



ST GILES
LONDON
HIGHGATE

SAFEGUARDING AND CHILD PROTECTION
POLICY

Keeping our younger students safe from harm

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St Giles London Highgate Safeguarding and Child Protection Policy

St Giles is committed to a practice which protects children from harm. This includes:

Safeguarding

- the school's duty of care to look after all of our students, particularly children, young people and vulnerable adults, and help them to achieve their potential
- strengthening relationships of trust between under 18s and adults
- ensuring safe systems are in place for the well-being of all of our students, particularly under 18s

Child protection

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

For the purposes of this policy a child is defined as a person under the age of 18.

1. Introduction

Between 25% and 30% of the students that study at St Giles London Highgate 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 London Highgate is usually 14 and school publicity makes it clear to parents and guardians on its website that these children will be studying in an adult educational environment. We do also accept students aged 12+ to study in closed groups.

Staff in this organisation accept and recognise our responsibilities to develop awareness of issues which cause children and young people harm. We will endeavour to safeguard children and young people by:

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

2. Designated Safeguarding Persons

Andy Gaskins is the Designated Safeguarding Lead at St Giles Highgate.

The school also has a Designated Safeguarding Person (DSP), Joni Stephens, who and a Deputy Designated Safeguarding Lead and Welfare Officer, Rachel Gomez, who is also the Under-18 Welfare Officer. The identities of all members of our safeguarding team are advertised around the school and on the students' arrival, and the Under-18 Welfare Officer meets newly-arrived under-18s during their first week. When Rachel is on holiday, Sally Jones conducts the under-18 meetings.



Andy Gaskins
Designated
Safeguarding Lead



Rachel Gomez
Deputy
Safeguarding Lead



Joni Stephens
Designated
Safeguarding Person

The Designated Safeguarding Lead, Andy Gaskins, the Principal, has overall responsibility for training and has the authority to take all necessary decisions to ensure that all students are safe and protected. This designated person will liaise when necessary with the Local Child Safeguarding Partners.

Andy Gaskins (Principal), Rachel Gomez (Director of Studies) and Joni Stephens (Assistant Director of Studies) have received specialist safeguarding training. Andy has completed advanced safeguarding training as well as training on safer recruitment, Lucy Wencker (Student Services) has completed the Accreditation UK course Safeguarding for Language Centre Staff and Matthew Anni (Accommodation Officer) has completed advanced level safeguarding training.

As a starting point all members of staff and homestay providers receive a copy of the School's Safeguarding & Child Protection Policy.

In addition to the training undergone by the DSP DSL and Deputy DSL all staff at St Giles Highgate as well as our homestay hosts undergo Basic Awareness Safeguarding training. All staff will have refresher training and may be asked to complete the next level of Child Protection training if appropriate. The Director of Studies has also received safer recruitment training.

The DSP, DSL and Deputy DSL will also participate in relevant local and national training events in relation to their Safeguarding roles

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 any other staff member that is trusted by the individual. This is raised

during induction and there are prompts to elicit concerns during regular one-to-one feedback sessions which all students have with their teachers.

Students are also encouraged to give feedback on any concerns during regular Under-18 meetings, and on their Week 1 Survey.

3. Staff Recruitment Policy

To ensure that employees working for St Giles are suitable for work with children, the following procedures are followed:

All staff must submit a CV with their application and all gaps in CVs must be explained satisfactorily. Proof of qualifications will be required and a minimum of two references will be followed up. The reference request will ask if the referee has any reason to believe that the employee is unsuitable for work with children. Staff will be required to affirm that there is no reason why they should not be employed in situations where they have responsibility for, or substantial access to, persons under 18.

Staff members are asked to agree to undergo a fresh enhanced DBS check before they commence employment with the school. Recent DBS checks requested by previous employers are not transferable. The School will note the date of issue and certificate number but will not retain any original DBS certificates on file. The DBS check is valid with the school for a period of three years.

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

At the same time, if a DBS check subsequently reveals matters which 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 provisional offer of appointment or to terminate a contract under the Disciplinary Procedure for misrepresentation or failure to disclose material facts during the job application/interview process.

It is against the law for the school to knowingly employ anyone who is on the DBS children's barred list.

If a DBS check has not come back by the time the applicant is due to start work, there should be exceptional and justifiable circumstances for employment to commence prior to receiving clearance. However, under such circumstances the employee would not be permitted to have unsupervised access to under-18s. Homestay providers will not be given students to accommodate until we have completed the DBS check

Further details of St Giles' policy on Disciplinary and Grievance procedures are to be found in the Staff Handbook and Contract of Employment. 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.

An applicant's suitability to work with children will be judged on a case-by-case basis and in light of the results of the relevant pre-appointment checks carried out on him or her. The fact that a person has a criminal record does not automatically make him or her unsuitable to work with children. St Giles will make a judgement about suitability taking into account only those offences which may be relevant to the particular job or situation in question. In deciding the relevance of convictions a number of points will be considered

- *Seriousness and nature of offence/s* – in general, serious convictions for sexual, violent or drug offences will be particularly strong contra-indicators for work with children. This includes assault and violence against a person, affray, riot and violent disorder, aggravated criminal damage, arson, drink and drug induced driving, drug offences, robbery and sexual offences.
- *Nature of appointment* – will help to assess the relevance of the conviction. For example, serious sexual, violent, drug or drink offences would give rise to particular concern where a position involves the care or supervision of children or teaching, training or instruction of children. Driving or drinking offences would be relevant in situations involving transport of children.
- *Age of offence/s* – offences which took place many years in the past may often have less relevance than recent offences. However, convictions for serious violent or sexual offences are more likely to give cause for concern than for instance an isolated case of dishonesty committed when the person was young. The potential for rehabilitation must be weighed against the need to protect children.
- *Frequency of the offence/s* – a series of offences over a period of time is more likely to generate cause for concern than an isolated minor conviction.

The disclosure should be discussed with the prospective employee. It is necessary to verify that the information contained on the disclosure does indeed relate to the person concerned. This verification must be sought prior to any judgements being made. The discussion will also aid the decision making process and should again broadly focus on the seriousness and nature of the offence/s, the nature of the appointment, age of offence, frequency of the offence/s and any concealment of offences at the application process.

Based upon the findings of this discussion, a judgement will be made with regard to the suitability of the prospective employee. This decision is not taken in isolation – at least two people should be involved; the Local Safeguarding Children Board may be able to offer support. A record made of the decision, bearing the judgement and the Principal's signature is kept on record in the Principal's office.

On occasions it is not possible for certain applicants to get a criminal record check. For a British national returning to the UK after working overseas where the authorities have refused to provide a record check because they are a British national, we will request a DBS check for their UK records and will take additional care with the other recruitment checks: checking identification and qualifications and obtaining a proper reference, and supervision.

For an overseas national, we will document what action has been taken to obtain a check and why this has not been possible, and take additional care with identity and qualification checks, exploring employment history and obtaining references. Based upon our findings, a judgment is made with regard to suitability for the role and the level of supervision.

With regard to homestay providers, St Giles' policy at present is to run enhanced DBS checks only on the main care-giver (except in the case of Private Fostering arrangements, where all adults aged 16 and over will undergo a DBS check). We ask the main care-giver to ensure that all other adults in the homestay are aware of our Safeguarding and Child Protection Policy and we ask other resident adults to complete a self-declaration form saying that they are suitable to host children. When performing DBS checks on the main care giver, the application makes clear that the activity is taking place at the applicant's home address.

We maintain a Single Central Record of the recruitment and vetting checks undertaken in respect of all staff in regulated activity with under-18s before they start employment at St Giles Highgate. The Record is checked and monitored regularly by the Principal.

4. Staff Code of Behaviour

4.1 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 and neglect. This organisation is committed to creating a safe environment in which young people can feel comfortable and secure while engaged in any of St Giles' Programme. Staff should at all times show respect and understanding for the individual's rights, safety and welfare, and conduct themselves appropriately.

4.2 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 endeavor to:

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

One-to-one contact

Staff should:

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

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.

4.3 Electronic contact with students under-18

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

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

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

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. St Giles Highgate provides separate toilets for both male and female students under the age of 16.

4.4 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.

4.5 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 day 1 under 18 meeting.

5. Safeguarding Procedures

The following safeguarding measures are followed at St Giles Highgate in order to look after under-18s to ensure their safety and well-being.

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. 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 and H&S is a standing item on the agenda for regular staff meetings.

All new students on their first day at St Giles are made aware of our fire safety and first aid policies.

All students have one-to-one feedback meetings with their main class teacher every two weeks (U18s 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 Accommodation Officer, the Director of Studies (Welfare Officer), Assistant Director of Studies, or the Principal.

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 serious concerns expressed by students are followed up by the Accommodation Officer, the Director of Studies (Welfare Officer), Assistant Director of Studies, or the Principal.

During their first week in the school all new students under the age of 18 have a meeting with the Designated Safeguarding Person, **Joni**, to check that they have settled in with their homestay and have no particular welfare or travel/commuting issues. The Designated Safeguarding Person will then conduct fortnightly check-in meetings with all under-16s on Wednesdays at 1:15. These meetings are obligatory. Under-18s are invited to liaise with **Joni** at any time if they have any welfare concerns during their time at St Giles.

The following specific safeguarding measures are followed in order to help keep students who are under-18 safe from harm:

Students under the age of 16 must book a 28 lesson per week course. These courses include three social program activities in the price. An exception may be made for students aged 14-15 who are travelling as part of a group that includes group leaders and scheduled activities. Exceptions may only be made at the discretion of the Principal.

5.1 Weekly lists

The Designated Safeguarding Person compiles a weekly list of new and existing students who are under the age of 18. The list is displayed in the staffroom and a copy is also held by the duty officer. The out of hours' duty officer keeps up-to-date next of kin details with them.

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.

5.2 Absence from school, procedure

All teachers must complete their class register at the beginning of each lesson. The registers are checked by the Director of Studies, the Assistant Director of Studies, the Principal or a member of the front office team and if an U18 student is not marked as present within 15 minutes of the start of the lesson (morning and afternoon), the member of staff will then enter the classroom to confirm that the student is absent.

All Under 18 students are highlighted on the register. If an under 18 is missing and no one has come to confirm this within 20 minutes of the start of the lesson, teachers should contact the office by phone to report the absence. Teachers should only leave their classes unattended if there is a risk to the welfare of a student.

A paper record of these daily attendance checks, any absences and action taken are kept by the DOS. When the DOS is absent this is done by the Principal.

If an Under 18 does not return for lesson 3 after the break the teacher should contact the office to report their absence.

Appendix C, below, sets out the procedure to be followed when a student is confirmed as absent from their class.

The policy on students waiting to the start of the next lesson before entering class if arriving late does not apply to Under 18s, who should enter class as soon as they arrive.

A copy of the absence procedure for U18s is displayed in the staffroom and included in the induction process.

5.3 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 are advertised and restricted for students who are over 18 only. Activities are advertised around the school and clearly marked either 'All ages welcome' or 'Over 18 only'

Students aged 14-15 will be entitled to three social program events per week included in their tuition fees. All students of this age are strongly encouraged to participate in the school's social program. The DSP, Welfare Officer, Social Program Officer or Principal will follow up cases of non-attendance to ascertain the reason why. (Students aged 14-15 who are accompanied by a group leader may be exempt from these at activities at the discretion of the Principal)

5.4 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.

5.5 Outside of school

All under-18s will receive a white student ID card (Adult students receive a green card) with the school's and UK emergency phone numbers. A duty officer is available to take calls outside of the school's normal opening hours. Under-18s are given advice about how to stay safe in London during their induction by the Designated Safeguarding Person. This advice is also displayed on the company's website and throughout the school building.

5.6 Supervision at the school

There is a rota for staff to supervise the school site during breaks.

5.7 Leaving London

If a student is aged 14-15 then they cannot leave London without written permission from their parents/guardian. They must be accompanied by another student under the age of 18, or with a member of the school staff, or with an adult who has been approved by their parents, guardians or the school. We ask hosts to make sure students aged 14-15 go with this person or that they go to an arranged meeting point to wait for this person

The school and the student's hosts must know where the student is going, when they are going, how they will travel, when they will return, and who they will be with. If a student aged 14-15 does leave London without this permission, the school will act in accordance with the disciplinary policy for U18s and this may result in the student's course being cancelled.

5.8 Vetting of other adults

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

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

From time to time we may have visitors in the school making use of our rooms. All visitors must be signed in and must wear a green lanyard whilst they are in the building. They are informed that there are children studying at the school and it is made very clear that they should not have any contact with our students during their stay. If they require food and drink during their stay, this is brought to their rooms. They are not allowed access to the café.

5.9 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 only permitted to be accommodated in homestay accommodation. The main care provider in homestays accommodating under-18s is DBS checked. Under-16s are not accommodated with students aged 18 and over.

For students who are under the age of 16 there is a 21.00 pm curfew in place Sunday to Thursday inclusive and 22.00 Friday and Saturday; for students aged 16 and 17 the curfew times are 23.00 (Sunday to Thursday) and 00.00 (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 07796 552 488. 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 D

The school requires hosts to help under-16s with their journey to the school on their first day. The school will also show students the safest route to and from the school. Risk assessments have been conducted for these journeys.

Third party accommodation providers are accredited by the British Council and ensure homestay hosts have undergone an advanced DBS check.

5.10 Behaviour and Discipline

Under-18s are expected to follow our school rules as laid out in the separate Disciplinary Policy for Students Aged 14 to 17.

St Giles' Student Disciplinary Code extends to excluding students from the school for more serious misdemeanors. 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 Adult Disciplinary Codes.

5.11 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 behavior 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 under-18s 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 his deputy in his absence if they are concerned about a particular student.

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

5.12 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 St Giles UK schools have a designated Special Needs Co-ordinator (SENCO) based in Brighton, who can offer help and advice to students and staff in relation to learners with Special Educational Needs.

Students with permanent or temporary mobility issues will be provided with personal fire evacuation plans, and the school will try to ensure that any such students are placed in classrooms nearest to the main fire escape routes.

5.13 E-safety

All PCs on the school premises and the student Wi-Fi network in the school are protected by secure firewalls that prevent anyone accessing inappropriate content online. Our notice boards include advice on E-safety and offer advice to under-18s about how to stay safe online and what to do if they receive unwanted contact online or via text. The school also produces a 'Staying Safe Online' document for students.

All staff are aware that personal contact with students under the age of 18 via private messaging or social media is strictly forbidden. Communication via our learning platform, which is open to access by the management team, is permitted for the setting of homework and the sharing of feedback.

Students under the age of 18 are given clear information about staying safe online at their day 1 meeting.

5.14 Fire Safety

All students are informed about fire safety at their induction.

5.15 First Aid and Medical Care

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

5.16 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 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 are displayed in the main reception office and Director of Studies' office.

5.17 Age of sexual consent

All students are informed on their first day at the school that there will be students aged from 14 upwards in the school and that the age of sexual consent in the UK is 16. This information is also available in the school's Disciplinary Policy

5.18 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 U18s can begin lessons. However, it is important that all staff remain mindful to 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 Director or Assistant Director of Studies
- **Supervision outside lesson times:** Although U18s are not formally supervised during break times; a member of staff (usually the Principal) will patrol the school grounds and café during these times while front office staff are able to observe the front of the building.
- **Washrooms:** Separate washrooms are provided for male and female students under the age of 16. Staff should ensure that no one over this age uses these facilities.

6. 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 information is available to, and exchanged between all those involved in this organisation and its activities. Some information is confidential and should only be shared on a strictly need-to-know basis.

6.1. 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.

6.2. 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 and Child Protection Policy available for anyone to view.

6.3. Staff

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

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

6.4. Other Bodies

A copy of our Child Protection Policy will be made available to any other appropriate body. The school has a written whistleblowing policy which is available in the staffroom.

7. 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)

7.1. Awareness of actual or likely abuse

Cases of abuse become apparent in a number of ways:

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

7.2. 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.

8. Procedure for Reporting Allegations or Suspicions of Abuse

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

8.2. What to do if abuse is suspected or disclosed

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

8.3. Record keeping

All records, information and confidential notes should be kept by the Designated Safeguarding Person in separate files in secure electronic files on the Principal's drive. Only the Principal and Director of Studies or another nominated senior manager and the Designated Safeguarding Person will have access to these files.

8.4. 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.

What happens when an allegation is made 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 Principal will contact the Haringey LSCB immediately on 020 8489 3145. No decisions will be made on further action without referring to the LSCB.

8.5 Low-level concerns

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

A low-level concern is any concern – no matter how small, that an adult working in or on behalf of the school may have acted in a way that:

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

The Keeping Children Safe in Education Act states:

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

408. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or

inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

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

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

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

Allegations Vs Low-Level Concerns

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

9.0. Further Action

Once a statement has been collected from a student further questioning should be avoided apart from important clarification of factual detail.

A senior management representative (usually the Principal) and the Designated Safeguarding Person will meet at the earliest possible opportunity to consider an appropriate course of action in response to the information revealed by the student and consider any other relevant information.

The Principal will decide if it is appropriate to involve other members of the school staff, e.g. the Director of Studies, the Accommodation Officer at this stage, and also whether to inform the student's agent and parents. There may be no need to take any further action in which case this decision should be recorded in writing.

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.

9.1 Contacting the Local Authority

Haringey Council:

For any serious concerns about a child's welfare:

SPA – Single Point of Access

spa@haringey.gcsx.gov.uk

Tel: **020 8489 4470** (Monday to Thursday 8.45am to 5pm: Friday 8.45am to 4.45pm)

Tel: **020 8489 0000** (out of office hours including weekends)

If you are worried about a child for any reason,

contact MASH on 020 8489 4470.

If you are making a referral: MashReferral@haringey.gov.uk

Haringey LADO:

John Srivastava 020 8489 2968 or email LADO@haringey.gov.uk

For private fostering referrals

privatefostering@haringey.gov.uk

Barnet Council:

If you are worried about a child for any reason

Mash – Multi Agency Safeguarding Hub

email: mash@barnet.gov.uk

Tel: **020 8359 4066.**

Barnet’s Local Authority Designated Officer can also be reached via these contacts

Contact information for private fostering:

privatefostering@barnet.gov.uk

Islington Council:

For any concerns, contact the Children’s Services Contact Team:

Monday – Friday, 9am-5pm - 020 7527 7400

For urgent enquiries out of hours contact the Emergency Duty Team on 020 7527 0992

Email: csctreferrals@islington.gov.uk.

This is a single point of contact for MASH, LADO and private fostering

Enfield Council:

For any concerns about a child in Enfield, please refer them to the Children’s MASH (Multi Agency Safeguarding Hub) using the Children’s Portal: **www.enfield.gov.uk/childrensportal**

You can call on 020 8379 5555 (Mon-Thurs 9am-5pm; Fri 9am-4.45pm).

Out of office hours call: 020 8379 1000 (select option 2 and you will be transferred to an advisor).

You can email at: **ChildrensMASH@enfield.gov.uk**

This is a single point of contact for MASH, LADO and private fostering

(All local authority contacts updated February 2024)

9.2 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.

9.3 Raised awareness of associated areas of child protection

St Giles Highgate wants all staff and homestay providers to be aware of associated areas of child protection. Child Sexual Exploitation, Female Genital Mutilation and Radicalization are all issues that have been in the news recently and everyone working for or with the School should be aware of these potential threats to child safety.

These areas are covered in regular staff training updates.

10. CCTV

(In order to improve site security CCTV is operational on the school premises. A copy of the school's CCTV policy is available in the staffroom.)

At time of updating this document (February 22), our CCTV system is not operational. I am in the process of having the system restored but due to losses made over the course of the pandemic, cost is an issue and we are looking to get a comprehensive system in place at an affordable price. In the meantime, staff are requested to be extra vigilant and the Principal and Academic Management team are regularly patrolling the school during breaks to ensure that students behave appropriately in all areas of the school.

11. Prevent

The school operates a Prevent policy. *Prevent* is a government-backed strategy designed to engineer a greater degree of social cohesion by tackling violent and

non-violent extremism and reducing the threat of radicalisation in our community. A copy of this policy can be found in the staff room.

The school's PREVENT Officer is Andy Gaskins (The Principal) If you have any concerns regarding a student's behaviour then please notify Andy immediately. In the event of Andy's absence then please speak to the Director of Studies or the Assistant Director of Studies.

To contact Haringey Council regarding concerns around extremism:

Telephone: 020 8489 3884 or 020 8489 1280 (office hours only)

Email: prevent@haringey.gov.uk

Additional Resources

1. Free online Safeguarding training from Accreditation UK

[Register for a British Council learning account now](#)

2. The Safe Network provides safeguarding information related to activities outside the home.

<http://www.safenetwork.org.uk/Pages/default.aspx>

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.

www.saferinternet.org.uk

Appendix A: Safeguarding Incident Concern Form Concern (& Disclosure/Allegation) Form

Please complete and give to a Designated Safeguarding Person (Andy, Joni Rachel) if you have any Safeguarding concerns about an under 18 student. You must complete the boxes in bold; the other information can be filled in by the DSP 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	
<p>Concern <i>(Please provide as much detail as possible)</i></p> <p><i>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.</i></p>	
Signed	

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: Safeguarding Incident Referral Form
Referral Form

(Information to be sent to relevant local authority and completed by Principal, DSP or Director of Studies)

Date & Time (form submitted)	
Name of School	St Giles International Highgate 51 Shepherds Hill, N6 5QP

Referrer's name & contact details	
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Details of Staff / Other Adult / Student involved

Full name	
Date of birth	
Gender	
Nationality	
Any disability?	
Role / connection with school	
Home address	

Details of Student under 18 involved

Full name	
Date of birth	
Gender	
Nationality	
Any disability?	
Address in London	
Parents' name & email	
Is student known to be at risk?	

Details of Alleged Incident

Date & time of incident	
Place of incident	
Brief circumstances of incident	
Names of potential witnesses	
Any other information?	

Nature of Allegation

Category (physical / sexual)	
Was technology involved?	
If Yes, what type?	
Signed (by referrer)	

Appendix C: Action to be taken by staff if a student under 18 years does not arrive for their class within 15 minutes of the official start time

1. A member of the office team will contact the student directly and / or the homestay host to discover the problem.
2. If the student is confirmed as not attending due to illness a note will be made and the student will be contacted between 2 and 3pm for an update.
3. If the student is running late, their name will be written on the U18 whiteboard to be removed on arrival.
4. If the student fails to arrive in a timely fashion, further contact will be made to assure the well-being of the student until they are confirmed to be in the building.
5. If the team are unable to contact the student they will speak to any known friends of the student and will attempt to contact the student by email or What's App
6. If no contact can be made in this way, the team will contact the parents/guardians of the missing student and ask for further contact details.
7. The team will also ask the parents/guardians to try and contact the student
8. If no contact can be made, the Principal will contact the police
9. If the situation proceeds beyond section 5, above, a full record of all activities taken up to the stage at which the student is found will be made for an incident report
10. The student's parents/guardians will be informed about what happened

Appendix D: 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 Highgate 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 E: 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: 07796 552 488
3. The emergency duty officer will attempt to call the student and, if known, friends of the missing student.
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. The emergency duty officer will also ask the parents/guardians to try and contact the student
5. If no contact can be made, the emergency duty officer will contact the police and the Principal
6. A full record of all activities taken up to the stage at which the student is found will be made for an incident report
7. The student's parents/guardians will be informed about what happened