

## FULL SAFEGUARDING

**Essence Summary** 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.

This policy relates to all students in our care regardless of gender, age, ethnicity, nationality, religion or disability. 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 understand that the child's needs are paramount. All staff are advised to maintain an attitude of 'it could happen here'.

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

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**Safeguarding Escalation Guide** Stafford House International (SHI) has a safeguarding policy that sets out best practice framework for our organisation to protect and respond to safeguarding concerns.

We will actively work to educate and protect children from any harm within our organisation. We are committed to promoting the welfare of children and young people and practise in a way that protects them.

We have a duty of care to all our students who are aged 18 and under and anyone over 18. SHI will respond/investigate according to any disclosure that is made and educate all staff, volunteers and third parties we work with to prevent concerns in the first place. We will confidentially record and escalate concerns to the relevant authorities and designated staff within our organisation.

The aim of this policy is to assist the designated safeguarding staff to carry out the above effectively.

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**What is Safeguarding?** Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. Safeguarding means:

- Protecting children from abuse and maltreatment
- Preventing harm to children's health or development
- Ensuring children grow up with the provision of safe and effective care
- Taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child. Everyone has a responsibility to keep children and young people safe.

All organisations that come into contact with children should have specific safeguarding policies and procedures in place. This includes voluntary and community organisations, faith groups, private sector providers, as well as schools, hospitals and sports clubs.

### **How does a school safeguard under 18 year olds in its care?**

Organisations need to make sure that the way they work with children keeps them safe and does not place them at unacceptable risk of harm. They can do this through:

- Establishing, implementing and following good safeguarding policies and procedures including safe recruitment
- Ensuring all staff and volunteers are aware of and follow the organisation's safeguarding policies and procedures
- Ensuring that all staff and volunteers receive child protection training.

**Designated Safeguarding Staff** All schools have a safeguarding team/allocated staff that have had Advanced Safeguarding Training for Designated Staff (formerly known as level 2 training) The safeguarding team could be made up of teachers, student services officers, welfare staff and academic managers.

Basic safeguarding training is required before following this higher level training.

#### **Duties of Designated Safeguarding Staff**

- Be a resource offering guidance on child protection, and on all areas of safeguarding
- Work proactively with all departments to develop practical systems that suit the organisation
- Contribute to the organisation's safeguarding policy to ensure it is fit for purpose
- Be ready to respond to any safeguarding concerns and what next steps to take
- Know legislation and government documents underpinning safeguarding in UK
- Keep up to date with safeguarding developments and have refresher training
- Know how to recognise abuse and how to respond if an allegation is made
- Have knowledge of relevant local authorities
- Especially where most students are adults, focus on all under 18s and their well-being Understand the need for maintaining confidentiality in certain situations
- Maintain accurate records of all child protection issues in a secure place, accessible only to Designated Staff
- Contribute to effective safeguarding systems, including strong communication and record keeping

The Advanced Training can be delivered by a Designated Safeguarding Lead or through English UK where a certificate is given. Further details of the English UK courses are available on their website.

<https://www.englishuk.com/training-calendar>

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**Designated Safeguarding Lead** Best practice is that each school has a Designated Safeguarding Lead (DSL) and Deputy. This would normally consist of senior managers.

DSL/DDSL would need to attend an advanced safeguarding training (formerly known as level 3 training) for designated leads through English UK and find a local authority DSL course, usually run by Social Services and refresh their knowledge and skills through network meetings, email updates and documents on an ongoing basis) as well as attending a refresher local authority course every two years.

### **Designated Safeguarding Lead/Deputy Duties**

To take lead responsibility for all safeguarding and child protection matters arising at the School and to support all other staff in dealing with any child protection concerns that arise;

- To be given the time, funding, training, resources, status and authority within the School to carry out the duties of the post including committing resources, and where appropriate, supporting and directing other staff to safeguard and promote the welfare of children;
- To promote and safeguard the welfare of children and young persons for whom you are responsible and with whom you come into contact;
- To be available for staff to discuss any safeguarding concerns. At least one of the DSL or DDSL should be available at all times and when this is not possible a clear procedure for who to contact should be in place
- Manage referrals
- Take the lead referring all cases of suspected abuse of any student in the School to Social Services
- Support staff who make referrals to local authority children's social care;
- Refer to the Local Authority Designated Officer (LADO) team all child protection concerns which involve a member of staff;
- As required, liaise with the case manager and the designated officer at the local authority for child protection concerns (all cases which concern a staff member);
- Take part in strategy discussions and inter-agency meetings and/or to supporting other staff to do so and to contribute to the assessment of children;
- Refer cases to the Channel programme (and supporting staff who make referrals) where there is a radicalisation concern;
- Make referrals to the Disclosure and Barring Service where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child; making referrals to the police where a crime may have been committed which involves a child.
- Deputy DSL - to liaise with the DSL in respect of police investigations or investigations under section 47 Children Act 1989 which involve the School.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with the relevant agencies.
- Raise awareness to ensure the School's Safeguarding Policy and the implementation of it, is reviewed at least annually and is up to date
- Ensure the Safeguarding Policy is available publicly;
- Ensure that parents are aware that referrals about suspected abuse or neglect may be made to Social Services.
- Maintain links with Local Safeguarding Children Board to ensure staff are aware of training opportunities and the local policies on safeguarding

### **The Designated Safeguarding Lead team need to receive enough training that they;**

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
- Be alert to the specific needs of children in need, those with special educational needs and young carers;
- Be able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school with regard to the Prevent Duty and provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
- Having received this training, The DSL or DDSL are able to go back into school and train other members of the safeguarding team if needed.

Training All staff/volunteers should receive the following basic (formerly known as level 1 training;

All staff or volunteers to have completed a basic safeguarding awareness session (this could be in many forms – one to one, reading or online). Each school should record how and when this was done for each person. Please find 2 links below for a free online basic safeguarding training course.

[English UK Training Calendar](#)

[British Council Online Basic Safeguard Training](#)

[British Council Catalogue of Training Courses](#)

Who can help? In an emergency where your DSL/DDSL is not contactable or you need to contact an impartial DSL/DDSL, we have provided the contact details of the teams in our other schools. In all instances please keep all details confidential.

Brighton	Canterbury	Cambridge	London	Stafford House Summer
<b>DSL</b> Simon Dooley Principal 07714636629	<b>DSL</b> Pat O'Donoghue Principal 07739094248	<b>DSL</b> Kelsey Harrington SSM 07964402449	<b>DSL</b> Connor O'Donoghue Principal 07803016318	<b>DSL</b> Melanie Judge Head of Student Experience 07917451810  Carl Robertson Short Courses Director
<b>DDSL</b> Christianne Velloso SSM 07543307642	<b>DDSL</b> Shirley Neal Vice Principal 07730321435	<b>DDSL</b> Mike Ward Principal 07747698654	<b>DDSL</b> Danny Wilkins SSM Susi Wright  DOS	<b>DDSL</b> Ying Ford Steven Jarvis
<b>DSS</b> Joanna Drury Anthony Evans	<b>DSS</b> Amanda Reeves Jon Betts Marina Yartseva Janice Addison Mary Eastley	<b>DSS</b> Janine Zilioli  Pixie Ha	<b>DSS</b> Noelia Gonzalez	<b>Safer Recruitment:</b> Ying Ford Melanie Judge  <b>DSS</b>  <b>All Centre Directors in our Summer Schools</b>
<b>Head Office Safeguarding Team:</b>	Laura McDowell GPM (DSL Trained) 07789835220			

\* All other Stafford House Staff will have been through basic safeguarding awareness training.

**\*\*Local Authority Designated Officer**

The DSL has a responsibility to report serious concerns about a member of staff to the Local Authority Designated Officer. This should be the LADO responsible in the local authority where the cause for concern takes place. Contact details for a LADO are readily available from the local authority's website.

## Our Aims

- 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 and compliance with statutory guidance with particular reference to such publications as [Keeping Children Safe in Education](#) (Safeguarding Teams will need to read the full document, Teachers and Other Staff need to read just Part 1)
- Having effective systems in place ensuring that our facilities, procedures and activities take account of the students' health, safety and welfare requirements. This is overseen by the Designated Safeguarding Team
- 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 training 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 International (Principals, Student Services Managers and Global Process 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

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**Definitions Under 18:** Any student or visitor who is under the age of 18. They are deemed to be a minor by law.

**Designated Safeguarding Lead (DSL):** A named member of staff, trained to Advanced Safeguarding Levels, someone who has full overall responsibility to ensure SHI meets the aims of this policy. Each SHI center will have a named DSL.

**Deputy Designated Safeguarding Lead (DDSL):** A named member of staff, trained to Advanced Safeguarding Levels, someone who assists in the overall responsibility to ensure SHI meets the aims of this policy. Each SHI center will have a named DDSL.

**Designated Safeguarding Person:** A named or named member(s) of staff trained Advanced Safeguarding Levels. This could be teachers, student services, academic managers etc.

**Local Safeguarding Children's Board:** key statutory mechanism for agreeing how the relevant agencies in each local area will co-operate to safeguard and promote the welfare of children in that locality, and for ensuring the effectiveness of what they do. The Children Act 2004 requires each local Children's Board authority to establish a Safeguarding Board.

**Duty of Care:** This is a responsibility of all staff and group leaders to protect under-18 from direct harmful behaviour, for example, emotional abuse, physical abuse or any other physical harm, sexual abuse and neglect.

**Child Protection:** Part of the Safeguarding process. It focuses on protecting individual children or young people identified as suffering or likely to suffer from significant harm. This includes child protection procedures which detail how to respond to concerns about a child or young person.

**Safeguarding:** The overarching principles are that all staff have the responsibility to safeguard under-18s, be vigilant and know to report concerns, including small ones, or allegations and who to contact both within and outside of SHI. All staff must be trained in Safeguarding to the level of Basic Awareness, all Designated Persons to the level of Advanced Safeguarding and the Designated Safeguarding Person to the level of Advanced Training for the DSL.

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**Type of Abuse** 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 abuse
- Emotional abuse
- 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

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**Safer Recruitment** Stafford House and Stafford House Summer will recruit in line with the CATS College Recruitment policy.

### **SHI & CATS Colleg Vales**

Prior to advertising a vacancy within Stafford House, a position must be approved by the Managing Director, HR Business Partner, Finance Business Partner and CEO.

- Unless any extenuating circumstances, all vacancies will be advertised internally via the CATS College Company Weekly Vacancy Report, distributed via internal email and displayed on appropriate notice boards in Head Office, Schools and the CATS College Company website. The exceptions to this are as follows:
- When an individual has been clearly identified as promotable and is highly suited to a position that has become vacant and has been identified for succession planning.
- Where, as a result of a restructure or department closure, or upon returning from a career break, maternity or adoption or other relevant leave, an individual employee requires redeployment.

### **External Advertising**

The use of external recruitment companies and advertising sites are not permitted, unless prior authorization has been received by the Managing Director.

### **Approval**

All offers of employment should meet the budgetary requirement. Any Stafford House school or department must submit and receive approval for any permanent positions. These requests should be approved by the Managing Director and submitted using the standard Vacancy Request form.

### **Job Descriptions**

Standardized job descriptions will be used across all centres, for roles that are not location specific.

Amended descriptions may be used, if prior approval from the Managing Director is received.

### **Safer Recruitment**

#### **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.

### **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.

### **Interviews**

There will be a face-to-face interview wherever possible, especially for management. Telephone or skype interviews may be used for temporary staff, especially 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, or where possible before that. 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.

### **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.

### **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.

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 3 months 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. In the (insert name of school) school this is (insert colour).

### **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.

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.

### **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.

### **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.

### **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. All data obtained is kept securely in accordance to the General Data Protection Regulation 2018.

Homestay Recruitment Stafford House International (SHI) is committed to providing students with a positive, secure and safe Homestay experiences. All students should benefit from an enriching stay in a home that provides a welcoming and safe environment that enhances their overall experience in studying with Stafford House.

SHI is also committed to training, supporting and recruiting Homestay hosts that are compliant with the accreditation body's requirements. We will keep accurate and up to date records in accordance with the GDPR regulations.

Stafford House International will conduct all Homestay recruitment in line with the requirements outlined by the respective accreditation bodies - British Council, ACCET, and Languages Canada - and in order to provide our students with the service and accommodation expected from a quality Language School.

Homestay providers are expected to adhere to the Homestay Provider Responsibilities (as outlined in the Stafford House Homestay Provider Agreement). These responsibilities include the obligations to ensure a duty of care for the student, the provision of appropriate and required facilities.

### Compliance & Recruitment

Who is responsible for Homestays and their recruitment?

- Centre Directors, Student Services and Housing Staff are all responsible for the safe recruitment of Homestay hosts or acquiring agency Homestays.
- Stafford House is committed to the full training of accommodation staff to support proper Homestay recruitment. Relevant staff will be versed in all necessary criteria required for appropriate Homestay recruitment, including but not exclusive to: visits and assessment, regular 'spot-checking', the maintenance and upkeep of Homestay records, all relevant accreditation and safeguarding policies.

What are we looking for in a Homestay?

- Attitude & approach in line with BC, LC & Accet
- Location - within reasonable travel time from the school & safe
- Facilities & Provisions are in line with BC, LC & ACCET

How do we maintain customer satisfaction & Homestay compliance?

- Spot checks, biannual visits and constant communication- 1 every 12-18 months?
- Feedback from students, agents and parents
- Use of agencies (London, Brighton & Cambridge) - review of agreements with agencies. Are they meeting their accreditation requirements, eg British Council
- Continued training and guidance after the initial recruitment
- Accurate recording and records of Homestays in line GDPR

### Responding, Decisions & Recording of Recruitment SHI Anti-Discriminatory practice

SHI recognise that both students and homestay providers come from a variety of cultural backgrounds. Cultural and religious backgrounds will not be the basis of any decision relating to our choice of homestay provider. SHI commits to respecting the customs and culture of our homestay providers, unless the safety or welfare of our student is compromised.

### Safeguarding & Welfare

With homestays accommodating under 18 year olds, the main host and anyone over the age of 18 who permanently lives at the same address is required to have a satisfactory Enhanced DBS check undertaken before under 18s are placed with them and every 3 years thereafter. Stafford House encourages staff to sign up for the DBS Update Service. Homestay hosts are to tick the 'Working at home address' box (equivalent to box 66 on the DBS's own application form) to ensure that the police can also inform us if any adults resident at or closely associated with the address are deemed unsuitable to work with under 18s.

Age, gender, nationality, special requirements are all considered when placing students with a homestay to ensure the safety of the students. We provide each host a full copy of our safeguarding policy and an intensive handbook which provides guidance about hosting under 18 students. It is not unusual to have concerns about young students staying in homestay accommodation for a variety of reasons. Hosts should, as a matter of course, discuss their concerns with the Stafford House accommodation team to clarify their understanding of the situation. Hosts must always pass information or concerns on to the Stafford House accommodation team and never promise confidentiality in issues concerning child protection.

All hosts will receive basic safeguard training, this can be done via the safeguarding information in the handbook when on the initial visit. Hosts will then be invited to complete an online basic safeguarding course provided by the British Council for UK schools - where hosts will receive a certificate on completion. Schools will then keep this on record.

## Record Keeping

We take great care in keeping our records up to date with details of who lives within the home and the dates of birth of each family member so that it is known when a member of the home turns 18. Hosts who are found to have a criminal record will be asked to provide satisfactory explanations for the record(s). Senior Management in centre will then investigate the outcome and assess the situation so that a joint decision can be made on a case-by-case basis. We will then always inform the host of the decision that has been made.

## Responding & Communication

SHI will respond to all emailed, written or telephone enquires in a timely manner. Ensuring that a record is kept of the response and stored securely

## GDPR Compliance

SHI will act in accordance to the CATS College privacy policy. To allow consistent quality checking, Stafford House will ensure full, accurate and secure records of Homestay providers are maintained in the appropriate database. All homestay provider personal data will be processed in accordance with the General Data Protection Regulation (GDPR) and the CATS Colleges Privacy Notice. [The CATS College Privacy Notice can be accessed HERE](#)

Refer to the full Stafford House Safeguarding Policy document for full details on our commitment to the safeguarding of our students and the Safer Recruitment commitments. Recruitment procedures for all roles involving responsibility or substantial access to under 18s will be in line with safer recruitment best practice and the organisations safeguarding policy, including suitability checks.

## Training

At SHI we provide training for all our staff.

All Staff

- Online basic safeguarding course
- 121 training with the DSL in center
- Annual refresher

DSP

- Online basic safeguarding course
- The designated safeguarding person(s) will attend a advanced safeguard training session with English UK
- 121 training with the DSL in center

DSL

- Online basic safeguarding course
- The designated safeguarding person(s) will attend a advanced safeguard training session with English UK for DSL's
- Local Social Services Safeguarding course for DSL

Homestays

- Safeguard training on initial homestay visit
- Refresher training on biannual revisit
- Updates to safeguarding policy are communicated

Young Travellers At Stafford House the welfare of our students is paramount. When students under 18 are travelling to one of our destinations we always advise them of the safety and security information.

All 16/17 year old students attending one of our SHI destinations will have to have had a parent or guardian sign our consent form before travelling.

#### **Travel from the Arrival Port**

We strongly recommend the Stafford House transfer service. If alternative travel arrangements are made, these must be communicated to the Global Sales Support Team in advance of travel.

When arriving at any UK/US/CAN airport/train station young travellers will go through passport control/immigration, here they will be asked to present the consent to travel document

#### **Supervision**

Direct supervision is not provided outside of lessons. A calendar of optional events is available in school. Some of these events may incur an extra charge which is clearly stated on the event via the student portal. All Stafford House activities are supervised at a ratio of one to 20 students approximately. Higher risk activities may require a consent form to be completed which Stafford House will obtain prior to the event

#### **Independent Travel Outside The Course City**

We strongly recommend traveling on Stafford House organised day excursions. Any independent travel including an overnight stay will require a parental consent for each event including any holiday's booked by the young traveller. The young traveller is responsible for advising Stafford House of any overnight stay they wish to organise, they are also responsible for obtaining the consent form their parent or guardian and producing this at least 1 week before the travelling date.

#### **Attendance**

On arrival at school each day registration is required. In case of sickness the school should be informed immediately if the student cannot attend.

Students aged under 18 are expected to have 100% attendance through out their course duration.

#### **Accommodation Meal Plans**

Your meal plan is dependent on your chosen accommodation. Homestay accommodation includes breakfast and dinner Monday to Friday, lunch is to be purchased by the student at the local amenities. Saturdays and Sundays include breakfast, lunch and dinner. Residential accommodation includes a full board meal plan of breakfast, lunch and dinner 7 days a week, this option is only available in the summer period noted on the price list.

**Private accommodation: We would not expect 16/17 year olds to live in their own private accommodation, if a parent or agent requests this we will go through the private accommodation process for minors.**

#### **Curfew**

Stafford House curfew time is 22:30 every night. The curfew time is not negotiable to help Stafford House provide the best possible care for all students under the age of 18.

Note: US/CAN: country and state laws and regulation will apply. Please speak to one of our Global Sales Support staff for more specific details regarding these laws and regulations

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## **Staff Code of Conduct**

The aim of this policy is to provide a comprehensive guide for all staff, regardless of position, to rely, reference, and follow when it comes to behaviour and interactions with both colleagues, clients, and partners that promote a safe and productive workplace. The scope of this policy is general beyond a specific job title while providing modes of behaviours that create a positive and supportive work environment to each individual interaction that may occur.

#### **Distribution**

All staff we will receive the 'Staff Code of Conduct' on their first day and this will be explained to them by their line manager. All staff should have confirmed they have understood and agree to the code of conduct on our database.

If the staff code of conduct is updated, staff should receive the revised version where they will read and confirm they understand it. This will also be recorded on the database.

#### **Content**

The Staff Code of Conduct will cover, dress code, interaction with minors, time and attendance, behaviour, personal information and social media. Complying with the Code of Conduct If a staff member willingly breaks the staff code of conduct, Stafford House International may consider formal action. The staff Code of Conduct is there to keep staff and SHI customers safe.

CATS College Values The following topic descriptions are based on shared CATS College & Stafford House values and provide goals to adhere to when considering making actions with staff, clients, and partners.

## Having Enthusiasm

- Being flexible and responsive
- Having a can-do attitude
- Hard work driven
- Consistently honest
- Willingness to learn
- Positivity in challenging situations

## Being Creative

- Looks for new ways to improve
- Receptive to ideas and implementation
- Approaches problems with different perspectives
- Is solution driven

## Accountability and Ownership

- Taking responsibility
- Meeting commitments
- Display of dedication and confidence
- Investment in job accomplishment
- Consistent pro-activity
- Follow through with decisions
- Calculation of risk
- Displays of leadership

## Being a Team Player

- Displays friendliness and punctuality
- Is reliable and respectful of co-workers
- Communicates with enthusiasm
- Collaborates with staff and partners
- Shares knowledge willingly
- Teaches others

## Being Customer Focused

- Maintains approachable demeanour and image
- Is helpful and empathetic
- Communicates openly
- Welcomes feedback
- Actively builds relationships
- Is detail oriented and organised
- Strives to be effective and efficient
- Embodies courteousness and professionalism

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## Photography and Minors

Stafford House International are committed to keeping children and young people safe whilst they study with us. The aim of this policy is to ensure we keep staff and students safe.

This policy ensures that SHI are compliant with accrediting bodies across the 10 schools.

### Photography

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

<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 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 <u>centre</u></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 storagemedium</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 <u>centre</u>. 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 SHS 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!

## Anti Bullying

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

This is not an exhaustive list of what constitutes bullying.

### 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.

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.

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.

### Responding to an Allegation

- 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

### What are the 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.

## Abusive Behaviour

The aim of this policy is to provide for all staff understanding of abusive behaviour and how Stafford House International manages this. In the policy we will identify and explain how we expect SHI staff to react when dealing with abusive behaviour in the workplace.

This policy will provide definitions, situations, and interaction outlines. This policy serves as a reference document for staff use to place staff in better positions when handling situations that arise because of abusive behaviour

### Defining Abusive Behaviour

Abusive Behaviour is a general term for various behaviours that may be or interpreted as aggressive, hateful, coercive or controlling, destructive, harassing, discriminatory, intimidating, isolating, or threatening that an individual may use to dominate the actions, thoughts, or mental and physical health of another individual.

There are several categories that abusive types of actions may fall under. This list is not meant to be exhaustive, but rather to provide umbrella terms for which actions, outside of those explicitly, mentioned may fall under:

- Physical
- Emotional or Verbal
- Sexual
- Financial
- Digital
- Stalking

Physical Abuse is any intentional or unwanted contact with a person. Physical abuse means any non-accidental act or behaviour causing injury, trauma, or other physical suffering or bodily harm.

Emotional or Verbal Abuse emotional abuse is an attempt to control, in just the same way that physical abuse is an attempt to control another person. The only difference is that the emotional abuser does not use physical hitting, kicking, pinching, grabbing, pushing, or other physical forms of harm. Rather the perpetrator of emotional abuse uses emotion as his/her weapon of choice. Verbal abuse (verbal attack or verbal assault) is when a person forcefully criticizes, insults, or denounces someone else.

Sexual Abuse also referred to as molestation, is usually undesired sexual behaviour by one person upon another. It is often perpetrated using force or by taking advantage of another. When force is immediate, of short duration, or infrequent, it is called sexual assault. The term also covers any behaviour by an adult or older adolescent towards a child to stimulate any of the involved sexually. The use of a child, or other individuals younger than the age of consent, for sexual stimulation is referred to as child sexual abuse or statutory rape.

Financial Abuse this may be limiting access to money or other resources, or by forcing all financial responsibility onto their victim while limiting their ability to provide this. Examples of this could be; hiding or stealing payroll records, refusing payment for hours worked, giving gifts or payments with explicit intention of receiving service or product in return.

Digital Abuse is the use of technologies such as texting and social networking to bully, harass, stalk or intimidate a person. Often this behaviour is a form of verbal or emotional abuse perpetrated online. Examples of this could be; sending unwanted media, use of technology for monitoring or tracking purposes and personal data being shared without consent.

Stalking is unwanted or repeated surveillance by an individual or group towards another person. Stalking behaviours are interrelated to harassment and intimidation and may include following the victim in person or monitoring them.

### Context of Abusive Behaviour

Abusive behaviour may occur at any time, at any location between any two individuals. There are many contexts and situations in which behaviour may intentionally or not be perceived as abusive. Please reference the Staff and Student codes of conduct policies for guidelines on appropriate and professional behaviour standards.

Stafford House aims to provide an abuse free environment for our staff, clients, and partners while working in an incredibly cultural diverse environment. Pay special attention of cultural differences in body language, tone, volume, vocabulary choice, or appearance

### Abusive Behaviour: Interactions & Responses

While there is a zero tolerance for abusive behaviour, it is still possible to occur. If any individual feels they may have been abusive, the victim of abuse, or a witness to abuse, our policy is to report this immediately to the applicable line manager for escalation.

These matters should be responded by offering a supportive response and where necessary or relevant, a reference to the highest line manager for further escalation and review. When a person self-discloses a matter that constitutes a potential or alleged situation of abuse, the appropriate staff member must take the individual to a private place within view but out of ear-shot of other people. Promises of confidentiality must not be given. Tell the individual that you have a duty to pass on the information, only to those who need to know. When receiving allegations of abuse it is a staff member's recommendation to;

- Listen carefully to what is said, take notes
- Do not interview the person, but ask what happened, keeping questions to a minimum and obtain sufficient facts to understand what is being alleged, do not attempt this by yourself
- Allow the person 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 allegations of abuse may lead to a criminal investigation, so do not attempt to personally investigate any allegations of abuse

- Reassure the person 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

Training SHI will provide training to all staff around how to deal with abusive behaviour and what actions they should take if ever encountering this.

Each school will have a named representative who is responsible for the over all welfare and safeguarding of our students.

Please report any concerns or incidents to the Principal/Center Director

**Prevent** With this policy Stafford House International aim to ensure there is an awareness of 'Prevent' within our schools. We will provide a clear framework to structure and inform our response to potential radicalisation/extremist views; including supporting the referral process for those who may be susceptible to the messages of extremism.

We aim to embed the core British Values in the school culture and recognise current practices which contribute to the 'Prevent' agenda and any areas of improvement.

The Prevent Duty, which came into force in September 2015 as part of the Counter-Terrorism and Security Act 2015, places legal requirements on education providers to minimise the risk of individuals being drawn into terrorism and to ensure vulnerable individuals receive timely and appropriate support. Therefore CATS Colleges must demonstrate that it has processes and policies in place to comply with the Duty in a proportionate way.

We aim to provide early intervention as this is at the heart of Prevent which aims to divert people away from being drawn into potential radical acts or extremist views.

We want to maintain a safe, healthy and supportive learning working environment for all our students, staff and visitors.

We will educate our staff, students, providers and visitors to ensure they are aware of the process, reporting and signs of which may need to be escalated.

### **Definition**

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Extremism is defined as the holding of extreme political or religious views

### **Signs and Symptoms**

Radicalisation can be really difficult to spot. Signs that may indicate a student is being radicalised include:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use

Students who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family.

### **Expectations of Staff**

Any member of CATS College staff may be in regular contact with students and/or work colleagues and may get to know them well. They may witness activity and behaviour or receive information which others are not privy to. They should use professional judgement to decide when concerns should be referred to the safeguarding team. All staff members should be familiar with the Safeguarding policies and Prevent Duty guidance for SHI.

If a person is in imminent risk of harm, call 999.

If your professional experience gives you concerns about the behaviour of an individual student or colleague, contact your Designated Safeguarding Officer/Lead.

Identification of concerns might include:

- Expression of views which are discriminatory against protected groups or individuals
- Third party reports of concerns about behaviour e.g. plans to travel abroad to high risk countries or extremist activities
- Evidence of discriminatory treatment of other groups or individuals
- Evidence of bullying behaviour or harassment
- Evidence of non-compliance with the providers expectations of behaviour
- Possessing, accessing extremist materials.
- Evidence of family concern about vulnerability to extremism
- Expression of extremist views, including on private social media accounts.

- Use of extremist language
- Threats of violence
- Extremism and Terrorism

This section provides ways in which a person can be vulnerable to radicalisation and the indicators that might suggest vulnerabilities. However, it should not be assumed that the characteristics or experiences set out below necessarily indicate a person is either committed to terrorism or may become a terrorist.

- Engagement with a group, cause or ideology
- Changing style of dress or appearance in accordance with ideology group
- Day to day behaviour/thoughts/ideas become centred around ideology group or cause
- Loss of interest in friends/activities not associated with ideology group or cause
- Possession of material or symbols associated with an extremist cause
- Attempts to recruit others to the group/cause/ideology
- Communications with others to suggest identification with group/cause/ideology

If you are concerned about a person's behaviour (staff or student) then please in the first instance report your concerns to the Designated Safeguarding Officer/Lead (DSO/L). The DSO/L will liaise with the Senior Management Team and if necessary liaise directly with the local Police Prevent Officer and Police Channel co-ordinator.

### **What is CHANNEL?**

CHANNEL is a government led initiative to protect vulnerable people from being drawn into terrorism. CHANNEL's aim is to support and protect vulnerable people from becoming extremists by placing a good support network around the person that challenges the ideology that supports terrorism, protects the individual person and provides adequate and relevant support.

CHANNEL focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for educational institutions to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

**Cultural Sensitivity** 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.

**Contractors/Visitors** 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.

### **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.

### **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.

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**Responding to an Allegation** 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 a member of the DST. 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 MD (insert name) 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.

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. Please refer to the [Safeguarding Escalation Guidance](#).

**Reporting Concerns** Reviews of child protection cases reveal that often there were a number of small signs, possibly insignificant in themselves, but when collected together built up a picture that indicated cause for concern. It is imperative that;

- Staff know how to recognise signs that may give cause for concern
- Staff report their concerns
- The Designated Safeguarding Staff collect those reports and know when and how to follow up

The general principle is to report concerns up the chain. Staff should not discuss concerns with one of their peers but should instead report concerns to one of the Designated Safeguarding Staff, preferably one of the Designated Safeguarding Lead team.

The final page of this document gives details of Designated Safeguarding Staff with indications of who best to report concerns to. That page is to be displayed on all staff notice boards

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**Recording of an Allegation** 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 the place, date, time, and names of persons to whom the information was given. The Study Holidays/SHI referral form - 'Safeguarding Incident/Concern Form' can be obtained from the DSP/DSL.

- Do not ask the child to make a written statement
- Avoid jargon
- Ask another member of the safeguarding team to sit with you to take accurate notes
- Use T.E.D questions (tell me, explain to me, describe to me)

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/Principal and also the Designated Safeguarding Team at HO. Use the [Safeguarding Escalation Guide](#) to find out who is in the HO Safeguarding team.

- Do not confront any person against whom an allegation has been made.
- The Designated Safeguarding Team will guide you and your team 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/Principal 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.

Training At SHI we provide training for all our staff.

#### All Staff

- Online basic safeguarding course
- 121 training with the DSL in center
- Annual refresher

#### DSP

- Online basic safeguarding course
- The designated safeguarding person(s) will attend a advanced safeguard training session with English UK
- 121 training with the DSL in center

#### DSL

- Online basic safeguarding course
- The designated safeguarding person(s) will attend a advanced safeguard training session with English UK for DSL's
- Local Social Services Safeguarding course for DSL

#### Homestays

- Safeguard training on initial homestay visit
- Refresher training on biannual revisit
- Updates to safeguarding policy are communicated

[English UK Training Calendar](#)

[British Council Online Basic Safeguard Training](#)

[British Council Catalogue of Training Courses](#)

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GDPR SHI will act in accordance to the CATS Colleges privacy policy. To allow consistent quality checking, Stafford House will ensure full, accurate and secure records are maintained in the appropriate database. All student testimonials will be processed in accordance with the General Data Protection Regulation (GDPR) and the CATS Colleges privacy notice.

[Click Here for the CATS Colleges Privacy Notice](#)

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