



**St Giles**  
*juniors*

## **St Giles Juniors**

**Bournemouth • Brighton • Cambridge  
Canterbury • London • Windsor • Oxford**

# **Safeguarding & Child Protection Policy 2022**

**For all St Giles Family Courses and  
St Giles Juniors Residential Summer Courses**

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## **1.0 Introduction & Policy Statement**

### **1.1 Context within St Giles Juniors**

St Giles Juniors offers young learners aged 5-19 from all over the world an educational and fun programme in a secure environment whilst in the UK. We operate 6 residential centres located in Brighton, Canterbury, London, Windsor, Bournemouth and Oxford. We also operate the junior component of the St Giles Family Courses in Brighton, Cambridge and London, the adult provision is provided by St Giles International's year-round adult centres.

Caring for children and young adults means we need to think of everything. We offer a complete package programme for our residential students. This includes: safe activities and excursions, close supervision, staff on call 24-hours a day in our suitable accommodation and travel and medical insurance.

St Giles International is committed to a practice which protects children from harm and helps them to be the best young person they can be. This Safeguarding Policy is sent out to all Juniors staff working in the UK before they commence employment and this is intended to be used as a reference throughout the Summer course for staff and managers and any other stakeholders. A printed copy will be present in all staff rooms and/or offices, as appropriate. This policy will be reviewed by the Director of Juniors in January each year and will be reviewed in light of the previous Summer in addition to changes that may need to be made for the next summer. Part of the review will be to take into consideration staff, student and other stakeholder's feedback.

Stef McLoughlin, the Director of UK Juniors, is the Strategic Lead and Designated Safeguarding Lead across all locations and centres. Our Operations Manager for the UK is the senior Designated Safeguarding Officer across all locations and Centres. Each Centre Manager acts as a local Designated Safeguarding Officer in each location.

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### 1.2 We Endeavour to Safeguard Children in our Care

St Giles Juniors believes that all children have potential and that every child matters, anywhere in the world. St Giles Juniors affirms the position that all children have the right to be protected from all forms of abuse as set out in article 19, UNCRC, 1989. This applies equally to all under 18s irrespective of their race, gender, physical appearance, disability, nationality, sexual orientation, age and religion.

St Giles Juniors' Safeguarding standards incorporate the following three elements:

- Developing and implementing procedures for an appropriate and measured response to welfare and safeguarding concerns
- Developing and implementing procedures for safer recruitment
- Raising awareness of safeguarding issues and best practice amongst our staff, managers and students

St Giles Juniors has a legal duty of care to all of our students, especially those who are under 18 years of age. In England the law states that people who work with children have to keep them safe. This safeguarding legislation is set out in The Children Act (1989) and (2004). It also features in the United Nations Convention on the Rights of the Child (to which the UK is a signatory) which sets out the rights of children to be free from abuse. The Government also provides guidance in their document Working Together to Safeguard Children 2013.

St Giles Juniors will be guided in its safeguarding procedures by:

- Best practice and our commitment to excellence in the care of under 18s
- Legal responsibilities under UK law in the care of under 18s
- Requirements of the Accreditation UK scheme

Safe and successful provision for students under 18 is most often found where there is a strong ethos of care and managers have established sound safeguarding practices in line with clear procedures which are based on the above legal requirements and government guidelines.

Safeguarding is every member of staff's responsibility and ensuring the safety and well-being of students is a daily event. Safeguarding should be considered regularly in relation to issues such as: happiness, health, hygiene and safety. Child protection is a very specific area of Safeguarding and will be handled by a small number of people when such a situation arises. Child protection situations are less common.

All adults working with children with St Giles Juniors are interviewed and vetted to ensure they are committed to the safety and well-being of the children they come into contact with. All staff sign to say they agree and will uphold all aspects of this policy and continue to its development.

One of our core values at St Giles Juniors is that we welcome students from all backgrounds and will not permit discrimination by students or staff on the grounds of religion, gender, sexual orientation, or ethnicity. In addition, even greater sensitivity will be shown to students who are arriving in the UK from territories currently in the midst of internal or international conflict.

### 1.3 Terminology

**Child Protection:** means protecting children from harm and abuse. St Giles Juniors recognises the definition of abuse used by the World Health Organisation:

"Child abuse' or 'maltreatment' constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other

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exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power."

**Duty of Care:** connected to safeguarding, is a legal responsibility that adults who work with children as professionals or volunteers have a duty to look after them properly; and be aware that children depend on adults for their safety and well-being.

**Regulated Activity:** the term most commonly used to describe roles where suitability and criminal record checks are required by law, which includes all roles involving responsibility for or substantial access to under 18s. Regulated activities most applicable to ELT providers are teaching; leisure programme supervision; general care or supervision (e.g. by a group leader, home-stay host or residential staff). All roles with St Giles Juniors are classified as regulated activity as they give the individual the opportunity to have unsupervised contact with children.

**Safeguarding:** means caring for children appropriately and ensuring they grow into happy and healthy young adults as well as preventing anything which is not in their best interests; it includes health and safety, child protection and pastoral care.

**Safeguarding Designated Person:** a named senior manager who has overall oversight of any child protection issues and will be involved with any major decisions. This person is the Juniors' Director of Studies, Stefania McLoughlin.

**Safeguarding Officer:** a named person who looks after day to day matters, training and recording systems. This person is usually the Centre Manager, Director of Studies and the Activity Manager.

**Safer Recruitment:** recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children; this is an essential part of safeguarding. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to children in order to harm them.

**Suitability Checks:** checks made to identify any known reasons a person would be considered unsuitable to work with under 18s, such as a criminal record check.

In England the primary criminal record disclosure service is the DBS (Disclosure and Barring Service), which conducts searches through police records (the Police National Computer and other data sources) and maintains the barred lists for individuals assessed as unsuitable to work with children and/or vulnerable adults. There are four types of checks in the UK:

- **Basic** – checks for unspent convictions only (available through Disclosure Scotland).
- **Standard** – checks for spent and unspent convictions, cautions, reprimands and final warnings, and will take about 2 weeks.
- **Enhanced** – includes the same as the standard check plus any additional information held by local police that is reasonably considered relevant to the workforce being applied for (adult, child or 'other' workforce). ('Other' workforce means those who don't work with children or adults specifically, but potentially both, e.g. taxi drivers. In this case, the police will only release information that's relevant to the post being applied for.)
- **Enhanced with list checks** – this is like the enhanced check, but includes a check of the DBS barred lists.

Additionally, we use the term '**police certificate of good conduct**' as a general term covering the documentation available as a result of criminal records checked outside the UK.

**Under 18s:** this policy refers to 'under 18s' rather than 'juniors' or 'children' to make it clear that these requirements apply to all students (and other young people we may come into contact with) who have not yet reached their 18th birthday, irrespective of the age of majority in their home country.

## **2.0 Safer Working Practice for Staff**

All employees are informed of this code of conduct when they receive a copy of this Safeguarding procedure prior to them starting work with St Giles Juniors. During their induction, staff will also receive further training on the points covered. All managers will ensure that all staff are reminded and retrained where necessary. We believe that it is important to constantly and actively uphold standards and working practices and positively address any issues with staff members as they may arise.

### **2.1 Rights of Under 18s**

St Giles Juniors recognises that under 18s have all of the rights ascribed to them under the UN Convention on the Rights of the Child. We assert that all children have the right:

- To a voice and have the right to be listened to and be believed.
- To say no and this will be taken seriously.
- To be supported to be the person they would like to be.
- To be treated with respect, and shall have their rights protected irrespective of their age, gender, ethnic background, religion or sexual orientation.
- To have their suspicions and allegations investigated and taken seriously.

### **2.2 Staff Code of Conduct**

This Code of Conduct is designed to give clear guidance on the standards of behaviour all staff are expected to observe, and St Giles Juniors notifies staff of this code and the expectations therein. St Giles Juniors staff are in a unique position of influence and must adhere to behaviour that sets a good example to all under 18s participating on a St Giles Juniors course. This is both to Safeguard themselves and the under 18s in our care but also to create a positive, sustainable and trusting working-relationship with the children in our care.

This Code of Conduct applies to all staff who are employed by St Giles Juniors, including middle and senior management. All adults working with under 18s should act as positive role models and set positive examples of behaviour and conduct. All adults working with children must avoid putting themselves at risk of allegations of abusive or unprofessional conduct through other people's malice or misunderstanding. This code aims to help all staff understand what behaviour is, and is not, acceptable and goes hand in hand with thorough induction procedures and robust management supervision. Staff should talk to their line manager if any aspect of the Code of Conduct or the Safeguarding Policy is unclear.

Staff have a duty to safeguard under 18s from all forms of mistreatment, including all types of abuse listed in section 4.1. The duty to safeguard under 18s includes the duty to report concerns about an under 18 to the Safeguarding Designated Person or Safeguarding Officer. In order to do this, staff must:

- Be familiar with this document. Staff are sent a copy of this Safeguarding Policy and the policy is referred to during their online training.
- Treat pupils, their parents or carers and colleagues with respect and dignity.
- Take all reasonable steps to ensure the safety and welfare of under 18s in our care.
- Comply with company policies and procedures, and follow all reasonable requests that support the wellbeing and development of under 18s.
- Maintain high standards of honesty and integrity in their work.
- Not engage in conduct in or outside of work which could damage or compromise the reputation and standing of St Giles or the employee's own reputation or the reputation of other members of the St Giles community. In particular, criminal offences that

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involve dishonesty, violence or controlled substances are likely to be regarded as unacceptable.

- Exercise caution when using information technology and be aware of the risks.
- Recognise that failure to meet these standards of behaviour and conduct may result in disciplinary action, including dismissal.

Additionally, staff should:

- Be aware that someone outside of a situation might misinterpret their actions no matter how well intentioned, particularly true across age-groups and different cultural norms.
- Not smoke in sight of or proximity to under 18s. Staff should raise these issues with students and educate them about the dangers and risks of using these products.
- Ensure that their personal relationships do not affect their role within St Giles particularly staff who are involved in relationships with other members of staff.
- Be aware that their role is to pass on concerns to a Safeguarding Designated Person and that they should never draw any conclusions about others.
- Use positive language about students, including under 18s, both to them and in private. Praise under 18s publicly and be even and fair in their dealings with all under 18s.
- Never allow themselves to be drawn into inappropriate attention-seeking situations such as tantrums or crushes.
- Never engage in horseplay, fighting, simulated fighting or other physical contact with a child that may be misinterpreted at the time or retrospectively.
- Conduct any physical contact with an under 18 in public and in view of other adults. This includes, giving first aid, presenting certificates and shaking hands, hugs etc.
- Never exaggerate or trivialise child abuse issues or make suggestive remarks or gestures about, or to, a child or young person, even in fun.
- Show respect for people's differences and encourage a culture of respect and tolerance in our centres.

### 2.3 Individual Privacy

While it is accepted that staff may, exceptionally, need to enter student's rooms in emergencies, or to enforce disciplinary rules, in all circumstances, staff should respect students' right to privacy, and staff should never normally enter a room uninvited. Staff and managers should ask to enter a room if necessary and no staff member should enter any bedroom alone when occupied by a student, particularly when a member of the opposite sex. It is important that staff **knock loudly on the door and identify themselves** and state that they will be entering the room. An example may be "Hello Annalisa, it's Joanne here, please can you open the door?" Preferably staff should do this in pairs, with a member of staff of each gender, as this is likely to be less intimidating to the child.

With the exception of during a genuine fire evacuation, staff should never try and enter a room without first identifying themselves and without having stated their name and **asked for permission** to enter a minimum of twice. Staff should be aware that students may be disorientated during the night and may need a few moments to collect themselves before being ready to reply in English.

When it is necessary for staff to enter a student's bedroom, it is important that this is done appropriately and the bedroom door should always remain open and the staff members should leave if asked to do so. This is to ensure that students are comfortable but also to protect the staff member from mistaken or malicious false accusation of impropriety. Any breach of the above guidelines should be reported to the Centre Manager without delay.

### 2.4 Dress Code

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All employees are expected to dress in a manner appropriate to their position and status, and that reflects positively on the organisation as a whole. The appearance and manner of staff should be consistent with the professional image fostered by St Giles International and projected in our prospectus and other literature.

All employees are expected to dress appropriately and a neat, clean and conservative appearance is required at all times (especially during evening and night duty). All clothing should fit properly (never too tight) and provide a modest covering; staff must avoid sheer fabrics, plunging necklines and styles that do not cover mid sections or underwear. More detailed information on company standards of dress is available to employees in the Staff Handbook.

**2.5 Adults not Employed by St Giles**

All students will regularly come into contact with adults who are not employed by St Giles Juniors such as taxi and coach drivers. We have made arrangements to ensure that third party contractors are equally as rigorous with their own recruitment and management as we are.

Care should be taken to minimise any contact between our students who are under 18s and any external adults. Students should be warned, in an age-appropriate way, of the danger strangers present.

Some St Giles centres may also host Group Leaders who are employed by agencies abroad and not by St Giles Juniors. St Giles Juniors asks that all agents obtain a police certificate of good conduct for the Group Leader assigned to St Giles Juniors' courses. St Giles Juniors requires a signed document to prove that the agent has conducted a Group Leader background check. These documents are held at the Juniors office in Brighton.

## **2.6 Whistle Blowing Procedure: Our Commitment to Openness**

St Giles Juniors is committed to high standards of openness and accountability. In line with this commitment St Giles encourages all employees with serious concerns about any aspect of St Giles' work to come forward and raise their concerns without fear of being disloyal or suffering harassment or victimisation as a result. Senior managers are hands-on and would rather be made aware of staff concerns as and when they arise.

We recognise that it is important to listen to concerns. St Giles Juniors recognises that concerns may need to be raised on a confidential basis. This Whistleblowing Procedure provides a safe route to raise concerns within St Giles at an early stage without fear. It is in everyone's interest that potential failings and mistakes are identified early so that the company can take the appropriate action.

St Giles makes clear that employees should not be treated detrimentally for raising concerns or making suggestions to management. Any issue reported or suggestion made will be taken seriously and investigated where necessary. In serious cases, this may involve interviews or an investigation to establish the facts. Concerns raised will be treated in a confidential manner and feedback will be given on any action taken. Complainants should put their names to any allegation and will be expected to co-operate with any investigation that takes place.

This procedure can be used where there are serious concerns such as:

- Any concern regarding safeguarding issues
- Any situation which should otherwise have been properly reported to the Director of Juniors and/or is likely to bring the company into disrepute.
- Financial malpractice
- Miscarriages of justice or breaches of law
- Mistreatment of staff, students or other stakeholders of St Giles International
- Other unethical conduct, (including any attempts to cover up the above or any offence likely to be committed)
- Risks to health and safety

Business ethics are increasingly seen as an issue that can build or damage a company's reputation and public trust. Employees therefore have a general responsibility to report all suspected concerns using this procedure for the positive benefit of all.

Where poor practice is shown to have occurred this may reflect badly on management, systems, or on individual managers. Whistleblowers may fear that management will be tempted to 'shoot the messenger'. It is important for employees to understand that there will be no adverse repercussions for raising concerns and we appreciate the opportunity as early as possible to correct our own mistakes.

St Giles recognises that the decision to report a concern can be a difficult one to make, especially if the issue involves a senior manager or someone in authority. If concerns are raised in good faith, there will be nothing to fear because whistleblowers raising matters of concern are protected from harassment, victimisation, and disciplinary action.

It is recognised that raising a concern will require this to be done in confidence under this procedure. St Giles will try and protect the identity of employees who raise a serious concern and do not want their identity to be disclosed. However, it should be recognised that in some instances, it may not be able to resolve the concern without revealing identity (for instance because a statement from an employee may be required as supporting evidence). In these circumstances the employee will be advised on how the investigation will proceed and the options will be discussed with the employee.

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### **2.7 How to Raise a Concern**

The matter should be kept confidential and therefore only told to someone in authority. As a first step, concerns should be raised with the line manager (usually the Centre Manager) to allow the situation to be fixed immediately.

If the employee believes that the Centre Manager is involved or would not be able to act impartially, then employees should raise their concerns with the Director of UK Juniors, Stef McLoughlin, by telephone +44 (0)7857 832907 or by email [smcloughlin@stgiles.co.uk](mailto:smcloughlin@stgiles.co.uk) stating the nature of their concern.

In exceptional circumstances and where the individual believes that the matter cannot be dealt with within St Giles Juniors, then they should raise their concerns with the Group Managing Director, Mark Lindsay in writing by email to [mlindsay@stgiles.co.uk](mailto:mlindsay@stgiles.co.uk) stating the nature of their concern and the reason why the concern has not been raised with the Director of UK Juniors, Stef McLoughlin.

The action taken by St Giles will depend on the nature of the concerns raised. The matters raised will normally be investigated internally by St Giles. This will usually be by the Director of UK Juniors, Stef McLoughlin but in exceptional circumstances may be an independent Senior Manager from St Giles. Where appropriate, matters of a criminal nature will be referred to the Police.

Employees should only make allegations in good faith and be aware that there may be repercussions to false allegations. Employees should remember that they should raise the matter as soon as possible. St Giles would prefer you to raise your concerns so that we can fix the problem as soon as possible.

## **3.0 Welfare of Under 18s**

### **3.1 Use of Risk Assessments**

St Giles Juniors uses written Risk Assessments to evaluate the risk posed to students (and where appropriate, to staff) in undertaking an activity. A hazard is anything that can cause harm. A risk is a combination of the likelihood of harm occurring and the severity or consequences should it occur.

Risk Assessments are written by following the Health and Safety Executive's advice on writing risk assessments, which includes: looking for hazards, deciding who might be harmed and how; evaluating risks and deciding whether existing precautions are adequate or whether more needs to be done; recording findings and reviewing the assessment periodically, revising if necessary, evaluating or 'rating' the risks and dealing with the highest risks first.

General Risk Assessments are written by the Operations Manager, Sophie McAllister and adapted by the managers in the centres to fit the specific activities being undertaken. Staff are asked to sign risk assessments to say they have read and understood what is written. Staff are also asked to convey the relevant information on mitigating any risks to students in an age-appropriate and sensitive way. Each risk assessment aims to instruct staff to pass on safety procedures to the students.

It is the responsibility of the Duty Manager in all centres to ensure that a risk assessment has been written for the specific activity being undertaken and that all adults working with children

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on that activity have read and signed a copy of the risk assessment. All signed risk assessments are kept on-site at the centre.

### 3.2 Supervision of Under 18s

Every centre has at least two managers responsible for the centre and the programme. There is always at least one manager or senior member of staff on duty (or on call during the night) who acts as the 'Duty Manager' which means they are the person responsible for the wellbeing of the students on that day or part day. Ultimately the welfare of students rests with the Centre Manager and the Director of UK Juniors, Stef McLoughlin. This means that there is a Duty Manager responsible for all under 18s for 24 hours a day, 7 days a week. During night time hours the Duty Manager will be on a sleeping night duty in the centre and so will be on-call during this time.

All classes, activities and excursions are compulsory. Under 18s are not allowed to opt out of any part of the programme. The Duty Manager will be responsible for checking that students have arrived in class or to activities on time each day. Students check-in regularly and regular roll-calls take place. If a student is not present when a roll-call is taken, this will be reported to the Duty Manager and the time will be noted at this point. A search will then commence which may involve some or all of the following actions:

- The student's residential area and bedroom are checked.
- If the student has not gone to class due to feeling unwell, the Duty Manager monitors the child for the rest of the day and seeks medical help if required.
- The Duty Manager will ring the student to check on his/her whereabouts.
- Should a child be missing for more than 30 minutes in the residence or 15 minutes on an excursion (or other off-site activity), then the Duty Manager will call the Centre Manager (firstly) and if not reachable, Director of Juniors, Stef McLoughlin (secondly) and report the situation. Should the Director of Juniors be unavailable or uncontactable for a further 15 minutes then the Duty Manager should follow the Emergency Action Plan.
- The decision will be made to call the parents in consultation with the Director of Juniors. This call should take place not later than when one hour has passed since the student was first noticed absent. Such a call is likely to be distressing for parents and carers and so managers should relay the message sensitively and calmly, stating that when the student returns, we will call back so that the parents can speak to them.

Students are roll-called at least three times a day, by floor and/or by room number: in the morning in class, in the evening at dinner and before bedtime. The same procedure as above would be followed if a child does not check in.

Students aged 13 and over are offered, on agreement from their parents, limited and controlled free time for short periods during excursions and after afternoon activities. Students must be in a minimum of a group of three to ensure that students are not (and not seen to be) vulnerable. All students should wear their wristband which has the emergency contact details of their Centre Manager. Members of staff patrol the designated area during free time to create a staff presence. If after their free time a student is not at the meeting point on time, the Centre Manager will consider taking away a proportion of a student's free time at the next opportunity to encourage good discipline and time-keeping.

Supervision is primarily provided by adults who are paid by St Giles Juniors and occasionally and secondarily by adult supervisors (Group Leaders) who may come from the student's country of origin and who help in the supervision of their own group of students. The ratio of adults to under 18s may vary depending on the nature of the activity and whether the activity is on-site or off-site, and in relation to the risk assessment relating to each activity. For example, a trip on public transport will have higher levels of staff than a film night at the

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residence. At all times, the ratio will be consistent with the British Council's minimum guidelines:

- **Ages 4- 8 years** 1 adult to 6 children
- **Ages 9 to 12 years** 1 adult to 10 children
- **Ages 13 to 17 years** 1 adult to 15 children

### **3.4 Fire Safety**

The Fire Procedure in each centre varies according to the specifics of the building, centre layout and age of the students. The Fire Procedure is displayed and shared with students during their orientation. The general procedure is as follows:

- Drills will be held every two weeks, where possible, and the students will be informed of the Fire Procedure regularly.
- If the students are in their class groups and the fire alarm is heard they will leave the building with their teacher, staying in their class groups, where possible, and assemble at the fire meeting point. Where safe to do so, the Duty Manager will sweep the classrooms to ensure all students have left the building. Each teacher will take a roll call of their class using the class register. The Duty Manager will check with each teacher that they have all their students and a list of unaccounted for students will be compiled, if necessary.
- If the students are in the residence in their rooms or outside lessons, they will all exit on hearing the alarm and assemble outside the residence at the fire meeting point. Where safe to do so, staff will sweep the floors of the residence announcing the fire alarm and asking students to vacate the building. The duty manager will hand out signs with floor and/or room numbers on to the available staff members and the up to date student lists for that part of the residence. The students will assemble around the relevant staff member and then the staff member will take a roll call. The Duty Manager will check with each of these staff members that all students are present.
- If the students are not in the residence when the fire alarm is heard, the Duty Manager will check the students in rooms in residence form (in the Centre Manager's file) and make sure that any student entries for that day assemble at the fire point in the car park, or are discounted from the list of unaccounted students, as appropriate.
- The Duty Manager will be prepared to hand the list of unaccounted for students to the Fire Officer on their arrival. The Duty Manager will also be aware of which staff members are in the residence.
- The Duty Manager (and Centre Manager) must follow-up on any unaccounted for students during a drill. Students will be reminded that they must attend in future and the importance of the evacuation procedure.

### **3.5 First Aid & Medical Care**

St Giles Juniors provides travel and medical insurance to all students on Junior courses including all under 18s, except those taking part in Family Courses with their parents. Additionally, emergency medical treatment is given without charge to under 18s visiting the UK.

St Giles Juniors offers all managers working at our centres in the UK a first aid course as part of the management training. Therefore, all Duty Managers are first aid trained and so we aim to always have at least one first aider on duty.

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Additionally, a list of local medical facilities is displayed in offices and staff rooms and a copy kept on the online drive in case any student should need to attend a medical facility such as a hospital or dental surgery. This list gives the address(es) of the centre, nearest accident and emergency facilities and a local dental surgery and some local taxi numbers for ease of use.

### 3.6 Helping Under 18s to Stay Safe Online

St Giles Juniors recognises our responsibility to ensure the safety of Under 18s when they are using the internet, social media and other forms of digital media.

We recognise the following dangers of the internet and we make staff aware of these during their induction training. The following points are some examples of why it is important for Under 18s to stay safe online (taken from the Kirklees Safeguarding Children Board's literature on this issue):

- **Computer Viruses:** Downloading from a dubious source can result in a computer becoming infected with viruses and this exposes the computer to the risk of inappropriate or illegal downloads and content being passed on to our students' computers and/or networks.
- **Grooming:** A child goes missing or is molested as a result of an online contact. In most cases these are young people who have 'met' someone online who 'lures' them by pretending to be a person of similar age and interests
- **Illegal Downloads:** File-sharing with others on the internet through peer to peer file sharing software:
- **Inappropriate Content:** The internet is not the single most influencing factor in causing children and young people to abuse drugs and other dangerous substances or misuse weapons, but some online sources of information can be an encouraging or enabling factor.
- **Making threats and law breaking:** Children can often make threats online which is both wrong and illegal. Online behaviour needs to be moderated, preventing threats, intimidation and harassment, it is also important to consider copyright and plagiarism.
- **Online fighting or bullying:** It is often difficult to express oneself in written form when angry resulting in misinterpretation and the escalation of issues needing to be solved. Fighting and bullying can be in the form of emails, text messages or through many other digital mediums.
- **Privacy:** Loss of privacy on the internet can happen in many ways and all have their own dangers. Disclosing names, passwords, telephone numbers or addresses can you put you or others at risk. Marketing by online companies, might result in personal information being sold or passed into the wrong hands.

To address these issues, St Giles Juniors is committed to:

- Making sure managers and staff are aware of the issues which can arise from under 18s having unmonitored or unrestricted access to the Internet.
- Helping students stay safe online by giving them advice during their induction.
- Informing students in induction that the host institution's security wall may detect inappropriate online activity and this may be reported to us.
- Monitoring under 18s use of the internet and not allowing unrestricted access to online content.

### 3.7 Airport Transfers

St Giles Juniors offers safe and reliable transfers both on arrival in the UK going to the centre, and on departure going from the centre to the airport for the flight back to the home country.

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We take safety seriously and all staff working at airports and on transfers, like centre-based staff members, are reference-checked as well as having a criminal record check. All transfers are done using reputable coach and taxi companies who use modern, safe vehicles and who have equally rigorous recruitment procedures and all staff are DBS checked.

On transfer days, our staff are based at both Heathrow and Gatwick airports to cover all terminals. Representatives (which may include our staff or one of our transport provider's drivers) cover other airports and train stations when necessary including for a small number of late night /early morning transfers.

Arriving students should look out for our representatives holding a St Giles Juniors yellow sign, with the logo above waiting in the arrivals area. Our staff wear distinctive yellow St Giles t-shirts to help students locate them. Departing students will be accompanied to; or met at; the terminal. All arriving students are sent a transfer confirmation and a permission to study abroad form, with contact details for the Duty Manager who is based at the airports. Staff track the flights and are in regular contact with the Duty Manager to ensure that students are met promptly.

If a member of staff does not accompany a student between our summer centre and the airport, St Giles will have the name of the driver. A representative will always escort students through check in or escort the student from the information desk to the vehicle taking them to our centre.

The person booking the course is given the information above at booking stage. St Giles also provides an unaccompanied minors service for a small extra fee. When a student is booked in as an unaccompanied minor, a named member of staff will collect them from the airline representative or escort them to the airline desk to be signed in to the airline representative.

### **3.8 Accommodation & Rooming**

St Giles Juniors tries wherever possible to separate students by age and gender. Different centres have different facilities and so some centres are able to accommodate separation more effectively.

We do not accommodate under 18s with adults except in the following circumstances:

- Where separate bathroom facilities exist
- Where the adult is a Group Leader and the agent has specifically requested that the agent be accommodated with the students, and where the Group Leader is accommodated in an area with separate (or individual) bathroom facilities
- Where a group includes a student who is part of a school year group and a student has had their 18<sup>th</sup> birthday that same year
- When we feel that having an adult on the same floor provides better security for students. Adults will use a separate bathroom.

Male and female under 18s will not share bathroom facilities with each other or adults except where individual unisex facilities are used individually. At no point should adults working with under 18s be in a state of undress when with students, especially those who are under 18, to avoid any misinterpretation or uncomfortable situations.

### **3.9 Road Safety**

Road Safety is managed carefully depending on the size and age of the group. Staff are made aware through training and induction of the dangers of walking students from place to place

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along roads and how best to achieve this safely in their specific centre and location. In general, staff will always observe the following road-safety guidelines:

1. Groups should have a staff member at the front and another at the back. Other staff members should be spread throughout the group, walking on the road-side of the group.
2. Students should walk on pavements and on routes passing through parks and other areas away from roads, where possible even when the route with a pavement or through a park may be longer.
3. Groups walking along a road with no pavement should walk in single file, and after dark should carry white lights at the front and red lights at the back to warn approaching traffic.
4. Students (and staff) are not allowed to wear earphones or headphones when walking.
5. Staff will be aware of the whole group, including those in the group who may be behind or in front of them and will ensure the group walks together and does not split due to different walking speeds.
6. Staff will be aware that most students will be unfamiliar with cars driving on the left.
7. Crossing a road will always take place at designated crossings, when possible, and staff will stand in front of traffic to prevent cars from creeping forward and through the group.
8. Staff members will ensure that students always cross in front of staff members.
9. Staff will instruct students on their first day and regularly again as necessary on how to cross roads safely.
10. Road safety posters will be displayed on all student notice boards, to remind students of the dangers associated with roads.

### **3.10 Transport**

All students should be seated when on coaches and other forms of transport. A risk assessment has been written specifically for travelling on private hire coaches and on public transport and all staff should be aware of the recommendations and action requested to fulfil the risk assessment.

Staff should never use their own private vehicles for the transportation of students. Each centre has a credit account with a local taxi company, which can be used by Duty Managers, for trips to hospital and other trips necessary for children to be transported to another location in an emergency.

### **3.11 Accidents & Near Misses**

Accidents are recorded in the centre accident book, which is held in the Duty Manager's file.

Near misses, those incidents which narrowly avoid a serious injury should also be recorded in the centre accident book. Serious injuries or occurrences of near-misses that might have resulted in serious injury, death or damage to property or equipment should be recorded and a report should be sent to the Director of Juniors immediately or as soon afterwards as safe to do so.

### **3.12 Emergency Action Plan**

The St Giles UK Juniors Emergency Action Plan is intended to assist agents, students, parents and members of staff to understand our procedure during an emergency situation if any St Giles Juniors centre is closed or its normal operation is disrupted due to an emergency

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situation such as, a natural event (e.g. flood), man-made event (eg. terrorism), or the incapacitation of a key member of staff or the death of a staff member or a student.

All staff should remember that students will depend on us for immediate direction and assistance as well as support over the days following any such incident. It is therefore of vital importance that all members of staff become familiar with this plan.

The emergency action plan outlines emergency contact details of the Juniors office, senior management and all junior centres. The Plan outlines how managers and staff should respond to the incidents listed above and in the event that key personnel are unavailable or incapacitated. It gives key responsibilities and details how communication will be managed in coordination with St Giles International Head Office in London.

### **3.13 Social Programme**

The social programme in each centre is carefully prepared with due consideration given to the age and culture of those students taking part in the programme. The social programme is overseen by the Activity Manager and the Centre Manager and offers a range of choices suitable for the ages of students at each centre. The social programme has flexibility built in and managers respond to requests from students. An afternoon activity option is offered for approximately every 30 students.

### **3.14 Who to Contact**

A photo board or photo wall is displayed in each centre with photographs of all staff and managers. Staff members with specific responsibilities such as Activity Management or the Safeguarding Lead are listed on this board. For example next to the picture of the manager responsible for the academic programme will be an explanation of their duties.

### **3.15 Student Code of Conduct**

Student welfare and safety is achieved with the support and co-operation of students, particularly for those students aged under 18.

Students will also be made aware that they should report any concerns about other students or staff to a manager (who will also be the Safeguarding Designated Person).

When Centre Managers welcome students to their centre on the first day, as part of their introduction, they will tell students about this code of conduct and the Safeguarding Policy in brief.

Rules posters are displayed in all centres, showing our 10 student rules:

- 1.** You should tell a manager if you or someone else is unhappy about something.
- 2.** Be nice to everyone in St Giles Juniors.
- 3.** Make sure you are on time for all classes, activities and excursions.
- 4.** It is not OK to be absent from classes, activities or excursions without permission from the Centre Manager.
- 5.** Stay within the St Giles areas for classes and activities.
- 6.** No smoking (including vaping) or drinking alcohol.
- 7.** Students are not to leave their rooms and are to be quiet after lights out.

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8. Show respect for all staff, leaders and other students.
9. Bad language, fighting and bullying is not OK.
10. Take care of all equipment and other people's things. Damage to property and graffiti is not OK.

### 3.16 Attendance Policy

Residential Students: All students are woken up by a member of staff in the morning. Students are roll called every morning and the Centre Manager is responsible for ensuring that all students are out of their bedroom and in class. Parents and agents are made aware of students who miss class due to illness. Students who are ill for two or more consecutive days in a row will have to see a doctor who will advise on whether the student should be missing school. Parents and agents are kept informed throughout.

Day Students: The Centre Manager or the Academic Manager will ring up the students when they are over ten minutes late in order to establish the reason for their absence and to ensure that they are safe. Students who are late more than two days in a row will have to attend a meeting with the Centre Manager who will follow the discipline policy. The adult responsible for the student in the UK will be informed when students are late on two consecutive days in a row. When a child has missed a day or more of school, the adult responsible for the child in the UK will be notified by both phone and email. When a child has missed two or more days of school the child's parents and agency (when applicable) will be notified. Please refer to 3.2 supervision of under 18s.

## 4.0 Child Protection

St Giles is committed to a practice which safeguards children and their welfare. While we try to ensure that the children in our care are happy and safe, occasionally situations may arise which suggest that abuse has or may take place. In these situations then all employees will be aware that it is their duty to follow the procedure for handling allegations without fear or favour. If any member of staff has concerns about the safety of a child or children they feel have not been dealt with appropriately, then they should use the whistle blowing procedure.

### 4.1 Child Abuse

Child Abuse is a term to describe a range of ways in which people, harm children. Abuse can be perpetrated by a child or more likely by an adult. The abuser can be a stranger but often the adult or person is known and trusted by the child.

We recognise the NSPCC's definition of child abuse, which includes:

- Emotional abuse
- Neglect
- Physical injury
- Sexual abuse

Abuse includes the act of inflicting abuse and also knowingly not preventing such behaviours, which cause significant harm or death, from taking place.

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.

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- 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.

Typical possible signs of neglect or abuse can include the following:

- Absence
- Aggression
- Being disruptive
- Being inattentive
- Being withdrawn
- Changes in behaviour
- Clinging to staff
- Eating disorders
- Homesickness
- Lack of hygiene
- Not wanting to return home
- Self-harm
- Wanting to return home

### **4.2 Guidelines for all St Giles Juniors Employees**

All adults working with children should remember, and inform students regularly that we can never promise to keep a secret. This is 'absolute confidentiality' and can never occur between a professional person (this includes all St Giles Juniors employees) and an under 18. Child Protection issues will always take precedence over issues of privacy and this will involve speaking to your line manager who may need to pass this information on.

Adults working with children must never promise a student, colleague, parent or any other individual that they will not act on information that they are told. Confidentiality will always be maintained in relation to staff, students and others in the St Giles community but confidentiality is subject to the duty to act on any information which indicates there is, or may be, a present danger to an under 18 or any other person.

Staff should be clear from the outset of their employment that information shared with them is private except if this information indicates that a child or another person is in danger.

With regards to child protection, all adults working with children should:

- Be as open and honest as possible with their Centre Manager about any concerns about colleagues or under 18s.
- Ensure that 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.
- Ensure that 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.
- Value each and every student they work with and recognise the unique contribution they make to the centre.

All adults working with children should never:

- Allow, or engage in, inappropriate touching of any kind.
- Do things of a personal nature for a child or a young person that they can do for themselves.
- Engage in provocative or rough physical games, including horseplay.
- Find themselves alone in a closed space with a child, especially of the opposite sex.
- Keep secrets.
- Spend excessive amounts of time alone with children, away from others.

### **4.3 Electronic Contact with Students Under 18**

Employees are not permitted to have personal electronic contact with students of St Giles. This is to ensure the safety of our students, particularly those who are aged under 18, and to

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protect our staff from allegations of improper conduct through malice or misunderstanding of a staff member's actions.

Managers may collect telephone numbers as part of the student orientation to a centre. Managers may use these telephone numbers in the event a student is missing or other emergency situation. Staff must request permission from the Director of Juniors for any electronic contact with a student before, during or after a course. This permission will only be given in exceptional circumstances but social-networking on Facebook, Instagram etc is strictly prohibited.

Staff should recognise that their role is a professional one and at no time, given the imbalance of the power in the relationship between a staff member and a student, should they consider themselves friends with students. Staff members' role is as a 'friendly professional'.

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

Where electronic communication does take place, employees should be as transparent as possible making use of company telephones or email addresses. If necessary the Director of UK Juniors [smcloughlin@stgiles.co.uk](mailto:smcloughlin@stgiles.co.uk) should be copied in to any email to ensure transparency. Staff should also pay particular attention to use neutral and non-emotive language that will not be misconstrued. Staff should not for example use words such as 'love' or put kisses on any message. As an indication, staff should not exchange any information with a student that they would not be happy to share with their employer, the child's parents or carers or the police.

### **4.4 Sharing Information Regarding Child Protection**

Good communication is essential in any organisation. In 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. Some information is confidential and should only be shared on a strictly need-to-know basis.

St Giles will act to ensure adults who work with children have information about how, and with whom, they can share their concerns, complaints and anxieties.

When sharing information, adults who work with children 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.

People 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. An important part of how we achieve this is by having a full copy of this Safeguarding Policy available for anyone to see.

### **4.5 Responsibility of Staff to Report**

It is the duty of St Giles staff to report a disclosure of abuse or an allegation of abuse to a Safeguarding Designated Person or a Safeguarding Officer. The Safeguarding Designated Person on duty can be contacted via the centre's 24 hour mobile telephone number.

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The Safeguarding Officer on duty can be contacted on the following number 24 hours a day:  
+44 (0)7857 832907

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 and referred to a Safeguarding Designated Person.

If a member of staff has suspicions, they should contact the Safeguarding Designated Person or Safeguarding Officer 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 Safeguarding Designated Person or Safeguarding Officer in confidence.

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### 4.6 What to Do if Abuse is Suspected or Disclosed

All adults working with under 18s should report any concerns regarding the welfare or safety of a child or child protection concerns to a Safeguarding Designated Person or a Safeguarding Officer using the form in appendix A of this document.

Adults working with under 18s should follow these guidelines:

- Accept what is said – it is not your role to investigate or question.
- Advise that you will try to offer support, but that you must pass the information on.
- Alleviate feelings of guilt and isolation, while passing no judgment
- Do not overreact.
- Listen to the child, rather than question him / her directly and allow the child to speak without interruption. Where you do need to ask questions, to ascertain whether there is a concern, use phrases such as 'tell me...', 'explain to me...' and 'describe for me...' to allow the child to give you more detail (remembering that it is for the police to investigate, not us).
- Offer reassurance without making promises, and take what the child says seriously.
- Thank the person for telling you.
- Explain what you have to do and who you have to tell. Never guarantee to keep a secret (absolute confidentiality), as Child Protection will always have precedence over any other issues.
- 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.

The Safeguarding Designated Person should discuss the concern/suspicion with a Safeguarding Officer and will together decide what further action is necessary and whether to make a referral to the Local Authority Designated Officer for child protection concerns.

In all cases alleging abuse or impropriety by a member of staff the matter will be discussed with the Director of Juniors. The matter may or may not be discussed with the individual staff member and the staff member may be suspended while an internal (or external, as appropriate) investigation is carried out, (in conjunction with the Local Safeguarding Children's Board and the police if necessary).

What happens when an allegation is made against a St Giles student?

It may be 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 Director of St Giles Juniors will contact the appropriate authorities which will include the Local Safeguarding Children Board. No decisions will be made on further action without referring to the appropriate local authorities.

### 4.7 Record Keeping

All records, information and confidential notes should be kept in files in the safe accessible only by the Safeguarding Designated Persons.

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In any case where an allegation is made, or someone in St Giles has concerns, a record should be made using the referral form in appendix A.

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

### **5.0 Safer Recruitment**

St Giles Juniors is committed to providing the best possible care and highest quality of educational programme to its students and to safeguarding and promoting the welfare of children and young people in our care. St Giles Juniors is also committed to providing a supportive, professional and safe working environment to its entire staff. St Giles recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit, train and retain staff of the highest calibre possible who share this commitment.

#### **5.1 Recruitment Procedure Aims**

The aims that guide our work concerning recruitment at St Giles Juniors are as follows:

- To ensure that safeguarding the welfare of children and young people is given due priority at each stage of the recruitment process.
- To ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position.
- To ensure that all job applicants are considered equitably and consistently.
- To ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital status, disability or age.
- To ensure compliance with all relevant recommendations and guidance.

#### **5.2 Recruitment Process & Materials**

Our safer recruitment statement: 'In line with safer recruitment for under 18s and vulnerable adults, all gaps in CVs must be explained and all staff will have their criminal record checked' is present on all job advertisements and on all correspondence with potential staff. All applicants for employment are required to complete an Application Form containing questions about their academic experience, employment history and their suitability for the role applied for. Any gaps in their employment history are questioned.

The application form includes an applicant's declaration regarding convictions and working with children, and makes clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants receive a clear and accurate Job Description for the role applied for.

Two references are taken up on all short listed candidates. All offers of employment will be subject to the receipt of a minimum of two satisfactory references, one of which must be from the applicant's current or most recent employer. Neither referee may be a relative or someone known to the applicant solely as a friend.

Most St Giles Juniors employees are on temporary summer contracts. Some of these employees return to St Giles Juniors every summer. If an employee has spent three months or more away from the company, this is considered to be a gap in employment. Returning applicants must provide us with contact details for a one referee who they have been in contact with in their employment gap.

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All referees will be asked if they believe the applicant is suitable for the role applied for, and whether they have any reason to believe that the applicant is unsuitable to work with under 18s. If the referee is a current or previous employer, they will also be asked to confirm:

- The applicant's dates of employment, job title and duties, performance, sickness and disciplinary record.
- Whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children.

St Giles Juniors will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant. References are usually in writing unless there are exceptional circumstances when a telephone reference will be acceptable. References are compared with information given on the application form and any discrepancies or inconsistencies in the information will be taken up with the applicant and explained satisfactorily before any appointment is confirmed.

Written references are followed up with a telephone call as follows:

- In exceptional cases reference is sent from a generic email address such as ...@hotmail.com or ...@gmail.com.
- All references that are completed in a brief or incomplete way
- 25% of all other (satisfactory) references as a spot-check.

### **5.3 Interviews**

Short-listed applicants are invited to a formal interview. Interviews assess the merits of each candidate against the job requirements, and explore their suitability to work with children. The selection process will either include an online video interview (such as Skype) or a face to face interview. Interviews are usually conducted by the Operations Manager, who undertakes the role of a Recruitment Managers. Occasionally (and for all second interviews for management posts) the Director of Juniors conducts interviews. Both post-holders have undertaken Safer Recruitment training with English UK.

All interviewees are asked questions about their attitude to working with children and their experience and knowledge of Safeguarding. Notes of this are kept and where appropriate, post-interview feedback will address any identified areas of weakness or gaps in knowledge.

### **5.4 Offers of Employment**

If it is decided to make an Offer of Employment following the formal interview, any such offer will be conditional on:

- The receipt of two satisfactory references (as above)
- Verification of the candidate's identity and qualifications
- The satisfactory receipt of either:
  - an Enhanced Disclosure (processed within less than 3 months of starting employment) with which St Giles is satisfied.
  - a police certificate of good conduct and a Barred List Check if applying from outside the UK and for applicants with a foreign address and no UK address
  - St Giles Juniors will check whether applicants who have worked in mainstream education (primary or secondary) are on the 'Prohibited List' by emailing [tp\\_support@teacherspensions.co.uk](mailto:tp_support@teacherspensions.co.uk) The Prohibited List has names of those who have been 'struck off' and are deemed unsuitable to work with under 18s, yet have not necessarily been convicted of a crime so nothing will appear on a DBS check.
- The agreement of a mutually acceptable start date and the signing of a contract incorporating St Giles's standard terms and conditions of employment, including agreement with and acceptance of this Safeguarding policy.

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Any employee who commences employment prior to the organisation having received their clearance and not having seen a prior criminal record check will not be allowed to work unsupervised. A record of any decision to allow a member of staff to start work without criminal record clearance will be made and will be signed off by a senior manager, usually the Director of Juniors. This record as with all criminal record clearance records is held in the Juniors' office in Brighton by the Director of Juniors.

All summer staff appointed in St Giles Juniors are offered and expected to attend an induction programme, regardless of previous experience, on commencement of the first and any subsequent contract. More information on the induction can be seen in section 6.0.

### **5.5 Recruitment of Ex-Offenders**

St Giles will not unfairly discriminate against any applicant for employment on the basis of the existence of a criminal record. St Giles makes appointment decisions on the basis of merit and ability. Recruitment decisions are made in the first instance by the Operations Manager and decisions on criminal records are made independently of this by the Director of UK Juniors.

If an applicant has a criminal record this will not automatically bar them from employment within St Giles Juniors. Instead, each case will be decided on its merits in accordance with our objective assessment criteria (detailed below). In view of the fact that all positions within St Giles are 'regulated positions' within the meaning of the Protection of Children Act 1999 (as amended by the Criminal Justice and Courts Services Act 2000), all applicants for employment should declare in confidence all previous convictions (including those which would normally be considered "spent" under the Rehabilitation of Offenders Act 1974).

If an applicant has a criminal record they should disclose this to the Director of Juniors in writing by email to [smcloughlin@stgiles.co.uk](mailto:smcloughlin@stgiles.co.uk) or by post marked 'private and confidential' to Stef McLoughlin, St Giles Juniors, 1-3 Marlborough Place, Brighton, BN1 1UB

A failure to disclose a previous conviction may lead to an application being rejected or, if the failure is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a relevant previous conviction may also amount to a criminal offence.

Under the relevant legislation, it is unlawful for St Giles to employ anyone who is included on the lists maintained by the Independent Safeguarding Authority of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for St Giles to employ anyone who is the subject of a disqualifying order made on being convicted or charged with certain offences against children. It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within St Giles.

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, St Giles Juniors will consider the following factors before reaching a recruitment decision:

- Whether the conviction or other matter revealed is relevant to the position applied for.
- The seriousness of any offence or other matter revealed.
- The length of time since the offence or other matter occurred.
- Whether the applicant has a pattern of offending behaviour or other relevant matters.
- Whether the applicant's circumstances have changed since the offending behaviour or other relevant matters.

If the post involves regular contact with children, it is St Giles' normal procedure to consider it a high risk to employ anyone who has been convicted at any time of any offence which is a

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sexual assault or other serious violent crime. Further details are available in confidence from the Director of Juniors by email to [smcloughlin@stgiles.co.uk](mailto:smcloughlin@stgiles.co.uk).

### **6.0 Training**

As an organisation, employing adults who work with children, it is important that staff are aware of their responsibilities under Child Protection legislation and has a working knowledge of St Giles procedures. Each member of staff must complete the online safeguarding and prevent training (level 1 training: awareness raising) and pass the test online at <https://galleryteachers.com/service/safeguarding-basic-awareness-course/>, a copy will be retained on personnel files. All managers (Director of Juniors, Operations Manager, Centre Managers, Activity Managers and Academic Managers) have completed Designated Safeguarding training (formerly known as level 3 training).

All staff are asked to read this Safeguarding Policy prior to their employment commencing. Staff are asked to sign to say they have read and understood the policy and addressed any questions to a line-manager. All staff are asked to read the Emergency Action Plan prior to their employment commencing. Staff are asked to sign to say they have read and understood the plan and addressed any questions to a line-manager.

All staff attend a pre-employment induction, immediately prior to the start of their contract (and regularly refresh their training at least once per year for returnees and permanent staff) and receive further additional training at this induction. This induction covers many topics, including the following topics which relate directly to Safeguarding:

- Health & Safety and Risk Assessment
- Safeguarding and Child Protection (level 1 training: awareness raising)
- Safeguarding Concerns and Handling Allegations

It is the responsibility of the Centre Manager and the Director of Juniors to ensure that all staff have completed these stages of training and induction in safeguarding children.

**Appendix A: Safeguarding Incident Referral Form**

Remember T.E.D. when talking to an under 18:

- Tell me
- Explain to me
- Describe to me

**The Child:**

Name: \_\_\_\_\_ Nationality: \_\_\_\_\_

Age: \_\_\_\_\_ Date of Birth: \_\_\_\_\_

**The Person Reporting:**

Name: \_\_\_\_\_

Position in school: \_\_\_\_\_

Name of anyone else present: \_\_\_\_\_

Position in school: \_\_\_\_\_

**a.** I am expressing my concerns: \_\_\_\_\_

**b.** I am passing on someone else's concerns: \_\_\_\_\_

Name of the person you are passing them on for: \_\_\_\_\_

Position in school: \_\_\_\_\_

**Details:**

Time and date: \_\_\_\_\_

Details of incident causing concern: \_\_\_\_\_  
(including dates and times as required)

\_\_\_\_\_  
\_\_\_\_\_

What has prompted the concern? \_\_\_\_\_

\_\_\_\_\_

Does the child understand what is happening? \_\_\_\_\_

Did someone speak to the child about this? \_\_\_\_\_  
(if so record what was said)

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Details of the exact conversation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Are/could other people be involved? \_\_\_\_\_

Who: \_\_\_\_\_

Any immediate action taken: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**Please take this completed form to the Safeguarding Designated Person.**

This disclosure must be stored in the centre safe and may only be discussed between the reporting staff member and the Safeguarding Designated Officer. If you have any concerns about the Safeguarding Designated Officer please contact Stef McLoughlin in confidence by email at [smcloughlin@stgiles.co.uk](mailto:smcloughlin@stgiles.co.uk) or by phone.

**Record of Action Taken (by Safeguarding Officers):**

Date and time received: \_\_\_\_\_

Immediate action taken: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Senior manager passed on to/discussed with: \_\_\_\_\_

Agreed further action taken/to be taken: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Parental contact details: \_\_\_\_\_

Parental address: \_\_\_\_\_

\_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_