

English in Totnes Safeguarding Policy

A. Policy Statement

A1) Context

English in Totnes (EiT) welcomes foreign students to our school. We recognise that we have a fundamental duty of care to all these students as they are living away from home and without their normal support networks. We also recognise the additional duty of care for all under 18s. This safeguarding policy represents our belief that it is always unacceptable for a child or young person to experience abuse of any kind and it is the responsibility of all adults in contact with young people to safeguard their welfare. Our school runs from one centre all year round: The Gate House, 2 High Street, Totnes, TQ9 5RZ. We welcome students from 11 years+. Students 11 years+ are able stay alone in homestay accommodation.

A2) Terminology

- Safeguarding: caring for children appropriately and protecting them from that which is not in their best interests
- Child Protection: Protecting children from abuse
- Abuse: all forms of physical and/or mental/emotional maltreatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation (including CSE,CCE), resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power
- All adults: Refers to all adults who are working with the children (including group leaders, teachers and homestay hosts)
- Designated Safeguarding Person (Advanced): On site member(s) of staff responsible for day to day child welfare concerns (Lucie Matthews)
- Designated Safeguarding Lead (Specialist): Consultant with overall responsibility for child protection and safeguarding issues in EiT (Sady Thomas).

A3) Statement of commitment

We recognise that:

- the welfare of the child/young person is paramount
- all children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- working in partnership with children, young people, their parents, homestay providers, agencies, leaders and teachers is essential in promoting young people's welfare.

A4) U18's entitlement

We seek to safeguard under 18s (regardless of race, gender, disability) by:

- valuing them, listening to and respecting them
- adopting child protection guidelines through procedures and a code of conduct for all adults







- recruiting staff and homestay providers safely, ensuring all necessary checks are made
- sharing information about child protection and good practice with under 18s, their parents and all adults
- sharing information about concerns with relevant agencies and involving parents and under 18s appropriately
- providing effective management for all adults through recruitment policies, supervision, support and training.
- ensuring that all adults including homestay providers, working with under 18's have a valid DBS check.

A5) Adult's responsibilities

This Policy applies to all EiT staff including directly employed staff, homestay hosts, accommodation and transport providers, volunteers, interns and anyone else working on behalf of English in Totnes. All adults are expected to read and abide by the policy and procedures set out in this document and must report any concerns to Designated Safeguarding Person as outlined in this document or outside authorities if they see fit (in the case of Devon, MASH).

A6) Associated policies

This policy should be read in conjunction with the following related policies:

- EiT Health and Safety Policy
- EiT Recruitment Policy
- EiT Welfare Policy
- EiT Online Learning Policy

The purpose of the policy:

- To provide protection for under 18s and vulnerable adults who receive English in Totnes' services
- To provide staff with guidance on procedures they should adopt if they suspect a child or young person may be experiencing or be at risk of harm.

A7) Policy review

We ensure that this policy is communicated and understood and that there are sufficient resources available for its implementation. The key relevant points of the policy are explained to all students upon arrival and there are posters in each centre that reiterates this information. Key staff members and details of important safeguarding contacts are also displayed throughout the centres. Our policy and procedures are reviewed annually by the Designated Safeguarding Lead (DSL) after

Our policy and procedures are reviewed annually by the Designated Safeguarding Lead (DSL) after discussion with the school management team and is updated according to any changes on government guidance.

A8) Roles and responsibilities

Responsibilities for the implementation of this policy are as follows:







U18s: Responsible for understanding the policy, looking out for each other and raising any concerns with adults if necessary.

Adults: Responsible for understanding the policy and pro-actively engaging with its requirements.

Designated persons:

In English in Totnes there is one Designated Safeguarding Lead (DSL), whose role it is to oversee the standards and practices across the school.

There is one Designated Safeguarding Person (DSP) responsible for the implementation of the policies and procedures. They are responsible for the implementation of all procedures as laid out in this document. Their contact details are made known to all staff and students and are also available on the website. For these details please see section C of this document (Child Protection).

A9) Under 18's Involvement:

All under 18's are made aware of the policy and the DSP on arrival in the school induction at the school and have 24/7 access to a DSP if required.

A10) Documental legal framework:

Schools have a duty, under the Children Act 2004, to safeguard and promote the well-being of children and young people. We also have a duty, under the Safeguarding Vulnerable Groups Act 2006, to promote and safeguard the welfare of vulnerable adults. The Education Act 2002 requires governing bodies of schools to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. The Children Act 2004 requires agencies to work co-operatively to protect the welfare of children. Schools also have a duty under Section 26 (1) of the Counter Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism, which includes not just violent extremism but also nonviolent extremism. More recently the document published in September 2021 'Keeping Children Safe In Education 2021' requires a 'child focused' approach to safeguarding which has been incorporated throughout this document.

A11) Policy Availability & Formats

The English in Totnes Safeguarding Policy is available on the EiT website, with a hard copy also available in the office and student lounge. The policy will also be provided to each staff member as an appendix in the staff handbook, with a simplified version sent out annually to homestay hosts.

B) Code of Conduct

B1) Overview

English in Totnes recognises the importance of creating a safe school culture where trust is built between staff and under 18s and both are protected from any behaviour which runs contrary to this culture. We achieve this through adherence to the policies laid out in this document and a genuine environment of care fostered by robust procedures, recruitment and training activities.

B2) Position of trust







All staff are to be made aware of the laws surrounding sexual activity with under 18's (as outlined in the Sexual Offences Act 2003) and know that it is illegal to engage in sexual activity with anyone under the age of 18 in the school's care, even though the legal age of consent is 16.

B3) Setting standards

The key elements of our code of conduct are interaction, appearance, intoxicants, IT and social networks, accommodation and transport. We expect all adults working on behalf of English in Totnes to be excellent role models for all students in their care and to cultivate a respectful, safe and secure environment for staff and students.

B4) Interaction

- Maintain professional physical and relationship boundaries, and act in a way appropriate to your Duty of Care
- Do not make suggestive or inappropriate remarks to or about any adult or U18. Inappropriate remarks include innuendo, swearing and discussing their or your own intimate relationships.
- Other than in exceptional circumstances do not communicate directly with U18s via email or text messages and only then with prior consent from the child's parent or guardian.
- Do not engage in behaviour that may be construed as 'grooming' an U18 for example giving money, presents or favours or talking or behaving in an inappropriate or unprofessional manner.
- Avoid putting yourself in a situation where you are on your own with an under 18 as far as possible
- Conduct all interactions in a calm manner and avoid shouting at U18s wherever this is possible unless there is a Health and Safety risk.
- Ensure physical contact within clear boundaries to avoid any allegations of inappropriate touching.
- If you are required to be in a one-to-one setting with an U18, consider how this can be managed effectively i.e. leaving a door open, using a room that has a window in the door, positioning yourself within sight of the door and considering if the one-to-one setting is necessary.
- Do not socialise with U18 students outside of school organised events.

B5) Appropriate appearance

Adults should present an appearance which:

- promotes a positive and professional image
- is appropriate to their role
- is not likely to be viewed as offensive, revealing or sexually provocative
- does not distract, cause embarrassment or give rise to misunderstanding
- is absent of any political or otherwise contentious slogans
- is not considered to be discriminatory

B6) Alcohol, drugs and smoking







- Do not consume, or allow U18s to consume any alcohol, drugs, cigarettes or intoxicating substances on school premises
- Do not provide alcohol, drugs, cigarettes or intoxicating substances to U18s
- Do not work under the influence of any intoxicants or drugs
- Inform all students on school rules and UK laws on alcohol, drugs and smoking.

B7) IT and social networks

- Do not take any images or videos of under 18s on your personal recording equipment ALL PHOTOS/VIDEOS MUST BE TAKEN ON THE SCHOOL'S IPAD WHICH MUST BE RETURNED TO THE OFFICE AFTER USE. ALL UNDER 18s MUST HAVE PARENTAL CONSENT WITHIN THEIR REPLY PACKS. OVER 18's MUST ALSO SIGN A CONSENT FORM.
 - Do not share your personal social media details with any under 18s
 - Abide by the rules as found in our E-safety policy and procedures
 - Do not contact students who are U18 on private/personal emails use the secure Microsoft Teams platform for teaching and learning communication.

B8) Accommodation

- Abide by the accommodation rules and guidelines in English in Totnes. For details please see the school's Accommodation procedures.
- Do not enter private areas without first gaining the student's permission. Or in the case of needing to search property, do not do so without informing them first and doing so in their presence.
- Ensure that the designated Homestay person has an enhanced DBS which includes a 'Working at Home Address' where all names and Dates of Birth for household members are recorded.

B9) Transport

- Abide by the specific guidelines of English in Totnes.
- All transport providers, whether staff or contractors, to have appropriate suitability checks in the form of a valid DBS and to be made aware of this document.

B10) Whistleblowing

- Staff are asked to report any concerns they may have about colleagues to the management team.
- They have a legal obligation to pass on any concerns of staff not following the EiT code of conduct or this document and will not be penalised for doing so and their report will remain confidential.







C) Child Protection

C1) Overview

We meet our child protection responsibilities by:

- Creating policies and procedures to comply with all regulatory requirements and guidelines
- Reviewing these policies and procedures annually
- Training all staff to an appropriate level of awareness and procedural competence with periodic review
- Making all policies and procedures available to all stakeholders

C2) Nominated/designated person

English in Totnes has one Designated Safeguarding Staff (DSP) who work with the Designated Safeguarding Lead (DSL) to ensure a safe environment for our staff and students.

Nominated DSP and the DSL for English in Totnes can be contacted by email or telephone.

Our year-round DSP is: Lucie Matthews and our year-round DSL is Sady Thomas.

In the unlikely event that these officers are unavailable, the school emergency phone is in use 24 hours a day, and the DSL will be contacted if necessary.

All allegations and concerns are reported by the DSP to the DSL and then to the local child safeguarding authority if deemed necessary. In these cases, these bodies will advise on next steps and procedures.

Devon Multi-agency Safeguarding Hub - 0345 155 1071 or mashsecure@devon.gov.uk

C3) How to respond to concerns

Scenarios which may cause an adult to have safeguarding concerns about an U18 are:

- An U18 tells an adult they are worried about another U18
- An U18 tells an adult of an issue that concerns themselves
- Anyone from outside English in Totnes reports a potential issue
- An adult witnesses behaviours of another adult which cause concern
- An adult sees in an U18 non-verbal indications of safeguarding concerns

More detailed information is found in Appendix 1: Abuse and possible symptoms of abuse

In the event of any one of the above adults should:

- Follow the Guidelines outlined in C5 (see below)
- Report immediately to the DSP
- Explain your concerns and the reasons behind them
- The DSP will advise you on the next step.

C4) Recognising symptoms of abuse







Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm.

It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race or ability. Abusers can be adults (male or female) and other young people and are usually known to and trusted by the child and family.

There are four main types of child abuse: **physical abuse**, **sexual abuse**, **emotional abuse** and **neglect**. The abuser may be a family member, or they may be someone the child encounters in a homestay situation or during classes, sports and leisure activities. An individual may abuse or neglect a child directly or may be responsible for abuse because they fail to prevent another person harming that child.

There is no textbook list of signs and signals. Being alert to abuse means:

- Thinking about what you are seeing and asking if it is acceptable practice
- Taking seriously what you are told
- Responding to the stresses behind requests for help or other presenting problems
- Being alert to signals or non-verbal communication or challenging behaviour, and aware that this could indicate unacceptable practice is being deliberately hidden or denied.
- Reporting any doubts to the DSP.

C5) How to respond to a child or young adult telling you about abuse

- When someone talks to you about alleged abuse, remember you are *not* investigating the situation, just listening.
- If a child discloses abuse, remember that this may be the beginning of a legal process, as
 well as of a process of recovery for the child. Legal action against a perpetrator can be
 seriously damaged by any suggestion that the child's words have been influenced in any
 way by the person they told.

The following guidance should be followed as far as possible:

- Rather than directly questioning the child, just listen and be supportive.
- Never stop a child who is freely recalling significant events, but don't push the child to tell
 you more than they wish.
- Do not promise to keep the information a secret. Rather you must inform the child that you will have to share this with the person responsible for their safety.
- Write an account of the conversation immediately afterwards, as close to verbatim as possible. Make a note of what they actually said, using his or her own words and phrases.
- Describe the circumstance in which the disclosure came about.
- Where physical harm is being reported use a body map to indicate the location of cuts, bruises and abrasions, noting the colour of any bruising.







 Hand your record to the DSP, who will contact the local children's social care office where appropriate.

C6) Keeping Records

- All serious concerns communicated to the DSP will be responded to on the same day
- All information regarding allegations of abuse or safeguarding concerns is recorded in writing by the DSP on the password- protected safeguarding area of the school network. A reference is made and dated in the student's record on the database.
- Access to the safeguarding file is only available to the DSP and the DSL, and any official outside agency as appropriate.
- Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS Disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.
- The DSP/DSL will take advice from the LADO, police and local authority social care services to agree the following:
 - Who needs to know and, importantly, exactly what information can be shared;
 - How to manage speculation, leaks and gossip;
 - What if any information can be reasonably given to the wider community to reduce speculation; and
 - How to manage press interest if and when it should arise.

C7) If a staff member is accused

The DSP/DSL will then work with the LADO/Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child.

Further guidance is available here: https://new.devon.gov.uk/educationandfamilies/child-protection

C8) If an under 18 student or adult student is accused

The DSP/DSL will work with the LADO/Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child.

C9) Raised awareness of specific areas

Training sessions of EiT staff run by DSPs will include raising awareness of Child Sexual Exploitation (http://www.devonsafeguardingchildren.org/children-young-people/sexual-exploitation/), Female Genital Mutilation







(http://www.safeguardingchildrenea.co.uk/resources/female-genital-mutilation-recognising-preventing-fgm-free-online-training/) and County Lines.

https://www.devonsafeguardingadultspartnership.org.uk/exploitation/county-lines/ This is done through discussions.

D) Training

D1) Responsibility and D2) How training is delivered.

The Designated Safeguarding Lead has overall responsibility for ensuring all adults have appropriate training and that this is updated annually. Additional sessions will be organised where deemed appropriate by the Designated Safeguarding Person in consultation with the DSL.

- All adults employed by English in Totnes must complete a minimum of the 'Basic Awareness Safeguarding' (previously known as Level 1) training available through the <u>Accreditation UK website</u>, attend a training session run by local DSP and be fully aware of the EiT Safeguarding Policy.
- Staff with access to U18s must also be in possession of a recent enhanced DBS check and sign the EiT Self Declaration where this is pending.
- DSP is expected to complete the 'Inter-Agency or Multi-Agency Safeguarding' (previously known as Level 2) training.
- The EiT DSL must complete the 'Inter-Agency or Multi-Agency Safeguarding' (previously known as Level 3) training.

E) Safer Recruitment

E1) Overview

Every adult who is recruited by the school (including homestay hosts and any other adults (over 18) in the home, Group Leaders and outside agencies) undergoes a process of suitability checking for work with U18s as appropriate to their role and status both through documentation checks and the interview and selection process. This includes all adults having a valid enhanced DBS check or local country-specific police check in the case of Group Leaders.

E2) Recruitment materials

All Job Descriptions and publicity for vacancies contain a statement that members of staff need to actively engage in looking after U18s safely, that they must follow the safeguarding policy and procedures, and provide appropriate suitability documents.

E3) Recruitment stages for all

In all recruitment interviews for roles with substantial access to U18s there are questions exploring the applicant's awareness of safeguarding. For example: 'Safeguarding is key to everything we do. What do you understand by this term, and can you give examples of how your role can contribute?' References are always followed up for new staff members. Every reference request contains a specific question asking if there are any concerns about this person working with U18s. Suitability checks for working with U18s are always sought.







E4) Applicants are informed that:

- References will be followed up
- All gaps in CVs must be explained satisfactorily
- Proof of identity and (where applicable) qualifications will be required
- Reference requests will ask specifically whether there is any reason that they should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18.
- Appropriate suitability checks will be required prior to confirmation of appointment.

E5) Applicants awaiting suitability checks

In the UK, in the event that a DBS check has not been completed by the start date of a new employee, commencement of employment can take place only with restrictions. The decision will be made by the line manager, with the agreement of the DSP and rationale must be completed and signed by both parties. This judgment will be based on an assessment of the risk compared to the consequences of the decision. If the employee does commence work, they must have signed a self-declaration and their access to U18s must be supervised at all times.

E6) Applicants with a criminal record

In the event that a disclosure shows that a potential employee or member of staff has a criminal record, the situation will be judged by the DSP who, in consultation with the DSL will take into account the seriousness and nature of the offence, the nature of appointment, the age of the offence and the frequency of the offence. The disclosure will be discussed with the prospective employee and any decisions made must be in writing and signed by the recruiter and the DSP.

E7) Applicants where a criminal check is not possible

For a British National returning to the UK after working overseas, a DBS will be completed for their time in the UK. Extra care will also be taken during the recruitment process to check documentation and references. For overseas nationals, EiT will document what action was taken to attempt a criminal check and why this has not been possible, and additional care will be taken to check documentation, employment history, and references. The decision will be made by the DSP, in consultation with the DSL.

E8) Recruitment of Homestays

Homestay hosts will agree to EiT's rules, policies and procedures. The Main Host, who will always be present overnight when hosting under 18s. will complete an Enhanced DBS which includes a 'Working at Home Address' with all names and Dates of Birth of those individuals living in the household, and complete a Self Declaration Form.

E10) Prohibited List Check

All EiT staff are checked against the 'Prohibited List.'

E11) Single Central Record

A single central record is kept for English in Totnes. This will include checks done for EiT staff, Group Leaders and Homestay Hosts.







F) Welfare / Implementing Safeguarding

F1) Use of Risk assessments

The Health and Safety Officer is responsible for monitoring the use of risk assessments. Risk assessments are completed for the following:

- All school buildings: The initial assessment is made by a full inspection of any buildings to be used. This is updated for any changes to the building or its use, and staff are informed of its contents. All appropriate details are passed on to students during their induction.
- All accommodation provision:
- Homestay: Hosts complete an initial risk assessment form and fire risk assessment form which is reviewed with them at the time of their house inspection. It must be updated on subsequent inspections or earlier if there are any changes to the building. Hosts include details of this in the student welcome upon arrival.

F2) Supervision ratios for U18s

The minimum supervision ratio for U18 students on Junior programmes is one leader per 6 students under 6 years old; one leader per 8 students for 7-10 years, one leader per 15 students 11-15 years, and one leader per 20 students for 16 and 17 years. This must always be respected. In some circumstances Group Leaders may be included in this ratio as being responsible for their own students, but this will be assessed according to the activity, location and circumstances, and will be recorded in relevant risk assessments.

If any U18s attend an adult programme, additional supervision needs are addressed in risk assessments. Curfew times are given to staff, students and accommodation providers and enforced throughout the student's stay. If an adult social event is posted on social media and there are students aged 16 and 17 attending a member of our staff will always be present at least 5 minutes before the start of the activity, during it and will ensure their safe departure on leaving the venue. The student will be asked to text the emergency phone on their return home and host families will be informed of their activity and the time to expect the student home.

F3) Missing students

If students go missing during transfers, on excursions or activities, after curfew times or during class, staff actions are detailed in the Teachers Handbook and Social Leader Guide given to all staff dealing with U18s. The process of contact is 1) Student's mobile phone 2) Host family 3) Group Leader.

F4) Welfare provision

We provide general care for our U18s through the following means:

- At least one Designated Safeguarding Person in the year-round school and an overall Designated Safeguarding Lead
- 24 hour emergency phone number given to all students, parents and agents
- Safeguarding policy read and understood by all staff







- Constant safeguarding review and training updates
- Safeguarding as an item on the agenda in every meeting to do with U18s
- Inductions and training for all staff including welfare scenarios
- Safe recruitment procedures

F5) Fire Safety

In the school, the supervisors for the U18 students are responsible for ensuring the safety of those in their care following the appropriate fire regulations and procedures.

F6) First Aid and Medical

English in Totnes requires to be fully informed of any medical condition/disability of a prospective student in order to be able to provide appropriate care for the student. In the case of such information not being provided EiT may have to refuse acceptance of the student and request that the student is returned home at his/her own expense.

EiT staff and host families cannot be responsible for administering or safeguarding medicines. Students who are prescribed medication are asked to bring a letter from the doctor or prescriber with the name of the medicine, the dosage and frequency of taking it and the name of the condition for which it has been prescribed, clearly described in English. This is in case the student needs medical attention whilst in our care. In the event that a student is taking regular medication, the student must be responsible for the care and administration of her/his own medication. EiT requires written confirmation from the student or parent/legal guardian to that effect prior to accepting the student. EiT retains the right to make decisions regarding the appropriateness of students' participating in certain activities if there is a medical condition and possible risks attached.

In the event of illness, U18s are accompanied to the local Doctor's surgery or the hospital. If there is a Group Leader with the student, they accompany them, with a member of staff on call in case of translation difficulties. If the student is unaccompanied, the EiT member of staff ensures appropriate supervision, acting in liaison with the attending medical professionals. A Complete First Aid Kit is available in the office and basic first aid kits are taken on all off-site activities.

F7) U18 Behaviour and discipline

- EiT insists on appropriate behaviors in all its activities. Students are asked to read the EiT Under 18 Handbook in advance of travel, and their parents must read and accept the Code of Conduct for their child detailed in the EiT Reply Pack and Parental Consent Form for U18s. These documents are sent out in advance of student's arrival through our secure booking system.
- In dealing with inappropriate behavior or bullying, EiT staff follow the procedures as laid out above. Students are informed of bullying in all its forms and what to do in response in our handbook and reply pack as above. This information is also displayed in every classroom.

F8) Airport transfers







U18 students are required to send details of who to contact in an emergency and, where possible, a contact number for the student themselves in advance of travel. We also require full details of the planned journey including flight information. Students are given the 24 hour emergency number prior to travel.

For students arranging their own airport transfer (only 16+): EiT requires signed confirmation from a parent/ guardian outlining the journey. All accommodation providers are required to contact the EiT emergency number if students are more than 2 hours later than expected and they have not heard about a delay from the emergency phone or the student.

For English in Totnes transfers: Details of the transfer booked and procedures on the day are sent in advance to all students. This includes advice on what to do if they cannot find the meet and greet person, and specific information as to how they should identify their contact person. In the case of UM arrivals, full personal details of the EiT representative are sent in advance to the airline and the parent/guardian. The EiT representative always carries a sign with the EiT logo and the full name of the student/group to be met.

F9) E - Safety

All students, as part of their welcome are made aware of the dangers the internet potentially entails

- All students are told not to give out any personal details/photos via social media
- To not contact people, they do not know in person
- Students are only to use the internet in class for work assigned by the teachers
- Mobile phones are to be put away during classes.

F10) Radicalization and Extremism

In English in Totnes, all staff and students are expected to have an acceptance and tolerance of a range of views and beliefs. This is clearly stated within our pre-course information. EiT staff will receive training where they are made aware of what could potentially be viewed as an extremist or radicalized view and the process of referral if encountered - http://www.safeguardinginschools.co.uk/tackling-extremism-and-radicalisation/. All staff complete a prevent course before starting work at the school.

F11) Private Fostering

The DBS has a yearly meeting with a member of the private fostering team and maintains phone and email contact throughout the year. Any student under 16 staying for more than 27 nights is reported to the local authority and the necessary checks are undertaken.



