

SAFEGUARDING AND CHILD PROTECTION POLICY

Always Putting the Welfare of our Students First

Updated 17.02.2022 TB

St Giles London Central Safeguarding and Child Protection Policy

Introduction

St Giles is committed to a practice which protects children, which includes everyone under the age of 18, from harm. This includes:

Safeguarding is:

- the school's duty of care to look after children and help them to achieve their potential
- concerned with strengthening relationships of trust between under 18s and adults
- ensuring safe systems are in place for the well-being of under 18s
- promoting the welfare of children and ensuring the best outcomes for every child

Child protection

- involves protection from the threat of direct harm
- is concerned with abuse that includes neglect, sexual, physical, or psychological and emotional abuse
- involves procedures for dealing with abuse when it arises

Around 8% of the students that study at St Giles London Central are under 18s with greater concentrations of students at this age in the summer. The minimum age of students at London Central is 16 and school publicity makes it clear to parents and guardians on its website that these children will be studying in an adult educational environment.

Staff in this organisation accept and recognize their responsibilities to develop awareness of issues which cause children and young people harm, and all share a responsibility to provide a safe environment in which children can learn.

The School endeavours to safeguard children and young people by:

- Adopting child protection guidelines through a code of behaviour for staff.
- Sharing information about child protection and good practice with children, parents, group leaders, and staff.
- Sharing information about concerns with agencies who need to know and involving parents and children appropriately.
- Following stringent procedures for recruitment and selection of staff including mandatory DBS checks for staff and homestay providers.
- Providing effective management for staff through supervision, support and training.
- We are also committed to reviewing our policy and good practice at regular intervals.

For many of our students this is their first experience of living away from home and in a foreign country and sometimes with low levels of language proficiency at the outset. We recognise that many of our students have a degree of vulnerability and many of the key principles behind safeguarding should be applied to the whole student body at the School.

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St Giles London Central Safeguarding and Child Protection Policy

1. Designated Safeguarding Personnel



1.1. Designated Safeguarding People (DSPs)

St Giles London Central has two Designated Safeguarding Persons (DSP). The identities of these persons are advertised on the e-School platform, during induction and on Who's Who displays around the school. The named persons are Alexandra I'Anson (right - Accommodation) and Stephen Parsons (left - ADoS).

DSPs meet newly-arrived under-18s as part of the School's induction process. The DSPs have all undertaken (at least) level 2 Child Protection and safeguarding training. If any student or staff member has any concerns about the welfare of an under-18 this should be reported to the DSP or any other staff member that is trusted by the individual.



1.2. Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is Tom Borrie (Left - Principal) and he has overall responsibility for child protection and safeguarding in the school and is the point of contact with the Local Child Safeguarding. Josh Round (Right- DoS) is the deputy lead and acts as lead in Tom's absence.

1.3. All frontline staff

All frontline staff which includes teachers, maintenance, café, cleaners and student services staff undertake basic online safeguarding and child protection training provided by EnglishUK. Refresher training sessions led by the designated safeguarding Persons or Leads are also held.

2. Safer Recruitment

2.1. Interviews, CVs and References

To ensure that employees working for St Giles are suitable for work with children, the following procedures must be followed during the recruitment process:

- Any job advertisements will clearly state that a role in the School will involve unsupervised access to under-18s. Please note that it is an offence for a barred individual to apply for such a position.
- All candidates must be informed that they will need to submit to an Enhanced DBS check prior to employment.
- Candidates for employment will normally be interviewed by a small panel and at least one member of the panel should have received prior formal guidance in safer recruitment.
- Interviews will normally be conducted in a systematic fashion with the use of a pre-agreed formulaic script. Consideration should be given that probe attitudes and behaviours towards young people and child protection and safeguarding in general.
- All staff must submit a full and up to date CV with their application and any gaps in dates in employment must be satisfactorily explained.
- A minimum of two references are required for each candidate. The reference request will ask if the referee has any reason to believe that the employee is unsuitable for work with under-18s. One of the references must be from the most recent employer unless there is a clear reason why this is not possible. All reasonable efforts should be made to ascertain that the reference is genuine.

We encourage all applicants called for interview to provide details of any criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to the Principal, and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process. Unless the nature of the position allows St Giles to ask questions about a person's entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

2.2. DBS Enhanced Checks

An enhanced DBS check must be conducted prior to employment with the School at the School's cost. DBS certificates from previous employers will not usually be accepted. The School will record the date and reference number of the application but will not retain any DBS certificates on file. The DBS check is valid for a period of three years.

Should a DBS check subsequently reveal matters which may materially affect the suitability of a person for employment with St Giles, the school will discuss matters with the prospective employee and reserves the right to withdraw any offer of employment or to terminate a contract. It is against the law for the School to knowingly employ anyone who is on the DBS children's barred list.

In recent years the Disclosure and Barring Service (DBS) has not always had the resources available to be able to process applications within a reasonable time-period particularly during busy seasons such as the summer and exceptionally the School may have no choice but to commence the employment of an individual before clearance has been received.

If this is the case, then the line manager must put in place reasonable controls to mitigate any potential risk. This may involve limitations on movement around the

building, participation in the social programme and a requirement that the individual not be alone with an under-18.

St Giles has a written policy on the recruitment of ex-offenders, which is available to all Disclosure applicants at the outset of the recruitment process. Further details of St Giles' policy on Disciplinary and Grievance procedures are to be found in the Staff Handbook and Contract of Employment.

2.3. DBS Update Service

All permanent members of staff are encouraged to switch to the DBS update service and will need to renew their status online every year. As a result of the Scheme, members will no longer be required to renew their DBS Enhanced status every three years but will continue with their registrations indefinitely. The School covers the cost of this annual subscription and will be notified automatically if there are any changes in status.

<https://www.gov.uk/dbs-update-service>

2.4. Recruitment of Homestay Providers

It is now normal practice for St Giles London Central to require the primary care giver in each homestay to undertake a DBS Enhanced check. Hosts are expected to be available to host any student on or above the age of 16 and are also expected to complete an online course in safeguarding and child protection.

When the primary care giver completes a DBS Enhanced check they must indicate that the activity will take place in their home. This results in the address also being checked and if there are other residents who may pose a risk to under-18s in the household this information will be shared with the School by the DBS service. A host must not accommodate an under-18 if they have not been DBS checked.

In addition to these measures the primary care giver is expected to confirm the identities of any other adults that may be resident in the homestay and submit a separate declaration, based on the Children Act 1989, and signed by each individual concerned stating that they are suitable to work with under-18s. (See Appendix A: Declaration of Suitability to Work with Children.

Finally, each new host must provide two character references (not from a family member) in support of their application and the house is inspected by the accommodation officer in person. Prospective hosts are interviewed to assess their aptitude and motivation for the roles and their attitudes towards under-18s and safeguarding and child protection are assessed. The house will also be inspected with note taken of any aspects that could indicate risk for young people. Hosts are then visited on a two year basis.

2.5. Overseas Police Checks

All new applicants for positions with the School who have lived or worked outside the UK for a continuous period of six months or longer within the past five years are required to produce a record of clear conduct from the local police force in the country concerned.

Candidates should be advised to apply for these checks prior to leaving the country if this is still an option. The School can provide guidance on where and how to obtain such a record. Please note that there may be a small cost to the applicant.

On rare occasions and in some of the remoter countries it may prove quite challenging to obtain such a document in which case the manager must be able to demonstrate and provide evidence that every effort has been taken by the candidate to obtain this documentation.

The line manager should alert the Principal without delay if they are not satisfied with the speed of progress or if obfuscation is suspected.

2.6. Barred List Checks

Accessing the barred list

The standalone Barred List is now managed by the Teaching Regulation Agency. They have reviewed who has access in accordance with guidance and, as a result, private language centres are no longer able to hold a licence for direct access to the standalone Barred List check. Members must therefore wait for sight of the DBS certificate before allowing a member of staff to have unsupervised access to under 18s.

Accessing the prohibited list

Since the end of the Brexit transition period, the UK no longer has access to the list of EEA nationals who have sanctions which prohibit them from working (usually as a teacher) in an education setting.

Any prospective staff have worked in the EEA recently you will need to be able to confirm that no sanctions are in place. This can be done by obtaining a letter from the professional regulating authority in the relevant country.

You can find contact details of regulatory bodies on the [European Commission's Regulated professions database](#). If this isn't possible, other options should be considered, such as additional references.

2.7. Single Central Record

A single central record of employment is maintained by the School for all staff and serves as a single record for the safeguarding checks carried out by the School. The record is password protected and is updated and managed by the Designated Safeguarding team and the senior management. The following details are included in the record:

- The employee's date of birth and address
- Verification that the employee's identity has been checked
- The date and reference number of the last DBS Enhanced check
- The date of the Overseas Police check (where required)
- Verification that the employee's qualifications have been reviewed
- Confirmation that the employee's references have been obtained and verified
- Confirmation that child protection, safeguarding and Prevent training has been undertaken
- Confirmation that Fire safety training has taken place
- Confirmation that staff have read and understood any updates to the safeguarding policy, staff code of conduct and the KCSIE act

3. Staff Code of Conduct

3.1 Statement of Intent

It is the policy of St Giles International to safeguard the welfare of all children and young people by protecting them from all forms of abuse including physical, emotional and sexual harm as well as neglect. This organisation is committed to creating a safe environment in which young people can feel comfortable and secure while engaged in any of St Giles' programmes. Staff should at all times show respect and understanding for the individual's rights, safety and welfare, and conduct themselves appropriately.

3.2 Guidelines for all St Giles Staff

Attitudes

Staff should be committed to:

- Treating children and young people with respect and dignity.
- Always listening to what a child or young person is saying.
- Valuing each child and young person.
- Recognising the unique contribution each individual can make.
- Encouraging and appropriately praising each child or young person.

By Example

Staff should endeavour to:

- Provide an example, which we would wish others to follow. This includes presenting oneself appropriately.
- Use appropriate language with children and young people and challenge any inappropriate language used by a young person, child or an adult working with young people.
- Respect a young person's right to privacy.

One To One contact

Staff should:

- Not spend excessive amounts of time alone with children, away from others.
- In the event of having to meet with an individual child or young person make every effort to keep this meeting as open as possible.
- If privacy is needed, ensure that other staff are informed of the meeting and its whereabouts. For these meetings there should be two members of staff, one male and one female, present. Staff members are strongly advised against meeting a child alone in a closed space, especially of the opposite sex.

Physical contact

Staff should never:

- Engage in sexually provocative or rough physical games, including horseplay.
- Do things of a personal nature for a child or a young person that they can do for themselves.
- Allow, or engage in, inappropriate touching of any kind.

3.3 Electronic contact with students under-18

Electronic contact is defined as the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment and computers. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.

This policy applies to the relationship between students and staff before, during or after a course.

Staff must request permission from the employer for any electronic contact with a student which is of a non-professional nature before, during or after a course. This may be necessary when needing mobile phone numbers from students for an excursion but the following list is strictly prohibited on non-school devices.

- Contact Via social media sites
- Contact via Whatsapp and other messaging platforms
- Contact via text message or email
- Contact via telephone

In any electronic contact with students, staff must pay particular attention to use neutral, un-emotive language that will not be misconstrued. Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.

e-School

Staff are permitted to communicate electronically with students via the e-school platform. When communicating with students via the e-School platform teaching staff should adhere to the behavioural guidelines laid out in the document and communication should always focus on the student's learning. Administrative staff who contact students in relation to attendance, transfers, accommodation, and other non-academic matters must also adhere to the behavioural guidelines laid out in the document.

General

Staff should:

- Be aware that someone might misinterpret their actions no matter how well intentioned.
- Never draw any conclusions about others without checking the facts.
- Never allow themselves to be drawn into inappropriate attention-seeking situations such as tantrums or crushes.
- Never exaggerate or trivialise child abuse issues or make suggestive remarks or gestures about, or to a child or young person, even in fun.

Teachers

When teachers wish to receive content, such as homework submission, electronically from students, this will be done using the e-school. Staff will not share private email addresses with their students.

3.4 Anti-bullying policy

St Giles has a written policy on bullying for staff in its Staff Handbook, and one for students in the Student Guide.

If you have any concerns for the physical or emotional welfare of any student, visitor or member of staff then you should report it to a DSP or the DSL immediately

4. Safeguarding Procedures

The following safeguarding measures are followed at St Giles London Central in order to help keep students who are under-18 from harm.

4.1 Weekly lists

The Child Protection Officer compiles a weekly list of new and existing students who are under the age of 18. The list is circulated to relevant staff and a copy is also held by the duty officer. The out of hours' duty officer has access to up-to-date next of kin details. A copy is also placed on the staffroom Safeguarding board.

4.2 Absence from school

A child going missing from education is a potential indicator of abuse or neglect particularly if this is a regular occurrence.

All students who are under 18 years old must sign a register to confirm that they are present in school when they arrive for their lessons. This register is maintained at the front desk. The Designated Safeguarding Officer (DSO) follows up any incidences where students have not signed in within 30 minutes of the start of the lesson.

As an extra level of protection and to protect against an U18 signing in and then leaving the school, teachers must report the absence of any student who is under the age of 18 after 15 minutes of the first lesson in the morning and the afternoon. The age of students is clearly indicated in class registers. If the teacher cannot leave the classroom, then they should report the absent student by calling the school reception on **0207 837 0404**.

4.3 Accommodation

Homestay

Students under the age of 18 who do not form part of a group and are not accompanied by an adult family member or guardian are normally only permitted to be accommodated in homestay accommodation.

There is a Sunday to Thursday 11pm and Friday – 00:00 curfew in place for students aged of 16 - 17. Students may exceptionally exceed this curfew or travel independently only if prior written parental consent is received and verified.

Private arrangements

Exceptionally, parents may choose to make their own private accommodation arrangements on behalf of their children as long as they are accommodated under the supervision of a responsible adult. Parents must sign a declaration of parental responsibility form to say that the person that will host the child has been vetted and approved by them. They must disclose full information about the host, the address of the host and provide contact details for the host.

Residential accommodation

Residential accommodation is only available to under-18s as an option at certain locations and at certain times of year. During the summer the schools offers residential accommodation at UCL to students aged 16-17. This residence has 24 hour supervision by St Giles Juniors staff. St Giles London Central students who use this accommodation will abide by St Giles Junior's residential rules including mealtimes and bedtimes.

Hotel accommodation

Students under the age of 18 will never be offered or encouraged to stay in hotel accommodation without direct supervision but it may be permissible if it conforms to the age-specific policies of the hotel, if the hotel has been checked by the School and is known to offer a satisfactory level of supervision and security, and if prior and verified parental consent has been received.

4.4 Leisure activities

The School runs an extensive social programme for students and endeavours to make sure that the programme is as safe and as accessible to under-18s as possible.

Risk assessments are created for each onsite and offsite event and include consideration of matters such as supervision ratios by adult staff, forms of additional ID, instructions and maps, and emergency contact numbers.

The minimum supervision ratio for any event involving students aged 16-17 is one member of staff for every 15-20 students. A higher ratio of supervision may be required depending on the nature of the event.

Attendance at some activities is restricted for students who are over 18 only.

4.5 Taxi transfers

We recommend that students under the age of 18, book a taxi transfer through the school to facilitate their safe arrival and departure but this is not mandatory. Parents are informed that such arrangements may not be deemed adequate by the UKVI and may prejudice their child's entry into the UK and we advise parents to provide us with the details of any relatives, guardians or other adults who will be meeting the child.

4.6 Emergency Contact Number

All under-18s receive a St Giles student ID (white) card with the school's emergency phone number on it. A duty officer is available to take calls outside of the school's normal opening hours. **The emergency number is 07804 919788.**

4.7 Advice on living in London

All students under the age of 18 are given an induction about the school and London by the Designated Safeguarding Officer. Advice includes but is not limited to the following: ways of traveling (stay in pairs and groups), plan how to get home in advance of evenings out, ensure the mobile phone is fully charged, inform about the laws that apply to under-18s, and tell friends and hosts where they are going.

4.8 1-to-1 Feedback

There are individual 1-to-1 feedback sessions between the teacher and the student on a fortnightly basis. Teachers will ask under-18s about their welfare and whether they are experiencing any problems during their time in London. Any concerns must be passed to the appropriate member of staff.

4.9 Vetting of service providers and agents

The School will ensure that it receives written confirmation from its partner organisations including its taxi transfer partner that they have effective and rigorous staff vetting procedures in place that include an enhanced DBS check for their staff members.

Agents will also be asked to provide confirmation that they have obtained a certificate of good conduct provided by the local law enforcement agency for any group leaders escorting groups that include under-18s and will be provided with a copy of the school's safeguarding and child protection policy.

4.10 Supervision of visitors

There are a certain instance where visitors are permitted to visit designated parts of the building unsupervised but they must report to reception first. Visitors who are part of a room hire group must wear a yellow wristband. Other visitors to the school must wear the ID badge provided to them at reception. Further guidance is given below:

- Third parties who have hired room space during school time must report to reception on arrival. The visitors are then required to sign-in they will be directed to their classroom. The person responsible for the booking will receive further guidelines about their expected conduct on the premises in a welcome pack and is required to share this information with other members of the group.
- Known contractors and regular delivery staff must establish their identity at reception and receive pre-authorisation from the facilities manager for their visit. They would normally be expected to wear a uniform and ID badge provided by their employer while on site. If the visit is not a regular visit, contractors would normally need to be escorted.
- Students attending teacher training courses. Students should be asked to produce valid ID. The movements of these students will be restricted to the areas designated by the teacher training team and their presence will be supervised by the teacher trainers.

Please note that all staff members will be asked to be vigilant concerning the behaviour and whereabouts of individuals that are identified by a visitor pass or wristband

4.11 Training for staff

All staff members (teachers and student services) receive basic level child protection and safeguarding training in addition to reading a copy of this document during induction.

When members of staff complete this course they should save a copy of their certificate and send it to their line manager. This certificate will be inserted into the staff member's personnel file.

Ongoing refresher training is delivered by the designated safeguarding team (DCOs). The Designated Safeguarding Officers are trained to at least level two and the School uses English UK to supply this training.

All members of the management team who are involved in recruitment have received safer recruitment training from the DSL.

4.12 Female Genital Mutilation (FGM)

Female genital mutilation is the ritual removal of some or all of the external female genitalia for non-medical reasons. The practice is most prevalent in 27 countries in Africa and parts of Asia and the Middle East. Victims are usually pre-pubescent and the typical age that this ritual takes place is under the age of 5.

There are no known health benefits for this procedure and the practice is rooted in gender inequality, attempts to control women's sexuality, and ideas about purity, modesty and aesthetics.

There is a mandatory duty to report to the police any known cases that come to light of FGM in female students under the age of 18 which are reported by the individual concerned and verified. The requirement also includes a duty to report any suspicions that an individual may be at risk of suffering FGM either in the UK or on a trip overseas.

4.13 Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. The School provides advice about this form of abuse in the Student Guide and is developing an information sheet for students under the age of 18.

4.14 E-Safety

All PCs on the school premises and the student Wi-fi network in the school are protected by secure firewalls that prevent anyone accessing inappropriate content online. Our Under-18 information sheet includes advice on E-Safety and offers advice to under-18s about what to do if they receive unwanted contact online or via text.

4.15 First Aid and Medical Care

Under -18s are reliant on adults for proper medical and first aid provision and may not themselves be the best judge of when to seek assistance. We therefore ask all staff and homestay providers to be especially vigilant in relation to the health of under-18s under their supervision or in their care. Within the school we have trained First Aiders. Staff members supervising social programme activities who are not First Aid trained will contact the emergency services in the case of injury to a child in their care. Homestay providers may be able to offer limited medical care but should help under-18s in their care receive all necessary medical attention through their own GP.

4.16 Behaviour and Discipline

Under-18s are expected to follow our school rules in the same way as adult students. Where the safety of an under-18 may be jeopardized by the enforcement of school rules relating to adults, most notably our policy of not allowing students who are more than 10 minutes late into class, Safeguarding takes precedence and under-18s are allowed in to class.

St Giles' student disciplinary code extends to excluding students from the school for more serious misdemeanours. Safeguarding takes precedence and we would not exclude an under-18 unless we had informed their parents and made provision for their safe return home. Please see the St Giles website for our full disciplinary code.

4.17 Use of Images

It is sometimes necessary to take photographs or videos of students for educational or publicity purposes. To ensure the safety of every student, the following procedures will be adhered to:

1. Adult students will be asked to give their consent for their photographs to be taken and their images to be used for school purposes. In the case of students under the age of 18 their parents/guardians will be asked to give permission. This is a parental choice and if no permission is received, then the pupils in question will not have photographs or videos taken of them.
2. When photographs are used for publicity purposes, for example on the school website the school will be mindful of the way students may appear in them, and will not include images which are in any way inappropriate, such as close-up portrait shots of individual students.

4.18 Sharing Nudes and Semi-nudes

The Safeguarding Lead keeps a document from The UK Council for Internet Safety offering advice on identifying and reporting risk in relation to nudes and semi-nudes.

If any member of staff has concerns relating to U18s sending, receiving or requesting nudes or semi-nudes then this should be immediately reported to the DSL. The DSL may seek further advice before acting.

All staff should note that the sharing of nudes or semi-nudes by an adult with an U18 constitutes child sexual abuse and should be reported to the police.

5. Sharing Information Regarding Child Protection

Good communication is essential in any organisation. At St Giles every effort will be made to assure that, should individuals have concerns; they will be listened to and taken seriously.

It is the responsibility of the management to ensure that information is available to, and exchanged between all those involved in this organization and its activities.

However, some information is confidential and should only be shared on a strictly need-to-know basis. Essentially, the School will take decisions on whether to share information based on the best interests of the child concerned. For example, if it is believed that sharing information with a certain party about a young person might lead that person being put in some form of danger then the information will not be shared with that party.

5.1. Children and young people

St Giles will act to ensure that young students have information about how, and with whom, they can share their concerns, complaints and anxieties. When sharing information, St Giles' personnel will be sensitive to the level of understanding and maturity, as well as to the level of responsibility, of the people with whom they are sharing information.

5.2. Parents

Parents / persons with parental responsibility are ultimately responsible for their children's welfare at all times, and they should be assured that their children are involved with a credible organisation. We achieve this by having a full copy of this Child Protection Policy available for anyone to view.

5.3. Staff

As an organisation, which works with children and young people, it is imperative that each member of the St Giles staff is aware of their responsibilities under the Child Protection legislation and has a working knowledge of St Giles procedures.

Each member of staff will receive training at induction. This training will include being given a copy of the school's child protection and safeguarding policy and completing a training module on child protection equivalent to a level one course. There will also be regular ongoing training sessions for all staff members.

Safeguarding will form a standing item on the agenda of all managerial level meetings in the School. In addition to this specific safeguarding and child protection meetings will be held throughout the year.

5.4. Other Bodies

A copy of our Child Protection Policy will be made available to any other appropriate body.

5.5. Safeguarding Governor

The Managing Director takes the strategic lead on safeguarding for the organisation.

6. What is Child Abuse?

Child Abuse is a term to describe a range of ways in which people harm children. Often the person is known and trusted by the child. All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

Child abuse is defined as, neglect, physical injury, sexual abuse or emotional abuse inflicted or knowingly not prevented, which causes significant harm or death. (NSPCC 1999)

6.1. Awareness of actual or likely abuse

Cases of abuse become apparent in a number of ways:

- A child may tell someone they are being abused.
- Someone may disclose that a child has told them, or they believe a child is or has been abused.
- A child may show signs of physical injury with no satisfactory explanation for its cause.
- A child's behaviour may indicate that it is likely he / she is being abused.
- A member of staff's behaviour or way he / she relates to a child causes concern.

6.2. Signs of neglect or abuse

Eating disorders, being withdrawn, aggression, being disruptive, absence, self harm, change of conduct, homesickness, not wanting to return home, being inattentive, lack of hygiene, clinging to staff etc. are just some of the possible signs.

6.3 Low-level concerns

A 'low-level' concern could be described as an action or behaviour towards a child that may not meet the threshold for reporting to the DSP or does not appear to cause a direct threat or harm to a child. However, 'low-level' concern does not mean that the action is insignificant,

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of the school; and/or
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

The Keeping Children Safe in Education Act states:

407. As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

408. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. **A member of staff who has a low-level concern should inform the Safeguarding Lead or Deputy Lead.**

Some examples of behaviour that may constitute low-level concern are as follows

- Being over friendly with students – including light touching
- Taking photographs of children on mobile phones
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate language or talking about inappropriate subjects

Allegations Vs Low-Level Concerns

Allegation	Behaviour which indicates that an adult who works with children has: <ul style="list-style-type: none"> • Behaved in a way that has harmed a child, or may have harmed a child • Possibly committed a criminal offence against or related to a child • Behaved towards a child in a way that indicates they may pose a risk or harm
Low-Level Concern	Any concerns that an adult may have acted in a manner which: <ul style="list-style-type: none"> • Is inconsistent with the organisations code of conduct • Relates to their conduct outside of work which caused a sense of unease or concern about their suitability to work with children
Appropriate Conduct	Behaviour which is entirely consistent with the organisation’s code of conduct, guidelines, and the law

7. Procedure for Reporting Allegations or Suspicions of Abuse

7.1. Responsibility of staff to report

It is not only the duty of St Giles staff but a legal requirement to disclose cases of abuse or allegations of abuse to the Designated Safeguarding staff without delay. **It is NOT for staff to decide whether or not a suspicion or allegation is true. All suspicions or allegations of abuse must be taken seriously.**

If a member of staff has suspicions, they should contact the Designated Safeguarding Person(s) or Lead in confidence. If a child or young person starts to talk to the staff member directly, they should allow that person to disclose and should allow them to continue talking following the guidelines below. They should then see the Designated Safeguarding Person in confidence.

Please note that if, at any point, there is a risk of immediate serious harm to a child and no designated safeguarding persons are available then a referral should be made to the relevant local authority's children's social care service immediately or the police should be contacted. Anybody can make a referral.

7.2. What to do if abuse is suspected or disclosed

- Never guarantee absolute confidentiality, as Child Protection will always have precedence over any other issue.
- Endeavour to meet the child in a semi-public or visible space if possible
- Listen to the child, rather than question him / her directly.
- Offer him / her reassurance without making promises, and take what the child says seriously.
- Allow the child to speak without interruption.
- Accept what is said – it is not your role to investigate or question.
- Do not overreact.
- Alleviate feelings of guilt and isolation, while passing no judgment.
- Advise that you will try to offer support, but that you must pass the information on.
- Explain what you have to do and who you have to tell.
- Record the discussion accurately, as soon as possible after the event,
- Use the child's words or explanations – do not translate into your own words, in case you have misconstrued what the child was trying to say.

7.3. Record keeping

All records, information and confidential notes should be kept by the Designated Safeguarding Lead in secure electronic files. Only the Designated Safeguarding Lead, the Designated Safeguarding Officers and the Director of Studies will have access to this information.

7.4. The Records

In any case where an allegation is made, or someone in St Giles has concerns, a record should be made. A template of the form to be used can be found in Appendix B. In addition to these full details must be recorded on the school risk register by the DSL or DSP(s). *Details must include, as far as practical:*

- Name of child or young person
- Age
- Home address (if known)
- Date of birth (if known)
- Name/s and Address of parent/s or person/s with parental responsibility
- Telephone numbers if available
- Is the person making the report expressing their own concerns, or passing on those of somebody else? If so, record details

- What has prompted the concerns?
- Include dates and times of any specific incidents
- Has the child or young person been spoken to?
- If so, what was said?
- Has any individual been identified in the allegation?
- If so, record details
- Who has this been passed on to, in order that appropriate action is taken? E.g. school Principal, Accommodation & Welfare officer, Director of Studies, local social services, police etc.
- Has anyone else been consulted?
- If so, record details
- ACTION TAKEN: this must be recorded.

Designated Safeguarding Persons

For reasons of confidentiality the only people who need to know this information are the appointed Designated Safeguarding Persons.

8. Further Action

8.1 Dealing with allegations of abuse committed by an adult

Once a statement has been collected from a student further questioning should be avoided unless it is to gain necessary clarification of factual detail. The Designated Safeguarding Lead and the Designated Safeguarding Officer will meet at the earliest possible opportunity to consider an appropriate course of action in response to the information revealed by the student and consider any other relevant information.

The School must ensure that the child is safe, supported and reassured. If/when it is safe, the child will return to their normal routine.

If an allegation refers to the Designated Safeguarding Lead, the Designated Safeguarding person should contact the Managing Director, Mark Lindsay on 020 78370404.

If an allegation refers to the Managing Director then the Safeguarding Lead should refer to the appropriate local authority.

The DSL will decide if it is appropriate to involve other members of the school staff, e.g. the Director of Studies, the Accommodation Co-ordinator at this stage, and also whether to inform the student's agent and parents. The DSL will contact the Local Safeguarding Board in Camden (LSCB) immediately. No decisions will be made on further action without referring to the LSCB.

The Managing Director should also be briefed of developments and further action may include the immediate removal of any imminent threat of danger, seeking advice from the Local Authority Designated Officer, contacting the police, or making a referral to the Disclosure and Barring Service (DBS) depending on the severity of the allegation.

The LSCB's role is to provide advice and guidance to schools dealing with allegations and, if necessary, to liaise with the police and other agencies and to monitor the progress of cases to ensure they are dealt with quickly and consistently. St Giles has a duty of care to its employees and will provide adequate support for anyone facing an allegation and provide them with a named contact if they are suspended.

There will be an initial discussion between the DSL and the Local Safeguarding Children Board (LSCB), at which some actions will be agreed:

- Immediate action to protect the child
- When and what parents should be told
- What should be said to the person(s) facing the allegation
- Whether the person(s) facing the allegation should be suspended

Suspension is not an automatic response and should only be considered where children are at risk of serious harm or the concern is so serious that it would result in immediate dismissal. If the person is suspended from their role or their study at the school, the reason must be communicated to them within one day.

The school must maintain confidentiality regarding the accused. Until any investigation, either internal or external, has been completed, the identity of the accused must not be released. If the allegation is unsubstantiated, unfounded or malicious, St Giles will support the member of staff on their return to work, especially if they have been suspended.

8.2 Dealing with allegations of abuse committed by a child

It may happen that the person being accused of abusing a child is also a child. In such circumstances the school has a duty of care to both children involved. The procedure is the same as for dealing with an allegation of abuse made against an adult but the school will take particular care to offer support and confidentiality to the alleged perpetrator.

The DSL will contact the Camden LSCB immediately. No decisions will be made on further action without referring to the LSCB.

8.3 Dealing with allegations against a St Giles student

It may happen that the person being accused of abusing a child is a student at St Giles, either an adult or a child themselves. In such circumstances the school has a duty of care to both parties involved. The procedure is the same as for dealing with an allegation of abuse made against an adult but the school will take particular care to offer support and confidentiality to the alleged perpetrator.

The school will ensure that the alleged victim is kept safe and the alleged perpetrator may be excluded from the school or asked to change class or homestay in order to avoid further contact with the alleged victim. The DSL will contact the Camden LSCB immediately. No decisions will be made on further action without referring to the LSCB.

8.4 Contacting the Local Safeguarding Children Board

The Camden Safeguarding Board can be contacted on: 020 7974 3317 (9am-5pm) and 020 7974 4444 (out of hours). A secure email address is available: lbcmarshadmin@camden.gov.uk.cjism.net and the address is: 9th Floor, St Pancras Square, London, N1C 4AC. Social workers have a maximum of 24 hours to make a decision about how to respond to a referral.

Contacts for other local authorities in London can be obtained from the following website: <https://www.londonscb.gov.uk/contacts/safeguarding-contacts/>.

8.5 Referrals to the Disclosure and Barring Service

A referral must be made to the DBS when the St Giles school: withdraws permission for an individual to engage in *work with under-18s* or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which does not involve contact with under-18s, because they think that the individual has:

- engaged in *relevant conduct*; i.e. action or inaction that has caused: neglect, emotional/psychological, sexual, or physical harm
- satisfied the *Harm Test*; to harm or cause harm, put a child at risk, attempt to harm or incite others to harm
- received a caution or conviction for a *relevant offence*

If these conditions have been met the information must be referred to the DBS.

The referral should be made to the DBS when the provider has gathered sufficient evidence as part of their investigations to support their reasons for withdrawing permission to engage in *work with under-18s* and in following good practice, consulted with their Local Authority Designated Officer (LADO) or Health and Social Care Trust Designated Officer if appropriate.

9. Prevent: Radicalisation and Extremism

9.1 Introduction

Prevent is a government-backed strategy designed to engineer a greater degree of social cohesion by tackling violent and non-violent extremism and to reduce the threat of radicalisation in our community.

In an ELT context we need to bear in mind that while international students can certainly benefit from a degree of integration into our local communities and from an awareness of British values and characteristics, they are under no obligation to integrate or to adopt these values and characteristics. The vast majority of students come to the UK to improve their level of English for instrumental reasons: employment, study, participation in the global world and for relatively short periods of time.

We should also be sensitive to the fact that language is not free from its relationship with power and that the English language has had its associations with notions of empire and hegemony. This is one reason why our industry has always been very sensitive to issues of identity and intercultural harmony.

Students and indeed members of staff should, however, respect core British values, follow the laws of this country and refrain from the promotion of radical and extremist views and acts. Our role is to challenge intolerance, to encourage open debate and critical thinking and to identify and protect any individuals who may be at particular risk from radicalisation.

9.2 Definitions for Extremism and Radicalisation

Extremism involves the creation of a narrative that mixes fact with assertions, subjective opinion and emotion to justify actions that promote violence, intolerance and separation. An extremist narrative does not allow for alternative interpretations and denies contradictory factual evidence or analysis and exploits people's fears or lack of understanding of others.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

9.3 The Notion of Core British Values

The government has attempted to articulate a set of values that exemplify core values that should be shared in this country. Many of these values are actually shared with societies from around the world. We have attempted to show below how these values are exemplified in our own language teaching context.

9.3.1 Democracy

This is respect for democracy and support for participation in the democratic process. Students have a voice in the classroom and are encouraged to listen respectfully to others. They are also expected to be active participants in the classroom and to share in the decision-making process.

9.3.2 Rule of Law

This is the belief that social justice and fairness are built on the rule of law. We stress that students should obey the laws of this country and stress that the school rules are

for everyone to follow. They keep everyone safe and create an environment in which learning can be achieved.

9.3.3 Individual Liberty

This includes the freedom and space to have ideas and to think and the freedom of expression. Free expression comes with responsibilities, however, and is conditional on showing mutual respect for other people. We encourage individuals to think independently and to take responsibility for actions that may impact upon others.

9.3.4 Mutual Respect and Tolerance

This captures notions that run core to our industry's values and are essential for an environment with 70+ different cultures and nationalities. We believe in a tolerant and open society where respect is shown to other people's different cultural identities, faiths and beliefs, and their right to make their own choices about how they live their lives.

9.4 The Prevent Officer

The Prevent lead for this school is **Thomas Borrie** (Principal)

The Prevent Officer is responsible for the following:

- To liaise with the other Prevent Officers in the St Giles group
- To represent the School to external bodies such as the police, local safeguarding authorities and local Prevent partnerships
- To be responsible for the training and support of all staff concerning the Prevent Agenda
- To contribute to the further development of the school's policies and strategies
- To stay abreast of causes of local and international tensions and inform staff of developments and likely flashpoints
- To act as a primary point of contact for staff and students for advice and guidance
- To report to the Managing Director in a timely fashion on any important issues raised in the School concerning the Prevent Agenda

9.5 Prevent Training for Staff

All members of St Giles staff and host families to undergo appropriate training on Prevent as part of their induction process. Mandatory basic training is provided by the Education and Training Foundation at: www.foundationonline.org.uk. Training has been tailored for all possible roles within the school. A record of this training is maintained on the School's Single Central Record.

Additional specialised training has also been developed for staff. In-house training materials have been developed and delivered for teachers to provide teachers with practical class management techniques that will make them feel more comfortable about recognising and responding to the discourse of extremism in class. There are also sessions on how to exemplify core British values in the classroom and also to develop critical thinking skills among students.

The following signs may be evidence that an individual is becoming vulnerable to radicalisation. If members of staff observe any of these signs they should forward such concerns to the school's safeguarding team.

- problems fitting in
- lack of friends
- mental health issues
- cultural alienation
- behavioural change, becoming withdrawn
- close friendship with someone significantly older
- refusal to accept evidence which challenges their ideas

9.6 Prevent Awareness for Students

Prevent training forms an important part of the school's induction routine for new students. Students are introduced to the core British values by the Principal. The thrust of the session is to show how society and the school are in harmony in the promulgation of these values and how these values also apply to the School environment. This brief introduction is followed up by a model lesson which is based on these values and introduces new students to life in the UK.

The average length of study for a student at the school is under six weeks and the school operates a system of continuous enrolment so the fluidity of the student body means that core values are modelled in the classroom by the teacher and Core values poster is used as an aid. The school has developed a small bank of materials for teachers to use if any issues of intolerance and extremism arise and teachers are encouraged to draw upon a bank of materials that develop critical thinking skills.

The school has also offered a number of optional discussion sessions for students on a number of issues such as the EU Referendum, the General Election and politics in the UK and offers a range of social and cultural integration activities and trips.

9.7 Visiting Speaker Policy

It is a requirement under Prevent that the content on any speeches or workshops which are organised by St Giles on behalf of staff or students and delivered by individuals who are not directly employed by the school are screened in advance to check whether any content could lead to the potential radicalisation of any participants.

The school only seldom invites external speakers to attend but this may include speakers at the annual management and teachers' conference, external professional development trainers for staff, speakers as part of the Teacher Tuesday Club, activities as part of the social programme, and occasional talks for students.

Guest speakers should be advised that they must disclose the full content of any sessions at least two weeks prior to the event. The member of staff who has organised the activity must compile a brief written risk assessment for the event and submit this profile for approval by the Prevent Officer. If the Prevent Officer is in any doubt about a speaker he may wish to contact the local Channel representatives or the Prevent department at BIS for further advice. Disputes will be arbitrated by the Principal.

The organiser or a nominated representative of the organiser must be present for the duration of the activity. Sessions must contain a balance of views and the opportunity for participants to challenge any assumptions.

9.8 Multi-Faith Prayer Room

The School does not offer dedicated prayer room facilities for students. Insufficient human resources are available to adequately supervise this room, there has not been a wide demand for such a room and there are great pressures on space in the building.

Students are welcome to exploit a classroom for the purposes of prayer if they find that it is free. A list of appropriate places of worship is provided to students in the student guide which they receive prior to their programmes.

9.9 E-Safety

The main risks to students include online grooming via social media and possible exposure to extremist literature and images online. A number of measures have been implemented to help counter these threats.

Firstly, the school has a firewall which provides a web filtering service. The system responds to pre-programmed algorithms and high-risk websites and denies access to the user. The attempted access is reported to the IT supervisor. The filter is updated on a continual basis.

The IT supervisor can also remotely monitor internet logs from every PC and checks unusual usage on a routine basis.

The School provides PC access for student use in the self-access centre. This area is a public space and care has been taken to position the PCs in areas where the screens are easily visible to other students and members of staff.

9.10 Referrals

A referral into the Channel process will be considered where there is a serious concern about a vulnerable student being drawn into violent or extremist behaviour. If any member of staff has such concerns, they should activate established safeguarding procedures, detailing their concerns to the Prevent Officer. The Prevent Officer will consult with the Safeguarding Lead to decide whether the concerns are sufficiently serious to move on to a referral.

Where the decision is made to refer, the Prevent Officer will contact the local authority Prevent Regional Co-ordinator to initiate the referral process. The current contact details are as follows:

<p>Chris Bowles chris.bowles@camden.gov.uk</p>	<p>Kat Cooper kat.cooper@camden.gov.uk or</p>
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<p>chris.bowles@camden.gov.uk.cjism.net</p> <p>020 7974 3672 07769 282 759</p>	<p>kat.cooper@camden.gov.uk.cjism.net</p> <p>020 7974 4706 07500 050891</p>
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If the Regional Co-ordinator is not available, an approach should be made directly to the local authority.

9.11 Developing resilience: Identification of risks and proposed actions

This section outlines the strategies that the school is using to fulfill its obligations under Prevent and to safeguard both students and members of staff.

Nature of Risk	Where or Who is affected	Specific actions to be taken
Exposure to extremist narratives	Leadership	<ul style="list-style-type: none"> The School will project an ethos that promotes a climate of respect for human rights, equality and freedom under law. All students receive information from the Principal as part of their induction about the importance of core British value and how these are exemplified in the school.
	Staff and Students	<ul style="list-style-type: none"> Allow perceived grievances to be aired and promote the values of conflict resolution Challenge unacceptable behaviour such as racism or bullying that can impact on the well-being of individuals and groups Provide training and support to staff to help them gain confidence in challenging views that threaten freedom of speech or freedom from harm. Develop teaching approaches that are conducive to dealing with controversial topics by promoting open respectful dialogue, affirming multiple dynamic identities, debating fundamental moral and human rights principals and ensuring freedom of expression and freedom from threat. Ensure that diverse views can be heard When discussing potentially divisive issues, teachers and staff are encouraged to present, and explore a range of examples of lifestyles, religious, political or cultural viewpoints without espousing a particular ideology or dogma
	Multi-faith prayer room.	<ul style="list-style-type: none"> The school does offers a prayer room facility to students although vacant classrooms may be used for this purpose where available. This limits the risk of one faith or language group potentially dominating the room and which would make adequate supervision very difficult. A list of places of worship is provided to students in the pre-course materials
	Third party venue hire arrangements	<ul style="list-style-type: none"> Agents and intermediaries that hire our classroom space for the purposes of meetings are made aware of Prevent and the need to adequately vet the parties that are taking meeting space in the building. Meeting participants must limit their movement in the building and are identified by their red lanyards. Such participants are encouraged not to fraternise with students.
	External Speakers	<ul style="list-style-type: none"> A profile of the external speaker and a risk assessment of the content of sessions to be delivered to students or staff onsite must be compiled by the organiser and submitted to the Prevent officer for approval a minimum of two weeks before the event is due to take place. The Prevent Officer may wish to seek further advice from BIS or the local Channel representative. A list of known terror groups is outlined: https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2
	Curriculum and environment	<ul style="list-style-type: none"> All students receive a lesson on Core British Values There are posters in every classroom to enforce the message of Respect and Core British Values. Teachers are encouraged to make reference to these posters as and when specific circumstances arise. Ensure that the curriculum allows space for the debate and

		<p>structured and balanced handling of potentially contentious issues</p> <ul style="list-style-type: none"> •Ensure that the curriculum embraces different identities, diversity, and co-operation •Stimulate a climate of learning with enquiring minds critically engaging with the important themes that affect the world today •Model how peaceful action has achieved results at local, national or international levels •All external stakeholder companies that use the premises receive a code of conduct which specifically forbids any inappropriate contact with students and makes them aware of their duties and responsibilities with regard to all aspects of safeguarding, including the Prevent agenda.
	Homestay accommodation	<ul style="list-style-type: none"> •Ensure homestay hosts are aware of Prevent and have completed the online training run by the Education and Training Foundation. Prevent will also be outlined at the annual homestay gathering which is usually held in the autumn. •The school monitors student feedback closely after the first week and at the end of the course. •Every new homestay host is carefully screened and required to undertake a DBS check. The property is visited by the homestay coordinator before being approved to be a suitable environment for students. Homestays are normally inspected every two years.
	The Prevent Officer	<ul style="list-style-type: none"> •Inform the police when necessary •Provide appropriate training and advice for members of staff •Ensure that staff know what the current issues and causes of tensions might be among different groupings of the student body
	Online	<ul style="list-style-type: none"> •Develop critical skills in managing harmful media and internet communication •Develop and promote a set of e-safety guidelines for students •Monitor for students accessing extremist material online including through social media sites

The threat of becoming radicalised	Leadership	<ul style="list-style-type: none"> •Control the promulgation of the extremist narrative (see above) •Promote inclusiveness
	Staff	<ul style="list-style-type: none"> •All members of staff are trained to recognise potential vulnerability to and warning signs of extremist radicalisation •Advise members of staff to monitor relationships that develop where there is a sizeable age gap or other difference between individuals where one of the parties is potentially vulnerable •Monitor for reports of changes in behaviour and evidence of withdrawal. Teachers often have considerable contact with students which usually entail 3 lessons x 5 days per week and so are able to monitor students' behaviour closely. •Encourage staff to report any concerns to the Prevent Officer as a matter of urgency. •Encourage teachers to exploit the fortnightly one-to-one meetings to monitor for changes in behaviour of students and probe any extreme comments.
	Curriculum and environment	<ul style="list-style-type: none"> •Encourage all students to be able to think critically for themselves and to take responsibility for their actions. The school is to make a bank of material available for the use of teachers and deliver Teacher Development sessions on the topics. •Model how students can express their views in the classroom and how to solve problems positively •Enable students to explore their own identities and how these relate to the diversity of global society
	Accommodation	<ul style="list-style-type: none"> •All homestay providers to be trained to recognise potential vulnerability to and warning signs of extremist radicalisation •All homestay providers to be made aware of their

		responsibility to embody Core British Values •Ensure that adults and under 18s are not accommodated in the same homestay
	Online	•Develop critical skills in managing harmful media and internet communication •Develop and promote a set of e-safety guidelines for students

The risk of being put at harm from physical or emotional abuse	Leadership	•Promulgate and enforce the School's anti-bullying policy and equality and discrimination policies •Ensure there is good flow of information between different stakeholder groups and include safeguarding and potentially vulnerable students as a standing item on the agenda of all meetings
	Staff	•Advise staff to be observant for signs of harassment, bullying or intimidation especially during one-to-one feedback sessions •Ensure that staff are aware of the other members of staff that have designated responsibility for ensuring the welfare of students •Ensure that there is space for safeguarding and welfare for every inter-departmental meeting to enable staff to gain an accurate and rounded impression of a student in order to assess ongoing vulnerability.
	Students	•Ensure they know who talk to if they are at risk of physical harm or abuse. Students are informed of the identity and roles of key personnel in induction. There are 'Who to talk to' posters on each floor of the building and in the study guide.
	Curriculum and environment	•Include information on student welfare policies is included in the student guide and on the website •Ensure that the appointed designated safeguarding officers and student welfare officers have good accessibility and are well known to all students.
	Accommodation	•Ensure that homestay providers that accommodate young people undertake basic safeguarding training
	Prevent Officer	•Inform the police when necessary

Tension between different groupings or segregation that leads to isolation	Leadership	•Academic management need to ensure that there is a good nationality mix in each class
	Staff	•Recommend the frequent use of pair and group activities within the classroom and provide variation within these groupings •Ensure that there is space for safeguarding and welfare for every inter-departmental meeting to foster communication and information sharing •The Prevent Officer will provide briefings and alerts for staff on significant regional issues and tensions so that staff can anticipate and identify the potential for flashpoints and conflict. •Maintain a reporting system for absence and irregular attendance which can be a sign of growing isolation and have a dedicated member of staff (receptionist/registrar) to follow up concerns •Provide focused welfare support to students who are identified as being at risk of becoming isolated
	Students	•Ensure they know who talk to if they are at risk of physical harm or abuse. Students are informed of the identity and roles of key personnel in induction. There are 'Who to talk to' posters on each floor of the building and in the study guide.
	Accommodation	•Enforce group policy of not accommodating the same nationalities or language groups together in homestay accommodation

	Curriculum and environment	<ul style="list-style-type: none">• The curriculum should promote shared values and diversity within communities• Ensure the availability of an inclusive social programme to encourage students to make friends and interact with other students
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10.0 Whistleblowing Policy

St Giles International is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other stakeholders in St Giles to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. St Giles has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by St Giles nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside St Giles.

10.1 Scope of Policy

This policy is designed to enable employees of St Giles to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

Financial malpractice or impropriety or fraud
Failure to comply with a legal obligation or Statutes
Dangers to Health & Safety or the environment
Criminal activity
Improper conduct or unethical behaviour
Attempts to conceal any of these

10.2 Safeguards

a. Protection

This policy is designed to offer protection to those employees of St Giles who disclose such concerns provided the disclosure is made:

- In good faith
- In the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

b. Confidentiality

St Giles will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

c. Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of St Giles.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable

sources

d. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

10.3 Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes notes of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

Complaints of malpractice will be investigated by the Principal unless the complaint is against the Principal or is in any way related to the actions of the Principal. In such cases, the complaint should be passed to the Managing Director for referral.

In the case of a complaint, which is any way connected with but not against the Principal, the Managing Director will nominate a Senior Manager to act as the alternative investigating officer.

Complaints against the Managing Director should be passed to the Chairman who will nominate an appropriate investigating officer.

The complainant has the right to bypass the line management structure and take their complaint direct to the Chairman. The Chairman has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

Should none of the above routes be suitable or acceptable to the complainant, then the complainant may approach one of the following individuals who have been designated and trained as independent points of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them:

If there is evidence of criminal activity then the investigating officer should inform the police. St Giles will ensure that any internal investigation does not hinder a formal police investigation.

10.4 Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

10.5 Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of St Giles auditors and the Police at this stage and should consult with the Chairman / Managing Director.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Managing Director or Chairman as appropriate.
- The Managing Director / Chairman will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to the company auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Managing Director / Chairman, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, St Giles recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.

Additional Resources

1. A free safeguarding and child protection awareness course by Nigel Heritage
<https://galleryteachers.com/service/safeguarding-basic-awareness-course/>
2. Camden Safeguarding Children Board
http://www.cscb-new.co.uk/?page_id=5175
3. The Safe Network provides safeguarding information related to activities outside the home.
<http://www.safenetwork.org.uk/Pages/default.aspx>
4. Further information about child abuse. The NSPCC also provide weekly alerts and carry training materials on their website.
www.nspcc.org.uk/preventing
5. British Council guidance on under-18s
<http://www.britishcouncil.org/education/accreditation/information-centres/care-children>
6. A free and confidential helpline for children
www.childline.org.uk
7. Further information about Female Genital Mutilation (FGM)
<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/>
8. UK Safer Internet Centre - This site contains advice on how to use the internet and new technologies safely and responsibly.
www.saferinternet.org.uk
9. Further information about Child Sexual Exploitation
<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/>
10. To download a copy of the government's policy on 'Keeping Children Safe in Education'
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
11. Further information on Prevent
<http://www.preventforfeandtraining.org.uk/>
12. Free online training on Prevent
<https://www.foundationonline.org.uk/>

13. IT advice for Prevent from Joint Information Systems Committee

www.jisc.ac.uk

14. Prevent - This is a list of all of the current known terror groups

<https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2>

15. Prevent – useful training materials for schools

http://www.preventforschools.org/index.php?category_id=86

16. A monthly newsletter on safeguarding by Nigel Heritage

<https://galleryteachers.com/profile/nigel-heritage/>

Children Act 1989

Appendix A: Declaration regarding suitability to work with children

To be signed by the all adult members (18+) of the household or regular visitors.

Full Name:

Date of Birth:

Home Address:

Have you ever:

1. Been convicted of any offence?	YES	NO
2. Had a child removed from your care by order of Court?	YES	NO
3. Had a prohibition imposed on you at any time?	YES	NO
4. Been disqualified from acting as a foster parent?	YES	NO
5. Been proved negligent whilst supervising under-16s on activities / courses organised by any other organisation?	YES	NO

If you have answered 'YES' to any of the above questions, please supply the dates and circumstances.

Date	Circumstances

Please note that this homestay will be deemed unsuitable for the accommodation of under-18s if you are on a DBS barred list. You will also be breaking the law if this application is continued.

Section 70(a) of the Children Act 1989 provides that a person who makes any statement in this notice or gives any information which s/he knows to be false or misleading, shall be guilty of an offence.

I understand that a Disclosure and Barring Service (DBS), previously CRB, enhanced check for previous convictions may be required and I agree to comply with any request from St Giles International for such a check to be undertaken subject to the Rehabilitation of the Offenders Act 1974 and exemption orders.

Signed:

Date:

L

Appendix B: Safeguarding Incident and Allegations Report Form

Reporting section details

Name of reporter:	
Role of reporter:	
Investigating manager:	

Details of person concerned

Name of person concerned:	
Nationality:	
Date of birth (if known)	
Gender:	
Present address (if known)	
Email address:	
Telephone number:	
Name and address of parent or person with parental responsibility (For under 18):	

The Nature of the incident

How did the issue come to light?	
Time and date of incident:	
Location of incident:	
Factually describe what was disclosed or observed. <i>(Please record with whom you spoke and why, time and date):</i>	
Witnesses <i>(include contact details)</i>	
Contextual information <i>(Is there anything that you have observed or know that may assist in understanding the concerns?)</i>	

<p>Any further findings <i>(Based on follow up investigation)?</i></p>	
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Actions

<p>What immediate actions have been taken? <i>(e.g. removal from harm)</i></p>	
<p>Further action points arising from investigation? <i>(Responsibility/timeframe)</i></p>	
<p>Who has been notified (internally) about this incident, how and when? <i>(Parents, agent, Principal, Managing Director, etc?)</i></p>	
<p>Which external agencies (if any) have been notified about this incident, how and when?</p>	

Signed:

Date:

Appendix C: Prevent – Risk Assessment for Visiting Speakers

This form should be completed by the organiser of the event and submitted for approval from the Prevent Officer not later than two weeks before the planned activity.

Date of Application		Date of Proposed event	
Name of Staff Organiser of event		Name of Prevent Officer	
Name of Invited Guest Speaker		Session Title	
Aim of the session		Description of materials submitted	
Name and Address of organisation of Guest Speaker		Anticipated audience	
Name of the member of staff to be present at event			
<p>To be completed by the Event Organiser: Please state the extent of the risk for any promulgation of extremist rhetoric and the potential threat of radicalisation that may be faced by staff or students:</p>			
<p>Is any further action required?</p>			
<p>To be completed by the Prevent Officer: Please state the action to be taken and sign and date this decision.</p>			

Appendix D – Code of Conduct for Visitors and Service Providers

1. All visiting individuals that use St Giles classroom space are obliged to sign in at reception on arrival to the building and will wear identifying badges or wristbands for the duration of their stay in the building. Individuals must sign out at reception before leaving the building.
2. Visitors are advised to check that that main door closes behind them when they arrive and leave the site.
3. All organisations that either directly hire classrooms or act as intermediaries to use classrooms at Southampton Row must be familiar with the Prevent Agenda and have policies in place that ensure that the premises are not used by extremist organisations to further the cause of radicalisation. Stakeholder organisations are encouraged to undertake a basic online awareness course.
4. The School reserves the right to terminate any classroom bookings or contracts if it has significant concerns about the nature of any behaviour or actions on the part of the client that have the potential to harm the School's reputation or bring the School into disrepute.
5. Individuals who have booked classrooms are expected to remain in the general vicinity of their designated classroom.
6. Visitors are forbidden from seeking contact with any of our student population at any time.
7. All individuals who are onsite on a regular basis during designated teaching periods where students are on the premises (M-F, 09.00-18.00) must provide evidence to the School that they have completed an enhanced DBS check (Disclosure and Barring Service). *Regular* is defined as an activity that is carried out by the same person either weekly or on 4 or more days in a 30 day period.
8. The School caters for adults aged 16 years and above. The School environment is not suitable for use by under-16s and any under-16 year old visitor must be accompanied by an adult at all times whilst on the premises.
9. All facilities (computers, projectors, photocopiers, blinds) should be treated with care and left in a fully functioning state. Any faults or issues must be reported to a member of staff at the earliest possible opportunity.
10. All rooms must be left in the state they were found, i.e. cleanliness, tidiness and room arrangement.

11. ICT usage must be safe, responsible and legal. No ICT device, whether School provided or personally owned, may be used for the bullying or harassment of others in any form.
12. Intimidating, loud, rude or offensive behaviour or language is not permitted.
13. Visitors and service providers are expected to be courteous to school staff at all times.
14. For your personal security, do not leave any items of value unattended whilst on site.
15. If you have any security, child protection, health and safety or safeguarding concerns please report these immediately to a member of staff.
16. Smoking (including electronic cigarettes) and consuming alcohol or illegal substances is not permitted nor is accessing the site whilst intoxicated or under the influence of drugs.
17. Visitors are expected to dress appropriately while on premises. This includes not wearing shorts and a shirt should be kept on at all times.
18. All companies must read and follow the Emergency and First Aid procedure. Do not block fire doors or fire routes, leave the building immediately if the fire alarm sounds, and obey any instructions issued by designated fire marshals. The fire assembly point is at Queen's Square.
19. If you feel unwell or sustain a minor injury onsite report this to reception. Any injuries need to be logged in the school's accident book.
20. Service providers are expected to maintain the highest standards of integrity and enthusiasm and provide a friendly, polite, personable and professional service to our students in keeping with the high standards set by the St Giles International Group.

Safeguarding Contacts London

In the case of an emergency or immediate threat of harm, always call 999

Barking & Dagenham

Telephone: 020 8227 3811
Out of hours: 020 8594 8356
Secure Email: childrensservices2@lbbd.gov.uk

Barnet

Telephone: 020 8359 4066
Fax: 08715948766
Email: MASH@Barnet.gov.uk
Secure Email: mash@barnet.gcsx.gov.uk

Bexley

Telephone: (Mon-Fri, 9am – 5pm) 020 3045 5440
Out of hours: 020 8303 7777 / 020 8303 7171
Secure Email: Childrensocialcare.admin@bexley.gov.uk

Brent

Telephone: 020 8937 4300
Out of hours: 020 8863 5250
Fax: 020 8397 1986
Secure Email: Family.FrontDoor@brent.gov.uk
Web link: <https://www.brent.gov.uk/services-for-residents/children-and-family-support/child-protection-and-care/child-protection/contact-our-protection-team/>

Bromley

Telephone: (Mon-Fri 8.30 5.00pm) 020 8461 7373 / 7379 / 7026
Out of hours: 0300 303 8671
Email (MASH): mash@bromley.gov.uk

City of London

Telephone: 020 7332 3621 (9.00am- 5.00pm, Mon – Fri)
Out of hours: 020 8356 2710
Email: children.duty@cityoflondon.gov.uk
Secure email: Children.Duty@cityoflondon.cjism.net

Camden

Telephone: 020 7974 3317 (9.00am- 5.00pm)

Out of hours: 020 7974 4444

Email: LBCMASHadmin@camden.gov.uk or cscp@camden.gov.uk

Secure email: LBCMASHadmin@camden.gov.uk.cjsm.net

Croydon

Croydon MASH Team

Tel: 020 8726 6400

Email: childreferrals@croydon.gov.uk

Ealing

Telephone: 020 8825 8000

Out of hours: 020 8825 8000

Fax: 020 8825 5454

Email: ECIRS@ealing.gov.uk

Enfield

Telephone: 020 8379 5555

Out of hours: 020 8379 1000

Email: spoe@enfield.gov.uk

Secure Email: spoe@enfield.gcsx.gov.uk

Greenwich

Telephone referrals: 020 8921 3172 (Mon-Thur, 9.00-5.30pm, Fri 9.00-4.30pm)

Out of hours: 020 8854 8888

Fax: 020 8921 3180

Secure Email: MASH-referrals@royalgreenwich.gov.uk

Hackney

Hackney First Access Screening Team (FAST)

Telephone: 020 8356 5500

Out of hours: 020 8 356 2710

Fax: 020 8356 5516 / 17

Email: fast@hackney.gov.uk

Secure Email: fast.account@hackney.cjsm.net

Hammersmith and Fulham

Telephone: 020 8753 6600
Out of hours: 020 8748 8588
Fax: 020 8753 4209
Email: familyservices@lbhf.gov.uk

Haringey

Telephone: 020 8489 1472 / 3145 / 4514
Out of hours (SPA): 020 8489 0000
Fax: 020 8489 1251
Secure Email: lscb@haringey.gcsx.gov.uk

Harrow

Telephone: 020 8901 2690
Out of hours: 020 8424 0999
Fax: 020 8861 1816
Secure Email: duty&assess@harrow.gov.uk.cjism.net

Havering

Telephone: 01708 433 222
Out of hours: 01708 433 999
Fax: 01708 433 375
Email: tmash@havering.gov.uk
Secure email: tmash@havering.gcsx.gov.uk

Hillingdon

Telephone: 01895 556633
Out of hours: 01895 556633
Email: lbhmash@hillington.gov.uk

Hounslow

MASH Office number: 0208 583 4303
Safeguarding Referral line: 0208 583 6600
Out of hours: 020 8583 2222
Children's referral email: childrensocialcare@hounslow.gov.uk
MASH email: MASH@hounslow.gov.uk

Islington

Telephone: 020 7527 7400
Out of hours: 020 7226 0992
Email: CSCreferrals@islington.gov.uk
Secure Email: CSCT@islington.gcsx.gov.uk

Kensington and Chelsea

Telephone: 020 7361 3013
Out of hours: 020 7373 3227
Fax: 020 7368 0228
Email: socialservices@rbkc.gov.uk

Kingston Upon-Thames

SPA Team (Open 8.00-6.00 pm, Mon-Fri)
Telephone: 020 8547 5008
Out of hours: 020 8770 5000
Secure Email: spa@kingston.gov.uk.cjsm.net

Lambeth

Telephone: 020 7926 5555 (24 hours)
Email: helpandprotection@lambeth.gov.uk
Secure Email: helpprotection@lambeth.cjsm.net

Lewisham

Telephone: 020 8314 6660
Out of hours: 020 8314 6000
Secure Email: mashagency@lewisham.gov.uk

Merton

Telephone: 020 8545 4866/3736
Out of hours: 020 8770 5000
Fax: 020 8545 4198
Email: mertonLSCB@merton.gov.uk
Merton MASH: 020 85454227 (Out of Hours: 020 8770 5000)
Secure Email: MertonLSCB@merton.gov.uk.cjsm.net

Newham

Telephone: 020 3 373 4600
Out of hours: 020 8430 2000
Fax: 020 8430 1003
Secure Email: ChildrensTriage@newham.gcsx.gov.uk

Redbridge

Telephone: 020 8708 3885
Out of hours: 020 8708 5897 (after 5.00pm and weekends)
Email: cpat.referrals@redbridge.gov.uk

Richmond

SPA Team (8.00-6.00pm, Mon-Fri)

Telephone: 020 8547 5008

Out of hours: 020 8770 5000

Secure Email: spa@richmond.gcsx.gov.uk

Southwark

Telephone: 020 7525 1921

Out of hours: 020 7525 5000

Fax: 020 7525 7992

Secure Email: MASH@southwark.gov.uk

Sutton

Telephone: 020 8770 6001

Out of hours: 020 8770 5000

Email: mash@sutton.gov.uk

Secure Email: mash@sutton.gov.uk.cjism.net

Tower Hamlets

Telephone: 020 7364 5606 / 5601

Out of hours: 020 7364 4079

Fax: 020 7364 2656 / 2655

Email: MASH@towerhamlets.gov.uk

Secure Email: MASH@towerhamlets.GCSX.gov.uk

Waltham Forest

Telephone: 020 8496 2310

Out of hours: 020 8496 3000

Fax: 020 8496 2313

Secure Email: MASH_requests@walthamforest.gov.uk

Wandsworth

Telephone: 020 8871 6622

Out of ours (after 5pm): 020 8871 6000

Email: IPOC@wandsworth.gov.uk

Secure Email: ipoc@wandsworth.cjism.net

Westminster

Telephone: 020 7641 4000

Out of hours: 020 7641 6000

Fax: 020 7641 7526

Email: accesstochildre services@westminster.gov.uk