

## STAFFORD HOUSE AND STAFFORD HOUSE STUDY HOLIDAYS

### Essence Summary

To be read by all adults working with or alongside children in our care

**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 have a "whole school" approach to safeguarding and all staff should respond to all signs, reports, and concerns of abuse.**

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

**Stafford House International (SHI)** provides residential and/or homestay language courses for students aged 16+ year- round. In addition, many of the schools provide residential and/or homestay language courses for juniors in conjunction with its sister company Stafford House Study Holidays (SHSH). The ages accepted on junior programmes will vary from one school to another depending on the attributes of the location.

**Stafford House Study Holidays (SHSH)** provides residential and homestay language and activities courses for students in aged 8-18 in seasonal centres, using facilities such as boarding schools or university campuses.

### We aim to

- Include best practice advice and policies from accreditation, governmental and charity bodies (such as the British Council, English UK, YLEUK and NSPCC), into existing policies such as this Safeguarding Policy and Staff Code of Conduct and compliance with statutory guidance with particular reference to such publications as Keeping Children Safe in Education, September 2023 (KCSIE). All staff need to read part one and Safeguarding Teams will need to read the full document.
- Have 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.
- Follow safer recruitment procedures with all the required checks 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 online training in child-safeguarding (unless they have a Level 2 or higher certificate).
- Provide effective management for staff through supervision, support and ongoing training
- Ensure 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 Children and Young People with Respect' card is carried by staff while at work.

## Distribution and review

This policy is available on the website and is given to all staff on confirmation of employment. It is also displayed on staff noticeboards, alongside contact details of the Designated Safeguarding team for that centre and an Escalation guide when outside help is required. This policy will be updated each year by the Management team of SHI (Principals, Student Services Managers and Global Process Manager) with the Head of Student Experience and Recruitment team at SHSH, taking into consideration risk assessments, current policy guidance, feedback and any incident reports.

## Definitions

Where policy or procedure applies to both Stafford House International (SHI) and Stafford House Study Holidays (SHSH) we use the umbrella name: Stafford House

**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 Stafford House. 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 Lead (and Deputy) to the level of Specialist Training for the DSL.

**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, 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.

**Minor:** Any person under the age of 18 is a minor by law. The age of adulthood in the UK is 18. We refer to minors as child(ren) and also sometimes as young people, to acknowledge that older teenagers have some awarenesses and responsibilities of adults but are not legally adults. Typically, we may refer to 16-17-year-olds as young people.

**Designated Safeguarding Lead (DSL):** A named member of staff, trained to Specialist Safeguarding Levels. Someone who has full overall responsibility to ensure SHI meets the aims of this policy. Each SHI centre has a named DSL and SHSH Head Office has a Safeguarding team including a named DSL.

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

**Designated Safeguarding Person (DSP):** A named or named member(s) of staff trained to Advanced Safeguarding Levels. This could be teachers, student services, academic managers etc. In SHSH centres the Centre Director is the DSP and keeps in close contact with the DSL at Head Office.

**Duty of Care:** This is the 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.

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

## 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.”

### The 4 main types of harm are:

- **Sexual Abuse**
- **Physical Abuse**
- **Emotional Abuse**
- **Neglect**

### And more specifically could be:

- Domestic Violence
- Inappropriate supervision by staff or volunteers
- Bullying, cyberbullying, acts of violence and aggression without our schools and campuses
- Victimisation
- Self-harm
- Unsafe environment and activities
- Crime
- Exploitation (including Child Sexual Exploitation)
- Radicalisation
- FGM (Female Genital Mutilation)

## Supporting Policy:

To support our Safeguarding, Stafford House also has the following policies:

### To be read by all staff:

- Abusive Behaviour Policy
- Anti-Bullying Policy
- Staff Code of Conduct
- Student Code of Conduct
- Health and Safety Policy
- Prevent Policy
- Respect of the Individual and Cultural Sensitivity
- Safeguarding Escalation Guide
- Photography Policy
- Young Travellers Policy

### To be read by relevant members of staff:

- Safeguarding Under 18s Online Policy
- Safer Recruitment Policy
- Homestay Recruitment Policy

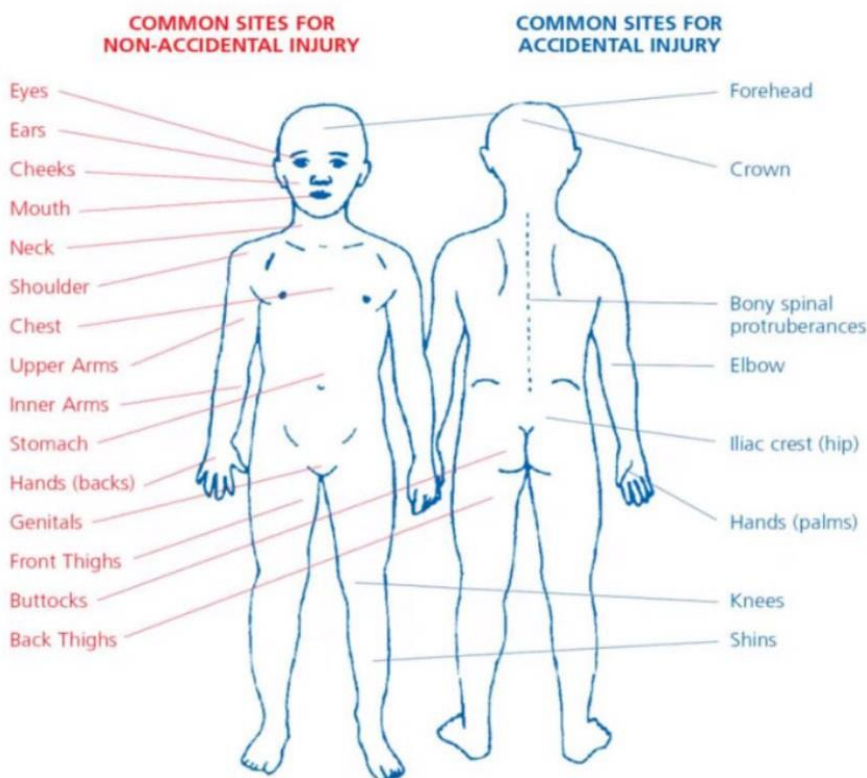
## Indicators of Abuse

The signs of child abuse are not always obvious, and a child might not feel able to tell anyone what is happening to them. The section above outlines different types of abuse and the signs that a child is being abused may depend on the type.

There are however some common signs that there may be something concerning happening in a child's life:

- unexplained changes in personality or behaviour
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with parents
- Knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body

This visual guide highlights common sites of non-accidental and accidental injury on the human body:



These signs don't necessarily mean a child is being abused, there could be other things happening in their life which are affecting their behaviour, but they are indicators.

## Safer Recruitment

**Staff recruitment:** Stafford House follows the Stafford House Recruitment Policy which includes safer recruitment guidelines and complies with accreditation guidelines. All staff involved in recruitment are required to attend a Safer Recruitment course. All job advertisements advise potential candidates that Enhanced DBS checks will be conducted after the appointment and before the employment start date.

Reference is also made to The Rehabilitation of Offenders Act 1974, which requires applicants to declare 'spent' convictions. Applicants from overseas will be required to obtain Police certificates of good conduct, or whatever the advised equivalent for that country is. All staff must sign a declaration of suitability to work with children at the application stage.

Interviews are face-to-face where possible and for senior or permanent positions require a panel of two or more interviewers. Where face-to-face is not possible, as is often the case with SHSH, video interviews are conducted.

In the case of staff being employed on a sessional or seasonal basis, any break of employment longer than 3 months will require a new DBS check. The school encourages/requires all employees to join the update service and the use of this can override the requirement to seek a new check.

**Homestay recruitment:** SH has a policy to ensure careful selection of homestay hosts and complies with BC accreditation.

## Staff Code of Conduct

Stafford House provides all staff with a code of conduct. The aim of this code of conduct is to provide a comprehensive guide for all staff, regardless of position, to follow when it comes to behaviour and interactions with colleagues, clients, and partners that promote a safe and productive workplace. All staff are required to read and understand the Code of Conduct when they are inducted or if it is updated. No staff member may have any kind of intimate relationship with a student (of any age) and staff are informed that any person in a Position of Trust engaged in any kind of sexual activity of any sort with a student aged under 18 is breaking the law, even though the legal age of consent is 16. Details are given on the safe use of social and digital media and the restrictions given on giving personal contact information to students (and former students). Guidance is given on the use of personal electronic equipment, including phones and cameras.

All staff are required by law to report any concerns about a colleague (Whistleblowing) not following the Staff Code of Conduct. Any report made will remain confidential and they will not be penalised for reporting it.

## Respect of the Individual & Cross-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.

## Photography (and filming)

SHI has a policy for photography and minors. Our aim is to ensure we are keeping staff and students safe.

Staff may only photograph minors with the permission of the Principal or Centre Director/Manager and only on work equipment. Photos should be of groups of students, not individuals, taken in appropriate dress and surroundings (for example not poolside or in a swimsuit).

Preference is for students of both genders in a photo and staff should not have their arms around a student. Staff must never use their own equipment to take photos. Guidance is given on the safe storage, distribution and display of photos and film.

## Student Code of Conduct

Students are taken through a student code of conduct to read and ask any questions they may have. They are made aware of expected behaviour norms in and out of the classroom and of the disciplinary procedure.

**This policy applies to students of all ages.**

## Abusive Behaviour

Stafford House aims to provide a safe and supportive environment for students and staff that promotes effective studying and working. Our school populations are diverse in terms of age, nationality and culture and expectations. Part of managing this mix is being prepared for misunderstandings and potential conflict.

The Student Code of Conduct helps students to understand what behaviour is expected of them and it is the responsibility of staff to model good behaviour, tolerance and respect at all times. There is an Abusive Behaviour Policy to give guidance to staff in how to deal with possible situations and who to report these to. This policy applies to students of all ages.

## Bullying

The Student Code of Conduct helps students to understand what behaviour is expected of them. The Anti Bullying Policy gives staff guidance on identifying the signs and symptoms of bullying and the appropriate actions to take if they have concerns or a student discloses such information. This policy applies to students of all ages.

## Prevent

Part of creating a safe and supportive environment is promoting the key values of British society. This includes, but is not limited to, Democracy, Rule of Law, Respect & Tolerance and Individual Liberty. Staff must embody these values in the way they work.

Part of our Duty of Care is to prevent the possible radicalisation of students so that they do not go on to be involved in extremist behaviour. All staff are required to understand the Prevent Policy so that they can identify possible concerning behaviour and know how to report it. This policy applies to students of all ages.

## Travel

SSSH requires all students to book a meet and greet service from the point of entry into the country. On departure individual students are accompanied to the point of check in while group students are guided by their Group Leader.

SHI recommends that students use their airport transfers service. Where students aged 16-17 opt not to use this, consent is required from a parent or guardian. Any request by the student to travel and stay away overnight during the course requires written consent from a parent or guardian for each instance, not just one consent covering the dates of the whole course.

We have guidance on the website for those students who are 16-17 when making arrangements for travelling.

## Contractors and Visitors

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. 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 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.

## Safeguarding Under 18s Online

All staff will receive a copy of the online code of conduct and safeguarding policy and sign an agreement stating they agree to follow them.

All staff will use a Zoom/Teams account set up and monitorable by Stafford House. Each Zoom/Team meeting will be set up with at least 1 co-host from the academic management or welfare teams who will be able to join the class at any time for lesson moderation.

Parents/ guardians will be sent the Online Code of Conduct for both students and staff so they are aware of the behaviours required by their child and that can be expected from Stafford House staff. They are required to read and sign an Online Consent form which includes a clear description of the course, codes of conduct and guidelines for staying safe online

General e-safety awareness will be addressed in the student induction on the first day of school.

## Child Protection

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. Staff are given guidance through training and the **Safeguarding Escalation Policy**.



## **All staff have a duty of care and must follow the 5 'R's: Recognise – Respond – Record – Report - Refer**

### **Recognising a safeguarding concern**

Staff are given basic training in recognising signs that could be cause for concern. In addition to a level one online course, ongoing and refresher training should be conducted at least annually, face to face where possible, to allow for discussion and the exchange of ideas.

### **Responding to a concern or an allegation**

All staff must be prepared to respond 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.

If a member of staff is approached by a student who wishes to make a disclosure about what could be a safeguarding matter, the staff must prioritise this above any other duty they have at the time. They must take the learner to a private place within view but out of ear-shot of other people. They must not interrogate or interview the child, avoiding leading questions. Promises of confidentiality must not be given but that only those people whose responsibility it is to know and act will be told.

Further information on how to recognise and respond is given in training, which is included with the Safeguarding Escalation Guide and Reporting Safeguarding Concerns.

### **Reporting a concern**

Any member of staff with an issue or concern relating to safeguarding or child protection, including but not limited to allegations of child abuse, should discuss it immediately with the DSL/ 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 DDSL or DSP. If the DDSL or 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 General Manager 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 Social Services and/or the Police as necessary. Stafford House is an 'agent of referral' and not of investigation.

### **Recording of an Allegation**

A full record must be made as soon as possible detailing the nature of the allegation using the 'Safeguarding Incident/ Concern Form'. 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. Include The nature of the alleged abuse, A description (if applicable) of any injuries observed, An account of the allegation. The Referral Form -'Safeguarding Incident/ Concern Form' can be obtained from the DSP/DSL. Copies are available on the staff noticeboard. The completed form must be signed and dated by the staff making the report and given to a DSP/DSL as soon as possible. A student must not be asked to write the report or sign a report.

### **Record Keeping**

The Data Protection Act 2018 and The UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children. For more information about how we use data please read our [Privacy Notice](#) and [Children's Privacy Notice](#).

Records of safeguarding incidents will be kept in a secure folder for 7 years or until the student reaches 25 years of age.



## Refer a concern or allegation

The Designated Safeguarding team will decide on a course of action and where appropriate refer the case to outside authorities, usually either the police or social services. Referrals to social care should generally be made with the consent, or the knowledge of, the parents/child. However, where there is an immediate risk of harm, or where the parents are implicated, a referral may be made without the knowledge or consent of the parents or child.

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.

Any staff that have any queries relating to this policy or the implementation of it should contact a member of the Safeguarding team. All contact details are available on the Safeguarding Escalation guide. Copies are on staff noticeboards.

## Oversight and case review

A review of cases and referrals will take place quarterly at the Designated Safeguarding Oversight Team, with any recommendations for changes in policy or process to be reviewed by the Standards and Quality Assurance Board.

## Further information:

[English UK Training Calendar](#)

[British Council Online Basic Safeguard Training](#)

[British Council Catalogue of Training Courses](#)

Safeguarding for UK/ SHI will act in accordance with the CATS Global Schools privacy notice. 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 UK/EU General Data Protection Regulation (GDPR) and the CATS Global Schools Privacy Notice.

## Data Protection:

References in this clause to the DPA are to the Data Protection Act 1998 and to the UK GDPR (General Data Protection Regulation).

In order to deliver education and protect students' welfare, SH will collect and process personal data, including sensitive and special category personal data (as defined in the DPA and GDPR respectively) that relates to the student and their circumstances.

Full details of the personal data collected and processed by SH, the purposes for which it is collected and the legal basis for doing so are contained in the CATS Global Schools Privacy Notice.

SH will comply at all times with our obligations under the DPA and the UK GDPR in relation to the student's personal data.

Data protection regulations are not barriers to justified information sharing. Instead, they provide a framework to ensure that personal data is protected and only shared appropriately.

- Be open and honest from the outset about why, what, how and with whom the personal data will, or could be shared.
- In some cases, we may need the individual's (or for our students, their parent or guardian's) consent before we share their personal data.
- Where possible, respect the wishes of those who do not want to share confidential information. But know this does not prevent us from sharing personal data with good reason, such as where safety or wellbeing may be at risk.
- Keep a record of your decision and the reasons for it if you decide to share or not to share the data, and record what you have shared, with whom and for what purpose.
- Seek advice from our [DPO](#) if you are in any doubt about if the personal data can be shared.

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UK Only: SH will comply at all times with our obligations under the DPA and the UK/EU GDPR in relation to the student's personal data.