.

Codes of Conduct

PLUS Staff Code of conduct

PLUS staff encompasses **Head Office** staff, **Campus Managers, Activity Managers, Activity Leaders, Course Directors, Teachers,** and **Group Leaders, Homestay Hosts** or any other employee of PLUS Ltd. Safeguarding and child protection are paramount at PLUS and therefore, all 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 or misinterpreted. The aim of the code of conduct is to protect not only under 18s but also staff members from unfounded allegations.

All PLUS staff are role models and it is their duty to set positive examples by following the below guidance:

- Staff should **NEVER** under any circumstance, establish or seek to establish contact with pupils for the purpose of securing any kind of relationship, through any means, whether face-to-face or via social media or the internet. If a student initiates contact, should the need arise, simply explain to them that they cannot, as it is company policy. This explanation should mitigate any feeling of rejection. The onus is on the member of staff, not the students, to distance themselves from any potentially inappropriate situation.
- Staff should not give their personal details such as their home or mobile phone number; home or email address unless the need to do so in an emergency or similar is agreed with senior management.
- Avoid being alone with a child or children. If a child insists on talking 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.
- Do not enter a student's room unless it is **an emergency** (for example, a student is missing, or there are concerns about their health) or there are other causes of concern such as misbehaviour or wrongdoing, and another member of staff is present, preferably of the same gender as the student. All campus staff must seek approval from the CSOs before taking it upon themselves to enter a student's room.
- Maintain professional standards of pastoral care by:
 - a. Treating all students, staff and associated adults with respect. This includes the use of appropriate language (avoiding the use of sexualised, derogatory or over familiar language) with all stakeholders.
 - b. Avoiding displays of affection between staff members.

- c. Avoid physical contact with students where reasonably possible. While for members of the Child Workforce holding children's hands and/or hugging (for example) may be appropriate in lots of cultures, it is **not appropriate** in the UK. All staff should take reasonable steps to avoid physical contact. For example, if a child takes you by surprise with a hug, raise your hands high so that it is clear that you did not intend for the contact to occur, or try to turn it into a high five before contact occurs. The same methods should be employed when pictures are being taken – raise your hands.
- d. Dressing appropriately whilst on duty (Campus Life staff must wear the PLUS t-shirt at all times). The following items are **not** acceptable:
- Revealing dresses and tops – consider what students may be able to see if you are bending, sitting on the floor, leaning across a table or performing First Aid.
 - Visible underwear – be aware of items showing when bending, sitting, leaning across a desk or performing First Aid.
 - See-through garments.
 - Spaghetti-string tops or vest tops.
- Read and understand the content of this policy and all other policies and codes of conduct that may be issued by PLUS.
 - Never flirt with a student or make sexually suggestive or provocative comments.
 - Try to recognise if a student is developing strong feelings for a member of staff and do nothing that might be construed as encouraging this. Inform the Campus Manager if this is suspected. The campus manager should make all reasonable adjustments to ensure that the student and staff member have as little contact as is reasonably possible.
 - 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**. This **extends to any form of kissing or touching**, regardless of the age of consent being lower than the age of 18.
 - PLUS operates a zero- tolerance policy on drug taking which constitutes Gross Misconduct. Any employee caught in possession of drugs will be immediately removed from the Campus and reported to the relevant authorities.
 - Alcohol must not be kept or consumed on campus at any time. Failure to adhere to this will result in disciplinary action.

- Never smoke in view of any under 18s or any other clients, and abide by the host institutions smoking policy.
- Be aware that the breaking of the above-mentioned rules may result in disciplinary action which could include summary dismissal.

Residential Accommodation & Night Checks

It is the responsibility of the Campus Manager and/or the Activity Manager to complete/make sure night checks are completed in the following manner:

- Night checks are in place to make sure that students are in their rooms and not doing anything other than going to sleep or getting ready to go to sleep.
- Night checks should be initiated at or after 11 pm **every night**.
- **Two members** of staff should complete night checks.
- Ideally, the gender of both staff members should be the same as the gender housed in the accommodation block, however this is not always possible. If the management team are both of the same gender, or one of them is on a day off, they should take an Activity Leader or a member of the Academic Team of the opposite gender with them. If the management team are each of a different gender, they can go together. However, when knocking on student doors and flats, the **staff member that is the same gender as the students, should take the lead**. The staff member of the opposite gender should position themselves (e.g. to the side of the door) so that they are not able to see inside the flat or room until the staff member taking the lead indicates that it is safe for all to do so.
- The Campus Manager must have made it very clear during the Welcome Presentation and in the Group Leader meeting that staff will be doing night checks. Students should also be told that they should be appropriately dressed when going to and from the bathroom to their bedroom either by wearing a long dressing gown or by only getting dressed and undressed in the shower cubicle.
- In university accommodation, **there is no need to enter a student's flat unless it is an emergency or they are having a party or being excessively loud**, the same applies to student rooms in boarding houses. If this is the case, please see the procedure for entering student's rooms/ flats. Otherwise, night checks mean **walking around ALL the accommodation blocks**, perhaps even entering the corridors between the flats and just making sure that everything is quiet and there are no students out of the blocks/ everything sounds like students are either asleep or going to sleep.

- In boarding houses, you will have to **enter the houses and walk down the corridors** student use to get to the bathrooms to complete the checks. **Be very aware of this when you enter the house.** If you hear any students still awake, make your presence known with your voice by saying, for example, 'night checks'; not loud enough to wake people up but enough for anyone in the corridors to hear you should they be going to and from the bathroom.

Procedures for opening students' doors/rooms/flats

- Only **emergencies and excessive noise or wrongdoing** warrant opening the door to students' rooms and/or flats if the student(s) is/are inside the room/flat or suspected to be inside.
- **Two members** of staff should be present, ideally both of the same gender as the students housed in the accommodation house or block they are entering in either boarding accommodation or university shared bathroom accommodation. In university en-suite accommodation, as flats are usually of mixed gender; each of the two staff members should be of the opposite gender.
- The **staff member that is the same gender as the student(s), should take the lead**. The staff member of the opposite gender (if any) should position themselves (e.g. to the side of the door facing the wall) so that they are **not able to see inside the flat or room** until the staff member taking the lead indicates that it is safe for all to do so.
- The staff member taking the lead should **knock on the door**. If the student or students respond, tell them to quieten down and/or ask them if they are okay without even opening the door. In the case that there is no response, and the situation requires the door to be opened, the Safeguarding Officer should decide whether it is appropriate to knock again or to open the door.
- If a decision has been made to open the door, the lead staff member should **open the door slightly, announcing who they are and that they are doing so**. If there is still no response from the student, open the door fully to either assess the situation or to tell the students to calm down and go to sleep.

Procedures for entering students' rooms/flats

If a staff member ever enters a student room, whether it is during an emergency, in the case of excessive noise or wrongdoing, to help students, to complete room checks or any other permissible reason, staff must follow these rules:

- **ALWAYS leave the door open**. Doors can be propped open with a chair or by the second member of staff.
- **Never close yourself in a room alone with a student**. This is not only to protect the students from harm but also avoid any situation which can be misconstrued or put any

member of staff at risk of false allegations.

Bathroom facilities

PLUS will make the appropriate arrangements for separate bathroom facilities for students and staff. In times of operational need, bathrooms may have designated times and/or slots for various groups. **Staff must dress appropriately when going to and from the bathroom.** This means staff should only get dressed and undressed in the cubicle when staying in accommodation with shared bathrooms.

Cameras, mobile phones or any other type of equipment with a recording device must not be used in a toilet or bathroom areas that are used by students. Pictures of student bathrooms can be taken by managers for operational reasons when there are no students on site and managers have the express permission from Head Office.

Student Code of Conduct

PLUS is committed to creating an environment for its students and staff that is safe, where everyone is treated with dignity and respect. PLUS aims for all students to have a safe and enjoyable experience.

Please follow the guidance below and sign the student behaviour form to say that you have read and understand it and agree to follow it. Ask your Group Leader or a member of PLUS staff to clarify anything that you are not clear about or have not understood:

- **Follow instructions** given to you by your Group Leader and/or PLUS staff. If you are forgetful, write them on your phone or take a picture of them to refer to.
- **Be on time!** If you are late for whatever reason, let your Group Leader know immediately.
- **Always wear your lanyard** during the day. Only remove it when you get ready for bed. Lanyards keep you safe and make you easily identifiable. They also have important phone numbers on them should you ever get lost.
- **Attach your room key to your lanyard** / put your key card in the lanyard holder. If you lose your key/key card, you/your parents will have to pay for a new one.
- Put your alarm on before you go to sleep at 11 pm, so you **wake up on time** and **give your phone a rest!**
- If you hear the **fire alarm, leave immediately**. If you can, take your lanyard/ make sure you have your lanyard, and leave all other belongings and exit the building swiftly, quietly, and calmly. Do not assume it is a test, even if you cannot see or smell any fire or smoke where you are, it could be a real fire threatening to block your exit.
- **Always behave responsibly and safely**.
- **Dress appropriately** for the type of activity you will be doing. Seek advice from your Group Leader if you are unsure as to what is appropriate. E.g. hooded tops with the hood up and any form of headgear must not be worn in classrooms unless for medical or religious reasons.
- **Take care of PLUS equipment, resources, facilities and buildings**. If you damage anything, the venue will have to pay for it to get repaired. The cost of the repair will be charged to either you or your group and must be paid before you can depart.
- Ensure you **attend 100% of your programme**. If you are feeling unwell, you must tell your Group Leader or a PLUS member of staff. Sometimes it is not always safe to stay in your room when you are sick and you may have to spend the day on a sick bed in one of the main offices.
- PLUS operates a **zero-tolerance policy on drugs**. Students found to be in possession of drugs or to have taken drugs **will be sent home**.
- Students must not consume or purchase alcohol. It is **illegal for alcohol to be purchased or consumed by those under 18 years**.

- Students are not allowed to smoke anywhere on campus. **It is illegal** in the UK to

smoke if you are under 16 years old and illegal to buy tobacco if you are under 18 years old.

- At PLUS, we respect all students and staff. **Bullying or harassment is not acceptable.** If you feel you are being bullied or harassed, then please speak to a member of PLUS Staff.
- Aggressive, threatening or violent behaviour towards anyone will not be tolerated.

Accommodation (Residential Students)

- **Be in the residence blocks by 10.30pm.** Lights out (that means go to sleep!) at 11pm. PLUS staff will be coming around the blocks to check that you are sleeping!
- **Do not leave your accommodation after 10.30pm** unless it is an emergency.
- **Be quiet after 10.30pm.**
- **Sleep in your own room** in your own bed.
- **Never move your mattress.** Especially not in the kitchen! You could accidentally block a fire exit in doing so.
- Do not enter any areas which are designated for the opposite gender - **no boys in girls' sections and no girls in boys' sections.**
- There will be weekly, spot room inspections while you are not in your room. **Keep your room clean and free from damage.** Put rubbish in the bin. Keep your clothes in the drawers and wardrobes provided or in your suitcase, not on the floor! If you accidentally break something, let your Group Leader know. We might be able to fix it.
- **No lit flames** such as candles in your room.
- **No dangerous electrical equipment** that could be potential fire hazards such as heaters or hot plates.
- **Do not overload the electrical sockets** i.e. only use one adapter per socket/ never create your own version of an adapter! Your creativity can be used during activities instead!
- You are provided with 3 meals a day. No cooking is allowed, this includes items such as Pot Noodles. It is forbidden to cook/boil any food in the kettle. Kettle are for water ONLY. Never put anything other than water inside the kettle.
- Your Group Leader can take care of your passport and travel documents. Any other **valuables are your responsibility to look after.** It is best to follow this guidance:
 - a) Only take small amounts of cash out on trips with you.
 - b) Keep your valuables safe and hidden. When you pay for something, don't get ALL your cash out on display.
 - c) Try to have banknotes of less than £50. These notes are rare.
 - d) Have two wallets/purses, one with just enough for the day, and one to keep all the rest in.
 - e) Don't use your phone in the street or while walking, keep it safe in a zipped pocket.
 - f) Wear your backpack on your front if you have anything valuable inside.

Accommodation (Homestay Students)

- Remember you are a guest as well as part of the family so please **show respect to all family members.**
- **You must be back in your homestay by 7 pm** unless you have written consent to return later and will be accompanied home by a Group Leader or another PLUS member of staff. You must return by 11 pm at the absolute latest.
- **You must not leave your homestay after returning from the campus** unless you have written permission to do so.
- You **must sleep in your own room** at night.
- **No lit flames** such as candles in your room.
- **No dangerous electrical equipment** that could be potential fire hazards such as heaters or hot plates.
- **Do not overload the electrical sockets** i.e. only use one adapter per socket/ never create your own version of an adapter! Your creativity can be used during activities instead!
- You may have to take part in family chores such as clearing the table after dinner and washing up.
- It's your responsibility to **tidy up your bedroom and generally clean up after yourself.**
- Always **ask permission to have a visitors.** Permission must be accepted in writing.
- **Ask permission before using the home telephone** as this may incur charges.

Lessons

- You must **be on time** for all classes
- You must **attend 100%** of your lessons
- **Switch off** your mobile phones and any other communicating devices when you are in class
- **Put your rubbish in the bin.**
- Let your teacher know if you need any help or support.

Breaching the Student Code of Conduct

If a student fails to achieve the PLUS expected standards of conduct, their behaviour may be addressed through the Student Disciplinary Procedure.

A serious breach of this code of conduct may constitute Gross Misconduct and could lead to expulsion and being sent back home. Examples of what may be deemed Gross Misconduct include, but are not limited to the following:

Bullying Harassment.

Aggressive and threatening offensive behaviour or language, fraud and deceit.

Cheating and/or plagiarism.

Theft.

Intentional or reckless damage to Plus property or student property.

Serious misuse of Plus property or equipment.

Alcohol or drug taking.

Smoking on college or residential premises.

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 **must not transport students** in their own car under any circumstance as they are not insured commercially.

Favouritism & Gifts

Staff must not have favourite students. Favouritism could lead to others feeling left out and leave staff open to accusations.

In the UK gift giving can be seen as attempted bribery. Staff must not accept gifts from students and/or Group Leaders until the group's departure day.

Whistleblowing Policy

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 further understand Whistleblowing, please read the below extract from '*Whistleblowing, Guidance for Employers and Code of Practice, March 2015*':

"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 is very different from a complaint or a grievance, which are not usually covered by whistleblowing law. If you wish to raise concerns over how child protection issues are being handled, the NSPCC Whistleblowing Advice Line can be reached on 0800 028 0285. If you have a complaint of a grievance, please see the PLUS Grievance Procedure and Disciplinary Rules on the PLUS website.

Child Protection

Situations When Adults need to respond

Adults have a responsibility to respond if they:

- i. Notice something themselves.
- ii. Are told about something by another person, student or adult.
- iii. When following a specific procedure an U18 disclosed something to them.

Identifying main forms and secondary of abuse and recognising symptoms

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.

Main Forms

'Working Together to Safeguard Children' identifies four types of abuse:

- Physical
- Emotional
- Sexual
- Neglect

Secondary Forms

- Child Sexual Exploitation
- Honour based Violence (including Female Genital Mutilation (FGM))
- Peer-on-peer (including Bullying & Cyber Bullying, and Sexual Violence and Sexual Harassment)

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.

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.

Honour Based Violence

(HBV), where family honour is considered more important than UK law (e.g. forced marriage) and includes Female Genital Mutilation (FGM). 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.

Peer-on-peer

Peer-on-peer abuse is not just adult to child. It encompasses the Bullying & Cyberbullying, and Sexual Violence and Sexual Harassment.

Bullying & Cyber 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 and/or Activity Manager, who will report it 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. All persons involved in an incident should go through formal interviews following the same procedure as a disclosure.

Sexual Violence and Sexual Harassment

Sexual Violence and Sexual Harassment usually involve male-to-female abuse and the following incidents are examples of unacceptable behaviour:

- Cat calling (sexually suggestive comments directed at someone privately or publicly)
- Skirt raising
- Up-skirting (it has been illegal in the UK since April 2019; this involves taking a sexually intrusive photographs up someone skirt without their permission)
- Touching Breasts

Or anything similar to the above.

A child telling an adult (disclosure)

Reassure – Report – Record

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 – if the situation allows, take the student into a private place with another staff member present who can report *word-for-word* what is said. Ideally, they should disclose to the Safeguarding Officers.
- 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 Safeguarding Officers 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)

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.

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.
 - If the Campus Safeguarding Officers were not present during the original disclosure, they should follow up with the student and their Group Leader (as long as the GL is not implicated in the disclosure) or adult reporting the incident.
 - A formal meeting should take place. The Campus Manager should lead the meeting and the Activity Manager, or similar, should take *word-for-word* notes of the disclosure/report. Which should then be read and signed by all those present and sent to Head Office.
 - If in any doubt as to how to proceed, the Campus Safeguarding Officers should contact the DSL and/or ADSL using the emergency number at the beginning of this document to ask for guidance rather than waiting for a formal response via email.
 - There should be reasonable monitoring and separation of all those involved. For example, if a student accused another student of rape, the accused should be roomed in a separate accommodation block/ house and be under the strict supervision of their Group Leader or another member of PLUS staff. The same applies for adults.
- None of the parties involved should be left unsupervised.
- Invite other persons involved or witnesses to a formal private meeting where *word-for-word* written recordings are made and sent to the DSL and ADSL.
- Ensure that all parties involved are monitored and separated until you receive further instruction from the DSL and/or ADSL.

Please use the form in Appendix A

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

Confidentiality

Any adult who becomes aware of child protection information must only share it with the designated team; not with anyone else, including their own family. Confidentiality about both the victim and the accused must be maintained.

Difference between a concern and a serious issue

Concern: A concern is why you see something that doesn't appear to be right, however there is no immediate danger to Under 18s.

Serious Issue: When an under 18 is in immediate danger of harm or abuse and an urgent response is required.

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.

Keeping Records

Storage & Access

Disclosure information is kept in a single, central record (this is a password protected spreadsheet) and records the following:

- Identity: name, address, date of birth, evidence of check made & date.
- Start date:
- Role in the 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.

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.

Training

Responsibility

Ultimate responsibility for staff training lies with the DSL and ADSL who ensure that all Head Office staff members involved in recruitment complete a Safer Recruitment Training Course. The administration of safeguarding and prevent training for PLUS Summer Staff lies with the Academic Recruiter and Leisure Recruiter who are monitored by the DSL and ADSL. The Operations Manager is responsible for ensuring that homestay hosts have completed their training and Sales ensure that Agents confirm that their Group Leaders have completed Safeguarding and Prevent training. Campus Managers and Activity Managers are given an additional face-to-face level of training by the DSL and ADSL.

Different Levels of Training

All PLUS staff including Homestay Hosts and Group Leaders participate in Level 1 Safeguarding and Prevent training prior to the commencement of their employment. Campus Managers and Activity Managers are trained to Safeguarding Level 2. The DSL and ADSL are trained to level 3.

Content & Delivery

Level 1 'Basic Awareness' Training is delivered online using the British Council Online Training which has various versions of basic awareness tailored to specific stakeholders. Prevent training is also delivered online by the Home Office. Staff are asked to complete the training every two years unless there have been significant updates whereby, they are requested to complete it annually. Level 2 training is conducted annually and Level 3 training is completed face-to-face every two years, usually through English UK.

Ensuring Understanding

All PLUS Summer staff have to complete an online test to ensure that they have understood their training and this safeguarding policy. They must achieve 100% in order to commence their employment.

Recording Training

All training providers issue completion certificates and they are kept in the employees file stating the following:

- I. Date of training.
- II. Who completed the training.
- III. Content of training.
- IV. Evidence that it was completed and understood.

Safer Recruitment

Overview

PLUS applies a comprehensive and strict recruitment and selection process. To ensure that candidates are suitable to work with children.

Recruitment Materials & Stages

In all recruitment materials PLUS' commitment to safeguarding and child protection is reinforced. Applicants are informed of suitability checks during their interview, and as part of their job offer letter. Safeguarding and Child Protection is highlighted in all PLUS recruitment advertisements.

All applicants must submit a CV with their application and all gaps in CVs must be explained satisfactorily. For example, for long periods of travel applicants may be asked to provide supporting documents such as travel itinerary. At interview, applicants are asked specific

safeguarding questions to assess their suitability to work with Under 18s. Proof of identity and qualifications are required.

All new members of staff must provide PLUS with **two** references who are asked 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. For staff recruited from outside the UK, one of the two references must be from the applicants' most recent employer. Returning staff from inside or outside the UK must provide **one** reference, which must be from their most recent employer.

Applicants informed

In order to deter abusers, applicants are informed of the thoroughness of the application process including that references will be specifically asked about applicants' suitability to work with under 18s, and that references will be followed up.

DBS Applications and renewals

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 unless they can provide one of the following: a valid enhanced DBS certificate dated within three months of their start date in a similar role (PLUS will still carry out a 'barred list check'); they are on the government update service in which case PLUS will check their status online to ensure there is 'no change', and proof thereof will be kept on file.

For returning staff, PLUS will access the original safeguarding checks that were made when the employee first applied to work for PLUS. If the returning staff member is from the UK, a minimum of a barred list check will be carried out before they commence work, and a new DBS will be carried out unless they are on the update service. If the returner is from outside the UK, a barred list check will not be carried out unless they have worked in the UK since working for

PLUS, however, they should apply for a new police check/and or certificate. Returning summer staff may start work without supervision and without a risk assessment before the new DBS is complete or before the new police check and/or certificate has been issued, however, the employee must supply PLUS with evidence of having applied for a new certificate and/or check.

All job offers for new staff are on the condition of successful Enhanced DBS checks or relevant international police checks and/or certificates for non-British nationals, or for those who have lived abroad for more than 12 months. For returners, all job offers are on the condition of a suitable reference from their most recent employer and a 'barred list' check if applicable. PLUS reserves the right to request additional referees. In addition, references are subject to follow-up call.

Head Office staff have their DBS renewed every three years, and returning summer staff must follow the same rules as new starters above.

PLUS will also ask for written confirmation from its partners and contractors that they will only

employ staff who have been DBS checked or equivalent, and ask agents to provide confirmation that they have obtained a police check for Group Leaders escorting groups that include under-18 year old students.

[Recruitment of Homestays](#)

Homestay providers 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 hosts 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.

All adults aged 18 or over in homestay are checked. Should PLUS ever recruit their own homestay hosts, this will be done by ticking box 66 on the main host's enhanced DBS check which means that the whole household will be checked. Homestay providers 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 Provider Terms and Conditions.

[Applications awaiting DBS](#)

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.

[Applicants with a Criminal Record](#)

If an applicant's disclosure shows a criminal record, PLUS will ask the candidate if they would like to disclose the offence, and review the applicant in the light of the information relating to the criminal record, and make a decision on the applicant's suitability accordingly. If the applicant declines to disclose the offence, their application will be denied.

Applicants where Criminal Check not Possible

For some countries, it is not possible to obtain a criminal record check for non-nationals. In these cases, employees must supply an additional reference from their employer during their time abroad. If their employer is their most recent employer, they must

Single Central Record

All records of the checks that have been completed for each employee are kept on single central record.

Prohibited List Check

The prohibited List check is an additional check on staff who have been deemed unsuitable to work in the regulated education sector. This check is made across the European Economic Area (EEA) as well as the UK and will be carried out on applicants who have worked in state schools in the EEA.

Welfare

Use of Risk Assessments

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. Campus Managers and Activity Managers receive training prior to the commencement of the campus on the importance of risk assessments and how to complete them with a final test to check understanding. PLUS also supplies example risk assessments, and risk assessments completed by the campus venue to the Campus Managers in order to assist them. Completed campus specific risk assessments are given to Group Leaders, who relay the information to students, and sign to say they have done so. All on-site PLUS staff, must also read the risk assessments and then then the Campus Manager and Activity Manager holds a training session on them to check for understanding and ensure that all staff know the procedures that are in place for mitigating any risk. All staff must also sign to confirm this, and all risk assessments are then displayed in the Campus Manager's office. The risk assessments are reviewed and updated before every activity. In addition, the Emergency Action Plan (EAP) is also in place for Grade A emergencies that involve serious incidents, injury or worse. Both staff on campus and at Head Office have clear procedures to follow and the appointed staff member in the event of an emergency on Campus is the Campus Manager, or the Activity

Manager in their absence. The appointed staff members at Head Office are the DSL and the ADSL.

Welfare Provision, Supervision Ratios & Unsupervised Time

PLUS uses the [Recommended adult to child ratios](#) as published on the NSPCC website (checked April, 2021) as guidance and student to adult ratios never go below 1:15. PLUS takes all staff, including Group Leaders into account when calculating ratios and ensures that there is sufficient adult supervision for all scheduled activities both on-site and off-site, taking into account the nature of the activity, the level of risk identified in the risk assessment, students' age, and the premises. In addition, Group Leaders have the ultimate responsibility for the students in their own group. At the General Meeting and in this policy, Group Leaders receive clear instructions on what is expected of them. 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.

Excursions & Unsupervised time

During excursions, groups of students must be supervised by their own group leader/s. The group leader ratio is 1:15. In addition, each group will be assigned their own activity leader/s (depending on the size of the group and operational requirements).

During the Welcome meeting, the Campus Manager will explain to ALL students and Group Leaders that any student who gets lost and/or becomes separated from their group, should

stay where they are. An Activity Leader will come back to find them. If they move from the route that was taken, it will be more difficult to find them. If their phone works, they should call the Campus manager number on their lanyard. If their phone doesn't work, and there is a shop nearby, they should go inside the shop and ask the worker to call the emergency number on their lanyard.

On closed campuses, those which are gated, or have monitored entrances and exits, students are free inside the confine of the campus. On open campuses and large campuses, students will be escorted by their Group Leader, or an Activity Leader to and from each location on campus. The level of supervision will be set out according to the risks on each particular campus and all staff and students will be made aware of where and when they must be supervised on campus and which area or areas are out-of-bounds.

For every excursion, the following must be carried out:

- The main (or only) Activity Leader will be at the front of the group.
- If there is a second AL, they will stay in the middle of the group, multiple ALs will distribute themselves evenly amongst the group.
- The main (or only) Group Leader will stay at the back of the group.
- A second GL or multiple GLs will distribute themselves evenly amongst the group.

Headcounts must be carried out by the main AL and the main GL **ALL THE TIME**. Below are examples of when they must be carried out without exception:

- At every meeting point (this applies also on campus).
- Prior to leaving the campus.
- On the coach prior to giving clearance to the bus driver to leave.
- Immediately on getting off the coach.
- At bus stops prior to getting on the bus.
- Just after getting on a bus.
- Just after getting off a bus.
- Arrival outside a tube station (coming and going).
- Arrival at the platform, before getting on and before getting off.
- On the tube.
- On the platform after just getting off the tube.
- At the entrance to an attraction.
- Just after entering an attraction.
- Just after exiting an attraction.
- At each stop on the walking tour as indicated on the map.

Students aged 14 and over are permitted to have 2 hours of free time during excursions in order to do shopping, and/or visit places of interest within a radius of one kilometre from the

Group Leader designated meeting point if parents have indicated their agreement to this on the parental consent. Group Leaders will have 24/7 direct contact with their students. Any students under the age of 14 are not permitted to have any free time, and must always be within viewing distance of their Group Leader.

| | |
|-----------------|-----------------|
| 8-13 year olds | No Allowance |
| 14-17 year olds | 2 Hours Maximum |

Students aged over 14 are also able to travel to and from their homestay unsupervised as long as they arrive back at their host accommodation by 19:00. The route of travel is risk assessed by the third-party provider and/or PLUS Head Office. Students under the age of 14 must be supervised on their journey to and from their host family. 14-17 year olds, may, under the supervision of a Group Leader or another member of the PLUS staff, with written permission from the Group Leader and the Campus manager, travel back to their homestay between 19:00 and 22:30.

Curfews

| | |
|----------------------------------|---|
| All Residential Centres all ages | 11:00 in own bedrooms |
| All Residential Centres all ages | 22:30 in the accommodation block/houses |

| | |
|--|--|
| All Residential Centres 8-13-year-olds | 19:00 back on campus |
| Homestay 8-13-year-olds | 19:00 no exception |
| Homestay 14-17-year-olds | 19:00 or 22:30 with written permission |

Lanyards

In order to enhance safety, and make PLUS students easily identifiable, students are given lanyards upon arrival, which display an ID card with the Campus Manager and Activity Manager Emergency phone numbers and the 24-hour Head Office emergency number. Students are instructed to and *must* wear them at all times. It is the responsibility of *ALL STAFF* including Group Leaders, to stop any student not wearing their lanyard and tell them to wear it/ send them back to their rooms to get it. If they claim to have lost it, immediately take them to get a replacement.

Visitors

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

- Report to the Campus Manager, once on site if it is a PLUS organised visit or any other designated personnel or office as instructed by the Host Institution such as the Security Office.
- Wear a **visitor lanyard** throughout their visit.
- Be **accompanied at all times**.
- Abide by any specific policy or practise for visitors of the host institution.

Unknown/uninvited visitors

Any visitor to PLUS centres who is not wearing a visitor lanyard should be politely challenged. 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's Office or any other areas as instructed by the host institution such as the Security Office. The purpose of the visit will then be investigated.

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, if neither is already there. The incident must immediately be reported to the Campus Manager and PLUS Head Office as a Safeguarding incident. It is the responsibility of all employees to verbally and respectfully challenge any unknown visitor.

Dealing with Welfare Concerns

If anyone has any concerns about welfare, they should report it to the Campus Manager and the Activity Manager. Concerns will be formally reported to Head Office and dealt with by the DSL and the ADSL who will advise on a course of action or provide an appropriate response.

If anyone does not feel comfortable, reporting concerns to the Campus Manager and Activity Manager, they should contact the DSL and ADSL on the number at the beginning of this document.

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 to the Course Director *BEFORE CLASS* the name of students not attending lessons. The Course Director should then communicate this to the Campus Manager or Activity Manager in their absence. 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 call the Group Leader who will investigate the absence.
- The Group Leader will call the student (and check to see if they are in their room if they are a residential student.)
- If the student is found, in absence of a valid reason, the student will be requested to attend the lesson.
- If the student is not found within 15 minutes, the Course Director **must** inform the Campus Manager immediately.
- (If the student is a Homestay Student, the Campus manager will contact the host family to see if the student is there. If not, the Campus Manager will send either the Group Leader or an Activity Leader to trace the route to the host family and back to look for the student.)
- The Campus Manager will initiate and oversee a search of the site, this may include the host institution security team. (A host family student may be on site somewhere).
- (If the student is residential and the Group Leader was unable to gain access to the student's room, the Campus manager and/or the campus security team will open the room following the procedures for 'entering students' rooms'.)
- If the student is still not found, a whole campus fire alarm may be activated.
- The Campus Manager and Group Leader should 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.
- The Campus Manager should inform PLUS Head Office as soon as possible using the DSL and ADSL Emergency number.
- Once it is clear that the student is not on campus, with their host family and contact cannot be established, the Campus Manager should call 101 (Police Non-Emergency Number and inform them of the missing student).

- The Group Leader should then 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, as soon as you notice that a student is lost/ missing:

- Find a safe space to stop.
- Recall the last head count where the student was present.
- Ask other members of the group and the Group Leader when the student was last seen.
- An Activity Leader should retrace the steps back to where the student was last included in the count.
- The Group Leader should stay with the group and remain where they are until the AL returns and attempt to make contact with the student.
- Inform the Campus Manager who, if the student is not found within a reasonable time, will inform PLUS Head Office and the authorities too.

- Inform all parties as soon as the student is found.
- If the student is not found within 15 minutes, the Campus Manager has to inform PLUS Head office and the authorities.
- The Group Leader should 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 to the Campus Manager the name of any students not attending activities, and the reason why. IF they do not have a valid reason, they will be asked to attend. 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 and the Campus Manager (who can inform the GL if the AL has not/was unable to do so) of any missing students who will investigate the absence.
- The Group Leader will call the student (and check to see if they are in their room if they are a residential student.)
- If the student is found, in absence of a valid reason, the student will be requested to attend the lesson.
- The Campus Manager will initiate and oversee a search of the site, this may include the host institution security team.
- (If the student is residential and the Group Leader was unable to gain access to the student’s room, the Campus manager and/or the campus security team will open the room following the

procedures for 'entering students' rooms'.)

- If the student is still not found, a whole campus fire alarm may be activated.
- The Campus Manager and Group Leader should 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.
- The Campus Manager should inform PLUS Head Office as soon as possible using the DSL and ADSL Emergency number.
- Once it is clear that the student is not on campus, with their host family and contact cannot be established, the Campus Manager should call 101 (Police Non-Emergency Number and inform them of the missing student).
- The Group Leader should then 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. However, in case of a student not returning home by the curfew time staff, host families are required to follow this procedure:

- No later than 10 minutes after the agreed curfew time, the family **must** 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 to contact the Campus manager who will contact their Group Leader.
- The Group Leader should try to contact the student.
- The Campus Manager will initiate and oversee a search of the PLUS campus, including halls of residence and campus facilities. This may include a whole campus fire alarm in collaboration with the host institution.
- The Campus Manager and Group Leader should 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.
- An Activity Leader should be sent on the route that the student takes home to see if they are there.
- If the student is not found within 15 minutes, the Campus Manager has to inform PLUS Head Office and the authorities.
- The Group Leader should 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 form in Appendix A.
- All parties need to be informed as soon as the student is found.

Emergency Contact Details

PLUS has a 24/7 Head Office emergency phone number for agents, parents, students and group leaders should an emergency occur [+44 \(0\) 7393075140](tel:+44207393075140). In addition, students will also have the number of the Campus Manager Emergency Number on their lanyard.

The 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. During the 'Welcome Night' students are asked to store the emergency number on their mobile phones.

Accommodation

Students under the age of 18 are not permitted to book a course without accommodation unless it has been agreed in writing in advance that they are residing locally with parents, legal guardians or family, and the relevant documents signed by a parent or guardian have been received and filed by PLUS Head Office. PLUS reserve the right to inspect any non-PLUS accommodation to verify its suitability for each student or students. Students under the age of 18 cannot move from PLUS provided accommodation to their own accommodation.

Length of stay

In accordance with UK legislation, the number of nights any student under the age of 16, or any student under the age of 18 with a disability, is able to stay with us will not exceed 27 nights. Students who fit the above specification will not be permitted to extend their stay beyond 27 nights.

Homestay Accommodation

All homestay hosts and their accommodation are visited, inspected, assessed, and approved before they are able to accept a student. Scheduled revisits take place annually along with unscheduled spot -checks which could occur at any time. In order to be approved, all hosts must have a valid gas safety certificate, an enhanced DBS check for all adult members of the household, a fire safety inspection with fire risk assessments, and a health and safety check. All hosts are provided with handbooks on hosting international students, this safeguarding policy, and Keeping Children Safe in Education.

Residential Accommodation.

Students in residential accommodation with shared bathrooms are roomed according to age and gender, and separate bathrooms are allocated to boys and girls. If there are any students who are 18 on campus, they are roomed separately to under 18s and have separate designated bathrooms. All adults are assigned their own bathrooms. At certain times, due to operational

restrictions, it may not be possible for bathrooms to be designated and will therefore be necessary to implement bathroom time slots for adults and children. Should the need arise, the slots will be designated by the CSOs and strictly monitored. Failure to adhere to the time slots will have serious consequences. Staff could face immediate suspension and students could be sent home.

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 some PLUS centres, usually boarding school host institutions, students are not allowed to stay in the accommodation during the day even if they are sick. In these cases, the host institution will

provide PLUS with a sick bed in or near the PLUS office or a medical room. Student must be checked on at least every hour, and this should be logged.

At each of our campuses, at least two staff members, usually the Campus Manager and the Activity Manager, are 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 should not 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 to check the packaging to find out whether it is suitable for a minor.

The Campus Manager must complete the Accident Register (Appendix C) after EVERY incident. They may also need to complete the host institutions' version of the form separately.

U18 Behaviour & 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 read the Student Code of Conduct and sign to say that they have read it. It is also the responsibility of the Group Leader to ensure that students have fully understood the Code of Conduct and their responsibilities.

Attendance

All students are informed at the Welcome Meeting and in the Student Code of Conduct that they are expected to attend 100% of their classes. They are advised that by attending all of their lessons they will receive the maximum benefit possible 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, in collaboration with Head Office, the Campus Manager will deal with the incident in different ways, depending on its severity.

Students will be warned and risk exclusion from participation in PLUS courses. More serious incidents will be reported to the authorities.

Expulsion

As a last resort PLUS may expel or suspend any student whose behaviour does not comply with the campus rules and/or local laws. Every attempt will be made to manage the student's behaviour at the campus. In the rare circumstance 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, including bullying to/of others.
- Theft.

In case of expulsion:

Agents and parents or guardians will be informed, and arrangements will be 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. This may include being supervised by the Group Leader 24/7.

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:

- The Campus Manager carrying out a *fire risk assessment* of the premises and reviewing it before each slot.

- The Campus Manager will include *fire safety in the Welcome Presentation* and warn all staff and students that it is a criminal offence to tamper with fire safety equipment. They will also highlight where on campus they can find a *fire map* leading them to their relevant muster/assembly point.
 - Activity Leaders will indicate the *emergency muster point or points during the orientation tour*.
 - PLUS will ensure that *all staff*, Group Leaders and students are aware of this policy and the Campus Manager will ensure that they have read the fire risk assessment and *know how to behave in case of emergencies*.
-
- The Campus Manager will carry out *fire drills* in collaboration with the host institution within 72 hours of group arrivals and will brief Teachers, Activity Leaders and Group Leaders of their roles. *Activity Leaders will act as fire wardens/marshals* and ‘sweep’ sections of the accommodation, they must not leave until everyone is out. *Group Leaders will have their register and complete a roll call* promptly and efficiently at the correct muster point. If the fire drill occurs during class time, the class *teacher will take on the role of Group Leader* in evacuations. The *Course Director and Assistant Course Director will be responsible for completing sweeps acting as fire wardens/marshals*.
 - Group Leaders and teachers *MUST* have a student list with them at all times which they use to complete a roll call on evacuation.
 - Fire wardens/marshals must be assigned to zones of the same gender and must only knock on student’s doors. *Only in a real fire should wardens open bedroom doors*.

Sweep* - all areas of the **building are divided into zones. Appointed Fire Wardens **are** responsible for checking their area **is** clear. This means checking every space possible in that zone.

Please refer to the PLUS Emergency Action Plan at the end of this policy.

[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 campus, 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. PLUS Head Office must have also received the parental consent with the ‘yes’ box ticked to that effect.

[E-Safety](#)

Most of the host institutions computing systems are protected by software that prevents anyone accessing inappropriate content online. In addition, all students and parents must read, agree to, and sign PLUS' Online Safety Agreement.

Please refer to PLUS' E-Safety Policy and Online Safety Agreement at the end of this policy.

Preventing Extremism and Radicalisation

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. 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.

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.

Where necessary, PLUS will establish effective partnerships with parents, families and local authorities. 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 Campus Safeguarding Leads, who will report to the DSL and ADSL. Any report will be dealt with sensitively and carefully, with confidentiality assured for the person reporting the concern.

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").

Risk assessments in the context of the Prevent duty mean:

- 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.

Counteracting risks in terms of prevent:

- 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.

Tolerance

All PLUS students and Staff **MUST** show proper tolerance and respect to others and they have a responsibility to report any who don't to the Campus Safeguarding Leads, who will in turn report to the DSL and ADSL.

Parental Consent

All parents and guardians must sign a Parental Consent prior to their student being accepted on Campus. A parental consent ensures that parents and guardians have understood and agree with PLUS' management of all aspects of the programme which include but are not limited to safeguarding, medical consent, levels of supervision, homestay provision, free time and travel to and from the campus. All parental consents are stored in a central location and accessible to each Campus Manager on a per campus basis.

Private Fostering

As outlined in the accommodation section of this policy, PLUS does not support private fostering and in accordance with UK legislation, the number of nights any student under the age of 16, or any student under the age of 18 with a disability, is able to stay with us will not

exceed 27 nights. Students who fit the above specification will not be permitted to extend their stay beyond 27 nights.

GDPR & Safeguarding

Keeping Students Safe in Education, 2019, states:

'Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children,

*Young People, Parents and Carers supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.'*

The seven Golden Rules:

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so.
5. Where you do not have consent, be mindful that an individual might not expect information to be shared. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Contextual Safeguarding

PLUS considers wider environmental factors that affect the welfare of students and staff out-

side the campus. This includes, but is not limited to, items such as road safety, the neighbourhood, or any risk in the local area. During the campus set up, Campus Managers and Activity Managers assess the risk of the local area and any risks from or to the local community. Risks and actions to be taken to mitigate them are communicated during the welcome presentation.

Equal Opportunity Policy

PLUS is committed to encouraging equality and diversity among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

PLUS, in providing services and facilities is also committed against unlawful discrimination of customers or the public.

The policy's purpose is to:

- provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time.
- not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation.
- oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

The organisation commits to:

- encouraging equality and diversity in the workplace as they are good practice and make business sense.
- creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
- training managers and all other employees about their rights and responsibilities under the equality policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.
- all staff understanding that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

- taking seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, third-party providers, visitors, the public and any others in the course of the organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997, which is not limited to circumstances where harassment relates to a protected characteristic, is a criminal offence.
- making opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- reviewing employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- monitoring the make-up of the workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity, and in meeting the aims and commitments set out in the equality policy. Monitoring will also include assessing how the equality policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

This equality policy is fully supported by senior management.

Details of the organisation's grievance and disciplinary policies and procedures can be found in each employee's contractual documents.

Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

Anti-Bullying Policy

Introduction

All minors and young people have the right to go about their daily lives without the fear of being threatened, assaulted or harassed. No one should underestimate the impact that bullying can have on a person's life. It can cause high levels of distress, affecting young people's well-being, behaviour, academic and social development right through into adulthood.

At PLUS, we are committed to providing a caring, friendly and safe environment for all of our students so they can learn in a relaxed and secure atmosphere free from oppression and abuse.

Bullying is anti-social behaviour and affects everyone. All types of bullying are unacceptable at PLUS Campuses and **will not** be tolerated. When bullying behaviour is brought to our attention, prompt and effective action will be taken.

What Is Bullying?

"Bullying behaviour abuses an imbalance of power to repeatedly and intentionally cause emotional or physical harm to another person or group of people. Isolated instances of hurtful behaviour, teasing or arguments between individuals would not be seen as bullying" (Torfaen definition 2008)."

Bullying generally takes one of four forms:

- **Indirect** being unfriendly, spreading rumours, excluding, tormenting (e.g. hiding bags or books).
- **Physical** pushing, kicking, hitting, punching, slapping or any form of violence.
- **Verbal** name-calling, teasing, threats, sarcasm.
- **Cyber**; all areas of internet misuse, such as nasty and/or threatening emails, misuse of blogs, gaming websites, internet chat rooms and instant messaging. Mobile threats by text messaging & calls. Misuse of associated technology, i.e. camera and video facilities.

Although not an exhaustive list, common examples of bullying include:

- Racial bullying
- Homophobic bullying
- Bullying based on disability, ability, gender, appearance or circumstance

Purpose of this Policy

All staff, including teaching and non-teaching staff, students, group leaders, residential accommodation staff and host families need to understand what bullying is and what the policy details as well as the procedure to report such incidents. Students should be assured that they will be supported when bullying is reported and bullying will not be tolerated at PLUS Centres. The purpose of the Anti-bullying policy is to highlight PLUS' aims to adopt the highest possible standards and to take all reasonable steps in relation to the safety and welfare of all students.

Signs and Symptoms

Many minors do not speak out when being bullied and may be indicated by signs or behaviour that he or she is being bullied. Staff and Adults should be aware of these possible signs and should investigate if a child:

- doesn't want to go on excursions;
- doesn't want to participate in any social activity;
- is unwilling to go to lessons (school phobic);
- begins to truant;
- becomes withdrawn anxious, or lacking in confidence;
- starts stammering;
- attempts or threatens suicide or runs away;
- cries themselves to sleep at night or has nightmares;
- uses excuses to miss school (headache, stomach ache etc);
- has possessions which are damaged or " go missing;"
- asks for money or starts stealing money (to pay bully);
- has unexplained cuts or bruises or shows signs of being in a fight;
- becomes aggressive, disruptive or unreasonable;
- is bullying other minors or students;
- changes their eating habits (stops eating or over eats);
- goes to bed earlier than usual;
- is unable to sleep;
- is frightened to say what's wrong;
- gives unlikely excuses for any of the above;
- is afraid to use the internet or mobile phone;
- is nervous and jumpy when a text message or email is received;

These signs and behaviours could indicate other problems, but bullying should be considered a possibility and should always be investigated.

Procedure

What to look for:

Students who are being bullied may show changes in behaviour, such as becoming shy and nervous, feigning illness, taking unusual absences or clinging to adults. There may be evidence of changes in study patterns, lacking concentration. Members of staff, host families and residential accommodation staff must be alert to the signs of bullying; legal responsibilities are known and should act promptly and firmly against it, in accordance with this policy. Surveys have shown that in the vast majority of bullying incidents, most people knew that what was going on was wrong. Sometimes people, either through lethargy, peer group pressure, or tacit support for what is going on fail to take action.

If you are the victim of bullying you should do the following:

- If you feel able to, confront the bully by verbally making him/her aware that you think that what he/she is doing is wrong.
- Share your feelings with someone else.
- If possible, talk to a member of Staff, your teacher or the Campus Manager about the incident.

If a Student witnesses bullying behaviour the following should be done:

- Support the victim by offering your friendship and make it clear that in your opinion what is happening to them is wrong.
- Encourage them to speak out by confronting the bully, or with their permission, confront the bully yourself.
- Accompany the victim to a trusted adult or Campus Manager (usually the Safeguarding Lead).

If a Staff member witnesses bullying or an incident is reported the following steps should be taken when dealing with incidents:

- Reassure and support the minor(s) involved.
- If bullying is suspected or reported, the incident will be dealt with immediately by the member of staff who has been approached.
- A clear and precise account of the incident will be recorded in writing and given to the Campus Manager.
- The Campus Manager will interview all concerned and will record the incident and send it immediately to the DSL and ADSL.
- Teachers, parents, host families, and residential accommodation staff will be kept informed.
- Punitive measures will be used as appropriate and in consultation with all parties concerned and the Senior Management Team at HO
- If considered necessary and appropriate by the Senior Management Team, police will be consulted.

Support

Minors who have been bullied must be supported by the School and staff will be expected to offer the following:

- An immediate opportunity to discuss the experience with a teacher or a member of staff of their choice.
- Reassurance to the minor.
- Continuous support.
- Restoring self-esteem and confidence.

Minors who have bullied will be helped by:

- Discussing what happened.
- Discovering why the student became involved.
- Establishing the wrong-doing and the need to change.
- Informing parents or guardians to help change the attitude and behaviour of the child.

Appropriate Action

The following sanctions may be applied by the Campus Manager *only after consultation with and approval from Head Office:*

- Official warnings to cease the offending behaviour may be issued to the accused 'bully'. The Campus Manager will speak to the students involved and may contact the parents (through their Group Leader), host families or legal guardians giving details of the offence.
- Suspension. Students may be suspended from all or part of the programme. Staff may be suspended on full pay pending an investigation.
- Exclusion. Students may be excluded from the programme and sent home. Staff may be removed from the campus.

The non-tolerance of bullying is made explicitly clear in the Welcome Presentation. All campus students and staff are present.

Prevention

At PLUS Centres we use a variety of methods to support minors in preventing and understanding the consequences of bullying through induction, curriculum and on-going activities. The ethos and working philosophy of PLUS Centres means that all staff actively encourage minors

to have respect for each other and for other people's property. Good and kind/polite behaviour is regularly acknowledged.

Staff will discuss bullying, this will inform minors that we are serious about dealing with bullying and paves the way for open conversations and increases confidence in minors to discuss bullying and report any incidents and concerns about behaviour.

Staff will reinforce expectations of behaviour. Staff must be careful not to highlight differences between students or an individual student, even if this is done in jest. This gives other children advocacy to use this difference to begin calling them names or teasing.

Staff must be vigilant regarding groups of friends together. Friendship groups may bring about an imbalance of power and groups must be guided towards welcoming others to join them and not excluding others from their group. Staff must reinforce a general message that minors do not have to be friends with everyone else, but they must be respectful of everyone else's feelings and be kind to each other.

In addition to this we will use some or all of the following to help raise awareness of, and prevent, bullying. As and when appropriate, these may include:

- Writing and implementing a set of campus rules.
- Signing a behaviour contract.
- Having regular discussions about bullying and why it matters.
- Setting up and sustaining a Student Support Scheme.

Monitoring, evaluation and review

The Designated Safeguarding Panel (the DSL and the ADSL) for PLUS and the Senior Management Team are responsible for reviewing the Anti-Bullying Policy on an annual basis in light of new recommendations and guidance in the area. The policy will be promoted and implemented throughout all our centres.

Emergency Action Plan

The full version of this document will be supplied to Campus Managers, Activity Manager and Course Directors:

Discovery of an emergency

If you discover an emergency, such as fire, flood, chemical spill;

- First, sound the alarm by hitting the nearest break glass. Ensure you know where the alarms and extinguishers are located around each area in the venue. (Remember break glasses are normally situated next to emergency exit doors).
- If you have radios or mobile phone contact try to alert the Campus Manager as to the whereabouts of the emergency.
- Clear your group and any other persons within the area away from the surrounding area and get them to the Assembly Point as allocated by the venue, even if the emergency appears minor and controllable. *YOU ARE NOT EXPECTED TO RISK YOUR OWN SAFETY. IF YOU FEEL THAT AN AREA HAS BECOME TOO DANGEROUS TO ENTER - GET HELP - DO NOT GO IN.*
- *Take your register with you* checking all children are present.
- Check that the emergency services have been called – if not call 999 and ask for the fire service. It is probable that assistance has arrived at the scene by this time. Another member of staff (or failing that a member of the public) should be sent to report the location, nature and extent of the emergency, plus any known casualties to the Campus Manager who can then inform the emergency services on arrival.
- The Campus Manager should inform venue managers as early as possible if an evacuation is in process regardless of the severity of the incident.
- Stay (without taking personal risk) where you can prevent anyone straying into the area, until instructed otherwise.

Audio Warning throughout the Building

- It is vitally important that all staff are aware of their role on hearing the alarm. Please remember that although an alarm may have been raised in one area, the emergency could be in a different location – even on another floor. Every time an alarm is activated not only search the zone concerned, but also the whole building. This search should be carried out by the Campus Manager or by the activity leader so long as it is practical to do so, who must carry a radio or mobile phone throughout the search.

- Activity leaders/Teachers should evacuate their area to the nearest allocated assembly point and should then complete a register to ensure all of their group are accounted for. Leaders and/or Teachers should check toilets and changing rooms to ensure that all children are evacuated successfully.
- Activity leaders/Teachers should inform the Campus Manager as soon as possible via phone/radio or in person that their area has been cleared. If there are missing children these must be reported immediately as well as any areas that staff were unable to search and evacuate.

All Other Staff

1. Report to Campus Manager immediately and await briefing by manager.
2. Assist in searches of the building as directed by the Campus Manager.
3. Assist with keeping areas clear in preparation for possible further evacuation or emergency service access.

False Alarm

1. Campus Manager should action a full search of building before deciding if it is a false alarm, e.g. the Break Glass may have been hit in one zone, but the fire is in another zone.
2. On Campus Manager's instructions leaders may carry on with activities, so long as it is safe to do so.
3. Campus Managers should liaise with venue staff to ensure alarms are silenced.

Fire or Evacuation

1. Staff to evacuate persons from the areas, which they are in including adjoining areas.
2. Staff should be contacted when and where the alarm has been activated so this area can be avoided during evacuation.
3. The Campus Manager should allocate staff to clear remaining areas of the building on their return to the central assembly point after their primary areas are clear.

Evacuation

The evacuation must take into account the location of the emergency. All staff involved in the evacuation must know the location. Again PERSONAL RISK MUST NOT BE TAKEN, ALL EVACUATION SHOULD BE CONDUCTED IN PAIRS WHEREVER POSSIBLE. One Activity Leader and other available staff as directed, to assist in the distribution of blankets if required, especially if evacuating from a swimming activity.

Clearing Groups and the Public

All staff must ensure that any area they are delegated to clear is checked thoroughly, again, without taking personal risk, work in pairs if possible. All people have to be evacuated quickly but without causing panic. Staff have responsibility to make participants aware of the need to evacuate and that it is not a drill.

However, if the participant refuses to leave after polite repeated requests then the stubborn participant should be left and the matter reported to the Campus Manager.

- Do not allow anyone back into the building and close doors behind you.
- People should not be allowed to get fully changed, but only to dress for decency.
- When you have cleared your area, close the fire doors behind you to prevent people re-entering and also to stop any breeze providing oxygen to the fire.
- Get participants clear of the building and ask them to stay at the designated assembly point. Establish so far as it is practicable that all those from your area have been evacuated.
- Close doors behind you.
- Do not re-enter the building, but go around the outside of areas to your assembly point.
- Report to the Campus Manager that your area is clear. Until you have reported back, then it will be assumed you are still in the building. Campus Manager ensures all areas have been cleared and needs all staff to feedback when an area cleared. Campus Manager completes roll call checklist or checks staff registers.
- Await instructions from the Emergency Service.

Re-admittance of groups and public (if applicable)

- Only after the Venue Manager and/or the Emergency service issue the all clear will users be re-admitted to change or continue with their activity as appropriate.
- The Campus Manager shall decide how to re-introduce the programme and will coordinate the distribution of groups as appropriate.
- All staff will need to demonstrate considerable sensitivity to users following the inconvenience and possible distress caused due to an evacuation or fire.

If re-admittance is not possible

- In the event of no re-admittance being possible, children should be moved to a suitable safe location as organised in liaison with venue managers and staff.
- If alternative activities can be offered for the rest of the day then these should be organised and run accordingly and in line with Active Sports activity guidelines.
- Campus Life Management head office managers should be made aware of the incident and should liaise with venue managers to ensure continuation of further or alternative activities within the week.
- If activities cannot be continued then Head Office would arrange for the groups to be accommodated on another campus subject to availability.

After the incident

Campus Manager to complete an incident report form. This may be completed by the venue manager and a copy should be forwarded to Campus Life Management head office as soon as is reasonably practical.

General Security Incident Procedures

Typical Examples;

- Unauthorised access by the public.
- Violence or abuse directed towards staff.
- Violence or abuse directed towards the participants.
- Theft or robbery.
- Discovery of dangerous substances/knives/guns or other objects that could be used to injure participants.

Site Specific Arrangements

- Campus Managers must ensure that at the start of each activity week, that they liaise with venue managers in order to be made aware of venue specific security procedures.
- Campus Managers in liaison with Campus Life Management head office are responsible for ensuring that staff are aware of their responsibilities if security is breached during the weeks activities.
- All staff must be made aware of the personnel on the site and for their designated activity areas, as well as any additional responsibilities above and beyond this plan prior to the commencement of activities. Staff should also be made aware of any contractors or authorised visitors who will be made identifiable by use of badges or correct company/school uniform.

Security Incidents

- If you discover an incident within the venue, however small, an immediate decision must be made, i.e. CAN YOU DEAL WITH IT IMMEDIATELY without any risk to yourself or others and in confidence that your action will deal with the incident effectively and prevent any risk to you or your participants in your group.
 - If in any doubt or you feel you need help, then the following procedure must be followed.
 - First, stop the activity and make sure other participants remain safe and are controlled preferably away from the incident.
 - Using your mobile phone or radio alert the Campus Manager as to the whereabouts and nature of the incident.
-
- Follow the instructions of the Campus Manager ensuring that the rest of the group are looked after. It is worth considering using the older or more responsible members of the group to help you deal with the situation if practical. HOWEVER do not put them in a position where they may be put in danger.
 - It is probable that assistance has arrived at the scene by this time. Another member of staff (or failing that a member of the public) should be sent to report the location, na-

ture and extent of the incident to the Campus Manager who can then inform the emergency services if required on arrival.

- The Campus Manager should inform venue managers as early as possible if an evacuation is in process regardless of the severity of the incident.
- Stay (without taking personal risk) where you can prevent anyone straying into the area, until instructed otherwise.
- If required the Campus Manager should contact the Police using **999** or **112** on your mobile phone.
- The Campus Manager must contact Campus Life Management head office if the emergency is serious and especially if there were any injuries sustained or violence occurred.

Other Staff

- It is vitally important that all staff are aware of their role on hearing that a serious incident has occurred.
- Activity leaders/Teachers should evacuate their area to the nearest allocated assembly point and should then complete a register to ensure all of their group are accounted for.
- Leaders should check toilets and changing rooms to ensure that all children are evacuated successfully. Activity leaders/Teachers should inform the Campus Manager as soon as possible via phone or in person that their area has been cleared.
- If there are missing children these must be reported immediately as well as any areas that staffs were unable to search and evacuate.

All Other Staff

- Report to Campus Manager immediately if requested and await briefing by manager.
- Assist in dealing with incident as directed by the Campus Manager.
- Assist with keeping areas clear in preparation for possible further evacuation or emergency service access.

Clearing Groups and the Public

- It may become necessary to clear an area or building due to the nature or cause of the security incident.

- All staff must ensure that any area they are delegated to clear is checked thoroughly, again, without taking personal risk, work again in pairs if possible. All people have to be evacuated quickly but without causing panic. Staffs have responsibility to make participants aware of the need to evacuate and that it is not a drill. However, if the participant refuses to leave after polite repeated requests then the stubborn participant should be left and the matter reported to the Campus Manager.

- Do not allow anyone back into the building and close doors behind you.

- People should not be allowed to get fully changed, but only to dress for decency.
- When you have cleared your area, close the fire doors behind you to prevent people re-entering.
- Get participants clear of the building and ask them to stay at the designated assembly point. Establish so far as it is practicable that all those from your area have been evacuated.
- Close doors behind you.
- Do not re-enter the building, but go around the outside of areas to your assembly point.
- Report to the Campus Manager that your area is clear. Until you have reported back, then it will be assumed you are still in the building. Campus Manager ensures all areas have been cleared and needs all staff to feedback when an area cleared. Campus Manager completes roll call checklist or checks staff registers.
- Await instructions from Campus Manager or emergency services.

Re-admittance of groups and public (if applicable)

- Only after the Campus Manager or emergency services issues the all clear will users be re-admitted to change or continue with their activity as appropriate.
- The Campus Manager shall decide how to re-introduce the programme and will coordinate the distribution of groups as appropriate.
- All staff will need to demonstrate considerable sensitivity to users following the inconvenience and possible distress caused due to an evacuation or serious incident.

If re-admittance is not possible

- In the event of no re-admittance being possible, children should be moved to a suitable safe location as organised in liaison with venue managers and staff.
- If alternative activities can be offered for the rest of the day then these should be organised and run accordingly and in line with Active Sports activity guidelines.
- Campus Life Management head office managers should be made aware of the incident and should liaise with venue managers to ensure continuation of further or alternative activities within the week.
- If activities cannot be continued then Head Office would arrange for the groups to be accommodated on another campus subject to availability.

After the incident

- Site Manager to complete an incident report form. This may be completed by the venue manager and a copy should be forwarded to Campus Life Management head office as soon as is reasonably practical.
- Parents should be made aware of the nature of the incident and any injuries sustained regardless of how minor.
- The area where the incident occurred should be checked by the Campus Manager to ensure that it is safe to use prior to the recommencement of activities.

- Staff should gather witness statements in order to aid in the investigation and reporting of the incident.

General Notes for Security

- Do not put yourself or others into situations of unnecessary risk.
- Avoid direct confrontation if possible.
- Do not expect the “Cavalry” to arrive immediately in all cases.
- Careful observation and reporting provide the essential information if the police or PLUS HO are to take action against wrongdoers.
- Do not try to sort things out on your own.
- Do not hesitate to call emergency services.
- Do not make physical contact with any aggressor.

Homestay Guidance

PLUS families have often hosted students for many years. They are friendly people who aim to help students when coming to a new country and house. People who take students may be a family with young children, a couple or a single person. Similarly, they may live in a house or a flat, be working or retired – there is no one ‘typical’ type of home stay host in the UK, there are a variety of situations. PLUS also works with homestay providers to ensure the experience will be as pleasant and enjoyable as possible.

While home stay can be a very positive experience for students, we also know that some teenagers find it a daunting prospect. We understand that it is not the right choice for all students. As a result, we recommend that students in home stay have visited the UK before and are comfortable communicating with native speakers. Generally, we believe students benefit from home stay if they are a little older (ideally 14 and above) and have a good working knowledge of English (intermediate and above). Students that enjoy meeting new people and are happy, independent and confident are more likely to benefit from this experience.

General overview

- Home stay families usually live no more than 45 minutes by public transport from the PLUS centre, however the travelling time can be longer in big cities.
- Hosts will need their homes checked for suitability and hazards, fire risk assessments in place and a gas safety certificate, renewed annually. Spot checks are carried out by PLUS and the British Council.
- Families can accommodate students from other organizations so long as their mother tongue is not the same as the PLUS students’ and families cannot host more than 4 students at a time.
- The students will be treated as a full member of the household, eating together and sharing the common living areas. In order to improve the students’ use of the English language, all communication with the student must take place in English.
- Families are always asked to collect the students on the first day from the pre-arranged meeting point (normally PLUS campus). Where a student can’t be collected by any member of the family, a taxi should be arranged from the college to his/her home.
- On arrival the family will show the student the guest room and all the common areas.
- The student must provide the host family with his/her mobile number and the family will ensure that the student always has the “PLUS Student Card” with the emergency contact number and the family address.
- The student can use laundry facilities once a week. Clean bed linen and towels will be provided weekly. Common areas, including fridges should be cleaned weekly.
- On the first day, the family will show the student the easiest route to go to school and give them help to ensure they can get to school safely. It is highly recommended the student brings with him/her the full college address.
- If the student can’t attend classes due to illness, the family must contact the PLUS Campus Manager to report the absence.

Meals

Accommodation includes full board. i.e. breakfast, dinner and a packed lunch. The host family is expected to have dinner with the student. Allergies and dietary requirements must be communicated in advance in writing and a full balanced diet should be offered (see sample menu below). If a student is going to miss or be late for mealtimes, they must inform the host family.

Bedroom

The room provided to the student should have adequate heating and lighting, including natural light, be sufficiently spacious and have an adequately sized bed with extra duvets/blankets available. It should also have privacy from members of the opposite sex and not be shared unless otherwise requested in writing by PLUS before the stay commences.

Students' welfare

- The student should treat the hosts courteously and respectfully. He/she must keep the room clean and tidy and respect the family's peace by keeping the noise to a minimum level especially at night.
- The student must be back in time for dinner and no later than 7pm. If this rule is broken, the family will contact the PLUS Campus Manager.
- In general, a home stay student should spend their evenings with the host family after dinner. If the student decides to return to campus for the evening, then this is done at their own expense and the Group Leader must take responsibility for the student. We do not recommend that the student return to campus, as this may involve a journey home late at night.
- If the student wishes to join the evening activity, the Group Leader must ask for authorisation from the PLUS Campus Manager using the "Family Late Night Authorisation" form at least 48 hours in advance. The Group Leader must make sure the student gives a copy of this form to the host family. The student is not allowed to be back home later than 11:00 pm. The Group Leader must take responsibility for the student and ensure they return home safely.
- The student must pay for any damage he/she causes in the home.
- The student is not allowed to bring guests home.
- If available, the student should have access to a landline phone. Under no circumstances should the student make outgoing calls unless authorised.
- If the student is under 17 years old, it will be the decision of the family whether a house key is provided. However at least one member of the family must be always at home when the student is back from school.
- It is illegal in the UK for anyone under the age of 18 to buy alcohol or cigarettes. The use of cigarettes, alcohol and drugs is strictly prohibited whilst in the UK.
- The family will immediately report unacceptable student behaviour to the Family Organiser or to PLUS Campus Manager who in turn will discuss the matter with the student and his/her Group Leader and, if necessary, inform the agent and parents and take action.

PLUS Complaints Policy and Procedure for Students

If a student is unhappy or has problems with the family, the student should speak to the Group Leader who in turn will inform the PLUS Campus Manager, who will be able to solve most

problems. If nothing has been solved after 36 hours, the student must contact the PLUS Office in London on 020 7730 2223.

PLUS is obliged to elicit formal feedback from the student during and after their stay and follow it up.

The full version of the guidance which includes a sample menu is sent to all host families.

Quality Control Plan

Progressive Task List

The progressive Task List is a 'check chart' on the CM & AM Trello board intended to assist the Campus Manager in ensuring the centre is set-up according to company guidelines.

In addition, the list is monitored by Head Office and pictures must be uploaded as evidence by the Campus manager and the Activity Manager.

Student Questionnaires

- The students questionnaires are distributed and collected jointly by the Campus Manager and the Course Director every Tuesday.
- These may be online or paper based.
- The questionnaires must be divided according to the group with the Vision Reference code clearly displayed.
- After the forms are collected the Campus Manager scans and sends them by email Head Office within 24 hours.
- The questionnaires must be divided according to the group with the Vision Reference code clearly displayed.

End of Season Feedback

At the end of the season, Campus Staff feedback (including Group Leaders and Activity Leaders) will be collated and reviewed. The Head Office team will use the feedback to modify or amend certain aspects of the summer programme and/or the summer programme planning and strategy.

Campus Sport Checks

PLUS is accredited by various bodies and as such, Campus staff should always be prepared to have a British Council or an ABLS spot check inspection. All aspects of the campus will be inspected including, but not limited to the fire log, registers, rooming lists, emergency action plans, and risk assessments.

In addition, Campuses will also be subject to an unannounced Head Office visit. A member or members of Head Office will walk onto campus to quality assess the programme provided and the campus set-up.

E-Safety Policy

Introduction

It is the duty of the School to ensure that every child in their care is safe, and the same principles should apply to the 'virtual' or digital world as would be applied to the real world. Increasingly, minors are accessing material through the internet which is not age appropriate. It is essential to address this and to encourage a lifestyle which incorporates a healthy balance of time spent using technology.

ICT in the 21st Century has an all-encompassing role within the lives of minors and adults. Current and emerging technologies used in school and, more importantly in many cases, used outside of school by minors include:

- The Internet
- E-mail
- Instant messaging
- Blogs
- Social networking sites
- Chat Rooms
- Gaming Sites
- Text messaging and picture messaging
- Video calls
- Podcasting
- Online communities via games consoles
- Mobile internet devices such as Smart Phone and Tablets.

The widespread use of digital communications technologies, as listed above, presents young people with a lot of opportunities for learning, participation, creativity and self-expression. At the same time, it poses a range of safeguarding concerns, which can be grouped as follows:

- **Content-** Student exposure to illegal, inappropriate or harmful online content including spam, pornography, substance abuse, violence, cyber-bullying, extremism and hate sites, and lifestyle sites that promote anorexia, self-harm or suicide.
- **Contact-** Students participate in exploitative digital communication including viruses and malware, personal data or identity theft, cyber-stalking, online grooming, anonymous online chat sites and cyber-bullying.
- **Conduct-** Concerns for students' health and well-being, such as gaming, gambling or social network addiction; online disclosure of personal information and ignorance of privacy settings; online reputation and 'sexting' (sending and receiving personally intimate digital images); and illegal conduct, including hacking, plagiarism, and copyright infringement of digital media, such as music and film.

E-safety is a shared responsibility; all staff, students and host families are encouraged to work together to develop strategies to promote a safe environment. As with all other risks, it is impossible to eliminate those risks completely. It is therefore essential, through good educational provision to build students' understanding the risks to which that they may see, so that they have the confidence and skills to face and deal with these risks.

Purpose

The requirement to ensure that minors and young people are able to use the internet and related communications technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in young learner centres are bound. The purpose of the e-safety policy is to help to ensure safe and appropriate use. Junior centres aim to adopt the highest possible standards and to take all reasonable steps in relation to the safety and welfare of all students.

This Policy is based on and incorporates elements of the following legislation and national guidance documents (including but not limited to):

- Racial and Religious Hatred Act 2016
- Counter-Terrorism & Security Bill 2015
- Criminal Justice Act 2003
- Sexual Offences Act 2003
- Communications Act 2003
- Data Protection Act 2018
- The Computer Misuse Act 1990
- Malicious Communications Act 1998
- Public Order Act 1986
- Obscene Publications Act 1959 & 1964
- Protection from Harassment Act 1997
- Criminal Justice and Immigration Act 2008
- Education and Inspections Act 2006

Scope

This E-safety policy together with the Social Media Policy applies to everyone working at or attending PLUS Junior Centres. It provides responsibilities on all staff, students, agency staff and volunteers, contractors, visitors and consultants. It shares the use of technology both on and off the campus premises and where there is a risk to the safety of students.

Policy Statement

The aims of this policy are:

- to encourage students to make good use of the education opportunities presented by access to the internet and other electronic communication;
- to safeguard and promote the welfare of students by preventing cyber-bullying and other forms of abuse;
- to ensure students use technology safely and securely;
- to help students take responsibility for their own e-safety; and

PLUS Junior Centres will take all reasonable precautions to ensure that users access only appropriate material. However, due to the global and connected nature of Internet content, it is not possible to guarantee that access to unsuitable material will never occur via a campus computer. PLUS cannot accept liability for the material accessed, or any consequences resulting from Internet use.

The use of computer systems without permission or for inappropriate purposes could mean that a criminal offence is committed under the Computer Misuse Act 1990 and breaches will be reported to the Police. Methods to identify, assess and minimise risks will be reviewed regularly. Everyone in the workplace has a legal duty to protect the privacy of information relating to individuals. Personal Data will be recorded, processed, transferred and made available according to the Data Protection Act 2018.

Responsibilities

Senior Management Team

The Senior Management Teams have a legal responsibility under the Prevent duty to make sure that this policy is implemented across PLUS Junior Centres. In addition, the Senior Management Team's duties are:

- To ensure that the centres follow all current e-safety advice to keep students and staff safe.
- To take overall responsibility for the e-safety provision.
- To take overall responsibility for data and data security.
- To be responsible for ensuring that staff receive suitable training to carry out their e-safety roles and to train other colleagues, as relevant.
- To make sure there is training and advice for all staff.
- To liaise with the Local Authority and other relevant agencies where required.
- To delegate the day to day management of e-safety to the Campus Manager.

Safeguarding Panel / Campus Manager

- The Campus Manager will take day to day responsibility for e-safety issues. The Safeguarding Panel based in PLUS' head office has a leading role in establishing and reviewing the company's e-safety policies / documents.
- To promote an awareness and commitment to e-safeguarding throughout the centres.
- To liaise with ICT technical staff at the various centres.
- To help and provide training and advice for all staff.
- To remain regularly updated on e-safety issues and legislation, and be aware of the potential for serious child protection issues to arise from: sharing of personal data; access to illegal/inappropriate materials, inappropriate on-line contact with adults/strangers; potential or actual incidents of grooming; cyber bullying and use of social media.

Teaching & Leisure Staff

All teaching and support staff are responsible for ensuring that:

- They have an up to date awareness of e-safety matters and of the current school e-safety policy and practices
- E-safety issues are embedded in all aspects of the curriculum and other school activities
- Students understand and follow the school's e-safety and acceptable usage policies
- They monitor ICT activity in lessons, extracurricular and extended school activities
- In lessons where Internet use is pre-planned, Students should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in Internet searches.

Students

- Need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so.
- To know and understand PLUS' policy on the taking / use of images and on cyber-bullying.
- Should understand the importance of good e-safety practice when using digital technologies out of school and realise that PLUS' e-safety policy also covers their actions out of school.
- To take responsibility for learning about the benefits and risks of using the Internet and other technologies safely both in school and at home.

Internet

The campuses used by PLUS provide internet access to students to support its academic activities and the educational opportunities presented by such access.

Reporting incidents & Procedure

E-Safety risks can be experienced unintentionally or deliberately by people acting inappropriately or even illegally. Any potential concerns must be dealt with at a personal level. Teachers play a very important role; their observation of behaviour is essential in recognising concerns about Students and in developing trust so that issues are reported.

Students should report to the Campus Safeguarding Officer (CSO) if they are troubled by something they have been exposed to on the internet; or they have evidence of an incident of wrong doing by another user, either on the campus network or outside it, where the behaviour could threaten someone's safety or welfare.

Similarly, staff and host families should report their concerns to the CSO, who will respond following procedures within the relevant company Safeguarding and Child Protection policy, for Bullying/Cyber-Bullying, and for Promoting Good Behaviour. Staff should also consider the Whistleblowing policy for procedures on how to report within the organisation.

Where there is cause for concern or fear that illegal activity has taken place or is taking place involving the use of computer equipment, the school will determine the level of response necessary for the offence disclosed. Following disclosure of this information this will need to be immediately reported to the Senior Management Team by the Campus Manager/Safeguarding Lead. The decision to involve Police will be made by the Senior Management Team and will be made as soon as possible, after contacting the Children Safeguarding Team or e-Safety officer, if the offence is deemed to be out of the remit of the company to deal with. All members of the school community will be informed about the procedure for reporting e-Safety concerns. The Safeguarding Panel based in PLUS' head office will be informed of any e-Safety incidents involving Child Protection concerns, which will then be escalated appropriately. The campus and host institution will manage e-Safety incidents in accordance with PLUS' behaviour policy where appropriate. PLUS will inform all stakeholders, including but not limited to, Group Leaders, agents, parents, carers, host families of any concern as and when required.

After any investigations are completed, the company will go through the facts, identify lessons learnt and implement any changes required. Where there is cause for concern or fear that illegal activity has taken place or is taking place then the Campus Manager will contact the Senior Management team and who will then inform the Police of the concern if required.

Staff Training

All new staff will be provided with information and guidance on e-safety matters to ensure awareness of current issues and to promote best practice. Detailed advice is also contained in the Staff Code of Conduct. Training is also provided to ensure staff know how to send or receive sensitive and personal data and understand the requirement to make sure there are passwords where the sensitivity requires data protection.

The following websites are recommended as further general guidance concerning e-safety: <http://www.thinkuknow.co.uk/> and <https://www.getsafeonline.org/>

Management of Social Media & Social Networking

All staff are made aware of the potential risks of using social networking sites or personal publishing either professionally with students or personally, and of the importance of considering the material they post, ensuring profiles are secured, and how publishing unsuitable material may affect their professional status.

Students are reminded about the ease of uploading personal information, the associated dangers and the difficulty of removing an inappropriate image or information once published.

Students are advised never to give out personal details of any kind which may identify them and / or their location. Examples include real name, address, mobile or landline phone numbers, school attended, IM and email addresses, full names of friends/family, specific interests and clubs etc.

Students will be advised on security and privacy online and will be encouraged to set passwords, deny access to unknown individuals and to block unwanted communications. Students will be encouraged to approve and invite known friends only on social networking sites and to deny access to others by making profiles private.

All stakeholders are advised not to publish specific and detailed private thoughts, especially those that may be considered threatening, hurtful or may offend another individual.

Staff personal use of social networking, social media and personal publishing sites will be discussed as part of staff induction and safe and professional behaviour as outlined in the Staff Code of Conduct.

Cyber Bullying

Cyber bullying can be defined as “The use of Information Communication Technology, particularly mobile phones and the internet to deliberately hurt or upset someone” - DCSF 2007.

Many young people and adults find that using the internet and mobile phones is a positive and creative part of their everyday life. Unfortunately, technologies can also be used negatively. When minors are the target of bullying via mobiles phones, gaming or the Internet, they can often feel very alone, particularly if the adults around them do not understand cyber bullying and its effects.

A once previously safe and enjoyable environment or activity can become threatening, harmful and a source of anxiety. It is essential that young people, school staff and parents and carers/ host families understand how cyber bullying is different from other forms of bullying, how it can affect people and how to respond and try to stop this from happening. Promoting a culture of confident users will support innovation and safety.

There are a number of statutory obligations on schools with regard to behaviour which establish clear responsibilities to respond to bullying. In particular section 89 of the Education and Inspections Act 2006:

Every school must have measures to encourage good behaviour and prevent all forms of bullying amongst Students. These measures should be part of the school's behaviour policy which must be communicated to all Students, school staff and parents.

Where bullying outside school (such as online or via text) is reported to a member of PLUS staff, it should be investigated and acted on. Although bullying in itself is not a specific criminal offence in the UK, it is important to bear in mind that some types of harassing or threatening behaviour or communications could be a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003, and the Public Order Act 1986. If a member of PLUS staff feels that an offence may have been committed, they should seek assistance from the Campus Manager who will, in turn, inform the senior management team in head office.

- Cyber bullying (along with all other forms of bullying) of any member of the campus community will not be tolerated.
- All incidents of cyber bullying reported to PLUS will be recorded.

- Students, staff and host families will be advised to keep a record of the bullying as evidence.
- PLUS will take steps to identify the bully, where possible and appropriate. This may include identifying and interviewing possible witnesses and contacting the service provider and the police, if necessary.
- Students, staff and host families will be required to work with PLUS to support the approach to cyber bullying and PLUS' e-Safety ethos.

Sanctions for those involved in cyber bullying may include:

- The bully will be asked to remove any material that is to be inappropriate or offensive
- An internet service provider or host may be contacted to remove content if the bully refuses or is unable to delete content.
- Other sanctions for students and staff may also be used in accordance with PLUS' Anti-Bullying, Behaviour and Safeguarding Policies.
- Agents/parents/ host families of students will be informed.
- The Police will be contacted by the Senior Management team if a criminal offence is suspected.

Revenge Pornography

Sharing private material as "revenge porn" online is illegal in England and Wales. The legislation, which went through Parliament as an amendment to the Criminal Justice and Courts Bill, came into force on Monday April 13th 2015. Clause 33 in the legislation defines Revenge pornography is the publication of explicit material portraying someone who has not allowed the image or video to be shared. The law now makes it illegal to disclose a "*private sexual photograph or film*" without the consent of the person in the content, and with the *intent to cause them distress*. It is not an offence under this section for the person to show the photograph or film to the individual.

Where illegal activity has taken place or is taking place involving students PLUS will determine the level of response necessary for the offence disclosed. Following disclosure of this information this will need to be immediately reported to the Senior Management Team by the Campus Manager. The decision to notify the Police will be made by the Senior Management Team and will be made immediately if deemed necessary.

Radicalisation & Extremism

PLUS Junior centres are subject to a duty under the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have “*due regard to the need to prevent people from being drawn into terrorism*”. This duty is known as the Prevent duty. Whilst this is a stand-alone policy, it is integral to our Prevent policy and should be applied as an extension to PLUS’ current and established policies and procedures that cover this area.

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 consult with the Campus Manager who will immediately refer to PLUS’ Prevent lead and Senior Management team to decide a course of action.

Students may become susceptible to radicalisation through a range of social, personal and environmental factors. All students are provided with information and reminded of the prevent duty as part of their induction.

All users are reminded that they cannot access or otherwise interact with the internet and Social media which promotes, encourages or supports extremism, radicalisation and or facilitates terrorism on campus IT equipment or on personal devices.

PLUS Centres expect students not to use their personal devices outside School hours to access material that promotes, encourages or supports extremism, radicalisation and or facilitates terrorism.

Monitoring & Review

PLUS’ Safeguarding Panel and Senior Management Team are responsible for reviewing this e-safety policy, in light of any incidents that have occurred, new technologies, in accordance with government guidance.

Further Information

The E-safety Policy should be read in conjunction with the following company policies which can all be found in the full copy of the Safeguarding Policy on the PLUS website:

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy
- Whistleblowing Policy
- Prevent Policy

Appendix 1

E Safety Record of Concern

| | |
|---|--|
| Name of Child | |
| DOB | |
| Date of incident/ Disclosure | |
| Time | |
| Record any Disclosure from Child using their Words. Use: Tell Explain Describe Outline To clarify/ gather information | Who? What? Where? When? |
| What are your concerns with the Child? | |
| Detail anything you have observed and when. | |

| | | | |
|--|---|------------------|--|
| | | | |
| What Category does the disclosure best fit? | Grooming | | |
| | Cyber bullying | | |
| | Misuse of Social Networking Site | | |
| | Sexting | | |
| | Gaming | | |
| | Underage Films | | |
| | Misuse of Digital Camera | | |
| | Other Please specify | | |
| Any other information to consider | | | |
| Name (PRINT) | | Date | |
| Position | | Signature | |

Online Safety Agreement

PLUS student Acceptable Use Agreement for 12 – 17 year olds
(to be read and signed by all students and parents prior to arrival)

Statement

The internet is a powerful tool giving great opportunities to everyone. Most things about the internet are good; some are not so good. This agreement aims to keep under 18 students safe online when they join a course at PLUS. Each host institution has online safety measures (*e.g. filters, passwords, monitoring of online activity, etc*) to help protect students. All under 18 students need to be responsible online, use the internet legally and follow these rules.

Student Agreement

I _____ will be responsible in my online behaviour whilst on a course with PLUS. I will not do anything that might risk;

- my own safety
- the safety of other users such as other students, staff or host families connected to the school
- the safety and security of the host institution's or other users' systems.

My Safety

- I understand PLUS and/or the host institution will monitor my online behaviour.
- I will not share my user name or password, or use another person's user name or password.
- I will be aware of 'stranger danger' online and not share personal information (e.g. contact details) about myself or others online.
- I will not meet anyone off-line who I have met online unless I have staff or a homestay with me.
- I will immediately report to staff or homestay, any unpleasant or inappropriate material or messages that make me feel upset or unhappy.

Proper (legal) online activity and the host institution's rules

- I will only use personal devices (mobile/iPhones, USB devices etc) and school devices at times allowed in the PLUS rules
- I will not create, access (download or upload), share or store any illegal or inappropriate material, using my own or the host institution's equipment while on the course with PLUS.
- Illegal and inappropriate online materials include:
 - gambling, pornography, age-rated games/films, websites or games showing violence, any sort of extremism or being unkind to others (intolerance) based on race, religion, disability etc., sending or receiving words or pictures about sex, accessing and not paying for music and films that are protected
- I will not install or store programmes on school or other users' equipment that will

alter or affect that equipment.

My behaviour

- I will act as I want others to act towards me
- I will not access, copy, remove or alter other people's or the school's online materials or settings without their permission
- I will be polite when I communicate with others online. I will not use unkind, angry or bad language in texts, emails or any other online messages.
- I will not take, send or share on social media, pictures of anyone without their permission

I am responsible

- I understand that I have broken PLUS rules if my online behaviour does not follow this Agreement and that I can be disciplined. If it is serious (e.g. breaking UK law) I might be sent home.
- This Agreement includes my time at the host institution and away from the institution for the duration of the course, particularly my behaviour to other members of the school community.

Student signature

- I understand this Agreement and that it is important I follow it when using the host institution or PLUS' equipment and my own equipment (e.g. phones / cameras / all other technology equipment), at all times during the course.

Name:

Signed

Date

Parent signature

- I understand this Agreement and have helped my child understand his/her responsibilities and the importance of acting safely and legally online.
- I accept that this Agreement is part of the PLUS rules for under 18s.

Name:

Signed

Date

PLUS student Acceptable Use Agreement for 8 – 11 year olds

(to be read and signed by all students and parents prior to arrival)

Be safe online

- I be careful when I am online.
- I will not tell people my name or anything about me or send pictures of me if I don't know them.
- I will not take or send pictures or other people unless they say it is okay.
- I will not use another person's iPhone/laptop/game machine.
- I will only use kind and good words in my messages.
- I will not send pictures or messages that make another person sad or unhappy.
- I will tell my teacher/homestay if I get any messages or pictures that make me sad or unhappy.
- I will not look at any websites or pictures if they show people being violent or un-kind.
- If I am not sure about anything online or how to be safe, I will ask my teacher / homestay for help.

Student signature

- I know I must follow the rules about being safe online and I will while I am on the course with PLUS.

Name:

Signed

Date

Parent signature

- I understand this Agreement and have helped my child understand his/her responsibilities and the importance of acting safely and legally online.
- I accept that this Agreement is part of the PLUS rules for under 18s.

Name:

Signed

Date

Photography and Filming Policy

The scope of this policy statement

PLUS works with children and families as part of its activities and this statement relates to all participants and their families and all PLUS staff including third party providers.

The purpose of this policy statement is to:

- Protect children and young people who take part in PLUS's services, events and activities, specifically those where photographs and videos may be taken.
- Set out the overarching principles that guide our approach to photographs/videos being taken of children and young people during our events and activities.
- To ensure that we operate in line with our values and within the law when creating, using and sharing images of children and young people This policy statement applies to all staff, volunteers and other adults associated with PLUS.

Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England.

Summaries of key legislation and guidance is available on:

- online abuse learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse
- child protection <https://learning.nspcc.org.uk/child-protection-system>

We believe that:

- Children and young people should never experience abuse of any kind
- We have a responsibility to promote the welfare of all children and young people and to take, share and use images of children safely.

We recognise that:

- Sharing photographs and films of our activities can help us celebrate the successes and achievements of our children and young people, provide a record of our activities and raise awareness of our organisation.
- The welfare of the children and young people taking part in our activities is paramount.
- Children, their parents and carers have a right to decide whether their images are taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.
- Consent to take images of children is only meaningful when children, their parents and carers understand how the images will be used and stored, and are fully aware of the potential risks associated with the use and distribution of these images.
- There are potential risks associated with sharing images of children online.

We will seek to keep children and young people safe by:

- Always asking for written consent from a child and their parents or carers before taking and using a child's image.
- Always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of children.
- Making it clear [in this policy] that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published.
- changing the names of children whose images are being used in our published material whenever possible (and only using first names if we do need to identify them).
- Never publishing personal information about individual children and disguising any identifying information (for example the name of their school or a school uniform with a logo)
- Making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information).
- Reducing the risk of images being copied and used inappropriately by:
- Only using images of children in appropriate clothing (including safety wear if necessary).
- Avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused.
- Using images that positively reflect young people's involvement in the activity.
- We will also develop a procedure for reporting the abuse or misuse of images of children as part of our child protection procedures.
- We will ensure everyone involved in our organisation knows the procedures to follow to keep children safe.

Photography and/or filming for personal use:

When children themselves, parents, carers or spectators are taking photographs or filming at our events and the images are for personal use, we will refer to this guidance on image sharing.

All students and staff will be reminded of the following during the Welcome Presentation:

- Asking for photos taken during the event not to be shared on social media or asking people to gain permission from children, their parents and carers before sharing photographs and videos that include them.
- Recommending that people check the privacy settings of their social media account to understand who else will be able to view any images they share.
- Reminding children, parents and carers who they can talk to if they have any concerns about images being shared.

Photography and/or filming for PLUS's use:

We recognise that our group leaders may use photography and filming as an aid in activities. However, this should only be done with PLUS's permission. Children, young people, parents and carers must also be made aware that photography and filming is part of the programme and give written consent.

If we hire a photographer, we will seek to keep children and young people safe by:

- Providing the photographer with a clear brief about appropriate content and behaviour.
- Ensuring the photographer wears identification at all times.
- Informing children, their parents and carers that a photographer will be at the event and ensuring they give written consent to images which feature their child being taken and shared.
- Not allowing the photographer to have unsupervised access to children.
- Not allowing the photographer to carry out sessions outside the event or at a child's home.
- Reporting concerns regarding inappropriate or intrusive photography following our child protection procedures.

Photography and/or filming for wider use:

If people such as local journalists, professional photographers (not hired by PLUS) or students wish to record one of our events and share the images professionally or in the wider world, they should seek permission in advance.

They should provide:

- The name and address of the person using the camera.
- The names of children they wish to take images of (if possible).
- The reason for taking the images and/or what the images will be used for.
- A signed declaration that the information provided is valid and that the images will only be used for the reasons given.

PLUS will verify these details and decide whether to grant permission for photographs/films to be taken. We will seek consent from the children who are the intended subjects of the images and their parents and inform the photographer of anyone who does not give consent. At the event we will inform children, parents and carers that an external photographer is present and ensure they are easily identifiable, for example by using them with a coloured identification badge. If PLUS is concerned that someone unknown to us is using their sessions for photography or filming purposes, we will ask them to leave and (depending on the nature of the concerns) following our child protection procedures.

Storing images:

We will store photographs and videos of children securely, in accordance with our safeguarding policy and data protection law. We will keep hard copies of images in a locked

drawer and electronic images in a protected folder with restricted access. Images will be stored for a period of two years.

We will never store images of children on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

PLUS not permit staff and volunteers to use any personal equipment to take photos and recordings of children.

Only cameras or devices belonging to PLUS should be used.

This policy statement should be read alongside our organisational policies and procedures, including:

Child protection.

Procedures for responding to concerns about a child or young person's wellbeing.

Staff Code of Conduct.

E-safety Policy.

Procedures for responding to concerns.

Contact details Photography and images co-ordinator Name: Dottie Pickthall

Phone: +44 (0) 20 7730 2223

Email: d.pickthall@plus-ed.com

Senior lead for safeguarding and child protection Name: Dottie Pickthall

Phone: +44 (0) 20 7730 2223

Email: d.pickthall@plus-ed.com

NSPCC Helpline 0808 800 5000

Professional Linguistic Upper Studies, Part of PLUS Group Ltd

3rd Floor 239 Kensington High Street London W8 6SN

Photography Release Form

(this document must be signed by all Group Leaders upon arrival)

Permission to Use Photographs on Behalf of a Child

Group Name: _____

Group Leader Name: _____

Location: _____

I grant to PLUS Ltd, the right to take photographs and videos of me and my group during our stay on campus. I authorize PLUS Ltd and its employees the right to use any photos or films, without the students' names, for internal use by PLUS at the final presentation only. Any digital images or video will be kept by PLUS Ltd for a period of a maximum of 5 years. Any images or videos taken by PLUS Ltd will not be used by third parties nor for commercial purposes.

I have read and understand the above:

Signature _____

Printed name _____

Date _____

PLUS DBS Policy

General principles

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust working with Under 18s, PLUS complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

Storage and access

Disclosure information is kept in a single, central record (this is a password protected spreadsheet) with access strictly controlled and limited to those who are entitled to see it as part of their duties and records the following information:

- Identity: name, address, date of birth, evidence of check made and date
- Start Date
- Role in Organisation
- Qualifications
- Self-declaration
- Enhanced DBS Certificate Number
- Barred List Check
- Overseas Police Check
- Right to work in the UK
- Prohibited list check

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.

Please refer to PLUS' Policy on the Employment of Ex-Offenders.

Employment of ex-offenders policy

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), PLUS complies fully with the [DBS Code of Practice](#) and undertakes to treat all applicants for positions fairly.

PLUS undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

PLUS can only ask an individual to provide details of convictions and cautions that PLUS are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).

PLUS can only ask an individual about convictions and cautions that are not protected.

PLUS is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

This policy is made available to all DBS applicants at the start of the recruitment process.

PLUS actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.

PLUS select all candidates for interview based on their skills, qualifications and experience.

PLUS ensures that all those in PLUS who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

PLUS makes every subject of a criminal record check submitted to DBS aware of the existence of the [DBS Code of Practice](#) and makes a copy available on request.

PLUS undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

PLUS Individual Student Emergency Contact Form

Student name _____

Campus _____ Vision _____ Ref. _____
Code _____

Home Address: _____ City _____

Country _____

Student Mobile Number _____

IN CASE OF EMERGENCY CONTACT:

(1) Name _____ & _____ Relationship _____

Telephone _____

(2) Name _____ & _____ Relationship _____

Telephone _____

ADDITIONAL INFORMATION

Is the student allergic to anything? Yes / No
If yes, please list all allergies _____

Is the student taking any medication we should be aware of? Yes / No
If yes, please list all medications we should be aware of:

Do you have any medical/mobility/mental health concerns of which we should be aware? Yes / No
If yes, please list medical/mobility/mental health concerns that we should be aware of:

The information requested on this form is confidential and for emergency use only. In the event of a medical emergency, this information will be used by authorized emergency personnel.

In the case of emergency, I give permission for my information to be released to emergency personnel. I also agree that any of my emergency contacts listed on this form may be notified in an emergency, as needed.

Date: _____

Signature: _____

Form to be sent to sales@plus-ed.com at least 14 days before the student's arrival.

Acknowledgement of Receipt and Acceptance of PLUS Safeguarding and Child Protection Policy

By signing this form, I confirm I have received and read PLUS' _Safeguarding and Child Protection Policy.

I understand that it is my responsibility to comply with the content of this policy.

Name
(printed): _____

Signature:

Date:

Group Leader declaration form

(this document must be signed by all Group Leaders upon arrival)

I the undersigned _____ confirm that the PLUS Campus Manager has provided me with the following:

- Student ID cards containing PLUS 24hour emergency number, Campus Manager mobile number and campus address
- Welcome letter with information about the centre including Emergency and First Aid
- Activity programme for the first two days

I also declare that I have read and understood “PLUS Safeguarding policy” for under18s and that I have all the students’ and students’ parents contact details.

My mobile number, to ensure that I am contactable at all times, is _____

Group Leader Name: _____

Group Leader Signature: _____

Date: _____

Appendix A

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 the Campus 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 | |

Appendix B

Response to a concern.

This section is to be completed by the Campus Safeguarding Lead.

| Action taken (Response & follow up) | Completed By | Date & Time |
|-------------------------------------|-----------------|-------------|
| | | |

| | | |
|--|--|--|
| | | |
|--|--|--|

Appendix C

Accident Register

Name of the person injured _____

Please indicate if the person injured is:

- Student
- Group Leader
- Member of staff

Injury reported to (Full Name and Position) _____

Date of Injury _____

Time of Injury _____

Please use the space below to describe in detail the injury you are reporting:

Date _____

Signature _____

Date _____

Signature _____