



St Giles

CAMBRIDGE



St Giles International Cambridge Safeguarding Policy

Keeping our younger students safe from harm

Updated on 14/01/2021 by J Goldup

St Giles Cambridge 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, which 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

Child protection, which is:

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

A proportion of the students who study at St Giles Cambridge are under-18s, with greater concentrations of students at this age in the summer. For many, this will be their first experience of living away from home and in a foreign country. The minimum age of students at Cambridge is 14 (since January 2019). School publicity makes it clear to parents and guardians on its website that these children will be studying in an adult educational environment.

Adults in this organisation accept and recognise our responsibilities to develop awareness of issues which cause children and young people harm.

We endeavour to safeguard children and young people by:

- adopting child protection guidelines through a Staff Code of Conduct (section 3)
- 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.

Whilst much of this guide refers to under-18s, we recognise that many of our students could be considered vulnerable and the guide is therefore applicable to all our students

We are also committed to reviewing our policy and good practice at regular intervals.

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St Giles Cambridge Safeguarding and Child Protection Policy

1. Designated Safeguarding Persons

1.1. Designated Safeguarding Persons (DSPs)



Sarah Marsden, the Director of Studies, invites all students to a virtual meeting before they arrive at the school, and is students' first point of contact throughout the course. Sarah ensures she meets regularly with under-18s, looks out for them around the building and ensures teachers follow safeguarding procedures and complete administrative work so that our students can be safeguarded. Sarah has completed Specialist Safeguarding training.

1.2. Designated Safeguarding Lead (DSL)



The DSL is Jessie Goldup, the Principal, who has completed Specialist Safeguarding training. The DSL has overall responsibility for training and will be involved with any major decisions. This designated person will liaise when necessary with the Local Child Safeguarding Board.

In Jessie's absence, Sarah Marsden assumes DSL responsibilities, and in Sarah's absence, Jessie takes on the day-to-day supervision of students.

1.3. All frontline staff

In addition to the training undergone by the DSPs and DSL(s), all staff at St Giles Cambridge undergo Basic Awareness Safeguarding training. There are also regular refresher training sessions led by the Designated Safeguarding Lead, relating to any update to our procedures, which are also included in staff induction. Staff may be asked to complete the next level of Child Protection training if appropriate.

If any student or staff member has any concerns about the physical or emotional welfare of any student this should be reported to the Designated Safeguarding Person or Lead.

2. Safer Recruitment

2.1. Interviews, CVs and References

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

- Any job advertisements clearly states that a role in the school will involve unsupervised access to under-18s. It is an offence for a barred individual to apply for such a position.
- All candidates are informed that they need to apply for an Enhanced DBS check through the school prior to employment. Candidates are asked whether there is any reason why they should not work with under-18s. Candidates are also asked whether any records are likely to show conviction.
- Candidates for employment are normally interviewed by two members of staff and/or across two interviews.
- Interviews are conducted in a systematic fashion with the use of a pre-agreed formulaic question script. Consideration is given to probing 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.
- Two references are required for each candidate. The reference request asks 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.

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 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 will involve the member of staff and other staff being told that the member of staff concerned should not be alone with under-18s, and limitations on their movement around the building, participation in the social programme, and a requirement that the individual not be alone with an under-18. Staff without a DBS check carried out by the school will remain identifiable by wearing a yellow lanyard (usually for visitors) until their DBS check is received.

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 Enhanced DBS checks carried out by the school will be renewed every 3 years, and the school completes and pays for this. All staff arriving with the update service in place will have their status checked on <https://www.gov.uk/dbs-update-service>

2.4. Homestay Providers

St Giles Cambridge require the primary care giver in each homestay hosting under-18s to undertake a DBS Enhanced check.

The checks are completed by the school and we 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.

The primary care giver is expected to confirm the identities of any other adults that may be resident or regularly visit (such as a non-resident partner) in the homestay and submit a separate declaration, based on the Children Act 1989, signed by each individual concerned stating that they are suitable to work with under-18s.

For homestays for under-16s, all adults in the house are DBS checked. Furthermore, homestays who can accommodate under-16s for more than 27 days will be registered with the local council as Private Fosterers.

Finally, each new host must provide two character references (not from a family member) in support of their application. 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 in person with notes taken of any aspects that could indicate risk for young people. Hosts are then visited every two years.

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 are 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. Candidates can claim back the costs incurred on starting in post.

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.

Advice provided by the school is given from

<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

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

All Teachers, whether having Qualified Teacher Status (QTS) or not, are checked against the National College for Teaching and Leadership as to a prohibition notice applied to that individual.

The email address is: employer.access@education.gov.uk and the telephone number is: 0207 593 5394. The following details for each Teacher are submitted at the time of application: Teacher Reference Number (TRN), Full Name (including middle names) and the Date of Birth (and/or National Insurance Number).

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 senior management (the DSLs). 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

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. 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 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 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.

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.

Bathrooms

Staff should never:

- Undress in a shared, public bathroom area

For this reason, male staff should not use the bathroom on the first floor, and should instead use the ground floor, staff-only toilet.

School rules

All staff are expected to participate in enforcing school rules. If a member feels uncomfortable doing so in certain situations, the matter should be reported immediately. Teachers' 1:1 Feedback sessions are a key time to check (younger) students' understanding of rules.

3.3 Online Safety

Students and staff should be aware about the risk of meeting people whilst in the UK who they have met online. Posters offering advice are displayed around the school and the issue is also discussed during the induction and in 1:1 under-18s meetings on the students' first day.

Electronic contact with students

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 social-networking on Facebook etc is strictly prohibited.

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 career.

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 open access staff email address. 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. A poster dealing with the issue of respect for other students is also displayed in each classroom. Bullying can be verbal, emotional and physical bullying. Staff should also be aware of and take seriously the issue of cyber-bullying. Issues observed should be reported to a DSP or DSL.

4. Safeguarding Procedures

The following safeguarding measures are followed at St Giles Cambridge in order to look after students to ensure their safety and well-being:

4.1 Daily Checks

The Principal conducts daily tours of the school's common ways to check for any fire or health and safety risks that might present a danger to students or staff. This is backed up by our maintenance officer's weekly checks and completion of the safety log. In addition, there is an annual fire risk assessment of the school buildings and a general risk assessment of the premises. Our policy is to act promptly in response to recommendations made in the risk assessment reports. Individual staff members or students can also approach the Principal directly with H&S concerns.

4.2 Regular contact

Induction

All new students, on their first day at St Giles, have an induction. This induction is led by the Principal, but maybe shared with other staff at busy times. This induction includes information about the school and Cambridge, and students are made aware of our fire safety and first aid policies, and who to contact if they need any help.

1:1 Feedback with Teachers

All students have one-to-one feedback meetings with their main class Teacher every two weeks (and in their first week). This affords the school an opportunity to check on the general welfare of each student as well as eliciting feedback from the student about their course and their accommodation.

Any serious concerns expressed by students are followed up by arranging for a meeting with the the Designated Safeguarding Person or the Principal.

Under-18s meetings

During their first week in the school, all students under the age of 18 have a meeting with a Designated Safeguarding Person to check that they have settled in with their homestay and have no particular welfare issues. Under-18s are invited to liaise with the DSLs at any time if they have any welfare concerns during their time at St Giles. A list of weekly tasks relating to the safeguarding of the school's students should be kept on the desk of all non-teaching members of staff. This document also lists who will cover such tasks in the absence of a staff member.

Online feedback opportunities

As well as our End of Course questionnaire, used for quality management, all students are asked to complete a questionnaire at the end of their first week at St Giles in which they are asked for their opinion about the school and its services. Any concerns expressed by students are followed up by the team.

Suggestion boxes

Suggestion boxes are found in the office and in the café, for students to give their feedback on the school and anything they would like to have.

Focus groups

Focus groups are held every quarter, or more regularly if felt necessary. Students are invited to ~~attend this on a fairly random basis, selecting a range of time already spent at the school,~~ gender, age and nationality, as well as accommodation type. Students who attend are told in advance and are also invited to collect and share their class' opinions as well as expressing their own.

4.3 Weekly lists

Under-18s

Under-18s are highlighted on our digital registers, which can be viewed and attendance followed up on immediately completed.

Medical conditions

Medical details are requested upon registration, and just before students arrive at the school. For under-18s, parental consent is also requested along with details of medication, illnesses and the parents willingness for their child to be given over-the-counter medicines.

4.4 Absence from school

- We follow up on under-18 absence within 30 minutes of the start of lessons.
- We follow up on over-18 absence within 2 days of absence.

All Teachers must complete their class register at the beginning of each lesson. Due to our digital registers, there is no need for further physical signals.

4.5 Supervision at the school

Students have lanyards which identify if they are over-18 (blue) or under-18 (red) to make students more easily identifiable. Information for parents stipulates that children will not be supervised in free time, however, the Social Programme Officer is stationed in the café during the lunch break, the Principal spends most lunch breaks in the garden and has a good view of students there. Regular checks are made by the Principal and DoS moving around the building regularly.

4.6 Vulnerable students

A list of students with Special Educational Needs or Medical Conditions will be distributed to key administrative staff and the relevant class Teacher. Staff and homestay providers need to be particularly vigilant to safeguard any under-18s so listed.

The school is unable to accept students with high levels of physical disability due to the nature of the building. Students with permanent or temporary mobility issues will be provided with Personal Emergency Evacuation Plans, and the school will try to ensure that any such students are placed in classrooms nearest to the main fire escape routes and/or on the ground floor.

4.7 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. Student access is limited and students cannot download programmes onto school equipment. Staff accounts have greater access but are locked when the staff member is not present. Our notice boards include advice on E-safety and offers advice to under-18s about how to stay safe online and what to do if they receive unwanted contact online or via text.

4.8 Fire Safety

All students are informed about fire safety at their induction. The school has two possible Fire Marshalls, Jessie Goldup and Sarah Marsden. Their status as Fire Marshalls is publicised around the school.

4.9 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 students 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 have contact details of a First Aider, should the need arise and can 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 to receive all necessary medical attention through their own GP.

All students are offered support to arrange medical care. Under-18s, and students who appear particularly vulnerable (eg. low language level, shy nature), will be accompanied should they need medical help, for example to attend a doctors' appointments or to visit Accident & Emergency.

4.10 Outside of school

All under-18s will receive a black and white student ID card (adult students receive a red card) with the school and UK emergency phone numbers. A duty officer is available to take calls outside of the school's normal opening hours. All students are given advice about how to stay safe in Cambridge during their induction by the Principal, and also in their 1:1 meetings. This advice is also displayed on the company website and throughout the school building. Under-18s and their parents must sign the under-18 Disciplinary Code to confirm their understanding of it.

4.11 Leisure activities

~~The School runs a series of activities for students as part of its social programme. Risk-assessments are created for onsite and offsite events and include consideration of under-18s. Attendance at some activities is advertised and restricted to students who are over 18. Activities are advertised around the school and clearly marked either for all students or 18+ only. In times of peak student numbers, consideration will be given to scheduling activities of interest for those over and under-18.~~

The school sells tickets for 3rd party trips. Over 18s can attend all trips; some 3rd party excursions accept 16 and 17 years olds, in which case we sell tickets subject to parental permission being granted. These excursions do not accept under-16s unless accompanied by a group leader or member of school staff. In times of peak student numbers, St Giles Cambridge will organise full day excursions, so that our younger students have the opportunity to travel under supervised conditions. These will be fully risk-assessed and run to appropriate ratios, with attendance subject to parental permission. More information, and information for those leading trips can be found in the Social Programme Kit.

4.12 Accommodation

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 permitted to stay in homestay accommodation only. The main care provider in homestays accommodating under-18s is DBS checked. All adults in homestays accommodating under-16s is DBS checked.

For students aged 16 and 17 the curfew times are 23.00 (Sunday to Thursday) and 00.00 (Friday and Saturday). For students aged 14 and 15, the curfew times are 21.00 (Sunday to Thursday) and 22.00 (Friday and Saturday). In cases where a child does not return before the curfew begins, the homestay should phone the child to ensure they are safe and should inform the school. If the homestay provider is unable to contact the child, they should phone the St Giles emergency phone on 07943631947. The emergency duty officer will continue to attempt to make contact with the child and if necessary will inform the police and parents/guardians. The exact procedure is laid out in Appendix C

We arrange all accommodation except in exceptional circumstances. Third party accommodation providers, if used, are accredited by the British Council and ensure homestay hosts have undergone an enhanced DBS check.

Bathrooms and Bedrooms

Homestay providers for children must be particularly careful to ensure that children enjoy privacy in the bathroom and bedroom whilst they are in their care. All bathrooms should be fitted with a lock that can only be activated from inside the bathroom and windows or glazing in doors must allow for complete privacy. Adults should knock before opening the door to the bedroom of any child in their care and should not enter the child's bedroom unless in an emergency.

4.13 Private Fostering

Private fostering is when a child under the age of 16 (or 18 if disabled) is cared for by someone who is not their parent or a close relative. This is a private arrangement made between a parent/school and a carer/homestay provider when an under-16 is to stay in England for 28 days or more. It is a legal requirement that St Giles contacts the relevant local authority to inform them that a child will be living in a private fostering arrangement with one of St Giles' homestays. Details of local authority contacts can be found at the end of this document and the DSLs have the relevant contact details stored in their personal and work mobile phones.

4.14 Taxi transfers

We strongly recommend that students under the age of 18 book a taxi transfer through the school to facilitate their safe arrival and departure. However, parents may elect to opt out of this arrangement on behalf of their child and should forward the school the details of any relatives or guardians who will be meeting the child. Parents are informed that such arrangements may not be deemed adequate by the UKVI and may hinder their child's entry into the UK. Students aged 14-15 who are traveling to the UK without a parent or guardian must use the school's taxi transfer service.

4.15 Vetting of other adults

The School ensures 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 are also 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.

Any visitors to the school at times when students are present are asked to report and sign in at reception and are supervised around the school unless they have provided sight of their DBS certificates. Visitors are asked to wear a yellow lanyard so that their presence is visible to all staff and students.

4.16 Behaviour and Discipline

All students are expected to follow our school rules as laid out in the separate Disciplinary Policy. 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 Under-18 and our Adult Disciplinary Codes.

4.17 Radicalization and Extremism

ELT organizations have been identified as areas where extremists may expound their views and try to involve others. Consequently, we have introduced measures to combat this risk.

From day one we state our expectations to staff and students about respecting others' views and challenging any behaviour which does not allow students and staff to work easily together. We aim to make our staff and students aware of the risk of radicalization and extremism, especially amongst under-18s from overseas, and to reassure them that they will be supported if reporting any concerns.

Our advice to students includes educating them about the need for tolerance and acceptance of a range of views and this is positively encouraged by Teachers during lessons.

We ensure that the school building is an environment where everyone feels safe and supported and we do not allow the display or promotion of inappropriate materials or organisations. The school's IT firewalls ensure that appropriate filters are in place and we aim to foster e-safety amongst students so that they are aware of what terrorist and extremist material may look like.

Staff are made aware that they should speak to the Principal or her deputy in her absence if they are concerned about a particular student.

Please see the school's Prevent Policy under Section 9 of this policy for further details including advice for host families. Details of local authority Prevent staff can be found at the end of this guide.

4.18 Use of Images

It is sometimes valuable 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:

- i) Adults will be asked to give their consent for their photographs to be used for school purposes. In the case of students under the age of 18, their parents are asked for permission, but the student may withdraw permission themselves.
- ii) 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.

4.19 Under-18s in an Adult Environment

The school makes clear in its publicity that the school is an adult environment and parents or guardians are asked to sign parental consent forms before any UNDER-18s can begin lessons. However, it is important that all staff remain mindful of the fact that children are present within this adult environment. Some aspects to consider include:

- ☐ **The age of consent in the UK is 16 but that this may vary from country to country:** The age of consent is clearly stated in the students guide.
- ☐ **Material selection and topics for discussion:** Teaching staff should be mindful that while more 'grown up' themes such as politics and economics are acceptable areas for discussion, some topics, such as drugs, alcohol or topics of a sexual nature should not be used in a mixed age classroom. If a Teacher has any doubts over the suitability of materials or lesson topics then they should consult with the Principal or Director of Studies.
- ☐ **Supervision outside lesson times:** Although under-18s are not formally supervised during break times, staff members are around the school and office doors are open during these times.

5. Sharing Information Regarding Child Protection

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

It is the responsibility of the management to ensure that appropriate information is available to and exchanged between those involved in this organisation and its activities. Some information is confidential and is only shared on a strictly need-to-know basis.

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 Safeguarding 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 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.

5.4. Other Bodies

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

5.5 Safeguarding Lead for the organisation

The Managing Director, Mark Lindsay, takes the strategic lead on safeguarding for the organisation. The Designated Safeguarding Lead must report all incidences to him.

5.6 Data Protection

A full copy of the groups Data Protection Policy can be found online

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 change in 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.

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 Persons 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 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.

7.2. What to do if abuse is suspected or disclosed

- Never guarantee absolute confidentiality, as Safeguarding will always have precedence over any other issue
- Endeavour to meet the student in a semi-public or visible space if possible
- Listen to the student, rather than question him / her directly
- Offer him / her reassurance without making promises, and take what the student says seriously
- Allow the student 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 separate files in a locked room or in secure electronic files. Only the Designated Safeguarding team will have access to these files.

7.4. The Records

In any case where an allegation is made, or someone in St Giles has concerns, a record should be made. *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 to 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. The school has 2 Designated Safeguarding Leads so that, if the allegation refers to a Designated Safeguarding Lead, the second Designated Safeguarding Lead or Designated Safeguarding Person should contact the Managing Director, Mark Lindsay on 020 78370404.

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 Cambridge 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 as well as 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 adult facing the allegation
- Whether the adult 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, 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 Cambridge 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 Cambridge LSCB immediately. No decisions will be made on further action without referring to the LSCB.

8.4 Contacting the Local Safeguarding Children Board

The Local Authority Designated Officer (LADO) at Cambridgeshire Safeguarding Children Board can be reached at 01223 727967 and Emergency Out-of-Hours Duty Team on 01733 234724. The **Multi-Agency Safeguarding Hub can be contacted on** 0345 045 1362 or at the address MASH.C&F@cambridgeshire.gcsx.gov.uk

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 School has taken the decision to incorporate Prevent within the umbrella of safeguarding. The Prevent Officer for this school is **Jessie Goldup** (Principal and Designated Safeguarding Lead).

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 for the Managing Director any Prevent issues

9.5 Prevent Training for Staff

The school's initial training on Safeguarding, which all staff complete during induction, also includes information about Prevent.

Hosts receive information about recognising signs of radicalisation and are asked to report any concerns they have to the school.

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 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.

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.

9.7 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 make use of a classroom for the purposes of prayer if they find that it is free and/or a space would be made available upon request. A list of appropriate places of worship is provided to students in the student guide which they receive prior to their programmes.

9.8 E-Safety

The main risks to students include online grooming and/or harassment 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 offsite IT supervisor can also remotely monitor internet logs from every PC and checks unusual usage on a routine basis.

The School provides internet access for student use in the self-access centre and the cafe. Both of these areas are public spaces within the building and care has been taken to position the PCs in areas where the screens are easily visible to other students and members of staff.

There are also posters in the self-access centre and the cafe that give advice to students on social media access and posters that encourage students to report any incidences of cyber-bullying and harassment.

9.10 Referrals

A referral to the Channel Panel (multi-agency hub to provide support to people at risk of radicalisation) 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 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 MASH to initiate the referral process. The current contact details are as follows:

Referrals relating to Prevent concerns will be made to the **Multi-Agency Safeguarding Hub** on 0345 045 1362 (children) or 0345 045 5202 (adults) at the address MASH.C&F@cambridgeshire.gcsx.gov.uk

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 resolutionChallenge unacceptable behaviour such as racism or bullying that can impact on the well-being of individuals and groupsProvide 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 principles and ensuring freedom of expression and freedom from threat.Ensure that diverse views can be heardWhen 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 not offer 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
	Third party venue hire arrangements	<ul style="list-style-type: none"> Agents and intermediaries that hire our classroom space for the purposes of meetings would be 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. Such participants would be 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"> 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 structured and balanced handling of potentially contentious issues 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. Prevent will also be outlined at the annual homestay gathering which is usually held in the winter. • The school monitors student feedback closely after the first week and at the end of the course. • Every new homestay host hosting under-18s is carefully screened and required to undertake a DBS check. All hosts are asked to sign Child Protection, Prevent and English UK documents to confirm their understanding. The property is visited by the homestay coordinator before being approved to be a suitable environment for students. Homestays are 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"> • 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	<ul style="list-style-type: none"> • Encourage all students to be able to think critically for themselves and to take

	environment	<ul style="list-style-type: none"> responsibility for their actions. 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-16s are not accommodated in the same homestay
	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

The risk of being put at harm from physical or emotional abuse	Leadership	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Ensure they know who to 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. We have a photoboard of all staff should a student want to see who is who

	Curriculum and environment	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Ensure that homestay providers who accommodate young people undertake basic safeguarding training
	Prevent Officer	<ul style="list-style-type: none"> Inform the police when necessary

Tension between different groupings or segregation that leads to isolation	Leadership	<ul style="list-style-type: none"> Academic management need to ensure that there is a good nationality mix in each class
	Staff	<ul style="list-style-type: none"> 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 to follow up concerns Provide focused welfare support to students who are identified as being at risk of becoming isolated
	Students	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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

10. 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. Free online Child Protection training from Barnardos

<http://www.barnardos.ie/what-we-do/training/elearning/elearning-course-introduction-to-child-protection.html>

2. Cambridge Local Safeguarding Children Board <https://www.cambslscb.co.uk>

3. A link to the reporting incidents form: _

<http://www.safeguardingcambspeterborough.org.uk/children-board/reporting-concerns/>

4. 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 www.nspcc.org.uk/preventing

5. British Council guidance on under-18s_

<http://www.britishcouncil.org/education/accreditation/information-centres/care-children>

6. NSPCC ChildLine: 0800 1111 www.childline.org.uk

7. UK Safer Internet Centre

This site contains advice on how to use the internet and new technologies safely and responsibly.

Appendix A: Safeguarding Incident Concern Form

Concern (& Disclosure/Allegation) Form

Please complete and give to a Designated Safeguarding Lead (Jessie) if you have any Safeguarding concerns about a student. You must complete the boxes in bold; the other information can be filled in by the DSL later.

Date	
Student first name	
Student family name	
Gender	
Date of birth	
Nationality	
Group / individual	
Student ID	
Name of person noting concern	
Role/Connection with St Giles	
Date and time concern noted	
Location	
Concern (Please provide as much detail as possible)	
NB: If reporting a disclosure / allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side or additional sheets to write more.	

Response to concern: This section to be filled in by the DSP/DSL.
Do parents / group leader / agent / homestay / others need to be informed?

Response	By whom	When

Appendix B: Action to be taken by staff if a student under-18 years goes missing from a school excursion/off-site activity

1. Check that all the other students are present. All staff and students should be asked to explain when they last remember seeing the missing student
2. A member of staff will search the immediate vicinity and if at a venue the venue manager should be informed to arrange a search
3. A member of staff (or other students) should phone the student's mobile number (staff leading the trip will have full list of contact details for the students on the trip).
4. The Principal (or his/her deputy) should be informed if the student is still missing.
5. A decision will be made as to whether the group should travel back to Cambridge or should be moved to a different location where the rest of the group can be safely supervised
6. Depending on the precise circumstances, the Principal, or deputy, or the staff on the trip will call the police. Precise information, timings and description should be readily available
7. The Principal will contact the student's parents/guardians
8. A full record of all activities taken up to the stage at which the student is found will be made for an incident report
9. The student's parents/guardians will be informed about what happened

Appendix C: Action to be taken by hosts/staff if a student under-18 years does not return to the homestay at the required times

1. The host will phone the student's mobile phone. If the student does not answer, the host will leave a message asking the student to get in contact as soon as possible.
2. If the student does not return to the homestay or does not return the host's call within 30 minutes, the host will phone the school. If this is outside of normal working hours, the host will phone the school emergency number:07943631947
3. The emergency duty officer will attempt to call the student and, if known, friends of the missing student.

Depending on the time, a decision will be made as to the appropriacy of point 4, 5 and 6.

4. If the emergency duty officer is unable to contact the student or friends, he/she will contact the parents/guardians of the missing student and ask for further contact details.
5. The emergency duty officer will also ask the parents/guardians to try and contact the student
6. If no contact can be made, the emergency duty officer will contact the police and the Principal
7. A full record of all activities taken up to the stage at which the student is found will be made for an incident report
8. The student's parents/guardians will be informed about what happened

Appendix D: Emergency Action Plan

EMERGENCY ACTION PLAN

The St Giles International Emergency Action Plan is intended to assist agents, students, parents and staff to understand our procedure during an emergency situation if any St Giles centre is closed due to extenuating circumstances, such as disasters, either natural (e.g. hurricane), or man-made (e.g. terrorism). Please note that this procedure is intended as a guideline only, as every situation is different and may require a different response.

Responsibilities of Key staff

Center Director or Principal

- ☐ To coordinate emergency response and liaise closely with other key staff members
- ☐ To inform and update St Giles Head Office as the situation develops
- ☐ To ensure at all times that they maintain a record of home telephone numbers, mobile/cell phone numbers and email addresses of all administrative staff and management to contact in the event of the emergency. This information should be kept confidential to the Center Director/Principal and Director of Studies. An updated list should be sent to the Managing Director's PA quarterly.

Director of Studies

- ☐ To contact all academic staff and instruct them accordingly, considering such issues as when to return to work, whether the school buildings are safe to use and accessible ☐
- ☐ To liaise with Registrar and student services to establish the well-being of existing students ☐
- ☐ To maintain a list of all Teachers' contact details and to provide an updated copy to the Centre Director/Principal quarterly.

Assistant Director of Studies

- ☐ To assist or deputize for the Director of Studies as required

Registrar (to be assisted by Student Services where possible)

- ☐ To contact all current students and update them on the nature of the emergency and how it affects the school including whether we are running classes and whether the building is safe to use and accessible
- ☐ To contact agents, and wherever possible the students' families and/or prospective students who may be affected by the emergency and keep them informed about our response and the well-being of their students
- ☐ To contact agents or emergency contacts of students who remain unaccounted for
- ☐ To pass on to the Principal emergency contact information of any students who are unaccounted for

Accommodation – Homestay & Residences

- ☐ To contact and update host families and residences about the emergency and the way we are dealing with it
- ☐ To liaise with student services to establish the well-being of existing students
- ☐ To advise on whether and when it is safe to return to the school for classes

Head office

- ☐ To update group website with a special notice on the homepage providing information or contact details in event of emergency
- ☐ To provide email and telephone responses with an update on the latest information we have
- ☐ To liaise with local centre management to ensure we have the latest information

Information for Staff

All efforts will be made to keep staff updated on the status of the emergency and staff should check emails regularly for the latest information on closure of the school and when it is expected to reopen. Where there is a breakdown in communication staff should follow official advice on TV and radio as to whether or not it is safe to travel. At all times, staff should exercise discretion and not travel if they feel it is unsafe to do so.

Contacting Existing Students, Their Agents, and Their Emergency Contacts

Our students are typically far from home and St Giles has a duty of care to keep their families fully informed about their welfare. Therefore, it is essential that accurate information about the emergency, and those affected, is passed on to agents and/or emergency contacts at the very earliest opportunity. Those contacted will need to know the nature of the emergency, how the students are affected, when to expect the school to reopen, and how to contact the school.

Emergency Point of Contact for Agents, Students, and Other Concerned Parties

School	Emergency Email	Emergency Telephone (24 hours)
St Giles London Central	londoncentral@stgiles.co.uk	+44 (0) 7804 919788
St Giles London Highgate	londonhighgate@stgiles.co.uk	+44 (0) 7796 552488
St Giles Cambridge	cambridge@stgiles.co.uk	+44 (0) 7943 631947
St Giles Brighton	brighton@stgiles.co.uk	+44 (0) 7816 414660 +44 (0) 7879 033142
St Giles Eastbourne	eastbourne@stgiles.co.uk	+44 (0) 7833 788118

Appendix E: St Giles Cambridge Fire Emergency Plan

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- If you discover a fire, you should operate the nearest alarm by pressing on the Call Point and follow the exit procedure posted around the building. The Call Points are indicated on the attached plan of the site.
 - If there is no nearby alarm, you should shout "Fire" and then follow the exit procedure below.
 - If you hear the fire alarm or hear someone shout "Fire" you should follow the exit procedure below.
 - If you are with a group of students in a room you should lead them out of the building by the nearest fire exit, following signs to the nearest exit. You should take the register with you. No-one should stop to collect belongings. Everyone should be instructed to assemble in Bateman Mews, behind the school. The member of staff responsible for his/her group of students should check using the register that all students are at the assembly point. The Fire Marshall, Jessie Goldup, is responsible for checking with the members of staff at the assembly point that the students in the group have been accounted for. In Jessie's absence, Sarah Marshall will check whether all staff and students are present.
 - If you are in other areas, e.g. the Café or Study Centre, you should leave the building by the nearest fire exit. You should instruct other people nearby to do the same, without stopping to collect belongings. You should instruct people to assemble at the point indicated above.
 - If it is considered safe to do so, the Principal (or Sarah Marshall in her absence) should try to ascertain that the building has been evacuated. No risks should be taken, however.
 - The Principal (or Sarah Marshall) is responsible for telephoning the emergency Fire Service.
 - Fire extinguishers are located at various points in the School. These should be used only by people who are competent to operate them.

Appendix F: St Giles Cambridge Lockdown Plan

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- There may be occasion when students should stay in their classrooms rather than evacuate, for example if an intruder were to enter the building.
 - If this were to happen, a text message will be sent to all staff (from Jessie Goldup, Principal, or Sarah Marsden in her absence). The fire alarm will not be sounded, as the aim would be for students to remain inside the building and inside their classrooms.
 - If you are with a group of students in a room, please ensure to maintain a calm environment whilst explaining the situation to your students.
 - If such emergency were to happen during break time, Jessie Goldup, Principal, or Sarah Marsden in her absence would make a decision as to whether to direct students to classrooms or away from the scene as necessary.
 - As soon as possible, a member of staff will visit classrooms and communal areas to check on groups there.
 - When the lockdown ends, a further message will be sent, and all areas of the school will be visited.

Appendix G: St Giles Cambridge Social Programme Kit

Policy and guidance overview.

1. The social programme activities are led as an additional job for existing staff. As such the school aims to match activities to teachers' qualifications and areas of specific interest. As all of our activity leaders are staff they are all subject to an enhanced DBS check and have completed Level 1 Safeguarding at least.
2. The majority of the activities we run, on and off-site, are relatively low risk events with few anticipated dangers. However, St Giles Cambridge produces a risk assessment document for all activities.
3. If the activity has a higher level of risk, we take appropriate precautionary action, and have a relevantly qualified member of staff lead the activity where possible. The level of risk is also reflected in the staff-student ratios.
4. For an on-site, low risk activity, such as conversation club or a craft workshop, there is no strict student to teacher ratio, but there is a rough limit of about 15-20 students per activity depending on the size of the room and the nature of the activity. So far, we have not had more than 12 participate in a single event. On-site we have first aid kits, a teacher who knows the building and the activity well. The member of staff leading such an activity will also have the support of the Principal and Front Office staff as they will also be present in the building.
5. For an on-site, higher risk activity, such as a cooking event in the café, there is a student to teacher ratio of 15:1. The member of staff leading such an activity will also have the support of the Principal and Front Office staff as they will also be present in the building.
6. For an off-site guided tour, such as trip to the Botanic Gardens, there is a limit of 15 students per teacher to ensure that the group can stay together under the supervision of the teacher. This limit is strictly enforced should there be any under 18s in the group.
7. For an off-site low risk activity, such as the restaurant trip, there is no strict student to teacher ratio, but should there be a huge amount of interest in the trip, we will seek an extra staff member to help manage the activity. It is also extremely rare to have more than 10-15 students for such a trip, which keeps numbers in the range suggested above (a maximum of 15 for a guided tour).
8. Summer weekend day trips will have a minimum of 1 – 20 staff ratio. However, this may be lowered to 1- 15 depending on the number of U18s attending the social program and the nature of the event.
9. The Social Program Organiser is first aid trained and a first aid kit is available in the staff room, to be taken out on trips.
10. Staff leading social program activities will be made aware of the names and number of U18 students attending the event, and who has provided details of any medical needs.
11. All staff leading social program events will be given a file containing information they may need:
 - a. A social programme mobile telephone – for taking pictures for our Instagram account
 - b. A list of who has given permission for their photos to be taken
 - c. The under-18 list, including contact details
 - d. A list of emergency staff contact numbers
 - e. The emergency procedure
 - f. An incident report form so that if anything happens it can be documented immediately
 - g. A safeguarding report form so that if anything is observed or spoken about it can be documented immediately

- h. A document which outlines the steps to be taken should an U18 become lost
- i. A sheet to explain why certain activities are only for Over-18s, to avoid awkwardness at, say, pub events.

St. Giles Cambridge Social Programme Kit Checklist

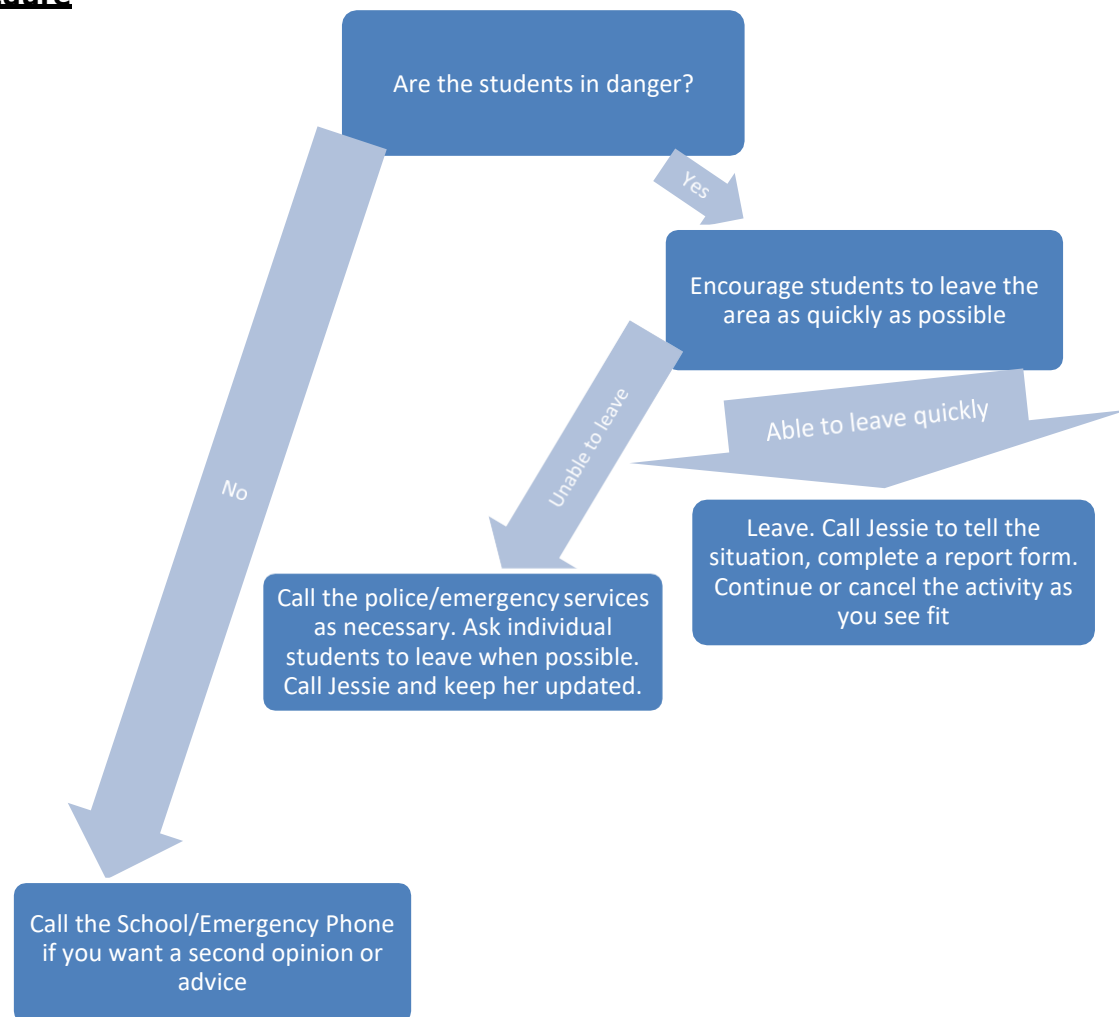
Do you have:		
a.	A social programme mobile telephone – for taking pictures for our Instagram account?	
b.	A list of who has given permission for their photos to be taken?	
c.	The under-18 list, including contact details?	
d.	A list of emergency staff contact numbers?	
e.	The emergency procedure?	
f.	An incident report form so that if anything happens it can be documented immediately?	
g.	A Safeguarding Incident Concern Form so that if anything is observed or spoken about it can be documented immediately?	
h.	A document which outlines the steps to be taken should an U18 go missing?	
i.	A sheet to explain why certain activities are only for Over-18s, to avoid awkwardness at, say, pub events?	
j.	The First Aid Kit?	

St. Giles Cambridge Social Programme Kit

Important phone numbers

Social Programme Phone 1	Liaising if more than one person on activity	07908625065
Social Programme Phone 2		07458140980
St Giles Cambridge	Any support need during working hours	01223 358089
St Giles Emergency Phone	Any support need out of hours	07943 631947
Jessie Goldup	Safeguarding, first aid, emergencies	07850 457576
Sarah Marsden	If Jessie doesn't answer	07795 818540
Lea Hanakova	Any support need	020604261141
Police/Ambulance/Fire	If students are in danger	999

Emergency procedure



- Students can leave the activity at any point.
- Under-18s can also leave, but encourage them to leave with other students for company.
- If a student needs to go to hospital, and especially for Under-18s, a member of staff should accompany them.
- Under-16s cannot travel outside of Cambridge without being accompanied, so please do not leave them behind (see separate guidance).

Protect yourself by:

- Being aware of the risks (risk assessments prepared for all activities)
- Asking questions and for support
- Avoiding physical contact with any student, and especially under 18s
- Avoiding being alone with a single student
- Don't take photos of students on your own mobile
- Give students the work mobile number, not your own
- Avoid contact through social media with students

Action to be taken by staff if a student under 18 years goes missing from a school excursion/off-site activity

10. Check that all the other students are present. All staff and students should be asked to explain when they last remember seeing the missing student
11. A member of staff will search the immediate vicinity and if at a venue the venue manager should be informed to arrange a search
12. A member of staff (or other students) should phone the student's mobile number (staff leading the trip will have full list of contact details for the students on the trip).
13. Jessie (or Sarah) should be informed if the student is still missing.
14. A decision will be made as to whether the group should travel back to Cambridge or should be moved to a different location where the rest of the group can be safely supervised
15. Depending on the precise circumstances, Jessie, or Sarah, or the staff on the trip will call the police. Precise information, timings and description should be readily available
16. Jessie will contact the student's agent/parents/guardians
17. A full record of all activities taken up to the stage at which the student is found will be made for an incident report
18. The student's parents/guardians will be informed about what happened

St. Giles Cambridge Social Programme Kit
Incident Report Form

Date and time of incident:	
Where did it occur?	
Name of person completing this:	
Name(s) of injured party/parties:	
Brief details of the incident:	
Extent of injury/details of diagnosis:	
Action taken:	
Advice given:	
Any other pertinent information:	
Parties informed or consulted:	
Further follow up required?	

Signed: _____ **Date:** _____

St. Giles Cambridge Social Programme Kit

Safeguarding Incident Concern Form

Concern (& Disclosure/Allegation) Form

Please complete and give to a Designated Safeguarding Lead (Jessie) if you have any Safeguarding concerns about a student. You must complete the boxes in bold; the other information can be filled in by the DSL later.

Date	
Student first name	
Student family name	
Gender	
Date of birth	
Nationality	
Group / individual	
Student ID	
Name of person noting concern	
Role/Connection with St Giles	
Date and time concern noted	
Location	
Concern (Please provide as much detail as possible)	
NB: If reporting a disclosure / allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side or additional sheets to write more.	

St. Giles Cambridge Social Programme Kit

Why Certain Activities are Only for Over-18s

It is the law in the UK that under-18s cannot enter a pub (or place whose main business is the sale of alcohol) unaccompanied*. Under-18s cannot buy any drink from a licenced bar, even if it is a coke.

For more information, please check: <https://www.gov.uk/alcohol-young-people-law>

*Being accompanied means that someone over-18 is responsible for you, which implies your parent or a guardian and cannot mean St Giles staff or another student.

Your parents have agreed that your course may be terminated if you break our rules:

- | | |
|--|---|
| | <p>5. We understand that the school reserves the right to terminate the course of any student who seriously or persistently misconducts himself/herself at the school or in the homestay during his/her stay. In such cases, there will be no refund of fees, and we will be responsible for our child's return or onward journey and the associated costs.</p> <p>Such misconduct may include: possession/consumption of illegal drugs/alcohol; intentional damage of school or host family property; repeated absence from classes; repeated disturbance of classes or in the host family; repeated breaking of school rules; criminal activity.</p> <p><i>The school's Student Disciplinary Code is available on request</i></p> |
|--|---|

And you have signed our Disciplinary Code to say that you agree with the rules and agree to respect those rules, which include:

- Smoking – it is illegal to buy cigarettes/tobacco if you are under 18 and it is illegal to smoke cigarettes if you are under 16.
- Under-16s are not allowed to smoke either at the school or outside the school
- Students aged 16 and 17 are not allowed to smoke at the school or at their homestay, unless the school has received written permission from their parents or guardians
- Alcohol – You may not enter any pubs, bars or nightclubs. It is illegal to buy and/or drink alcohol if you are under 18
- Using or having illegal drugs is strictly not allowed. If someone offers you drugs always say NO!

Our rules are fixed to protect you and us as a school and are in line with the law in England, so please respect our rules. Otherwise, you put yourself and the school in danger and therefore there can be no exceptions to those rules.