



Safeguarding Policy

The Medway School of English Ltd

Updated 22 May 2019

Contents

Policy Statement

Policy Aim

Young person Safeguarding Lead

Why do we need a Safeguarding Young people Policy?

Recognising Abuse

Treating Young people with Respect

Celebrating Young people's Achievements

Safer Recruitment

Induction and Training

Confidentiality

Handling Disclosures

Responding to Concerns

Handling Allegations / Dealing with Complaints / Disciplinary & Grievance Procedures

Record Keeping

Implementing Safeguarding

Policy Date

References

Policy Statement

We recognize that the welfare of all young people is paramount and that *all* young people; regardless of ability or culture, have equal rights of safeguarding. We have a duty of care when they are in our charge and we will do everything we can to provide a safe and caring environment whilst they attend our activities.

Policy Aim

As members of SAFE -Safer Activities for Everyone Community Interest Company- (since 2013), we aim at all times to attain SAFE standards in all our activities with young people, their families and / or carers. We will achieve this by adhering strictly to this policy and the guidance and risk assessments.

Young person Safeguarding Lead

The responsibility of managing the safeguarding of young people can be both demanding and challenging.

Our lead for young people safeguarding in Medway and West Kent is:

Name: Mr Christian Schmitz MA
Contact details:
phone: 01622 370385
e-mail: info@medwayschoolenglish.com

Our lead for young people safeguarding for all other areas in Kent is:

Name: Mrs Frances Taken BA (Hons) TEFL
Contact details:
phone: +44 7775 674028
e-mail: franceskirkbytaken@gmail.com

Their role is to oversee and ensure that our safeguarding young people policy is fully implemented and that we attain SAFE standards. These details will be made available to all adults, young people, parents, host families/carers and teachers on our website.

Why do we need a Safeguarding Young people Policy?

The five main outcomes for young people as detailed in "Every Young Person Matters" agenda 2003 and subsequent Young people Act 2004 are:

- being healthy
- staying safe
- enjoying and achieving
- making a positive contribution
- economic well-being

Government guidance is clear that all organizations working with young people, families, parents and carers have responsibilities. It is important to remember that young people and young people can also abuse and that such incidents fall into the remit of this policy.

All organizations should:

- **have senior managers committed to safeguarding**
- **be clear about people's responsibilities and accountability**
- **have a culture of listening to young people**
- **safe recruitment practices for all staff and volunteers working with young people**
- **procedures for safeguarding young people**
- **procedures for dealing with allegations against, and concerns about, staff & volunteers**
- **make sure staff have mandatory induction and further safeguarding training, supervision, reviews and support**
- **have agreements about working with other organizations and agencies**

Working Together to Safeguard Young people

"Young people are individuals whose rights, needs and welfare are paramount."

Young people Act 1989

The 2 key principals of Working Together to Safeguard Young people are:

- **Safeguarding is everyone's responsibility; for services to be effective each professional and organization should play their full part and**

and

- **a young person centered approach: for services to be effective they should be based upon a clear understanding of the needs and views of young people**

“No young person or group of young people must be treated any less favourably than others in being able to access services which meet their particular needs”

Equality Act 2010

All references and documents are available under “References” on the homepage of www.safecic.co.uk

Recognizing Abuse

Physical:

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing significant harm to a young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a young person.

Emotional:

Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person's emotional development. It may involve conveying to young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. These may include interactions that are beyond the young person's developmental capability, as well as **over-safeguarding** and limitation of exploration and learning, or preventing the young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing young person frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a young person, though it may occur alone, May feature age or developmentally inappropriate expectations being imposed on young people.

Sexual:

Sexual abuse involves forcing or enticing a young person or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching

outside of clothing. They may also include non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people.

Neglect:

Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a young person is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a young person from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

Treating Young people with Respect

We endeavour to treat all young people with respect, regardless of ability or culture.

Celebrating Young people's Achievements

We positively encourage all young people and young people to succeed and celebrate their achievements and we are particularly sensitive to the needs of disabled young people who may achieve in smaller steps than their peers but are equally entitled to celebration.

Safer Recruitment

All vacancies advertised by The Medway School of English Ltd are seen with the following statement: A DBS certificate of an Enhanced Disclosure for the Young

People's Workforce is required for this position; any certificate must be three years old or less. For applicants who do not already hold such a certificate, The Medway School of English Ltd is able to process DBS applications. We pay for the Enhanced Disclosure application.

The Medway School of English Ltd is committed to safeguarding and promoting the welfare of under-18s and expects all of its employees to share this ethos. We see it as our duty to rigorously check any potential members of staff to ensure that they are fully suited to working in an environment where they will come into regular contact with under-18s.

All applicants should note that:

- *references will be followed up*
- *all gaps in CVs must be explained satisfactorily*
- *proof of identity and (where applicable) qualifications will be required*
- *reference requests will ask specifically whether there is any reason that the candidate should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18*
- *appropriate suitability checks will be required prior to confirmation of appointment*

APPLICANTS AWAITING DBS

In the case where an applicant is still awaiting the return of their disclosure check and are due to commence employment, only in exceptional and highly justifiable circumstances will the applicant begin their employment. Any decision to allow an applicant to commence employment prior to them being cleared by DBS will be made only if it is unavoidable. If the decision is made to allow an applicant to commence employment prior to them receiving clearance from DBS they will:

- Have signed a self declaration form
- Remain supervised at all times

APPLICANTS WITH A CRIMINAL RECORD

If a suitability check returns showing evidence of a criminal record, the management will make an informed judgement on whether the applicant is suitable for the vacant position. Factors taken into consideration will be:

- The seriousness and nature of the offense(s) in relation to the responsibilities of the position (e.g. violent, sexual or drug offenses would be a strong reason to reject a candidate for a role involving the care of under-18s)
- The age of the offender(s)
- The frequency of the offense(s)

Before a judgement is made, the contents of such a disclosure will be discussed with the candidate to confirm that the information disclosed does

relate to them. This discussion will aid the decision making process and provide the opportunity to discuss the offence(s) in greater detail.

Any judgement will be agreed by at least two members of staff, including the Managing Director.

The decision making process will be clearly recorded, referencing the discussion, judgement and reasons for decision.

It is a requirement that all staff have had at least Safeguarding Training Safeguarding children - level 1' prior to commencing their work. A course can be done online, <http://www.mscb.org.uk/safeguardingtraining/e-learning.aspx> or face to face-

Handling Disclosures

A disclosure may be made verbally or through play or through the behaviour by a young person or an adult and it is important for everyone to remember the following:

If you are concerned about a young person it is important that this information is communicated to the lead for young person safeguarding.

You may become aware of possible or likely abuse by:

- Your own observations and concerns;
- Being told by another person that they have concerns about a young person;
- The young person tells you;
- The abuser tells you.

Also remember that you may not always be working directly with the young person but become concerned because of difficulties experienced by the adults e.g.

- Domestic violence incidents
- Mental health issues
- Substance and alcohol abuse Incidents

Other concerns may be:

- Young people living away from home or gone missing
- Peer abuse including bullying
- Race and racism
- Violent extremism

- Sexual exploitation
 - Female genital mutilation
 - Forced marriage
 - Concealed pregnancy
 - Young person trafficking
 - eSafety
 - Peer to peer sexual violence and sexual harassment
 - Homelessness
 - Sexting (also known as youth produced sexual imagery)
-
- Initiation/hazing type violence and rituals.
 - Young person criminal exploitation and county lines: young people being used to carry drugs or money from urban to rural areas

Remember:

- Do not delay.
- Do not investigate.
- Seek advice from the young person safeguarding lead or deputy.
- Make careful recording of anything you observe or are told.

Our lead for young people safeguarding in Medway and West Kent is:

Name: Mr Christian Schmitz MA
 Contact details:
 phone: 01622 370385
 e-mail: info@medwayschoolenglish.com

Our lead for young people safeguarding for all other areas in Kent is:

Name: Mrs Frances Taken BA (Hons) TEFL
 Contact details:
 phone: 07775 674028
 e-mail: franceskirkbytaken@gmail.com

If you would prefer not to report your concerns to us, but directly to Social Services, please use the following contact numbers:

Private fostering coordinator

03000 416161 (for Kent County Council)
01634 335726 (for Medway Council)

Responding to Concerns

We ensure and emphasize that everyone in our organization understand and know how to share any concerns immediately with the young person safeguarding lead. Everyone including both the lead for young person safeguarding will deal with concerns using the following:

Handling Allegations / Dealing with Complaints / Disciplinary & Grievance Procedures

We have clear policies in line with SAFE recommendations about handling allegations, dealing with complaints and our own disciplinary and grievance procedures and these details will be made available to all adults, young people, parents and carers as necessary.

We are mindful that the three procedures may confuse the next appropriate steps to take. We are clear that, in any case where a complaint has been made with regards to any inappropriate or poor practice, we will discuss the situation with young people's social care services before making an open decision about the best way forward.

It is the responsibility of the young person safeguarding lead to ensure that these procedures are rigorously adhered to. In the case that the young person safeguarding lead is implicated, the deputy should be informed. In the exceptional circumstances that both are involved, it is the duty of the person concerned to contact young people's social care services direct.

Young people's social care services will manage any investigations, overseen by the Local Authority Designated Officer (LADO) in accordance with Local Safeguarding Young people Board (SCB) procedures. These are available on the SCB website.

With regards to disciplinary and grievance procedures, we are very clear that we will take no steps until we have fully discussed and agreed a strategy with the Local Authority Designated Officer, young people's social care services and/or the police. Any will override the need to implement any such procedures. Our management are responsible for making referrals to the Disclosure & Barring Service (DBS), and the relevant professional bodies of an individual who does or may pose a danger to young people and young people. Other organizations will liaise with their LADO and local agencies if such a referral needs to be made.

Step One:

If you are worried a young person has been abused because:

- You have seen something
- A young person says they have been abused
- Somebody else has told you they are concerned
- There has been an allegation against a colleague
- There has been an anonymous allegation
- An adult has disclosed that they were abused as a young

Any consultations should not delay a referral.

In an emergency do not delay: Dial 999

Step Two:

Your organization should have a policy for young person safeguarding - check this for guidance. Talk to the lead for safeguarding.

CONSULT,
MONITOR
AND RECORD
Sign/Date/Time
Include name and job role

Step Three:

The lead for safeguarding should refer the concern to Young people's Social Care Services and/or the Police and follow up the referral in writing within 24 hours.

In cases of allegations against a person with a "duty of care", the Local Authority Designated Officer (LADO) will co-ordinate the next procedural steps.

Under "whistle blowing", anyone can refer directly to the police or Social Care Services if, in good faith, they are concerned the organisation is not managing safeguarding concerns appropriately.

Record Keeping

All records will be securely kept in locked drawer. Only the two young person safeguarding lead a will have access and records will only be kept as long as necessary.

Normally these records will be passed to young people's social care services as soon as possible. All records will be handwritten (and if recorded electronically, kept in a secure area) by the person with the concern within 24 hours, on headed paper or incident sheets and will be factual, non-judgmental. All such records will have a front page listing the papers in chronological order.

It is helpful to record any known details of the young person/young people or young people involved e.g. name, address, date of birth etc. All records should be factual. It is equally important to record the reasons for making the decision not to refer to young people's social care services as when the decision is taken to refer. Always sign, clearly detail name and job role of the person making the record. Date and time these records.

Providers of young person care, educational, health or other formal services will use the Common Assessment Framework, or local equivalent, referral forms

Implementing Safeguarding

USE OF RISK ASSESSMENTS

Risk assessments are maintained for all programmed activities and excursions, a copy of which will be held by all relevant staff such as relevant to staff, teachers, group leaders and guides. A copy risk assessments are available for students upon request. All Risk assessments are in place to:

- Prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace
- Provide clear instructions and information and adequate training, to ensure employees are competent to do their work.
- Engage and consult with employees on day-to-day health and safety conditions Implement emergency procedures – evacuation in case of fire or other significant incident.
- Maintain safe and healthy working conditions, for both staff and students.

SUPERVISION RATIOS

This section refers to guidance provided by the British Council and refers to the general principles in determining suitable ratios of young people to supervising adults.

It is vital to give adequate thought to the level of supervision and who will be undertaking supervision during the planning of a site visit.

When planning a trip, think about the appropriate adult to pupil ratio. There are no legal requirements - supervision should be based on a reasonable

judgment of the numbers and expertise of adult supervisors necessary, taking into account as seen in the risk assessment the:

- nature and hazards of the trip
- number, age, gender of the pupils
- Competence, authority and experience of the adults.

As an absolute minimum, each suitable candidate that at least two adults should accompany any group of up to 40 pupils. If a student is taken ill or another emergency arises, one adult can deal with it while the other looks after the rest of the party (suitably altering the activities to accommodate the lower level of supervision). However, trips involving hazardous activities will normally require a much smaller ratio than for trips that do not.

- For trips to local sites and museums, government guidelines suggest a ratio of one adult to every: 15-20 pupils aged 11 and above.
- For School Groups from abroad, it is the responsibility of the school to provide adequate group leaders to satisfy this ratio during all programmed activities. For all privately booked groups, it is the responsibility of the group organizer to ensure that this ratio is met upon booking and maintained through all activities scheduled by the school.

MISSING STUDENTS

An under-18 is deemed as missing if their whereabouts becomes unknown at any point during their programme. For scheduled 'Free Time', a student is deemed as missing if they do not return to a pre-determined point when expected.

The school has a missing student procedure for each scenario in which a student may become missing; from lessons, during excursions or activities during transfers and in their accommodation.

The school will issue all adults with the relevant Missing Student Procedure document, which is to be followed in the event of a missing student.

Teaching staff are prepared before a class with a list of student names and are aware that they must notify immediately if a student is not in the lesson.

Adults must act immediately upon the knowledge of a missing under-18.

WELFARE PROVISION

A Welfare Officer (called 'group leader' in The Medway School of English Ltd) will be present whenever possible when under-18s are scheduled for lessons at the school.

Young people will be made aware of the Welfare Officer through signage around the school premises and, if applicable, through their introduction on during Welcome Presentations.

Safeguarding contact details will be given out to students of where and who they contact if they are in need of any support or feel that they being abused in any way.

FIRE SAFETY

All students and staff at The Medway School of English Ltd will be told about the procedure during the enrollment process and all young people will be inducted into the building's evacuation procedure within their first day of lessons, this induction will include an explained, along with the exit strategy and meeting points.

FIRST AID & MEDICAL

Under-18s and adults will be made aware of the first aiders. Medical information is provided during the enrollment process and medical requirements must be declared by parents/guardians before enrollment and will be made known to relevant adults. The school will not accept the enrollment of under-18s prior to the receipt from a guardian, confirming that all medical conditions and special requirements have been disclosed.

The school reserves the right to remove young people from their course and request their return home if a medical condition or requirement comes to light during their stay which has not been previously declared and has or may have an impact on the young people's safety or welfare, or the safety or welfare of those around them.

YOUNG PEOPLE - BEHAVIOUR AND DISCIPLINE

All students are provided with a student handbook which includes guidelines on what is expected of them during their me at The Medway School of English Ltd and the procedures in place in the event of misconduct or unsatisfactory behaviour.

AIRPORT TRANSFERS

All drivers must be risk assessed and have a clear DBS. Telephone numbers are exchanged prior to arrival via agent or parent, to ensure that the meet runs smoothly.

Policy Date

This policy was agreed and disseminated on 22 May 2019 and will be reviewed annually or when there are substantial organizational changes.

Policy Review Date: May 2020

Signed by Lead for young person safeguarding and Managing Director:

A handwritten signature in black ink, appearing to read 'C. W. M.', is positioned above the date.

Date: 22 May 2019

References

Note, all references can be found in the reference section at www.safecic.co.uk