



# Safeguarding Policies Handbook

Summer 2024

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# Introduction

The purpose of this handbook is to provide comprehensive guidance and information regarding the safeguarding practices and procedures at PLUS. Its primary goal is to ensure the safety, wellbeing, and protection of all students participating in our programmes. It also aims to provide clear guidance to staff members and stakeholders on their roles and responsibilities in promoting a safeguarding culture.

This handbook applies to all staff members, volunteers, contractors, and visitors involved in the delivery of our programmes. It outlines the necessary protocols and measures to be implemented to safeguard students who participate in our programmes. These policies and procedures are designed to adhere to the legal and regulatory requirements set forth by relevant UK legislation, including but not limited to the Children Act 1989 and 2004, the Education Act 2002, the Counter-Terrorism and Security Act 2015, and the General Data Protection Regulation (GDPR).

It is important that all personnel involved in our programmes familiarise themselves with the contents of this handbook and adhere to the outlined policies and procedures. Any questions, concerns, or suggestions regarding safeguarding should be directed to the appropriate designated staff member responsible for safeguarding matters.

As legal and regulatory requirements may change over time, this handbook will be reviewed periodically and updated as necessary to reflect any amendments to safeguarding legislation and best practices.

## Key Contacts

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### External Contacts

See [Appendix 1](#)

## Definitions

Safeguarding at PLUS encompasses all measures taken to ensure the safety, wellbeing, and protection of children and young people participating in our programmes. It involves creating an environment that promotes their welfare, prevents harm, and responds appropriately to any concerns or risks that may arise. Safeguarding goes beyond addressing physical safety and extends to emotional, mental, and social aspects of a student's wellbeing. It includes protecting individuals from abuse, neglect, exploitation, and any other form of harm that may compromise their development and rights.

Some key terms are defined below.

**Child:** A child is defined as a person under the age of 18.

**Safeguarding:** The actions taken to protect children and vulnerable adults from harm, abuse, neglect or exploitation.

**Child protection:** A set of measures and activities designed to protect children from harm, abuse, neglect or exploitation.

**Disclosure:** A statement made by a child or adult about an incident of harm, abuse, neglect or exploitation.

**Allegation:** A claim or accusation that someone has engaged in harmful, abusive, neglectful or exploitative behaviour towards a child or vulnerable adult.

## 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 generally accommodated residentially in boarding schools, colleges, and universities. PLUS programmes typically include English tuition along with cultural experiences and leisure activities in internationally mixed groups and occasionally in closed groups.

### Statement

PLUS is committed to safeguarding, child protection, 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. 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.

PLUS aims to achieve a safe environment for all and uphold all students' rights to safety and protection by:

- Promoting a culture of vigilance and maintaining an attitude of 'it could happen here' to avoid complacency.
- Working closely with accreditors, government bodies, and children protection boards and charities for guidelines, best practices, and advice.
- Appointing a Safeguarding Team who are trained to advanced level, known to all students, staff, and stakeholders, and reachable 24/7.
- Creating clear channels of communication for students and staff so that concerns can be reported promptly and action taken swiftly.
- Ensuring that all staff receive safeguarding training.
- Following safer recruitment procedures and ensuring suitability homestay hosts.
- Taking action against any staff found not to be suitable to work with children and notifying the Disclosure and Barring Service.

### **Duty of Care**

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 external providers who come into contact with any of PLUS' students should read and follow this policy and report any concerns, incidents or allegations following the procedures outlined in this handbook.

### **Key Safeguarding Principles**

Our safeguarding approach is underpinned by a set of key principles that guide our actions and decisions:

- Promoting the welfare of children and young people: The wellbeing and safety of our students are of paramount importance. We are committed to providing an environment that nurtures their development, safeguards their rights, and protects them from harm.

- Putting the student at the centre: We prioritise the best interests of each student, considering their individual needs, circumstances, and perspectives. Their welfare and safety are at the heart of all our policies, procedures, and actions.
- Preventing harm: We proactively identify and mitigate potential risks and hazards to prevent harm to students. This includes robust risk assessments, effective supervision, and appropriate measures to address safety, bullying, discrimination, and other potential threats.
- Empowering students: We empower students by promoting their autonomy, encouraging their participation, and providing opportunities for them to develop skills, knowledge, and resilience. We actively listen to their voices, respect their choices, and involve them in decisions that affect their wellbeing.
- Collaboration and communication: We believe in effective collaboration and open communication among staff members, students, and external agencies. By working together, we can share information, identify concerns, and take collective action to safeguard students.
- Continuous improvement: We are dedicated to continually reviewing and enhancing our safeguarding policies, procedures, and practices. Regular training, monitoring, and evaluation allow us to adapt and improve our approaches based on emerging research, best practices, and changing needs.



## Safeguarding Team

The Safeguarding Team at PLUS plays a crucial role in ensuring the effective implementation of our safeguarding practices and procedures in our programmes. This dedicated team is comprised of the Safeguarding Leads along with all Campus Safeguarding Officers and Monitors at the various locations where PLUS operates. The following sections outline the specific roles and responsibilities of each member within the Safeguarding Team to provide a comprehensive understanding of their contributions to our safeguarding framework.

### Safeguarding Leads

The Safeguarding Leads oversee safeguarding from Head Office across the organisation. Any serious matters or concerns should be reported directly to them. There are two Safeguarding Leads at PLUS:

- Designated Safeguarding Lead (DSL): The person in charge of coordinating safeguarding activities and providing support and guidance to staff and participants. They are the primary point of contact for all safeguarding concerns and oversee the implementation of safeguarding policies and procedures. They are trained to Level 3.
- Assistant Designated Safeguarding Lead (ADSL): The person who supports the DSL in day-to-day safeguarding activities, including collecting documentation and conducting investigations. They are trained to Level 2.

Their contact details can be found under [Key Contacts](#).

Whenever needed, our Safeguarding Leads are supported by a Deputy Designated Safeguarding Lead who assumes responsibility for safeguarding in the absence of the DSL and is trained to Level 3.

In addition to our internal safeguarding structure, we are privileged to receive bespoke guidance from a dedicated external agency. This agency equips us with precise protocols and best practices for handling safeguarding matters with the highest standards of professionalism. Any investigations into safeguarding concerns, allegations, or incidents are conducted in strict accordance with the guidelines laid out by this agency.

## **Responsibilities**

The responsibilities of the Safeguarding Leads include the following:

**Providing expertise and guidance:** They possess comprehensive knowledge of safeguarding legislation, policies, and best practices. They take the lead in developing, implementing, and regularly reviewing the safeguarding policies and procedures at PLUS. They ensure that these policies are effectively communicated to all staff members, students, and relevant stakeholders.

**Acting as a point of contact:** They act as a primary point of contact for staff members, students, parents, and external agencies regarding any safeguarding concerns. They handle all disclosures or allegations of abuse with sensitivity, ensuring that appropriate action is taken in line with established procedures.

**Liaising with external agencies:** The Safeguarding Leads maintain effective working relationships with local authorities, child protection services, and other external agencies involved in safeguarding. They facilitate communication and cooperation in cases where the welfare of a student is at risk.

**Record-keeping and monitoring:** They ensure accurate and confidential record-keeping of all safeguarding concerns, incidents, and actions taken. They monitor and review the effectiveness of safeguarding procedures, making recommendations for improvements as necessary.

**Supporting staff and students:** They provide support and guidance to staff members who have concerns or require advice on safeguarding matters. They also ensure appropriate support is available to students who may be experiencing safeguarding issues, collaborating with relevant personnel to provide the necessary assistance.

Ensuring that programmes and materials are informed by safeguarding guidelines and best practices: They are responsible for ensuring that all our programmes as well as staff manuals and training materials align well with our safeguarding standards, are up-to-date and accurate. They also ensure that the set-up of all PLUS programmes is informed by safeguarding guidelines and best practices.

Ensuring adherence to safeguarding guidelines and best practices in programmes and materials: They hold the responsibility of ensuring that all our staff manuals and training materials consistently meet our safeguarding standards. They diligently design and update these resources to ensure their accuracy and alignment with the latest safeguarding guidelines and best practices. Furthermore, they play a crucial role in ensuring that the setup and implementation of all PLUS programmes are guided by the principles of safeguarding, incorporating industry-leading practices to create a safe and secure environment for our students.

## Campus Safeguarding Officers

PLUS operates its programmes out of multiple locations and, as such, each campus has at least one Campus Safeguarding Officer on site. In general, and unless otherwise stated, the role of Campus Safeguarding Officer is assigned to the Welfare Officer. Depending on the characteristics of the centre, there may be one or two Welfare Officers within our campus team. If only one Welfare Officer is employed, a second staff member will be designated to assume their safeguarding responsibilities in their absence as Deputy Campus Safeguarding Officer.

Campus Safeguarding Officers are responsible for ensuring the safety and wellbeing of the students at the particular campus where they operate. They have the knowledge and skills to recognise and act on safeguarding incidents and concerns and are in direct contact with the Safeguarding Leads. Campus Safeguarding Officers receive Level 2 in-house training designed and delivered by our DSL. This training happens prior to the start of their role. In exceptional circumstances where training has not been completed prior to the start of their role, it will be arranged as soon as possible once they begin. Meanwhile, they will have the full support of the Safeguarding Leads at all times.

The role of the Campus Safeguarding Officer is to:

- Take overall responsibility for safeguarding on campus.
- Ensure implementation and compliance with safeguarding policies and procedures.
- Receive information from staff, children, Group Leaders, parents or carers who have child protection concerns and ensure it is recorded 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 Safeguarding Leads.

The Campus Safeguarding Officer at each campus is made known to all students and staff. Safeguarding concerns and in particular minor concerns and issues should be reported to them. Campus Safeguarding Officers are guided and supported by the Safeguarding Leads and have access to 24/7 direct communication with them. If any allegations should not or cannot be reported to a Campus Safeguarding Officer, they should be reported directly reported to the Safeguarding Leads.

## Safeguarding Monitors

In addition to the Campus Safeguarding Officers, we have designated Safeguarding Monitors who play a crucial role in maintaining a safe environment for all students. The Safeguarding Monitors are comprised of the remaining campus staff including all management staff as well as the Activity Leaders and Teachers who are directly involved in day-to-day activities and interactions with the students. They are trained to Level 1 and take part in our in-house training at the start of their role.

### Responsibilities

The responsibilities of our Safeguarding Monitors are as follows.

**Notifying and Reporting Concerns:** Safeguarding Monitors are responsible for promptly notifying and reporting any safeguarding concerns they come across to the designated Safeguarding Officer. They play a vital role in being vigilant and observant of any signs or incidents that may raise safeguarding concerns.

**Keeping Records:** It is essential for Safeguarding Monitors to maintain accurate records of any observed issues or incidents related to safeguarding. These records should include relevant details and observations that may assist in the assessment and investigation of safeguarding concerns.

**Point of Contact:** As part of their role, Safeguarding Monitors will often act as the initial point of contact for students or staff who have safeguarding concerns or require guidance. They should be approachable and supportive, ensuring that individuals feel comfortable discussing their concerns and providing appropriate guidance or directing them to the designated Safeguarding Officer.

**Promoting Awareness:** Safeguarding Monitors have a responsibility to promote awareness of safeguarding policies and procedures among students and staff. They should actively engage in educating others about recognising and responding to safeguarding concerns, emphasising the importance of creating a safe and supportive environment.

By fulfilling these responsibilities, the Safeguarding Monitors contribute significantly to our overall safeguarding efforts, ensuring the wellbeing and safety of all students. They work closely with the Safeguarding Officer and have access to necessary support and guidance whenever required.

# Training

At PLUS, we recognise that well-trained and knowledgeable staff members are vital to the effective implementation of our safeguarding practices. We are committed to providing comprehensive training and professional development opportunities to ensure that all staff members understand their roles and responsibilities in safeguarding and are equipped with the necessary skills to create a safe and nurturing environment for our students.

## Training Requirements

All adults affiliated with PLUS must complete Basic Awareness Safeguarding Training (Level 1) and Prevent training. This includes all staff as well as Homestay Hosts and Group Leaders. In addition, Campus Safeguarding Officers and Safeguarding Leads are required to be trained to Advanced and Specialist level, respectively. They are required to complete this training through external training providers.

PLUS also provides Safer Recruitment training to its new recruiters. This training covers best practices for recruiting staff and is an important part of the company's commitment to safeguarding. It equips recruiters with the knowledge and skills necessary to ensure that our staff selection process prioritises the safety and wellbeing of our students. If senior recruitment staff are available to deliver this training, in-house training may be provided to ensure that it aligns well with the practicalities of our work context.

All training described in this section is required for all PLUS staff, Homestay Hosts, and Group Leaders before the start of their employment or hosting period. Additionally, all staff members, Homestay Hosts, and Group Leaders are required to complete refresher training regularly. This ensures that all PLUS employees and partners are up-to-date with the latest safeguarding policies and practices.

## Induction Training

During the induction process, new staff members receive specific training on safeguarding to ensure they have a solid foundation in understanding and implementing our safeguarding framework. This training covers topics such as:

- The responsibilities and expectations of staff members in safeguarding and promoting the welfare of students.
- Identifying signs of abuse, neglect, and other safeguarding concerns.
- Reporting procedures and how to raise concerns effectively.
- Maintaining professionalism and ensuring the safety of all students.

Completion of the induction training is a prerequisite for all staff members before they commence their duties at PLUS.

## Training Administration

The Safeguarding Leads are responsible for ensuring that the relevant processes are in place so that all adults affiliated with PLUS complete their required training. They oversee the training of Head Office staff as well as Campus Safeguarding Officers. The administration of safeguarding and prevent training for Head Office and all campus staff falls under the responsibility of the Recruiters. The Campus Safeguarding Officer delivers the Safeguarding Induction Training on campus.

## Safer Recruitment

PLUS applies a comprehensive and strict recruitment and selection process to ensure that candidates are suitable to work with children. The sections below outline the procedures we follow, which include making clear reference to our safeguarding policies in all advertising materials, screening applicants during interviews and reference checks, and carrying out extensive background checks.

### Recruitment Procedures

In all recruitment materials PLUS' commitment to safeguarding and child protection is reinforced. Applicants are also informed of suitability checks at different stages including during their interview. Safeguarding and Child Protection is highlighted in all PLUS recruitment advertisement

Applicants are required to submit their CV and explain any gaps in their CV satisfactorily. For instance, for extended periods of travel, applicants may be asked to provide supporting documents such as travel itineraries. During interviews, applicants are asked specific safeguarding questions to assess their suitability to work with children under the age of 18. This will be corroborated with references at a later stage. Additionally, applicants must provide proof of their identity and qualifications.

All new staff members must provide two references. References are asked if there is any reason why prospective employees should not be employed in situations where they have responsibility for or substantial access to persons under 18. If the applicant has worked outside the UK, one of the two references must be from their most recent employer. Returning staff from inside or outside the UK must provide one reference from their most recent employer.



In order to deter abusers, applicants are informed of the thoroughness of the application process. This includes stating that references will be specifically asked about the applicant's suitability to work with under-18s, and that references will be followed up. It also includes mentioning that DBS or police checks as well as barred list checks will be carried out.

## Background Checks

### New Staff

Before commencing work at PLUS, all successful candidates are asked to undergo a Disclosure and Barring Service (DBS) check, or a local equivalent for non-British nationals or those who have lived abroad for more than 12 months. This will not be necessary if the applicant can provide a valid enhanced DBS certificate dated within three months of their start date in a similar role. In such case, only a barred list check will be carried out. If the staff member is already registered with the government update service, PLUS will additionally check their status online to ensure that there is no change.

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. This reference must specifically mention that the employer has no knowledge of any issues or allegations related to child safeguarding or protection that would give rise to concern about the employee's suitability to work with under-18s.

### Returning and Permanent Staff

For returning staff, PLUS will access the original safeguarding checks that were made when the employee first applied to work for PLUS. For staff members returning from the UK, we will carry out a minimum of a barred list check before they commence work with us again. Additionally, we will carry out a new DBS check every three years thereafter. For staff members returning from outside the UK, we will not carry out a barred list check unless they have worked in the UK since working for PLUS. However, they should apply for a new police check every three years thereafter. For permanent staff, a new DBS check will be carried out every three years.

### **Job Offer Conditions**

All job offers for new staff are on the condition of successful Enhanced DBS checks or relevant international police checks. 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, and references are subject to follow-up calls.

### **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.

### **Assessment of Criminal Records**

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.

If an applicant's disclosure shows that they have a criminal record or information on the Disclosure which gives rise to concerns about their suitability to work with persons under 18, PLUS will refer the disclosure to the Safeguarding Lead for assessment. If necessary, PLUS will seek advice from the appropriate authorities or organisations in order to assist with the assessment. The applicant will be given the opportunity to discuss any issues arising from the disclosure before any decision is made. All disclosures and any notes of discussions will be kept confidential.

If PLUS decides not to employ an applicant, or to terminate employment where relevant, due to their criminal record, PLUS will inform the individual in writing and offer them the opportunity to appeal the decision. The appeal will be heard by a Director of PLUS and will be subject to the terms and conditions of the PLUS complaints and disciplinary procedure.

### **Partners and Contractors**

To ensure the safety and wellbeing of all participants, PLUS requires its partners and contractors to conduct DBS checks on their staff. They must then provide written confirmation that the DBS checks have been carried out. For Group Leaders, Agents must provide written confirmation that they have obtained the relevant police checks. In both cases, PLUS may conduct random checks on a sample of the staff to ensure that the screening process is being carried out appropriately.

In the case of Homestay Hosts, PLUS will ensure that all providers through which hosts are recruited conduct suitable screening processes, including DBS checks for all adults aged 18 or above in the household. Additionally, PLUS may conduct random checks on a sample of homestay hosts to ensure that the screening process is being carried out appropriately.

## **Record Keeping**

The following records will be maintained by PLUS in relation to all recruitment activities:

- Applications and CVs: A record of all applications received for any position, along with their CVs.
- References: All references received in relation to a candidate.
- DBS and police checks: Records of all DBS and police checks carried out for each successful candidate.
- Training certificates: A record of all Safeguarding and Prevent training completed by staff members.

All records will be kept securely and confidentially, in accordance with data protection laws. They will be kept in an HR restricted folder which only recruiters and Safeguarding Leads have access to. These records may be shared with relevant parties for safeguarding purposes, in accordance with data protection laws.

## Code of Conduct

We have a Code of Conduct for all staff involved in the delivery of our programmes, including Head Office staff, Campus Staff, Group Leaders, Homestay Hosts, and any other employee. 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 code of conduct below:

- Ensure you have a thorough understanding of our Safeguarding Policies and ensure compliance at all times. Promptly report any concerns, suspicions, or disclosures to the designated staff or relevant authorities if need arises.
- Provide adequate guidance and support to students at all times. You must be vigilant, attentive, and responsive to the needs and concerns of the students, ensuring their safety and wellbeing.
- Always treat children and young people with respect and dignity. Do not discriminate against them, and do not engage in any behaviour that may be considered abusive.
- Never engage in any behaviour that could be construed as sexual in nature with a child or young person. This includes physical contact, comments, or gestures that are sexually suggestive or inappropriate. Never flirt with a student or make sexually suggestive or provocative comments.
- Avoid physical contact with students where reasonably possible. While holding children's hands or hugging may be appropriate in many 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.

- 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 Safeguarding Officer if this is suspected. The Campus Safeguarding Officer should make all reasonable adjustments to ensure that the student and staff member have as little contact as is reasonably possible.
- Staff should never 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, 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.
- 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. If you have a conversation inside a room at any time, ensure that the door is open and you are not standing between the child and the door.
- Avoid entering a student's room. If you must enter a student's room, follow the relevant guidelines provided elsewhere in this document.
- Never take photographs or videos of children or young people without first obtaining the necessary consent from the child's parent or guardian.
- 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.
- Staff should not give their personal details such as their phone number or email address unless the need to do so in an emergency or similar makes it indispensable.

- Dress appropriately while on duty. This includes wearing the lanyards and clothing provided at all times. Revealing dresses and tops, visible underwear, see-through garments, spaghetti-string tops or vest tops are not acceptable.
- Avoid displays of affection between staff members.
- 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 institution's smoking policy.

If a breach of the code of conduct is reported or discovered, an investigation will be initiated. This investigation will aim to gather all relevant information and evidence regarding the alleged breach. If the investigation confirms that a breach has occurred, a disciplinary process will be initiated.

The disciplinary actions for breaching the code of conduct may include, but are not limited to, the following:

- Verbal or written warnings: A formal warning may be issued, emphasising the seriousness of the breach and the need for immediate compliance with the code of conduct.
- Training or counselling: Additional training or counselling sessions may be provided to the staff member involved, focusing on the specific areas where improvement is required.
- Suspension: In more severe cases, a temporary suspension from duties may be imposed, during which further investigation or review takes place.
- Termination of employment: If the breach is deemed significant or repeated, it may result in termination of employment or other appropriate consequences as outlined in the organisation's policies.

# Child Protection

## Recognising Abuse

The term abuse 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, and this includes inflicting harm but also failing to act to prevent harm. Abuse can take place in a range of settings including within a family, in an institutional setting, by telephone, and on the internet. Some typical signs of abuse are as follows:

- 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

Common forms of abuse include physical abuse, emotional abuse, sexual abuse, and neglect. Each of these is explained in the following sections.

### 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 sexualised play, words or drawing
- A child who is sexually provocative or seductive with adults
- Repeated sleep disturbances through nightmares or wetting

Older minors may additionally exhibit:

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

Sexual abuse may also be inflicted by peers. Peer-on-peer sexual abuse includes but is not limited to the following examples:

- Cat calling (sexually suggestive comments directed at someone privately or publicly)
- Skirt raising
- Up-skirting (taking a sexually intrusive photographs up someone skirt without their permission)
- Touching Breasts

### Child Sexual Exploitation

Child Sexual Exploitation 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.

### Female Genital Mutilation

Female Genital Mutilation 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 the duty of all health and social care professionals and teachers in England and Wales to report to the police 'known' cases of Female Genital Mutilation in under 18s which they identify in the course of their professional work. If you encounter a case of Female Genital Mutilation or have reason to believe that a girl might be at risk, you must inform the Safeguarding Leads immediately.

Indication that Female Genital Mutilation is about to happen includes:

- a girl talks about getting ready for marriage
- a family is arranging a long break
- knowledge that an older sibling has undergone it

Indication that Female Genital Mutilation has happened includes:

- reluctance to take part in any physical activities
- difficulties to sit still
- bladder problem
- behaviour change

### Neglect

Neglect is the persistent failure to meet a child's basic physical 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 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
- Inappropriate clothing

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.

## Reporting Safeguarding Concerns

Any staff member who has a concern about the welfare or safety of a child or young person attending our summer school must report it immediately to the Safeguarding Team in as much detail as possible. Staff members must also record the details of the concern as soon as possible using our Safeguarding Concern Form, which can be found in [Appendix 2](#).

Staff members must not discuss any allegations or concerns with anyone other than the safeguarding team or, if applicable, external safeguarding bodies. Confidentiality about both the victim and the accused must be maintained.

Staff members must not attempt to investigate the concern themselves. This is to ensure that the child is not put at risk of harm and to avoid compromising any potential investigation. Staff members must also refrain from confronting the person believed to be an abuser at all times for the same reasons. More broadly, assumptions, interpretations, or decisions on the basis of an allegation should not be made.

If a staff member has concerns that a child or young person is in immediate danger, they should call the emergency services (police, ambulance or fire service) on 999 immediately.

### When a Child Shares a Concern with You

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.

If the situation allows, the child should disclose directly to a Campus Safeguarding Officer. If this is not possible and the student discloses abuse to you, follow the guidelines below.

- Listen carefully and stay calm.
- Avoid challenging or interrogating the child.
- Use the words *tell*, *explain*, and *describe* to avoid asking leading questions.
- If the situation allows, take the student into a private place with another staff member present.
- Take notes if possible. Ideally, you will report word-for-word what is said.
- Record dates and times as well as details of anyone else who was present.
- Reassure the child that telling you was the right thing to do. Communicate that they have a right to be safe and protected.
- Do not promise confidentiality. The child might ask the adult to promise secrecy before disclosing. Such a promise should not be made, but you should assure the child that you will only pass the information on to those who need to know about it.
- Report immediately to the Safeguarding Team.
- Make accurate notes for reference in the future by completing the report incident form ([Appendix 2](#)). Record the actual words the child used as far as possible.
- Consider whether you should avoid leaving the child alone. If placed in the care of another adult, the child must not be asked further questions, only reassured and kept safe.

### **When an Adult Shares a Concern with You**

It is possible that an adult may approach you to share a concern about the welfare or safety of a child or young person attending our programme. In this situation, you should encourage the adult to report their concerns to the Safeguarding Team. If they are reluctant or refuse, it is your responsibility to report this information, in as much detail as possible. Please follow the steps below.

- Listen to the concern without interrupting or making judgments.

- Allow the adult to share as much detail as possible, including the names of the child and any staff members or witnesses involved.
- Take notes if possible. Ideally, you will report word-for-word what is said.
- Record dates and times as well as details of anyone else who was present.
- Report immediately to the Safeguarding Team.
- Make accurate notes for reference in the future by completing the report incident form ([Appendix 2](#)). Record the actual words the child used as far as possible.

## Responding to Allegations

If an allegation is reported to the Safeguarding Team, a thorough investigation will be undertaken. The steps below will generally be followed, although some alterations are possible depending on the nature or the severity of the allegation.

- If the Campus Safeguarding Officer was not present during the initial disclosure, they must schedule a formal meeting with the disclosing student or adult. Unless implicated in the disclosure, the student's Group Leader should also participate in this discussion. Other involved parties or witnesses should also be invited if applicable.
- The Campus Safeguarding Officer should lead the meeting, and another staff member should take word-for-word notes of the disclosure. At the end of the meeting, the notes should then read and signed by all present.
- If in any doubt as to how to proceed, or if the severity of the concern requires so, the Campus Safeguarding Officer should contact the Safeguarding Leads immediately.
- In some cases, it may be necessary to monitor and separate the individuals involved, depending on the seriousness of the situation. For example, if there is an allegation of sexual misconduct, the accused and accuser should be housed separately and supervised closely.
- After investigating and addressing the safeguarding concern, the member of the Safeguarding Team who led the investigation and made the decision on how to resolve the concern should complete the Action Taken section of the Safeguarding

Concern Form. This section should describe in detail how the concern was investigated and addressed.

### **Allegations Against PLUS Staff**

If an allegation is made against a staff member, staff will always be given the opportunity to explain the situation and their actions. As PLUS' primary concern is the students' welfare, it may 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.

If the investigation concludes that the staff member did not engage in any wrongdoing, the staff member will be reinstated and any suspension will be lifted. If the investigation reveals that the staff member has breached PLUS' safeguarding policy, their contract will be terminated with immediate effect, and the relevant authorities will be notified if necessary.

### **Allegations Against Group Leaders**

If a Group Leader is accused of any misconduct, PLUS will immediately notify the Agent and cooperate fully with any investigations. If an allegation of misconduct is substantiated, PLUS will take all necessary action to ensure the safety and wellbeing of the students on the programme, which may include the removal of the Group Leader from the programme. This may include, for example, finding alternative accommodation for the Group Leader for the duration of the investigation. PLUS will work closely with the Agent to ensure that any investigation is handled appropriately, that any required notifications are made, and that any necessary support is provided to students and staff affected by the allegation.

### **Allegations Against Homestay Hosts**

Our homestay hosts undergo rigorous processes to ensure they provide a safe and nurturing environment for our students. However, in the event of any safeguarding concerns or allegations, PLUS will take swift action to ensure the welfare of our students. This may include relocating the student and contacting the relevant authorities.

PLUS will conduct a thorough investigation in cooperation with the local authority and adhere to relevant guidelines and legislation. The homestay host will be suspended from

hosting students and forbidden from contacting any PLUS students until the investigation concludes. If the allegations are proven, the homestay host's contract will be terminated immediately.

### **Allegations Against a Student**

During the investigation, the student in question may need to be supervised by the Group Leader or be temporarily suspended from attending classes and/or participating in activities, depending on the nature of the allegation and the potential risk to other students. They may also need to be placed in alternative, supervised accommodation. This decision will be made on a case-by-case basis by the Safeguarding Team.

If the allegation is found to be substantiated, appropriate action will be taken. This may include disciplinary measures such as suspension or expulsion from PLUS, as well as involvement of external authorities such as the police or social services as required by law.

It is important to recognise that a child against whom an allegation has been made may also be at risk. In such cases, PLUS will prioritise the safety and wellbeing of both the alleged victim and the accused student.

### **Keeping Records**

To ensure all relevant information is available, it is essential to retain all documentation related to a safeguarding concern. This includes:

- The completed Safeguarding Concern Form, including the Action Taken section
- Any additional notes taken during the disclosure, including details of what was said and any relevant context
- Meeting minutes from any discussions or follow-up meetings related to the concern
- Follow-up actions taken by the Safeguarding Team or any other relevant parties, including dates and outcomes of any investigations or interventions

To ensure the confidentiality, it is crucial that staff members store these documents securely before turning them over to the Safeguarding Team. This means keeping them in a locked cabinet or drawer, password-protected computer file, or another secure location

that only authorised personnel can access. Once prepared, staff members must promptly provide this documentation to the Safeguarding Team via email at [safeguarding@plus-ed.com](mailto:safeguarding@plus-ed.com).

The Safeguarding Team are responsible for keeping records related to any safeguarding investigations that occur at PLUS. This allows us to provide accurate information if needed for any future reference requests, and to ensure that all relevant details of the safeguarding concern are captured and documented appropriately. It also allows to have the necessary information readily available if an investigation or an allegation resurfaces.

All records are kept securely and confidentially, in accordance with data protection laws, on the password-protected Office account of the Safeguarding Leads and is accessible to them only. Access to records will remain restricted to those who need to know, such as other members of the Safeguarding Team and the relevant authorities. All records will be retained for a period of 10 years from the date of the allegation, or until legal proceedings have concluded.



## 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.

### 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 generally assigned their own bathrooms. At certain times, due to physical restrictions, it may not be possible for individual bathrooms to be provided to adults and will therefore be necessary to implement bathroom time slots for adults and children. Should this situation arise, the slots will be designated by the Campus Safeguarding Officers and strictly monitored. Failure to adhere to the time slots will have serious consequences. Staff would face immediate suspension and students could be sent home.

### Rooming Policy

At PLUS, we are committed to ensuring the comfort, safety, and well-being of our students. Our approach to room allocation is designed to reflect these priorities, taking into account key factors such as gender, age, and the need for effective supervision. The key guidelines involved in our room allocation process are outlined below.

- Students are placed with or near other students of the same or similar age.
- Where twin or multiple-bed rooms are available, priority is given to students under 12 years of age in their allocation.
- If there are any 18-year-old students on campus, they are roomed separately from under 18s.
- Wherever possible, students are roomed in close proximity to their Group Leaders for supervision, safety, and safeguarding purposes.
- Genders may be mixed within the same accommodation area (for example a building or a floor) to facilitate proximity between students and their Group Leaders.
- It is our strict policy that bedrooms and bathrooms are not shared by males and females or by children and adults.

Please note that room allocation is finalised before arrival to the campus and cannot be altered upon arrival under any circumstances.

### **Night Checks**

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. They involve walking around all the accommodation blocks, including the corridors between the flats, to ensure that everything is quiet and no students are outside their rooms.

Night checks will primarily be conducted by the Activity Leaders, who can liaise with Group Leaders as necessary. The role of the Activity Leader is primarily to ensure that all is in order, but should any disturbances arise from a specific room or student, they will inform the Group Leader immediately. The Group Leader will then take appropriate action to address the situation, as the Activity Leader's function is mainly to report any issues that may arise.

It is imperative that all staff, whether Activity Leaders or Group Leaders, exercise utmost sensitivity and caution when conducting night checks. Any action that could potentially compromise a student's safety or privacy should be avoided at all costs.

Please follow the guidelines below during night checks.

### Activity Leaders

- Conduct the checks quietly and respectfully, so as not to disturb the students who are already asleep.
- Conduct night checks in pairs, wherever possible involving one male and one female staff member.
- In universities where the students are accommodated in flats, there is no need to enter the flats; as long as you cannot hear sounds from outside the flat you can consider that all is well and continue walking to the next flat.
- In boarding houses, you may have to walk down the corridors students use to get to the bathrooms to complete the checks. Be very aware of this when you enter the house. In such cases, 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.
- If a student is found to be awake or engaging in inappropriate behaviour, you should knock on the door and tell them to quieten down, explaining that if the issues persists you will need to contact their Group Leader.
- If the issues continue or are too serious for Activity Leaders to address on their own, the Group Leader must be called upon. The Activity Leaders must remain at the site to assist the Group Leader and ensure that the issue has been resolved.
- Wherever possible, the Group Leader called upon should be the same gender as the student involved.

### Group Leaders

- When the Group Leader arrives, they should knock on the student's door and ask them to come outside the room. There is generally no need for the Group Leader to go inside the students' rooms.
- If the Group Leader must enter a room, they need to first have clear and explicit confirmation from the student that they can come in.
- If the Group Leader is of a different gender than the student, but there is an Activity Leader of the same gender as the student present, the Activity Leader should go first and confirm to the Group Leader that it is acceptable for them to enter the room.

- Group Leaders must ensure that the situation is fully resolved before returning to their bedrooms and follow-up the incident on the following day to ensure that the situation does not reoccur.

### Emergencies

- In case of a critical emergency or if there being reasons to believe that immediate action is required, staff are authorised to enter the student's room without prior confirmation from the student.
- Wherever reasonably possible, campus staff must seek approval from the Campus Safeguarding Officers before taking it upon themselves to enter a student's room.
- 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 assess the situation.
- If a student is found to be missing, the staff member should immediately inform the management team and initiate a search of the campus. It is important to act quickly in such situations.
- If a staff member ever enters a student room, they must always leave the door open and never close themselves in a room alone with a student.

### 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 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 only be taken by managers for operational reasons when there are no students on site and managers have the express permission from Head Office.

## Homestay Accommodation

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 at least 48 hours in advance. The Group Leader must make sure host family are notified in writing. 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.

### **Complaints**

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 48 hours, the Group Leader must contact the PLUS Office in London on 020 7730 2223.

### **Guidance for Providers**

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.

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.

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.

Full details regarding homestay safeguarding and welfare practices and provisions can be found in PLUS' Homestay Provider Terms and Conditions.

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 will also be required to ensure that any adult visitors to the home should not be left alone with under 18 homestay students at any time. A full policy will be prepared in advance.



## 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.

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.

# 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 wellbeing, 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 refers to repetitive, intentional, and harmful behaviour that involves an imbalance of power between individuals. It includes actions such as physical, verbal, or emotional abuse, social exclusion, and online harassment.

Common examples of bullying include:

- Physical bullying, such as hitting, kicking, or pushing.
- Verbal bullying, including name-calling, teasing, or making derogatory remarks.
- Social bullying, such as excluding someone from a group, spreading rumors, or manipulating relationships.

- Cyberbullying, which involves using digital platforms to harass, intimidate, or embarrass others.
- Emotional bullying, including mocking, humiliating, or belittling someone's feelings or experiences.
- Racial or cultural bullying, targeting individuals based on their race, ethnicity, or cultural background.
- Sexual bullying, involving unwanted advances, comments, or actions of a sexual nature.
- Homophobic or transphobic bullying, directed at individuals based on their sexual orientation or gender identity.

Please note that this list is not exhaustive, and other forms of bullying may exist.

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.

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.

## Procedures

### Students

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

- If you feel safe and confident, you can assertively and calmly confront the bully by expressing that their behaviour is unacceptable. However, always prioritise your safety and avoid escalating the situation.
- Share your feelings with someone else.

- It's important to inform a member of the school staff about the bullying incident. They are there to ensure your safety and can take appropriate action to address the situation. Provide them with as much information as possible to help them understand the issue.

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

- Support the victim: Offer your friendship and let them know they are not alone. Be there to listen and provide comfort.
- Encourage them to speak out: Encourage the victim to report the bullying to a teacher, school staff member, or trusted adult. Assure them that it's important to seek help and that they will be supported.
- Accompany the victim: If the victim feels comfortable, offer to accompany them when they speak to a trusted adult. This can provide additional support and reassurance.

### **Staff**

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

- Take immediate action: If you witness bullying, intervene promptly to ensure the safety and wellbeing of the individuals involved. If an incident is reported to you, take it seriously and prioritise addressing the situation.
- Provide support to the victim: Offer reassurance, empathy, and a safe space for the victim to share their experience. Listen attentively, validate their feelings, and let them know that you are there to help.
- Document the incident: Record detailed information about the incident, including date, time, location, individuals involved, and a description of what transpired. Please use the Safeguarding Concern Form available in [Appendix 2](#). This documentation will be valuable for further investigation and addressing the issue effectively.
- Report the incident: Notify the Campus Safeguarding Officer. Depending on the nature of the incident reported, the Campus Safeguarding Officer may then decide to interview all concerned and contact the Safeguarding Leads. A decision will then

be made on follow-up measures. If considered necessary and appropriate by the Safeguarding Leads, police will be consulted.

- **Maintain confidentiality:** Respect the privacy and confidentiality of all individuals involved. Share information on a need-to-know basis with the relevant authorities and ensure that sensitive information is handled appropriately.
- **Supportive follow-up:** Offer ongoing support to the victim, ensuring they feel safe and supported. Collaborate with colleagues to implement appropriate interventions and preventive measures. After a bullying incident, students should be given an immediate opportunity to discuss the experience with a teacher or a member of staff of their choice. This is to reassure the minor and help them restore self-esteem and confidence.

## Sanctions

The following sanctions may be applied by the Campus Safeguarding Officer after consultation with and approval from Head Office:

- Official warnings to cease the offending behaviour may be issued to the accused 'bully'. The Campus Safeguarding Officer will speak to the students involved and may contact the parents or legal guardians (through their Group Leader), giving details of the offence.
- Students may be suspended from all or part of the programme.
- Students may be expelled from the programme and sent home.

The non-tolerance of bullying is made explicitly clear to all students in the Welcome Presentation.

## 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 ongoing 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.

## Extremism and Radicalisation

Preventing extremism and radicalisation is part of PLUS' commitment to keeping students safe. Being drawn into terrorism includes not just violent extremism but also non-violent extremism which can create an atmosphere conducive to terrorism. 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 their 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 the following:

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

Counteracting risks in terms of prevent includes:

- 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



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
- Train staff so they are able to recognise signs of vulnerability to radicalisation and know how to refer their concerns
- Provide students with information on their Prevent Duty as part of their induction
- 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 Officers, who can then report to the Safeguarding Leads. The Safeguarding Leads' responsibilities in relation to Prevent include overseeing the referral of cases of suspected radicalisation or allegations to external agencies or the police as appropriate. Any report will be dealt with sensitively and carefully, with confidentiality assured for the person reporting the concern.

All PLUS students and staff must show proper tolerance and respect to others and they have a responsibility to report any who don't.

## Photography and Filming Policy

The purpose of this policy 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.

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.
- 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:

- Requiring all staff to always inform and seek authorisation from the Safeguarding Leads prior to capturing any photos or videos.
- Always asking for written consent from a child and their parents or carers before taking and using a child's image.
- Making sure that children and their parents and carers understand how images of children will be securely stored and for how long, as well as what potential risks are associated with sharing images of children.
- Making it clear 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.
- 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).
- 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 store photographs and videos of children securely by:

- Keeping hard copies of images in a locked drawer and electronic images in a protected folder with restricted access
- Storing images for up to two years
- Never storing images of children on unencrypted portable equipment such as laptops, memory sticks, and mobile phones

PLUS does not permit staff to use any personal equipment to take photos or recordings of children. Only cameras or devices belonging to PLUS should be used.

## E-Safety Policy

It is the duty of PLUS 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
- 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 wellbeing, 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 and students 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 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

## Internet Access and Responsible Usage

The campuses used by PLUS provide internet access to students to support their academic activities and to facilitate educational opportunities. The use of the internet allows students

to access a wide range of resources, collaborate with peers, and engage in online learning platforms. It is important to note that internet access is provided under the premise of responsible and safe usage. PLUS acknowledges the importance of promoting digital citizenship and ensuring that students are aware of the potential risks associated with online activities.

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. 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. If need arises, Personal Data will be recorded, processed, transferred and made available according to the Data Protection Act 2018.

## Responsibilities

### Safeguarding Leads

The Safeguarding Leads are responsible for ensuring that this policy is implemented across PLUS Centres. In addition, the Safeguarding Leads' duties are:

- To ensure that the centres follow all current e-safety advice to keep students and staff safe.
- To take overall responsibility for data and data security.
- To provide guidance and advice to 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 our campus staff.

### Campus Safeguarding Officer

The Campus Safeguarding Officer will take day to day responsibility for e-safety issues. Their responsibilities include:

- 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 guidance and advice to all campus staff.
- To remain regularly updated on e-safety issues and legislation and be aware of the potential for serious child protection issues.

### **Teaching & Leisure Staff**

All teaching and leisure 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.

## Reporting incidents

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. Staff members 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 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 should report their concerns to the Campus Safeguarding Officer, who will respond following procedures within the Child Protection policy.

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 Campus Safeguarding Officer 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 Safeguarding Leads. The decision to involve Police will be made by the Safeguarding Leads and will be made as soon as possible if the offence is deemed to be out of the remit of the company to deal with. PLUS will then 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.

## Preventing Online Risks

It is the responsibility of all staff members at PLUS to help students understand and prevent online risks to ensure their safety in the digital world. By educating students about the potential dangers and empowering them with knowledge and strategies, we aim to foster a culture of online safety. To this end, all staff should take active steps to ensure that:



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

# General Data Protection Regulation

This General Data Protection Regulation (GDPR) policy outlines the principles and guidelines that govern the appropriate sharing and handling of personal information within PLUS. The policy ensures compliance with the GDPR Data Protection Act 2018, and human rights laws, while prioritising the safety and privacy of individuals.

This policy applies to all staff members, contractors, and stakeholders who handle personal data on behalf of PLUS. It encompasses the collection, storage, processing, and sharing of personal data.

## Principles of GDPR Compliance

**Lawfulness, Fairness, and Transparency:** PLUS ensures that all personal data processing activities are carried out lawfully, fairly, and in a transparent manner. Individuals are provided with clear and concise information about how their personal data is collected, used, and stored.

**Purpose Limitation:** Personal data is collected for specified, explicit, and legitimate purposes. PLUS ensures that personal data is not processed in a manner that is incompatible with these purposes.

**Data Minimisation:** PLUS only collects and processes personal data that is necessary and relevant for the specified purposes. Personal data is kept to a minimum and is not retained for longer than required.

**Accuracy:** PLUS takes reasonable steps to ensure that personal data is accurate, up to date, and kept in a reliable and secure manner. Staff members are encouraged to promptly notify the designated data protection officer of any inaccuracies or changes to personal data.

**Storage Limitation:** Personal data is stored for no longer than necessary for the purposes for which it was collected. Regular reviews are conducted to ensure that personal data is securely disposed of when it is no longer needed.

**Security and Confidentiality:** PLUS maintains appropriate technical and organisational measures to protect personal data against unauthorised access, disclosure, alteration, and destruction. Staff members are trained on data protection practices and are obligated to maintain the confidentiality and security of personal data.

**Data Subject Rights:** PLUS respects the rights of individuals regarding their personal data, including the right to access, rectify, restrict processing, and erase personal data when applicable. Requests related to data subject rights are addressed promptly and in accordance with applicable data protection laws.

## **Staff Responsibilities**

All staff members have a responsibility to handle personal data in accordance with this policy. Failure to comply may result in disciplinary action, as outlined in the organisation's disciplinary procedures.

Any suspected or actual personal data breaches must be reported immediately to Head Office. Staff members are encouraged to promptly notify Head Office of any potential security incidents or breaches to ensure timely investigation and appropriate actions.

## Medical Care

Ensuring the health and safety of our students is paramount at PLUS Ed. This section outlines clear protocols for handling student illness, administering first aid, and managing emergency situations to provide comprehensive medical care to all participants.

### Student Illness

If a student falls ill, Group Leaders must promptly attend to their needs while ensuring continuous supervision for the remaining group members. In the event that a hospital visit is required, a Group Leader must accompany the ill student to the hospital. Before doing so, Group Leaders must coordinate with the Campus Manager to arrange supervision for the rest of the group by either a Group Leader or if needed by designated PLUS staff.

Should a student become ill and need to remain in their accommodation while the group participates in an excursion, special arrangements must be made with the Campus Manager. In some institutions, students may not be permitted to remain in their accommodation during the day even if feeling unwell. Therefore, prior to leaving an ill student in the accommodation, Group Leaders must obtain confirmation from the Campus Manager regarding the host institution's policies.

Group Leaders must also ensure that a responsible adult is allocated to supervise the ill student and oversee their care. This may be a Group Leader or designated PLUS staff. At no time may a Group Leader leave any students unsupervised on campus without prior arrangements being made.

When a student stays in their accommodation due to illness, whether under the supervision of a Group Leader or PLUS staff, regular check-ins are essential. The responsible individual must check on the student every hour, logging these check-ins and ensuring that the student has their contact details in case of worsening condition.

Group Leaders should oversee any requests for over-the-counter medication, ensuring its suitability for minors by checking the packaging before administration.

## First Aid

### Training and Responsibility

PLUS will always strive to ensure that each centre has at least one first aider available for general assistance to students and Group Leaders, and all our centres are equipped with first aid kits. However, the responsibility to supervise the well-being of students, including their medical needs, falls on the Group Leader. Therefore, it is expected that each group will include at least one Group Leader who has been adequately trained to supervise the medical needs of the students and is capable of providing first aid, medical assistance, and emergency response.

### Emergency Treatment

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 accident, this must be logged in the incident report form available in [Appendix 2](#).

When administering first aid, the primary objectives are as follows, with the aim of ensuring the well-being of the casualty:

- Preserve life: Take immediate action to sustain the casualty's life.
- Establish a clear airway: If the casualty is unconscious, carefully position them to ensure an unobstructed airway for proper breathing.

- Control bleeding: Identify and promptly address any external bleeding to minimise blood loss.
- Prevent deterioration: Take necessary measures to prevent the condition from worsening or escalating.
- Ensure comfort and protection: Create a safe and secure environment for the casualty, ensuring they are kept warm and dry.
- Monitor condition: Maintain continuous observation of the casualty's condition to assess any changes or signs of improvement.
- Promote recovery: Offer verbal reassurance, provide comfort through physical touch, such as holding their hand, and offer emotional support throughout the process to aid in their recovery.

## Contextual Safeguarding

The well-being and safety of our students and staff extend beyond the boundaries of our campus. Thus, we take into account the wider environmental factors that may impact their welfare and security in the surrounding area. This approach, known as contextual safeguarding, allows us to address potential risks and promote a safe and secure environment both on and off-campus.

Key Considerations:

- **Road Safety:** Campus Safeguarding Officers conduct assessments to identify any specific road safety risks in the vicinity of the campus. Mitigation measures are implemented and communicated to staff and students to ensure their awareness and adherence.
- **Neighbourhood Assessment:** Campus Safeguarding Officers evaluate the local area to identify potential risks and concerns that could impact the welfare of our students. This assessment covers factors such as the proximity of busy roads, potential hazards nearby, and any relevant safety measures that need to be implemented to mitigate risks.
- **Community Engagement:** It is important to maintain mutual respect with and considerate behaviour towards the local community. Campus Safeguarding Officers thus are also instructed to assess any potential risks that could affect a harmonious coexistence during our stay. This includes any risks from or to the local community.

During the campus setup process, relevant contextual safeguarding risks and associated mitigation actions are identified. These risks and mitigation measures are effectively communicated to staff and students during the welcome presentation and through other appropriate channels.

## 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 Safeguarding Officer carrying out a fire risk assessment of the premises.
- Including fire safety in the Welcome Presentation, warning all staff and students that it is a criminal offence to tamper with fire safety equipment and highlighting the location of the assembly point.
- Wherever possible for the host institution, carrying out fire drills on a regular basis and according to host institution's Fire Manager's instructions.

### Fire Drills Procedures

- The Welfare Officer will initially liaise with the host institution's Fire Manager for instructions and brief all personnel involved accordingly, ensuring that every staff member involved has a clear understanding of their role.
- Activity Leaders will act as fire marshals and sweep sections of the accommodation or any other relevant facilities, ensuring that their area is clear. They must be assigned to zones of the same gender and must only knock on student's doors. Only in a real fire should fire marshals open bedroom doors.
- If the fire drill occurs during class time, the class teacher will take on the role of fire marshal.
- Group Leaders will have their register and complete a roll call promptly and efficiently at the correct assembly point.
- The Welfare Officer will be oversee the implementation of the fire drill protocol, ensuring that all staff members are fulfilling their designated roles effectively; ensuring that all areas are checked thoroughly during the evacuation, and conducting a debriefing session with the PLUS team to review the effectiveness of



the evacuation procedures. They will also log the details of the fire drill using the form available in [Appendix 2](#) and keep a record on a centralised digital folder.

## On Discovering a Fire

- Any person discovering a fire should sound the alarm. Fire alarms can be activated by pressing hard against the glass with your thumb.
- The person discovering the fire will inform a member of staff immediately who will then telephone the emergency services by dialling 999.
- If you phone the emergency services yourself by mobile phone, dial 999.
- Do not hang up the phone until you have received proper acknowledgment of your report.

## On Hearing the Fire Alarm

- Evacuate immediately using the nearest fire exit and proceed to the evacuation assembly point. Do not stop to collect personal belongings.
- If safe to do so, close doors and windows behind you as you leave. Members of staff should take their registers with them.
- Staff should make sure that all students get out of the premises safely.
- On arrival at the assembly point, give your name to the person taking the roll call. The responsible persons for taking roll call will make sure all students, staff, and visitors are accounted for.
- Do not re-enter the building until told it is safe to do so by the Welfare Officer.

## Young Learners

PLUS recognises that the safeguarding of children is of the utmost importance. This is particularly so in the context of younger students who can be more vulnerable. This policy outlines guidelines and recommendations as well as the measures and considerations in place for their care and supervision.

### Definition

At PLUS, young learners are defined as students aged 10 and 11 years old.

### Guidelines for agents

#### Requirements

- Young learners require close attention and supervision from their assigned Group Leaders at all times. This includes always being aware of their whereabouts and remaining vigilant on signs of distress, discomfort, or any unusual behaviour.
- We expect that Group Leaders are adequately prepared for their role and have been trained on understanding and managing the specific needs of younger learners as well as child welfare and protection.
- All groups with young learners must maintain a suitable staff-to-student ratio which allows Group Leaders to provide personalised attention and close supervision.
- It is essential to clearly communicate the location of the Group Leader's bedroom to the children, ensuring they know where to go in case of any issues.
- Group Leaders are to ensure that young learners are not left alone with any person over 18, except during lesson time.
- Each of our summer centres has a recommended age range which is linked to the host institution's policies and beyond our control. If you wish to enrol young learners

that fall outside the recommended age ranges, kindly seek confirmation from your sales representative.

- When the child needs to use the bathroom outside of their personal accommodation, the Group Leader is to keep a vigilant eye on their entrance and exit to the bathroom.
- There must be no hazards including sharp objects, cleaning products or scalding hot water the child could harm themselves on in their accommodation room. Group Leaders are required to ensure that this requirement is met upon arrival.

### **Recommendations and best practices**

- It is recommended that Group Leaders travelling with young learners have proven previous experience working with children and that they are trained in first aid.
- We recommend a ratio of 1 adult to 10 children in groups with young learners. We recognise that variations may be appropriate depending on factors such as total group size and number of young learners, presence of older siblings, and type of programme and accommodation.
- We encourage placing young learners in centres that align with recommended age ranges, where there are higher chances of having peers in the same age group and where our team will endeavour to design programmes which cater to their needs.
- It is advisable that young learners are accommodated in ensuite rooms. Twin rooms are also encouraged for this age group.
- It is advised that Group Leaders set up a buddy system whereby each young learner is paired with an older student buddy for guidance and support. Buddy systems are encouraged especially during excursions, where each young learner should be paired with a responsible older student or another young learner.
- It is recommended that Group Leader are prepared to facilitate direct communication with parents or guardians during the camp.

### **PLUS care guidelines**

- Young learners will not be grouped with students 18 and above for any lessons, activities, or excursions.

- PLUS will only accept young learners if they are part of a group and accompanied by Group Leaders.
- Our team will ensure that young learners are not housed in a room with anyone more than 2 years older.
- Our teachers will be routinely notified about the presence of young learners in their classes.
- Our teachers will immediately report to the Course Director if a young learner is absent from a lesson.
- All PLUS staff will receive training focused on the specific needs of young learners, including engagement, safeguarding, and safety.
- Our team will prepare comprehensive risk assessments and emergency evacuation procedures, both taking into account the presence of young learners.
- PLUS will prioritise housing young learners as close to their Group Leaders as possible for increased safety and oversight and separate from older students.
- In the absence of ensuite bedrooms, PLUS will endeavour to arrange separate bathroom facilities for young learners and older students as much as practicalities allow.
- Wherever feasible, young learners will not be placed in the same classrooms as students over 14 to ensure age-appropriate learning environments.
- Efforts will be made, within practical limits, to group young learners together in both lessons and activities.
- The leisure and academic programmes will consider and endeavour to integrate the unique needs and interests of young learners.
- Wherever possible, staff with experience in working with younger children will be allocated to centres with young learners.

# Welfare

## Risk Assessments

### Statement

At PLUS, we are committed to fostering an environment that is both safe and conducive to learning and personal development. Our approach to managing health and safety is guided by a principle of sensibility and proportionality, closely mirroring the recommendations of the Health and Safety Executive (HSE) available [here](#) and [here](#). We believe that effective health and safety management is not about the elimination of all risk, but rather about the careful management of real risks – those with the potential to cause harm.

### Our Commitment

#### Focus on Real Risks

We dedicate our resources to managing risks that are real and have the potential to impact the welfare of our students and staff. This means prioritising significant risks and implementing control measures that are reasonable and practicable, rather than expending efforts on trivial matters and unnecessary paperwork.

#### Promote Risk Awareness, Not Avoidance

Our goal is to create a safe learning environment in which students can develop an appreciation for assessing and managing risk. This includes offering activities that challenge students and provide them with the opportunity to develop new skills in a controlled and safe manner.

#### Sensible and Proportionate Risk Assessments

We strive to ensure that our health and safety arrangements are proportionate to the level of risk, avoiding over-cautious approaches that may hinder the learning experience. Our risk

assessments are designed to be straightforward, focusing on controlling serious risks without the need for complex calculations or extensive documentation.

### Encourage Learning Through Play and Exploration

Recognising the value of play in learning and development, we support activities that allow students to explore and understand their abilities. We aim to strike the right balance between protecting children from serious risks and allowing them to reap the benefits of play, which inherently includes exposure to manageable risks.

### Practical Judgement Over Excessive Paperwork

Our approach is grounded in sensible adult judgement, not in the creation of copious paperwork. We acknowledge that not all risks can be eliminated, and that minor accidents and mistakes may occur. Our focus is on ensuring that risks which are not beneficial or integral to an activity, such as those arising from poor maintenance, are identified, and managed appropriately.

### **Our Procedures**

Risk assessment templates are provided to all relevant management staff who are then asked to draw up more specific risk assessments for their own centres taking into account specific activities, excursions and students' ages. Designated staff receive training prior to the commencement of the campus on the importance of risk assessments and how to complete them. PLUS also supplies example risk assessments in order to assist them.

When the programmes begin, completed campus specific risk assessments are given to staff and participants as needed to ensure that they know the procedures that are in place for mitigating any risks. The risk assessments are then stored in a centralised digital location, ensuring that all staff know how to access them on demand. The risk assessments are then reviewed and updated as needed.

## Supervision Ratios

PLUS adheres to the recommended adult-to-child ratios, ensuring that they never fall below 1:15. When calculating ratios, we consider all staff members, including Group Leaders, to ensure sufficient adult supervision for all activities, both on-site and off-site.

To determine appropriate ratios, we take into account various factors such as the nature of the activity, identified risks in the risk assessment, students' age, and the premises. Group Leaders hold the ultimate responsibility for the students in their assigned group and receive clear instructions through various channels, notably the Group Leader Handbook, regarding their duties and expectations.

While most students arrive in groups accompanied by Group Leaders, we may also accept individual students in some centres. For individual students, we assign at least one responsible adult throughout their stay. To ensure effective communication and emergency support, we request parents and Agents to complete the Individual Student Emergency Contact Form prior to students' arrival.

## Supervision Procedures

During excursions, groups of students must be closely supervised by their own Group Leaders. The Group Leader ratio is 1:15. In addition, Activity Leaders will also help supervise the students in the groups allocated to them.

For every excursion, the following procedures must be carried out:

- The main Activity Leader will be at the front of the group.
- If there is a second Activity Leader, they will stay in the middle of the group, multiple Activity Leaders will distribute themselves evenly amongst the group.
- The main Group Leader will stay at the back of the group.
- If there is a second or multiple Group Leaders, they will distribute themselves evenly amongst the group.

Headcounts must be carried out by the main Activity Leader and the main Group Leader for each particular group continuously throughout the excursion. 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

## Unsupervised Time

While it's not compulsory for children to have unsupervised periods, PLUS is not equipped to tailor supervision to the specific requirements of each parent or legal guardian. As a result, any deviations from PLUS's standard supervision practices necessary for an individual child's needs must be managed by the Group Leader. It is the Group Leader's duty to ensure these bespoke arrangements are implemented throughout the programme. PLUS staff will adhere to our standard procedures unless directed otherwise by the Group Leader. Consequently, it falls to the parent or legal guardian to coordinate any special supervision arrangements with the Agent and, where relevant, the Group Leader.



Students aged 14 and above will sometimes be allowed to have unsupervised time. This is subject to the following conditions:

- The unsupervised time has been duly authorised by Group Leaders and PLUS staff and recorded on relevant registers.
- The student has a mobile phone with sufficient battery life to last for the entirety of the unsupervised period.
- The student is accompanied by a minimum of two other students at all times during this period.
- The length of unsupervised time does not exceed a maximum of 2 hours.
- Unsupervised time will not extend beyond 19:00.
- The students stay within a radius of one kilometre from the campus or designated meeting point.
- The students do not use public transport (except homestay students as appropriate)

Students aged 14 and over are permitted to have unsupervised free time during excursions in order to do shopping, and/or visit places of interest. 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.

On closed campuses with gated entrances or monitored exits students are free within the confines of the campus premises. On open and large campuses, students below 14 must be escorted by their Group Leader to and from each location on campus unless it is agreed beforehand that a member of PLUS staff will be escorting them. Students aged 14 and above will generally be able to move freely on these campuses. A higher level of supervision may 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 areas are out-of-bounds.

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. Provided written

permission from the Group Leader and the Campus Manager and supervision from a Group Leader or PLUS staff are available, students over 14 may travel back to their homestay between 19:00 and 22:30. In these cases, the homestay providers must be informed beforehand.

## Curfews

### Residential Centres

19:00 - back on campus (all below 14 years old)

22:15 - in the accommodation block/houses

22:30 - in own bedrooms

23:00 - lights out

### Homestays

19:00 - back at accommodation

22:30 - back at accommodation if 14 years old or above and written permission and supervision are available

## 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 emergency phone numbers. The ID cards also display the students' name, the PLUS logo and other PLUS details, and the student's allergies if any. Students and staff are instructed to 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, sending them back to their rooms to get it if necessary. If they claim to have lost it, immediately take them to get a replacement.

## Early Departures

We recognise that external factors and unforeseen circumstances may necessitate a student's early departure from the programme. This section provides the procedures for requesting and processing an early departure.

### Notification

The Agent must inform PLUS via their designated sales representative about the student's need for early departure as soon as possible. Initially, they will propose and agree on a collection date, time, and location. Once this has been decided, the agent will complete an early departure form which is available upon request from their sales representative. The completed form should then be submitted to PLUS along with a scanned copy of the collector's passport. PLUS reserves the right to request additional documentation or clarification as needed.

Once approved, the agent will be notified and the form and scan received will be forwarded to the Campus Manager from Head Office. The Agent must share the same information with the Group Leader.

### Collection

A formal handover process to the parent or authorised individual will take place on the designated collection day. Upon arrival, the individual collecting the student is required to present their passport for verification, which must correspond with the passport scan previously provided. Both the Group Leader and the Campus Manager must be present to oversee this process and to authorise the release of the student.

## Visitors

Under normal circumstances, visitors not affiliated with the programme, including family members, are not permitted on site. Group Leaders' requests for visits must be requested to the Campus Manager, whereas Agents' requests for visits must be requested directly to our Head Office team. Upon receipt of a request, the Campus Manager and our Head Office

team will jointly review the request and coordinate with the host institution. Whenever a visit is authorised, all visitors must:

- Report to the Campus Manager on arrival and make a record of their visit on our site register
- Report to any other personnel such as the Security Office as instructed by the Campus Manager
- Wear a lanyard which they will be provided with by the Campus Manager at all times to ensure they are easily recognised as an authorised individual on campus
- Be accompanied at all times if not provided with a lanyard
- Abide by any specific policy or practise for visitors of the host institution
- Refrain from entering the dormitory access, as access is strictly prohibited for visitors.

Any visitor to PLUS centres who is not wearing a PLUS lanyard or accompanied by a PLUS staff member should be politely challenged. For example, "Can I help you?"; "Can I direct you to the Campus Manager office"; or "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 Safeguarding Officer who will then report it to the Safeguarding Leads.

It is the responsibility of all employees to verbally and respectfully challenge any unknown visitor.

## 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**

All students are required to attend 100% of their lessons. No later than 10 minutes after the beginning of lessons, the Course Director must go around all classrooms and receive confirmation from all teachers that their students are in class. Group Leaders are required to communicate to the Course Director before class the name of any students not attending lessons.

In case of a student missing from a lesson without prior notice, staff are required to follow the procedure below:

- If a teacher reports that any students are missing to the Course Director, the Course Director will note down the name of any absent student.
- The Course Director will then 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, which may involve 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.
- 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 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 by the Campus Manager using the Incident Register Form available in [Appendix 2](#).
- All parties need to be informed as soon as the student is found.

### Excursions

During the Welcome Presentation, 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 emergency numbers on their lanyard. If their phone doesn't work and there is a shop nearby, they should go inside the shop and ask the staff to call the emergency numbers on their lanyard.

When on excursion, as soon as staff notice that a student is lost/missing, they should follow the steps below.

- 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 Activity Leader returns and attempt to make contact with the student.
- Inform the Campus Manager who, if the student is not found within 15 minutes, will inform Head Office and the authorities too.
- 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 by the Campus Manager using the Incident Register Form available in [Appendix 2](#).
- All parties need to be informed as soon as the student is found.

### **Leisure 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.

In case of a missing student, staff are required to follow this procedure:

- 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 activity.
- If the student cannot be contacted, the Campus Manager must be informed.
- 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 as outlined in this handbook.
- If the student is still not found, a whole campus fire alarm may be activated.
- The Campus Manager and Group Leader will 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 Head Office as soon as possible to report the absence.
- Once it is clear that the student is not on campus or with their host family and contact cannot be established, the Campus Manager should call 101 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 by the Campus Manager using the Incident Register Form available in [Appendix 2](#).
- All parties need to be informed as soon as the student is found.

### Homestays

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 by the Campus Manager using the Incident Register Form available in [Appendix 2](#).
- All parties need to be informed as soon as the student is found.

## Emergency Action Plan

The purpose of this Emergency Action Plan is to ensure the safety and wellbeing of all individuals on campus in the event of an emergency situation. It provides guidance and procedures to be followed by staff, students, and visitors to mitigate risks and respond effectively to emergencies.

Emergencies are unexpected and potentially dangerous situations that require immediate action to ensure the safety and well-being of staff and students. They can arise from various circumstances such as fire outbreaks, medical incidents, security threats and intruders, or severe weather conditions.

This Emergency Action Plan is 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 if need arises as specified below. Appointed staff member in the event of an emergency on Campus is the Welfare Officer or the Campus Manager in their absence. The appointed staff members at Head Office are the Safeguarding Leads.

### Types of Emergency

An emergency incident can be clarified as an unexpected event which affects staff and/or students, and which causes disruption on a scale which is beyond the normal coping capability of the PLUS team. The emergency incident may involve significant threat, damage, or injury to property and individuals, and may have long term impacts on students, staff and parents/guardians.

The following are examples of emergency incidents which may necessitate activation of the emergency plan.

- A fire within or nearby the premises
- A serious accident involving students and/or school personnel

- Death of a student or member of staff
- Kidnap or disappearance of a student
- A terrorist attack, or violent intruder on or nearby school premises
- Chemical or toxic substance release
- An epidemic such as meningitis or Coronavirus
- Severe weather events such as flood, high winds, extreme storms, etc.

## Procedures

If you discover an emergency, follow the steps below.

- Ensure your own safety and remain calm.
- 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.
- Take your register with you if possible to check that all children are present.
- Clear your group and any other persons in the vicinity away from the surrounding area and get them to the nearest Assembly Point as allocated by the venue, even if the emergency appears minor and controllable.
- If needed, carry out first aid to the best of your abilities.
- On arrival to the Assembly Point, ensure all of your group are accounted for if possible with the help of your register. If there are missing children these must be reported immediately.
- It is worth considering seeking assistance from more senior members to help you deal with the situation if practical. However, do not put them in a position where they may be put in danger.
- If you have your mobile phone, try to alert the Welfare Officer as to the whereabouts of the emergency.
- Alternatively, a 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 Welfare Officer.
- All staff should report to Welfare Officer as soon as possible and await instructions.

- Check that the emergency services have been called. If not, call 999 and ask for the fire service.
- Assist with keeping areas clear in preparation for possible further evacuation or emergency service access.
- If relevant, members of staff should stay as needed where they can prevent anyone straying into the area (without taking personal risk).
- Staff should inform venue managers as early as possible if an evacuation is in progress regardless of the severity of the incident.

### **False Alarm**

- The Welfare Officer 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.
- On Welfare Officer's instructions, staff may carry on with activities, so long as it is safe to do so.
- The Welfare Officer should liaise with venue staff to ensure alarms are silenced.

### **Evacuation**

The evacuation must take into account the location of the emergency. If a fire evacuation in particular, staff should know where the alarm has been activated so this area can be avoided during evacuation. Ideally, all staff involved in the evacuation should be familiar with the location to be evacuated. When assisting in conducting searches, the steps below must be followed. Personal risk should never be taken.

- Search not only the zone concerned, but also the whole building.
- All areas should be checked including toilets and changing rooms.
- Evacuation should be conducted in pairs wherever possible.
- A mobile phone should be carried throughout the search.
- Note that 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.
- If there are any areas that you were unable to search and evacuate these must be reported.

### **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. 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. If a participant refuses to leave after repeated requests then the participant should be left and the matter reported to the Welfare Officer.

- 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 Welfare Officer that your area is clear. Until you have reported back, it will be assumed you are still in the building. The Welfare Officer ensures all areas have been cleared and needs all staff to feedback when an area has been cleared. The Welfare Officer will then complete a roll call checklist or check staff registers.
- Await instructions from the Emergency Service.

### **Re-admittance of Groups and Public**

- 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 Welfare Officer 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.
- The Safeguarding Leads 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**

Welfare Officers will complete an incident report form. This may be completed by the venue manager and a copy should be forwarded to the Safeguarding Leads as soon as is reasonably practical.

## **Security Incidents**

Typical Examples of general security incidents include the following:

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

If you discover a security 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 follow the procedures above.

### General Notes

- 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 the Safeguarding Leads 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.

### Site Specific Arrangements

- Welfare Officers must liaise with venue managers in order to be made aware of venue specific security procedures.
- Welfare Officers in liaison with the Safeguarding Leads are responsible for ensuring that staff are aware of their responsibilities if security is breached.
- 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 PLUS lanyards.

## Student Wellbeing and Conduct

When students arrive on campus various steps are taken to ensure their safety and wellbeing throughout the programme.

All students and Group Leaders take part in a Welcome Presentation. This includes an overview of our safeguarding procedures including how to report safeguarding concerns. It is the duty of the Campus Safeguarding Officer to inform all students and Group Leaders that if students have any concerns about their safety or wellbeing or have any allegations to report, they as Campus Safeguarding Officers are available at all times. It will also be made clear that if students do not feel comfortable speaking to the Campus Safeguarding Officers, they can speak to any Activity Leader or their Group Leader who will then relay the information.

Campus generic and campus specific Health and Safety procedures are also relayed to students during welcome presentations. These include but are not limited to, assembly point, key staff, 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 the UK, and emergency contact numbers.

They are also signposted to the Student Code of Conduct. An overview of this Code of Conduct is provided during the presentation and the students are then asked to read the document thoroughly and clarify any questions. It is the duty of the Group Leader to ensure that students understand the contents of the Student Code of Conduct so that students know what is expected of them and what their responsibilities are.

### Behaviour & Discipline

Students are expected to follow our rules while attending our programmes. The rules are explained during the Welcome Presentation and through the Student Code of Conduct.



Any incident or misbehaviour will be reported to the Welfare Officer. The Welfare Officer will handle the incident in different ways, depending on its severity. After a thorough investigation of the matter, and in collaboration with Head Office wherever relevant, the Welfare Officer will reach a decision and inform the Group Leader and students involved as needed.

Interventions may include verbal warnings, written warnings, meetings with the student, involvement of parents or legal guardians, or temporary or permanent exclusion from specific activities or the programme as a whole.

As a last resort PLUS may expel 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 and to provide support and guidance. In the rare circumstance of expulsion, no refund will be provided, and the Agent will be responsible for covering any incurred expenses, such as those for airport transfers, extra meals, or additional supervision.

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. Students must be removed from the programme and separated from other students until arrangements can be made to fly home. This may require close supervision by the Group Leader 24/7.

# Whistleblowing

Whistleblowing is the term used when someone who works in or for an organisation wishes to raise concerns about malpractice or wrongdoing. We expect all members of staff and any adults associated with our organisation to report any malpractice or wrongdoing that comes to their attention. This includes any concerns they may have about the conduct of their colleagues, students, contractors, Group Leaders, or anybody else.

Any concerns raised will be taken seriously, investigated promptly, and dealt with appropriately.

## Procedure

If any member of staff has a concern about malpractice or wrongdoing, they should report it as soon as possible. Concerns can be reported verbally or in writing to the Safeguarding Team.

The Safeguarding Team will conduct a preliminary assessment of the concern to determine whether it requires further investigation. If an investigation will not be conducted, the Safeguarding Team will inform the whistleblower of the reasons why and close the matter. Alternatively, the Safeguarding Team may escalate it to the relevant person or committee for further investigation.

The Safeguarding Team will keep the whistleblower informed of progress at appropriate intervals, and will provide the whistleblower with a summary of the findings and any action taken as a result of the investigation.

If you wish to raise concerns over how child protection issues are being handled, or if you feel uncomfortable reporting to internal staff, please see the external contacts available in [Appendix 1](#).

## Support and Protection

PLUS recognises the importance of supporting and protecting whistleblowers who act in good faith. We provide assurance that individuals who make genuine reports will not face any adverse consequences or detrimental treatment. Whistleblowers can expect the following:

- **Supportive Environment:** Whistleblowers will be treated with respect and fairness throughout the process. PLUS encourages a supportive environment for individuals to come forward with their concerns.
- **Confidentiality:** Whistleblower identities will be kept confidential to the extent permitted by law and as necessary for conducting a thorough investigation. Disclosure of identities will only occur when required by legal obligations or as authorised by the whistleblower.
- **Non-Retaliation:** PLUS strictly prohibits any form of retaliation against whistleblowers. Any staff member found to have engaged in retaliatory behaviour will be subject to disciplinary action.
- **Anonymous Reporting:** PLUS offers the option of anonymous reporting to protect the identity of whistleblowers who prefer not to disclose their personal details.

## Quality Control Plan

The Quality Control Plan outlines the measures and procedures in place to ensure the consistent delivery of high-quality summer school programmes across all campuses operated by PLUS. This plan aims to maintain the highest standards of safety, education, and student wellbeing throughout the entire duration of our programmes.

The objectives of the Quality Control Plan are as follows:

- Maintain a safe and secure environment for all students and staff.
- Ensure adherence to safeguarding policies and procedures.
- Deliver engaging and effective educational programmes that meet the needs of students.
- Provide excellent customer service and support to students and stakeholders.
- Continuously monitor and evaluate the quality of our services to identify areas for improvement.

### Training and Evaluation

All staff members undergo an initial induction including comprehensive safeguarding training and role-specific training.

Campus Managers, Activity Managers, and Course Directors also conduct regular performance evaluations and provide constructive feedback to enhance staff effectiveness. The performance evaluation procedures for Activity Leaders and Teachers are outlined below.

#### Activity Leaders

Campus Managers will assess Activity Leaders' performance by:

- Evaluating the Activity Leader's ability to effectively plan and coordinate activities with other members of the Leisure Team.
- Assessing their ability to deliver quality activities and walking tours, engaging and motivating students, and fostering an inclusive environment.
- Considering feedback from students and other staff members regarding their performance.

On the basis of their assessment, they will:

- Provide comprehensive feedback on strengths, areas for improvement, and specific recommendations.
- Discuss strategies to overcome challenges and achieve performance goals.
- Establish an action plan for further development and growth.

### **Teachers**

Course Directors will assess Teachers' performance by:

- Conducting classroom observations to evaluate teaching methodologies, lesson planning, and instructional delivery.
- Assessing the teacher's ability to engage students, facilitate learning, and manage classroom dynamics effectively.
- Evaluating the use of appropriate teaching resources, technology, and assessment strategies.
- Considering student feedback, academic performance, and progress as part of the evaluation process.

On the basis of their assessment, they will:

- Provide feedback on teaching strengths, areas for improvement, and strategies for enhancing instructional skills.
- Support teachers in setting professional goals and implementing effective teaching practices.
- Share best practices among the teaching staff.

Through the performance evaluation process, PLUS aims to recognise and support the growth of Activity Leaders and teachers, ensuring the continuous improvement of their performance and the overall quality of the summer school programmes.

## **Student Questionnaires**

The student questionnaires are distributed and collected jointly by the Course Director weekly during class time.

The forms are collected and scanned and uploaded to a centralised SharePoint folder. The Course Director and Welfare Officer then review all responses, highlighting any feedback requiring action and thereafter creating an Action Plan. The Action Plan serves to explain issues identified in the feedback and how they are addressed, including a follow-up section. Wherever serious issues are identified, the Course Director or Welfare Officer contact Head Office without delay.

## **End of Season Feedback**

At the end of the season, Campus Staff feedback is 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 Spot Checks**

PLUS is accredited by various bodies and as such, Campus staff should always be prepared to have a British Council or a BAC 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 unannounced visits by members of the Head Office to assess the implementation of safeguarding policies and the overall quality of the programme and campus set-up. The campus spot checks serve the following purposes.

### **Objective Assessment**

- The unannounced nature of the spot checks ensures an objective evaluation of safeguarding practices and programme delivery.
- The assessment aims to identify any potential gaps or areas that require improvement to uphold the highest standards of safety and wellbeing for students.

### **Comprehensive Evaluation**

- The spot checks evaluate various aspects of the summer school programme, including campus infrastructure, facilities, and the implementation of safeguarding procedures.
- The assessment encompasses classroom environments, accommodation areas, communal spaces, activity planning and execution, staff conduct, and adherence to health and safety guidelines.

### **Observational and Documentation Review**

- Members of the Head Office conduct thorough observations of the campus environment, interactions between staff and students, and the overall atmosphere.
- Documentation, such as safeguarding records, incident reports, and risk assessments, may be reviewed to ensure compliance with established procedures and best practices.

### **Feedback and Recommendations**

- Following the spot checks, the Head Office provides feedback to the campus management team on areas of strength and opportunities for improvement.
- Recommendations are provided to address any identified deficiencies and enhance the safeguarding measures and overall quality of the summer school programme.

### **Continuous Improvement**

- The spot checks serve as a catalyst for continuous improvement efforts across all campuses.

- The feedback and recommendations received from the Head Office spot checks help identify best practices that can be shared among campuses to enhance overall performance.

The campus spot checks conducted by the Head Office underscore PLUS's commitment to providing a safe and enriching environment for students during their summer school experience. By conducting unannounced visits and comprehensive evaluations, PLUS ensures that all campuses consistently uphold safeguarding standards and deliver high-quality programmes that prioritise student wellbeing and safety.



## Appendix 1: Safeguarding External Contacts

Central London
Local Safeguarding Children Board
07739315388 (Emergencies); 020 7641 4000
<a href="http://www.rbkc.gov.uk/lscb">www.rbkc.gov.uk/lscb</a>
<a href="mailto:accesstochildrensservices@westminster.gov.uk">accesstochildrensservices@westminster.gov.uk</a>
Ardingly
West Sussex Safeguarding Children Partnership
01403 229900 (Emergencies); 0330 222 7799
<a href="http://www.westsussexscp.org.uk/">www.westsussexscp.org.uk/</a>
<a href="mailto:wschildrenservices@westsussex.gov.uk">wschildrenservices@westsussex.gov.uk</a>
Bath
Safeguarding Bath & North East Somerset
01454 614165 (Emergencies); 01225 396312; 396313 or 396810
<a href="http://www.safeguarding-bathnes.org.uk/children">www.safeguarding-bathnes.org.uk/children</a>
Brighton
Brighton & Hove Safeguarding Children Partnership
01273 335905 (Emergencies); 01273 295643
<a href="http://www.bhscp.org.uk/preventing-abuse-and-neglect">www.bhscp.org.uk/preventing-abuse-and-neglect</a>

### Chelmsford

Essex Safeguarding Children Board

03330 139 797

[www.escb.co.uk](http://www.escb.co.uk)

[childrens.safeguarding@essex.gov.uk](mailto:childrens.safeguarding@essex.gov.uk)

### Chester

Cheshire West and Chester Safeguarding Children Partnership

01244 977 277 (Emergencies); 0300 123 7047

[www.cheshirewestscp.co.uk](http://www.cheshirewestscp.co.uk)

[i-ART@cheshirewestandchester.gcsx.gov.uk](mailto:i-ART@cheshirewestandchester.gcsx.gov.uk)

### Dublin

TULSA – Child and Family Agency

+353 (0) 76955749

[www.tusla.ie/](http://www.tusla.ie/)

### Edinburgh

Public Protection in East Lothian and Midlothian

0131 200 2324 (Emergencies); 0131 271 3413

[emppc.org.uk/home/](http://emppc.org.uk/home/)

[socialcaredirect@edinburgh.gov.uk](mailto:socialcaredirect@edinburgh.gov.uk)

### Ellesmere

Cheshire West and Chester Safeguarding Children Partnership

0300 123 7047; 01244 977277

[www.cheshirewestscp.co.uk](http://www.cheshirewestscp.co.uk)

[noreen.gallagher@cheshirewestandchester.gov.uk](mailto:noreen.gallagher@cheshirewestandchester.gov.uk)

### Epsom

Surrey Children's Single Point of Access (SPA)

01483 517898 (Emergencies); 0300 470 9100

[www.surreycc.gov.uk/social-care-and-health/childrens-social-care/](http://www.surreycc.gov.uk/social-care-and-health/childrens-social-care/)

[cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

### Hatfield

Hertfordshire Safeguarding Children Partnership

0300 123 4043

[www.hertfordshire.gov.uk/services/Childrens-social-care/](http://www.hertfordshire.gov.uk/services/Childrens-social-care/)

### Kingston

Kingston and Richmond Safeguarding Children Partnership

020 8770 5000 (Emergencies); 020 8547 5008

[kingstonandrichmondsafeguardingchildrenpartnership.org.uk](http://kingstonandrichmondsafeguardingchildrenpartnership.org.uk)

[lscsb-support@kinrichlscb.or.uk](mailto:lscsb-support@kinrichlscb.or.uk)

### Loughborough

Leicestershire and Rutland Safeguarding Children Partnership

0116 305 7597 or 5641 (Emergencies); 0116 454 2440

[www.lrsb.org.uk](http://www.lrsb.org.uk)

[lado-allegations-referrals@leicester.gov.uk](mailto:lado-allegations-referrals@leicester.gov.uk)

### Stirling

Stirling Council Child Protection Committee
01786 470500 (Emergencies); 01786 47117
<a href="http://www.stirling.gov.uk">www.stirling.gov.uk</a>
<b>Uxbridge</b>
Hillingdon Safeguarding Children partnership
01895 250 111 (Emergencies); 01895 556 633
<a href="http://hillingdonlscb.org.uk">hillingdonlscb.org.uk</a>
<b>Windsor</b>
Bracknell Forest Local Safeguarding Children Board
01344 786 543 (Emergencies); 01344 352 005
<a href="http://bflscb.org.uk">bflscb.org.uk</a>
<a href="mailto:MASH@bracknell-forest.gov.uk">MASH@bracknell-forest.gov.uk</a>

In addition to these numbers, you can also contact the NSPCC Child Protection Helpline at 0808 800 5000.

# Appendix 2: Forms and Templates

## Fire Drill Log Form

This Fire Drill Log Form is to be completed after each fire drill conducted at the campus. The form should be submitted to the designated personnel responsible for maintaining fire safety records at the campus. Please ensure that all relevant information is accurately recorded to support ongoing fire safety efforts and identify areas for improvement.

Date	
Campus	
Time of Drill	
Evacuation Time	
Weather Conditions	
Number of Participants	
Location of Assembly Point	
Notes	

Name of Staff Conducting the Drill:

Date and Time of Completion:

Signature:

## Safeguarding Concern Form

This Safeguarding Concern Form is used to record any concerns or incidents that may arise during our programmes that relate to the safety and welfare of children and young people. Please complete this form as soon as possible after the incident or concern has occurred. If you are unsure about any of the information required on this form, please leave the section blank.

All allegations reported using this form will be taken seriously and will be investigated promptly and sensitively, in accordance with our safeguarding policy. The information provided on this form will be treated confidentially and will only be shared on a need-to-know basis with individuals who are involved in managing the incident and/or providing support to those who have been affected.

### Disclosure Details

Date and time of disclosure	
Name of person making the disclosure	
Name and role of person noting the disclosure	
Names and roles of others present during disclosure	

### Incident Details

Student's full name	
Gender	

Date of birth	
Nationality	
Group ID	
Name and address of parents/guardians	
Date and location of the incident	
Details of the incident	
Name and address of witnesses	
Witnesses reports	
Signature	

### Action Taken

Summary of action taken	<i>To be completed by the Safeguarding Team at a later stage</i>
Date and Signature	<i>To be completed by the Safeguarding Team at a later stage</i>

## Incident Register Form

This Incident Register Form is to be completed as soon as possible after an accident or incident occurs. It is important to provide accurate and detailed information for proper documentation and reporting. This form should be submitted to the designated personnel responsible for recording and managing accidents and incidents at the campus.

Please ensure that all relevant information is provided, including any necessary follow-up actions, communication with parents or legal guardians, and any medical treatment provided.

Date and time	
Campus	
Name and role of person involved	
Location of the accident	
Description of the accident	
Immediate actions taken	
Witnesses and contact details	
Injuries sustained	
Medical treatment provided	
Notes and comments	



Form completed by	
Date and time	
Signature	

## Confirmation of Receipt

By signing this form, I confirm I have received and read PLUS' Safeguarding Policies Handbook.

I understand that it is my responsibility to ensure a thorough understanding of these policies as well as compliance at all times.

Name:

Signature:

Date: