

# SAFEGUARDING CHILDREN POLICY

## 1. Introduction

### 1.1 Policy Statement and aims

To be read by all adults working with or alongside children in our care whilst on our campuses. This policy relates to all students in our care regardless of gender, age, ethnicity, nationality, religion or disability.

Stafford House School of English provide residential and/or homestay language courses for students aged 16+.

In addition each School of English provides residential and/or homestay language courses in conjunction with its sister company Stafford House Study Holidays. The ages accepted will vary from one School of English to another depending on the attributes of the location, but Stafford House Study Holidays itself provides residential and homestay language and activities courses for students aged 9-18.

In addition to the safeguarding considerations of young people aged 16-17 at Stafford House School of English, this policy takes into consideration the requirements of younger students who come on Stafford House Study Holidays courses. Stafford House Study Holidays was one of the founding members of the interest group English UK Young Learners and their expertise in this field has been invaluable in formulating this policy.

**All children and young people have the right to protection from any kind of abuse and the right to exist in a safe and friendly environment whilst in the care of Stafford House.**

We are committed to providing as far as is reasonably practicable, an environment that is safe from any kind of harm, for all those under the age of 18 at our centres.

We aim to achieve this by:

- Including best practice\* advice and policies from accreditation, and governmental and charity bodies (such as the British Council and NSPCC), into existing policies such as our Safeguarding Policy and Staff Code of Conduct.
- Having effective systems in place ensuring that our facilities, procedures and activities take account of the students' health, safety and welfare requirements
- Following safer recruitment procedures carefully, for all staff, ensuring the suitability of all staff to work with students under the age of 18
- Requiring all staff to have completed an on-line course in child-safeguarding (unless they have a Level 2 or higher certificate)
- Providing effective management for staff through supervision, support and ongoing training
- By ensuring students have a clear channel of communication in time of need
- By ensuring that all staff understand general child safeguarding principles and that a copy of the Stafford House Study Holidays 'Treating Young People with Respect' card is carried by staff while at work.

This policy will be updated each year by the Management team of Stafford House School of English (Principals, Student Services Managers and Operations Manager) in consultation with the Academic Director and Recruitment team at Stafford House Study Holidays.

\*Best practice is a term we use to define professional procedures that are accepted as being correct or most effective.

### **A copy of the statement above to be displayed in all staff areas**

#### 1.2 Definition of a child

In the UK, the legal definition of a 'child' is a person under the age of 18. As an organisation, we are committed to meeting and, wherever practicable, exceeding our duty of care towards all students and safeguarding children from harm. We understand that under 18s from overseas may not have the same knowledge of life and local customs as students from the UK, hence they may be more vulnerable to harm than UK students of the same age.

#### 1.3 What is the difference between child safeguarding and child protection?

This is one definition of child safeguarding:

“The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully”

Types of harm can include:

- Sexual abuse
- Grooming
- Physical and emotional abuse and neglect
- Domestic violence
- Inappropriate supervision by staff or volunteers
- Bullying, cyber bullying, acts of violence and aggression within our schools and campuses
- Victimisation
- Self-harm
- Unsafe environments and activities
- Crime
- Exploitation

Child safeguarding is different from 'Child Protection' which is the protection of children from direct specified harmful behaviour, how we act upon reports of abuse and neglect using referral processes to other agencies.

Safeguarding and child protection sit alongside each other, however Stafford House is not an investigating agency. Any allegation or suspicion of abuse or significant harm will normally be carried out by the social services or police.

#### 1.4 Contact people

Although on a day-to-day basis our Student Services Managers, or in the summer Student Welfare Officers, may be the first point of contact for our students, the Principal at each location will also be on hand. Each School will have as a minimum a Designated Safeguarding Person (DSP) and if it is considered necessary a Designated Safeguarding Lead (DSL). It must be made clear to all staff who the DSP and DSL are and how they may be contacted.

#### 1.5 Staff Training

All staff receive in-house training in child safeguarding and related areas as part of their induction. In

addition, all staff are required (prior to commencing work) to complete an introductory on-line course in child-safeguarding for which a certificate is issued. Applicants must bring this certificate with them on their arrival at the centre. Staff will be unable to commence duties until this has been received.

## 2. Safer Recruitment

### 2.1 Job Descriptions and Person Specifications

Stafford House requires all staff to fill out a job application form upon application. It, like our interview process, clearly and accurately sets out the duties and responsibilities of the job role. The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job.

### 2.2 References

References for **short listed** applicants will be sent for immediately after an offer has been made. Two **FULL** professional/character references must be provided. These will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. The reference request will include a specific reference to suitability to work with children. Any discrepancies or anomalies will be followed up. We do not accept open references, testimonials or references from friends or relatives.

### 2.3 Interviews

There will be a face-to-face interview wherever possible for management and telephone or skype interviews for non-management roles. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the recruiter to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant is a bona fide applicant and can meet the demands and expectations of our courses and safeguarding criteria. Any information in regard to past disciplinary action or allegations, cautions or convictions, will be discussed and considered in the circumstance of the individual case during the interview process. All staff involved in staff recruitment as well as the DSP/DSL should attend a Safer Recruitment course Line managers should also receive Level 2 Safeguarding training and the DSL or DSP if there is no DSL should receive level 3 and/or inter-agency Safeguarding. All applicants who are subsequently appointed are required to bring evidence of their identity, right to work, address and qualifications to the centre on the first day. Original documents will only be accepted and photocopies will be taken. Unsuccessful applicant documents will be destroyed within 6 months of the date of notification.

### 2.4 Offer of Appointment and New Employee Process

The appointment of all new employees is subject to the receipt of a satisfactory DBS Certificate, references, and copies of qualifications and proof of identity. A personal file checklist will be used to track and audit paperwork obtained in accordance with guidance from the safeguarding sector. The checklist will be retained in personal files. In addition a candidate-specific risk assessment is carried out on every successful applicant and kept alongside the Tracking sheet in their file.

### 2.5 The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to children. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at Stafford House Study Holidays.

#### 2.6 DBS (Disclosure and Barring Service) Certificate (formerly known as CRB Disclosure)

It is our policy to re-check employee's DBS Certificates on every application and if there is a gap of longer than 4 weeks employment with Stafford House, then applicants will be re-checked before they return back to work. In short, all employees commencing work will have undergone a new DBS check before commencing work and this is funded by Stafford House. Stafford House encourages staff to sign up for the DBS Update Service. On rare occasions when it is not possible to wait for a DBS check to be returned, a risk assessment will be carried out and a check on the Children's Barred List (List 99) will be implemented until DBS Check is received. However, full professional references must have been received for this to happen. During this period, the member of staff will wear a different coloured lanyard which identifies their provisional status to other staff and their supervisory responsibility and access to students is limited.

#### 2.7 Dealing with convictions

All staff must sign a declaration of suitability to work with children at application stage. Stafford House operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence
- how long ago the offence occurred
- one-off or history of offences
- changes in circumstances

The recruiter, in discussion with the DSL or DSP if no DSL, will discuss the facts relating to the above, and then a decision will be made.

#### 2.8 Proof of identity, Right to Work in the UK and Verification of Qualifications and/or professional status

All applicants will be required to bring their identification documentation such as passport, birth certificate, driving licence, etc. with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations.

In addition, applicants must be able to demonstrate that they have legally obtained any academic or vocational qualification required for the position and claimed in their application form.

#### 2.9 Overseas Checks

All new employees where persons have lived outside the UK are subject to additional checks; a 'Certificate of Good Conduct' or 'Police Certificate' will be required from the applicant's country of residence.

#### 2.10 Induction Programme

All new employees will be given an induction programme which will clearly identify the company's policies and procedures, including the Child Safeguarding Policy and make clear the expectation and codes of conduct which will govern how staff carries out their roles and responsibilities.

#### 2.11 Record Retention / Data Protection

Stafford House will retain all interview notes on all applicants for a period of 6 months, after which time the notes will be destroyed (i.e. shredded). The 6 month retention period is in accordance with the Data Protection Act 1998 and will also allow Stafford House to deal with any data access requests, recruitment complaints or to respond to any complaints made to an Employment Tribunal.

All information retained on employees is kept centrally in the Human Resources Office in a locked and secure cabinet.

### 3. Responding to a child making an allegation of abuse

### 3.1 Guidance

Safeguarding is the responsibility of ALL members of staff at the centre. All staff are in a position of trust, and therefore all staff are required to take a shared responsibility to safeguard children and young people. You will receive safeguarding information and training during your induction. All staff will also be made fully aware of their duties and in safeguarding learners and responding to allegations of abuse or neglect.

**Child abuse does not necessarily have to be physical or sexual. It can also be emotional or psychological, or due to the neglect of a child's physical or emotional needs.**

Any member of staff with an issue or concern relating to child protection, including but not limited to allegations of child abuse, should discuss it immediately with the DSP. Anyone who hears an allegation of abuse against another member of staff, or has concerns about the behaviour of another member of staff, must report the matter immediately to the DSP. If the DSP is unavailable, or involved in an allegation, the matter must be referred immediately to the DSL. A concern against the Principal or DSL should be forwarded to the Chief Operating Officer of Stafford House.

The DSP or DSL will decide on an appropriate course of action.

At no point should an attempt be made to investigate the situation. This will be undertaken by NSPCC/Social Services and/or the Police as necessary. Stafford House is an 'agent of referral' and not of investigation.

### 3.2 Responding to a child making an allegation of abuse

All concerns or disclosures of abuse should be acted upon-staff should know the 5 Rs':

- Recognise signs of vulnerability
- Respond to student concerns
- Record student concerns
- Report student concerns
- Refer student concerns

#### **Responding**

Stay calm-sometimes issues are raised which, whilst seemingly complex, are generally safeguarding matters and not necessarily a child protection issue. These matters should be responded to by offering a supportive response and where necessary or relevant, refer them to the SWO team or their Group Leader. When a learner self-discloses a matter that constitutes a potential or alleged situation of abuse, the staff member must take the learner to a private place within view but out of ear-shot of other people. Promises of confidentiality **must not** be given. Tell the learner that you have a duty to pass on the information, **only** to those who need to know.

- Listen carefully to what is said
- Do not interview them, but ask what happened, keep questions to a minimum and obtain sufficient facts to understand what is being alleged
- Allow the child to continue at their own pace
- Ask questions for clarification only and always avoid asking leading questions (questions that suggest a particular answer). Do not make assumptions or offer explanations

Remember that an allegation of child abuse may lead to a criminal investigation, so **do not attempt to personally investigate any allegations of abuse**

- Reassure the child that they have done the right thing in telling you
- Tell them what you will do next and with whom the information will be shared

If in doubt ask your Designated Safeguarding team at Head Office.

### 3.3 Recording

A full record must be made as soon as possible detailing the nature of the allegation. Record in writing everything that was said, using the child's own words. Note place, date, time, and names of persons to whom the information was given. The Study Holidays referral form - '**Safeguarding Incident/Concern Form**' can be obtained from the DSP.

- **Do not** ask the child to make a written statement
- Avoid jargon
- Include:
  - The nature of the alleged abuse
  - A description (if applicable) of any injuries observed
  - An account of the allegation
- Ensure that the record is signed and dated by the appropriate persons.

Report the incident immediately to the Centre Director and also the Designated Safeguarding Team at HO. **Do not** confront any person against whom an allegation has been made. The Designated Safeguarding Team will guide you and your CMT in dealing with any allegation or suspicion of abuse, and if applicable, report allegations and incidents of abuse to the LADO (Local Area Designated Officer) at the local County Council Children's Social Services.

If the Centre Director is the person against whom the allegation is made, the report should be made directly to the Designated Safeguarding Team at HO.

Stafford House recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore those dealing with such allegations within a centre, shall do so with sensitivity and will act in a careful, measured way and in accordance with our procedures. If you are ever in doubt as to what to do, please consult a member of the Safeguarding Team at Head Office.

## 4. Staff Code of Conduct with Children and Young People

### 4.1 Advice for Staff

- Staff must avoid actions/situations that might be misconstrued, bearing in mind that even perfectly innocent actions can sometimes be misinterpreted.
- Staff should avoid working on a one to one basis with a student. For example, if a student stays after class to ask a question, you should try to get one of their friends to stay with them, and always keep the door open.
- Staff should never enter a student's bedroom; if it is absolutely necessary to do so, for example if the student is sick, you should call their Group Leader or another member of staff (preferably same sex) to go in with you. Staff should also never invite any student into their own bedroom, living quarters, or any other room. Bathrooms must be signposted for the use of either Staff or Students, and staff should not use any student bathroom.
- Staff should ensure they adhere to our dress code in this handbook and be aware of the effect of their appearance to students. They should be also be extra sensitive when at evening activities and on accommodation at night.

#### 4.2 Staff Code of Conduct

**Staff must:**

- Keep the blue 'Treating Young People with Respect' card with them at all times
- Treat all children and young people with dignity and respect. Provide an example of good conduct you wish others to follow
- Respect a young person's right to personal privacy
- Treat all young people equally
- Encourage young people and adults to feel comfortable whilst in their care. Recognise that special caution is required when you are discussing sensitive issues with children or young people (see 'Cultural Sensitivity' section).
- Challenge unacceptable behaviour and report all allegations/suspensions of abuse or bad behaviour (e.g. bullying, alcohol/solvent/drug abuse, smoking)

**Staff must not:**

- Have inappropriate physical, verbal or sexual contact with children or younger people
- Allow themselves to be drawn into any inappropriate behaviour, or make suggestive or derogatory remarks or gestures in front of children or young people
- Show favouritism to any individual or group
- Swear or make racist, sexist or blasphemous remarks within earshot of other staff or students
- Smoke or consume alcohol, in front of or in the company of students or their group leaders, or allow any effects of these practices to affect them in any way
- Take a chance, when common sense, policy or practice suggests another more prudent approach
- Endanger the well-being of children/young people through action or inaction, whether intentional or not

## 5. Policy on Personal Communications with Students

#### 5.1 Advice for Staff

Please be aware of the potential dangers of personal contact (i.e. contact beyond what is reasonably expected in performing your duties) with students, and the following advice from child protection/ teaching agencies:

If students do try to make contact with you on your personal email or phone, discourage this and inform your line manager. Exercise extreme caution in connection with internet sites/messaging systems, and avoid inappropriate communication with all individuals under 18, or others with whom you may be in a position of trust. This also extends to taking part or attempting to take part in on-line gaming with students or associates of students, who may well be underage or unaware that you are an adult.

Take care to avoid becoming personally involved in a student's personal affairs. Remember that your personal profiles can be viewed by anyone, and people working with children should be especially careful about their personal web presence, checking any relevant privacy settings carefully. The legal responsibilities of people working with minors extend past the end of any contract they have with Stafford House.

#### 5.2 Risks to Students

Students may be able to find information about your personal life that may be inappropriate for minors, and may damage your working relationship with your students.

By allowing students access to friendship groups you may be inadvertently introducing them to a wider circle of adults, over which you have no control, and may facilitate inappropriate contacts. Sexual predators and bullies

are known to use information available on web pages and social networking sites to gain information about children, such as their interests, tastes and location. Staff who post information about students (e.g. photos of their summer holiday, names etc.) on a personal web page may make them vulnerable to inappropriate attention.

### 5.3 Our Policy

- The onus is on the member of staff – **not** the students – to distance themselves from any potentially inappropriate situation.
- Students are clients of Stafford House Study Holidays. Staff should not attempt to instigate private contact with students of any age during or after the course.
- Staff must not give their personal email/postal addresses or telephone number to students, or ask for theirs, during or after the course.
- Staff must not add any students to any social networking sites (e.g. Facebook, Instagram, Twitter, etc.), nor allow themselves to be added to any student's social networking site.
- Staff must use common sense and professional judgement to avoid circumstances which could be perceived to be of an inappropriate nature.
- Staff must not - by any means or in any circumstances - make, view or access illegal or inappropriate images of children.
- Unless authorised, staff must not distribute (by any means) images or information about students of any age. This includes the use of student images or details on blogs, social networking sites, messaging systems or any internet sites. An exception for example would be an authorised member of staff posting leaver ceremony photos on the school's Facebook page, with the student's consent. This is acceptable practice in a School of English but should not be adopted on Study Holidays programmes.

## 6. Policy on Taking Photographs of Children

The taking of pictures of children and teenagers is restricted for legal reasons and many schools and other institutions have a policy on this. There are two reasons for our policy outlined below: firstly the safeguarding of children in our care, and secondly, data protection regulations.

Our policy refers to the use of film and digital cameras, including mobile phones:

- Only staff authorised by the Principal are allowed to take pictures of students and must be employees of Stafford House. Students must never be photographed alone, but always in pairs or groups
- No clues as to the identity of the student must be visible in the image
- Members of staff and/or Group Leaders of both gender must be present
- Students are to be asked their permission before taking the picture
- Only pictures of students in appropriate dress are acceptable, for example, taking pictures of students at poolside is not allowed
- Any person taking photographs must have their identity card clearly visible to the subjects and should let the person being photographed know whether or not the image will be retained for further use
- Images must be securely stored and only used by those authorized to do so
- Images must not be transmitted electronically, or printed copies distributed, unless authorized by the Principal
- Anyone suspected of capturing unauthorised or inappropriate images should be reported to the Principal

### Summary of Policy on Taking Photographs of Children



<b>Extent of Policy</b>	<ul style="list-style-type: none"> <li>• This policy covers all photographs taken by Stafford House staff</li> <li>• Group Leaders are expected to follow the policy – they may take photos of their own students for business use, providing the students give their permission.</li> </ul>
<b>Subject</b>	<ul style="list-style-type: none"> <li>• Students should never be photographed alone</li> <li>• Group photographs are acceptable, providing the students have given their consent</li> <li>• Wide angle group shots are also acceptable</li> <li>• Students should not be identifiable to a third party</li> </ul>
<b>Taking the Photo</b>	<ul style="list-style-type: none"> <li>• Ask the students' permission before you take the photograph. If this is not feasible (i.e. action shots taken during activities), ask the students' permission afterwards to keep the image</li> <li>• When taking a photo of students, please make sure that there is a Group Leader present, or members of staff of both genders</li> <li>• Photographs should only be taken in appropriate settings. Poolside, for example, is inappropriate.</li> <li>• Any member of staff taking a photograph of students must have their ID badge clearly displayed</li> <li>• Use of personal cameras or mobile phones is NOT permitted, except by prior arrangement</li> </ul>
<b>Storage of Image</b>	<ul style="list-style-type: none"> <li>• Any photographs taken of students should not be copied or loaded onto any company or staff computer, nor should any images be copied onto any student's or Group Leader's computer.</li> <li>• All images must remain on the storage device of the camera, i.e. on the SD card or internal memory</li> <li>• Once printed and displayed, the original image should be deleted</li> </ul>
<b>Management of Image</b>	<ul style="list-style-type: none"> <li>• Any photographs of students must be managed and monitored by a member of the Welfare team</li> </ul>
<b>Printing of Image</b>	<ul style="list-style-type: none"> <li>• If the image is to be printed, it should be printed directly from the SD card</li> <li>• Printed copies of the photograph should not be distributed</li> </ul>
<b>Display of Image</b>	<ul style="list-style-type: none"> <li>• Images of the students may only be displayed with the permission of the students involved</li> <li>• If a student asks for a photograph of them to be taken down, it should be done so immediately</li> <li>• Photographs of students should only be displayed while the student is at the centre</li> <li>• The image must not be used in any way that may upset or humiliate the student</li> </ul>

<b>Distribution of Image</b>	<ul style="list-style-type: none"> <li>• Photographs of students must NOT be transferred from the original medium to a computer</li> <li>• The image must not be displayed on any internet/intranet storage medium</li> <li>• Images must never be sent via email to anyone</li> <li>• The subjects of the photograph are entitled to keep a printed copy of the photograph provided that there are no objections from any other subjects in the photograph</li> </ul>
<b>Disposal of Image</b>	<ul style="list-style-type: none"> <li>• A member of the Welfare team is responsible for the disposal of images once activity has finished, or once the subjects of the photos have left the centre. Photographs of students should not be kept for any longer than is necessary.</li> </ul>

## FAQs

### **Should we stop students taking photos of each other?**

No, the students are free to take photographs of one another, unless the subject of the photograph objects, or if the taking of the photograph could be construed as a form of bullying.

### **A Group Leader is taking photos of students. Should we stop them?**

We cannot stop a Group Leader from taking photographs of their own students, as many have permission through their agencies and already have a "sign off". However, please make sure that the photographs are being taken in line with SHSH policies, and that there is no odd behaviour, i.e. taking lots of photographs of the same student/taking close-up photographs of students.

### **A member of staff has a much better camera than the centre one. Can they use this to take photos?**

This is OK if it is agreed in advance, but they should use the company SD card, and the camera will still be subject to checks by a member of the Welfare team.

### **A member of staff takes some photos of students on their phone/camera while on excursion/ activities. Is this allowed?**

Staff should be told in advance that this is not acceptable. Should a member of staff do so, make sure that the photographs are deleted from their phone immediately, and remind them that taking photographs on personal devices is not permitted by company policy. If a member of staff witnesses another taking a photograph on their phone/camera, it is that member of staff's responsibility to report the incident to their line manager or DSP.

### **Students are asking us to give them copies of photos from the display. Should we?**

We can provide a printed copy to the subjects in the photograph, provided that there is no objection from any subjects, and that they have all given permission. Electronic copies should NOT be distributed.

### **A student has asked to have their photograph taken with a member of staff. Is this allowed?**

This is more a question of staff protection than child protection. Only have your photograph taken with a student if you feel comfortable in doing so, and please be aware of the context in which the photograph is being taken, i.e. where the photograph is being taken. Is it in a public place? Are there other people around? What is the level of physical contact? Please also remember that you cannot ask for a copy of this photograph!

## 7. Policy on Physical Contact with Students

You must abide by the terms of the Equality Act and the Children Act of 1989. Failure to do so may result in disciplinary action and if necessary, referral to outside authorities.

It is Stafford House policy to **advise against any physical contact with students**, especially any type of 'positive touch' (see below). However, we recognise that there may be circumstances where this is unavoidable, and some exceptions exist (see below), but it is crucial that staff only do so in ways appropriate to their professional role.

### 7.1 'Positive Touch'

Positive touch is used to mean everyday acts of communication by physical means to indicate approval, reassurance or sympathy. Positive touch is used in schools when necessary to comfort/reassure children or to demonstrate skills e.g. in P.E. or Art, is to be avoided wherever possible.

### 7.2 First Aid

Emergency treatment may be required at any time and staff should never feel constrained from acting immediately to prevent harm even where this involves body contact

- Any procedure used must have a First Aid or hygiene purpose and should not involve more contact than is necessary
- Any such procedure should be undertaken by a person of the same sex as the student if available
- Ensure that there is open access to the area where you are, taking into account the student's requirement for dignity and privacy
- Wherever possible, contact should be avoided e.g. asking a student to clean their own cut/graze, unless they are very young

### 7.3 Negative Intervention

Negative intervention means that where necessary, reasonable force can be used by authorised staff in schools to control or restrain pupils to prevent them from:

- committing a criminal offence
- injuring themselves or others
- engaging in any behaviour prejudicial to maintaining good order and discipline at the school, whether during class or elsewhere

Negative intervention is not justified for trivial misdemeanours but for any situation which can be resolved without physical force. It is not a substitute for good behavioural management. Staff must also take into account the student's age and level of understanding. Never give the impression of loss of temper – remain calm.

If a student is about to injure themselves or someone else, staff are obliged to intervene, to protect the student(s) from harm. However, physical intervention must only be used as a last resort. Other ways of resolving the situation include:

- Talking calmly to the student and telling them to stop
- Removing other students from the area
- Summoning help from colleagues and the Group Leader
- Telling the student that help has been sent for
- Telling the student that their parents will be informed
- Reminding the student of the school rules and the possible sanctions for breaking them (e.g. being sent home)

Self-defence: Everyone has the right to defend themselves against an attack, provided they do not use a disproportionate amount of force to do so.

#### 7.4 Precautions before engaging in any physical contact

- Ensure that you and the student are in a public area, e.g. not alone behind closed doors. If you are in a room, leave the door open or ask another member of staff to be present
- The contact should be the minimum necessary for the purpose
- You must always remain conscious of the physical context of your actions. Remember that even innocent actions can be misconstrued
- Physical contact with a person of the same gender is less likely to be misconstrued, so be extra vigilant with a person of the opposite sex

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**A full incident report must be completed after any incident and emailed/faxed to Head Office immediately.**

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## 8. Anti-Bullying Policy

### 8.1 Statement of Intent

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. Bullying of any kind is unacceptable at our school. If bullying does occur, all students should be able to tell us and know that incidents will be dealt with promptly and effectively. We are a TELLING school. This means that anyone who knows that bullying is happening is expected to tell the staff.

### What is Bullying?

Bullying is the use of aggression with the intent of hurting another person. Bullying results in pain and distress to the victim.

Bullying can be:

- Emotional - being unfriendly, excluding, and tormenting (e.g. hiding belongings, threatening gestures)
- Verbal - name calling, sarcasm, spreading rumours, teasing
- Physical - pushing, kicking, hitting, punching or any other use of violence
- Racist - racial taunts, graffiti, gestures, etc.
- Sexual - unwanted physical contact or sexually abusive comments
- Homophobic - because of/focusing on the issue of sexuality

### Why is it important to respond to bullying?

Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Students who are bullying need to learn different ways of behaving.

### 8.2 Objectives of this Policy

All staff must make themselves fully aware of what constitutes bullying, and what actions are necessary. We take bullying very seriously. Students, parents and host families should be assured that they will be supported when bullying is reported and that bullying will not be tolerated.

### 8.3 Signs and Symptoms

A child may indicate by their behaviour that he or she is being bullied. Adults should be aware of these possible signs and that they should investigate if a child:

- Changes their usual routine
- Is unwilling to go to lessons or activities
- Begins truanting
- Starts stammering
- Becomes withdrawn, anxious or lacking in confidence
- Cry themselves to sleep at night or has nightmares
- Stops eating
- Comes back with clothes torn or books damaged
- Has possessions or money go 'missing'
- Has unexplained cuts or bruises
- Is frightened to say what's wrong
- Is bullying other children or siblings
- Becomes aggressive, disruptive or unreasonable

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

### 8.4 Procedures

- Report bullying incidents to your line manager or DSP
- Incidents of bullying or threats of bullying will be recorded in writing by Stafford House staff
- In serious cases, parents should be informed and asked to discuss the problem
- If necessary and appropriate, the police will be consulted
- The bullying behaviour must be investigated and the bullying stopped quickly
- Attempts will be made to help the bully/bullies change their behaviour

### 8.5 Outcomes

- The bully/bullies may be asked to genuinely apologise
- Other consequences may take place. In serious cases, suspension or even exclusion will be considered
- If possible, the students will be reconciled

After the incident(s) have been investigated and dealt with, each case will be monitored and a written report kept to ensure further bullying does not take place.

## 9. Cultural Sensitivity

### 9.1. Policy

Our organisation values the individuality of all our children and young people. We are committed to giving all our students every opportunity to be the 'best they can be'. Within our environment of learning and healthy interaction, we do not tolerate any lack of sensitivity, disrespect, bullying or harassment of any kind. All our policies are there to help ensure that we promote the individuality of all our students, irrespective of ethnicity, attainment, age, disability, gender or background. We aim to reflect the multi-ethnic nature of our society here in the UK and ensure that the courses we offer include positive attitudes to all people. This is expected of not only students to students, but staff members to each other and especially all staff to students at all times.

We do this by:

- Creating an atmosphere in which students and staff feel valued and secure
- Having consistent expectations of students and their learning
- Ensuring that our teaching takes into account the learning needs and backgrounds of all students as much as possible
- Actively encouraging racial equality through our manuals, course books and supplementary materials and displays of students' work
- Making clear to our students and staff what constitutes aggressive and racist behaviour and that it will not be tolerated
- Identifying and dealing quickly with any signs or incidents of racist behaviour

Staff must take great care to respect the cultural, political and religious sensitivities of children and young people. Comments or questions regarding their background, society or beliefs, may cause offence and/or distress.

The Management Team is responsible for ensuring that the policy is communicated and implemented by all staff at all times. All staff members are responsible for dealing with racist incidents, and being able to recognise and tackle racial bias and stereotyping.

Any issues or concerns relating to the above should be communicated to the DSP or DSL.

## 10. Other people involved with Stafford House who are not staff

### 10.1 Other people engaged in regulated activity.

In addition to employees, it is recognised that various contractors and suppliers come into contact on a more or less regular basis with our students.

#### 10.1.1 Contractors and Suppliers

The school requires that the coach and taxi companies that are used regularly conduct background checks on their staff. Regular contractors including electricians, maintenance, Fire Safety and Hygiene operatives should also have background checks. A name register is to be kept of all these regular visitors.

All contractors who come on site are required to sign in, read the Visitor Guidance notes and wear a lanyard. Separate colour ribbons are used to denote whether they are known to have DBS clearance or not. As much as is practicable, those that are not known to have clearance should be accompanied, especially in student areas.

#### 10.1.2 Visitors

Visitors including interviewees are also required to follow the signing in process and wear the lanyard denoting no background check details are recorded. They should be accompanied at all times.