

# Safeguarding Policy

## A) Policy Statement

### A1) Context

Nottingham Language Academy (NLA) is located in a self-contained building close to the city centre. The majority of our students are aged over 18. The minimum age for our adult courses is normally 18 but we also accept 16 and 17 year old students. In July and August we offer a course for Young Learners (11 - 17) and closed courses for Young Learners throughout the year by request. Full-board homestay accommodation is offered to these students or they may choose to stay with relatives.

### A2) Terminology

**Safeguarding:** Proactively seeking to involve the whole community in keeping children safe and promoting their welfare.

**Child Protection:** Protecting children from abuse.

**Abuse:** All forms of physical and/or emotional ill treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to a child's health, survival, development or dignity in the context of a relationship of trust, responsibility or power.

**All adults:** Refers to all adults who are working with the children (including group leaders and homestay hosts).

**Staff:** Refers to those employed by NLA in whatever capacity.

**Designated Safeguarding Person** Senior member of staff responsible for day-to-day child protection and safeguarding issues.

### **A3) Statement of commitment**

NLA recognises its responsibility with respect to safeguarding the welfare of any young person. Safeguarding means proactively seeking to involve the whole community in keeping children safe and promoting their welfare, for example – road safety and safe use of social networks. Child protection is a central part of safeguarding and promoting welfare. It is the process of protecting individual children identified as either suffering or at risk of suffering significant harm as a result of abuse or neglect, for example physical abuse.

### **A4) U18's Entitlement**

This policy relates to all young people under the age of 18 regardless of race, culture, religion, and gender, who have an entitlement to be protected.

### **A5) Adult's Responsibilities**

We seek to maintain a safe and supportive environment and ensure that all adults working with Nottingham Language Academy accept and recognise their responsibility for the safety of all young people under the age of 18.

### **A6) Associated Policies**

**This policy supports the following NLA policies and documents:**

- Admissions Policy
- Equal Opportunities Policy
- E Safety Policy
- Bullying and Harassment Policy
- Welfare Policy
- Staff Handbook
- Student Handbooks

### **A7) Policy Review**

We ensure this policy is communicated and understood and that there are sufficient resources available for its implementation. Our policy and procedures are reviewed annually by the Designated Safeguarding Persons. The review will incorporate feedback from staff and students. The policy will be signed off by the Academy Director

## **A8) Roles and Responsibilities**

### **Roles:**

The Designated Safeguarding Person(s) are Zita Reszler and Linda Walker.

### **Responsibilities:**

- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the school when deciding whether to make a referral by liaising with relevant agencies.
- Train in how to recognise signs of abuse, and when it is appropriate to make a referral. Training will be updated every 2 years.
- Ensure all staff have access to and understand the school's Safeguarding Policy.
- Ensure all staff have had child protection/Safeguarding induction training and are able to recognize and report any concerns as they arise.
- Ensure homestay hosts are sent a copy of the school's summary of our Safeguarding Policy and encourage them to do the on-line Basic Awareness training.
- Ensure Safeguarding policy is updated and reviewed annually.
- Ensure students and parents have access to the Safeguarding Policy (summary in the Student Handbook and full policy on the website alerting them that referrals may be made).

## **A9) U18s involvement**

Data collected during the 'early feedback' will be used to inform our policy review each year. A summary version of the policy is provided to U18 students in the Young Learners' Summer School Handbook, and in the Student Handbook . This is sent to them prior to the start of the course.

## **A10) Policy availability and formats**

The full policy is available on the website and in the Staff Handbook. A simplified version is contained in the Student Handbooks. This is sent to students/parents at the time of booking and to Homestay Hosts

## **B) Code of Conduct**

## **B1) Overview and Principles**

A Code of Conduct is designed to give clear guidance on the standards of behaviour all staff are expected to observe. It is important that an atmosphere of trust between under 18s and adults is present thus creating a safe school culture. There is a need to protect both adults and under 18s from any behaviour/actions which might be misconstrued. This Code of Conduct applies to all adults who are employed by the Academy. Academy staff are role models and in a unique position of influence and must adhere to behavior that sets a good example to all students.

## **B2) Setting standards**

Key elements that are expected of adults when working with under 18 students:

- To be excellent role models.
- To set examples of good behavior.
- To avoid putting themselves at risk of allegations of abusive or unprofessional conduct.
- To treat students with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a member of staff's professional position.

## **B3) Adult – U18 interaction**

Physical contact between adults and under 18s is usually not acceptable.

Physical restraint of under 18s is not permissible, unless it is to ensure the safety of the child or other people.

Staff must avoid using inappropriate or offensive language.

Staff must not give personal gifts to students as this might be misconstrued.

Staff must not socialise with individual students outside of school events.

## **B4) Appropriate appearance**

Staff are expected to dress appropriately to their role in order to promote a positive and professional image of themselves and the school. Items of dress that may cause offence to any member of the school should not be worn.

## **B5) Alcohol, drugs and smoking**

Adults will reinforce the fact that It is illegal for vendors to sell cigarettes and alcohol to under 18s and it is illegal for anyone to misuse controlled drugs. Smoking and drinking alcohol on school premises or in homestay accommodation by U18s is not allowed.

Adults working with U18s have a responsibility to educate them, and never condone or make light, of their use.

Staff (and group leaders) should only smoke in the designated areas outside and it is prudent to avoid being seen by U18 students.

## **B6) IT and social networking**

Students and staff receive information on the safe use of IT and social networks in the Staff Handbook and the Student Handbooks. These are provided at the time of joining the school.

Adults are required to be vigilant and remind students about the potential harm caused by unsafe use of the internet and social networks.

Staff should not share personal social media details with under 18s.

Staff should not take any images or videos of under 18s on personal recording equipment.

## **B7) Accommodation**

Homestay hosts are required to provide facilities that afford students' privacy while dressing and using the bathroom. Hosts will also explain to students the need to respect one another's privacy.

## **B8) Transport**

Taxi and Coach companies used to transport U18 students are required to provide written confirmation that they will only use drivers who have been properly DBS checked. In emergencies staff may be asked to transport students in their own cars. A risk assessment is carried out in this event.

## C) Child Protection

### C1) Overview

NLA meets our child protection responsibilities by:

- Creating policies and procedures to comply with all regulatory requirements and guidelines.
- Reviewing these policies and procedures annually.
- Training all staff to an appropriate level.
- Making all policies and procedures available to all members of the school community.

### C2) Designated person

The Designated Safeguarding Person(s) are Zita Reszler and Linda Walker and can be contacted by email or telephone

[Zita.reszler@nottinghamlanguageacademy.co.uk](mailto:Zita.reszler@nottinghamlanguageacademy.co.uk)

Telephone +44 (0)115 9881318

[linda.walker@nottinghamlanguageacademy.co.uk](mailto:linda.walker@nottinghamlanguageacademy.co.uk)

Telephone +44 (0)115 9881318

In the event that these DSPs are not available the school emergency phone is in use 24 hours a day.

All allegations and relevant concerns are reported by the DSP to the local child safeguarding authority. This body will advise on next steps and procedures. The contact details for Children and Families Direct in Nottingham City is:

**0115 876 4800**

**Email: [candfdirect@nottinghamcity.gcsx.gov.uk](mailto:candfdirect@nottinghamcity.gcsx.gov.uk)**

### C3) How to respond to concerns

**Scenarios which may cause an adult to have safeguarding concerns about an U18 are:**

- An under 18 tells an adult they are worried about another under 18.
- An U18 tells an adult of an issue that concerns themselves.
- An adult witnesses behavior of another adult which causes concern.

In the event that adults have concerns they should:

- Follow the guidelines outlined in C5

#### **C4) Definitions of Child Abuse**

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race or ability. Abusers can be adults (male or female) and other young people, and are usually known to and trusted by the child and family.

There are four main types of child abuse: physical abuse, sexual abuse, emotional abuse and neglect. The abuser may be a family member, or they may be someone the child encounters in a homestay situation including during classes, sports and leisure activities. An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child.

There is no textbook list of signs and signals. Being alert to abuse means:

- Thinking about what you are seeing and asking if it is acceptable practice.
- Taking seriously what you are told.
- Responding to the stresses behind requests for help or other presenting problems.
- Being alert to signals or non-verbal communication or challenging behaviour, and aware that this could indicate unacceptable practice is being deliberately hidden or denied.
- Reporting any doubts to the DSP.

#### **C5) How to respond to a child or young adult telling you about abuse:**

When someone talks to you about alleged abuse, remember you are *not* investigating the situation, just listening. If a child discloses abuse, remember that this may be the beginning of a legal process, as well as of a process of recovery for the child. Legal action against a perpetrator can be seriously damaged by any suggestion that the child's words have been influenced in any way by the person they told.

The following guidance should be followed as far as possible:

Rather than directly questioning the child, just listen and be supportive. Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish. Do not promise to keep the information a secret. Rather you must inform the child that you will have to share this with the person responsible for their safety. Write an account of the conversation immediately afterwards, as close to verbatim as possible. Make a note of what they actually said, using his or her own words and phrases. Describe the circumstance in which the disclosure came about. Where physical harm is being reported use a body map to indicate the location of cuts, bruises and abrasions, noting the colour of any bruising. Hand your record to either of the Designated Safeguarding Persons, who will contact the local children's social care office where appropriate.

## **C6) Keeping Records**

All serious concerns communicated to the DSP will be responded to on the same day.

All information regarding allegations of abuse or safeguarding concerns is recorded in writing by the DSP on the password-protected safeguarding area of the school network. A reference is made and dated in the student's record on the database.

Access to the safeguarding file is only available to the DSP, and any official outside agency as appropriate.

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate.

It will provide clarification in cases where future DBS Disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

The DSP will take advice from the Local Authority Designated Officer, police and local authority social care services to agree the following:



- Who needs to know and, importantly, exactly what information can be shared.
- How to manage speculation, leaks and gossip.
- What if any information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if and when it should arise.

### **C7) If a staff member is accused**

The DSP work with the LADO/Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child. Further guidance is available here:

<http://www.cscb-new.co.uk/downloads/LADO/Guidance>

### **C8) If a child is accused**

The DSP work with the LADO/Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child. Further guidance is available here:

<http://www.cscb-new.co.uk/downloads/LADO/Guidance>

### **C9) Raised awareness of specific areas**

DSPs will ensure they are aware of associated areas of child protection such as Child Sexual Exploitation and FGM and take necessary action to raise awareness with adults.

## **D) Training**

### **D1) Responsibility and D2) How training is delivered.**

The DSPs have overall responsibility for ensuring all adults have appropriate training and that this is updated every two years. Additional sessions will be organised where deemed appropriate

All adults employed by NLA must complete a minimum of the online Basic

Awareness Training and be fully aware of the NLA Safeguarding Policy.

(<http://www.safeguardingchildren.co.uk/course-signup.html>)

Homestay hosts will be encouraged to complete the online Basic Awareness Training and be fully aware of the NLA Safeguarding Policy. A summary will be sent to each host annually

Staff with access to U18s must also be in possession of a recent DBS check and sign the NLA Self Declaration where this is pending.

DSPs will complete the Advanced Training for Designated Staff (Level 2) delivered externally with 2 yearly update training.

## **E) Safer Recruitment**

### **E1) Overview**

Every adult who is recruited by the school (including homestay hosts and Group Leaders) undergoes a process of suitability checking for work with U18s as appropriate to their role and status both through documentation check and the interview and selection process. Agents or schools sending groups will be asked to provide confirmation that relevant police checks have been carried out for accompanying group leaders

### **E2) Recruitment materials**

All Job Descriptions and publicity for vacancies contain a statement that members of staff need to actively engage in looking after U18s safely, that they must follow the safeguarding policy and procedures, and provide appropriate suitability documents.

### **E3) Recruitment stages for all**

In all recruitment interviews for roles with substantial access to U18s there are questions exploring the applicant's awareness of safeguarding. For example: 'Safeguarding is key to everything we do. What do you understand by this term, and can you give examples of how your role can contribute?' References are always followed up for new staff members. Every reference request contains a specific question asking if there are any concerns about this person working with U18s. Suitability checks for working with U18s are always sought.

### **E4) Applicants are informed that:**

- References will be followed up.
- All gaps in CVs must be explained satisfactorily.
- Proof of identity and (where applicable) qualifications will be required.
- Reference requests will ask specifically whether there is any reason that they should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18.
- Appropriate suitability checks will be required prior to confirmation of appointment.

### **E5) Applicants awaiting suitability checks**

In the event that a DBS check has not been completed by the start date of a new employee, commencement of employment can take place only with restrictions. The decision will be made by the Line Manager, with the agreement of the DSPs and a rationale must be completed and signed by both parties. This judgment will be based on an assessment of the risk compared to the consequences of the decision. If the employee does commence work, they must have signed a self-declaration and their access to U18s must be supervised at all times.

### **E6) Applicants with a criminal record**

In the event that a disclosure shows that a potential employee or member of staff has a criminal record, the situation will be judged by the DSP who will take into account the seriousness and nature of the offence, the nature of appointment, the age of the offence and the frequency of the offence. The disclosure will be discussed with the prospective employee and any decisions made must be in writing and signed by the recruiter and the DSP

### **E7) Applicants where criminal check not possible**

**British nationals returning to UK after working overseas:** Where an overseas police certificate of good conduct cannot be obtained a DBS check for their UK records will be sought and additional care taken with other recruitment checks.

**Overseas nationals:** Action already taken to obtain police certificate of good conduct be documented and additional care with identity, qualification, employment history and references taken.

### **E8) Recruitment of Homestays**

All resident adults ( over 18) in the household will be required to have an Enhanced DBS check before being accepted as Homestay hosts. Existing hosts who have a break in hosting for a substantial period may be required to have a new check, at the discretion of the Director. In addition a self-declaration form is required each year for all resident adults. Character references will be sought for new homestay hosts.

## **E9) Disqualification by association**

Students under the age of 8 are not accepted on our courses

## **E10) Prohibited List check (ISI and Ofsted only)**

## **E11) Single Central Record**

All safer recruitment records are stored in one spreadsheet. This applies to all adults: homestay hosts, group leaders and staff. The following information is included:

- Identity – name, address, Dob, evidence of check made and date.
- Start date.
- Role in organization.
- Qualifications – required, evidence of check made and date.
- DBS certificate – disclosure number, evidence of check and date.
- Overseas police check – check required, evidence of check and date.
- Right to work in the UK – evidence of check and date.
- Prohibited list check – N/A
- Disqualification by association N/A

## **F) Welfare/Implementing Safeguarding**

### **F1) Use of Risk assessments**

The School Health and Safety Officer and Accommodation Officer are responsible for monitoring the use of risk assessments. Risk assessments are completed for the following:

**All school buildings:** The initial assessment is made by a full inspection of any buildings to be used. This is updated for any changes to the building or its use, and staff are informed of its contents. All appropriate details are passed on to students during their induction.

**All accommodation provision:** Homestay: Hosts complete an initial risk assessment form which is reviewed with them at the time of their house inspection. It must be updated on subsequent inspections or earlier if there are any changes to the building. Hosts include details of this in the student welcome upon arrival.

**Classroom based activities in-house:** Any specific risks are assessed on the day and action taken is noted on the register.

**Excursions and off site activities:** The initial assessment is made through a site visit in advance. Specific risks are then updated and signed off on the day.

## **F2) Supervision ratios for U18s**

Activities will be staffed in line with the level of risk identified in the risk assessments and following DfEE advice in the 1998 publication Health and Safety of Pupils on Educational visits. Usually the minimum supervision ratio for U18 students on Young Learner programmes is one leader per 15 students. In some circumstances Group Leaders may be included in this ratio, but this will be assessed according to the activity, location and circumstances, and will be recorded in relevant risk assessments. If any U18s attend an adult programme, additional supervision needs are addressed in risk assessments. Curfew rules are given to staff, students and accommodation providers and enforced throughout the student's stay.

## **F3) Missing students**

When students go missing during transfers or after the curfew time the host will inform the school using the emergency number and appropriate action taken by the duty officer. Students who go missing during excursions or activities will be contacted by phone by the member of staff in charge. If the student can not be located the school will contact the host, parents and possibly police.

## **F4) Welfare provision**

We provide general care for our U18s through the following means:

- 24 hour emergency phone number given to all students, parents and agents.
- Safeguarding policy read and understood by all staff.
- Basic Awareness Safeguarding training ( Level 1) completed by all staff, and suggested to all homestay hosts.
- Constant safeguarding review and training updates.
- Safeguarding as an item on the agenda in every meeting to do with U18s.
- Inductions and training for all staff including welfare scenarios.
- Safe recruitment procedures
- Student Services Advisors are available to help students with any problems
- Regular tutorials are held with DOS and other tutors in order to identify specific issues and problems
- Student Handbooks contain welfare information

## **F5) Fire Safety**

Adults supervising U18 students are responsible for ensuring the safety of those in their care following the appropriate fire regulations and procedures. See Health and Safety Policy

## **F6) First Aid and Medical**

NLA requires to be fully informed of any medical condition/disability of a prospective student in order to be able to provide appropriate care for the student.

NLA staff and hosts cannot be responsible for administering or safeguarding medicines. Students who are prescribed medication are asked to bring a letter from the doctor or prescriber with the name of the medicine, the dosage and frequency of taking it and the name of the condition for which it has been prescribed, clearly described in English. This is in case the student needs medical attention whilst in our care. In the event that a student is taking regular medication, the student must be responsible for the care and administration of her/his own medication. NLA requires written confirmation from the student or parent/legal guardian to that effect prior to accepting the student.

NLA retains the right to make decisions regarding the appropriateness of students' participating in certain activities if there is a medical condition and possible risks attached.

In the event of illness, U18s are accompanied to the local Doctor's surgery or the hospital. If there is a Group Leader with the student, they accompany them, with a member of staff on call in case of translation difficulties. If the student is unaccompanied, the NLA member of staff ensures appropriate supervision, acting in liaison with the attending medical professionals.

A Complete First Aid Kit is available outside the Reception office and basic first aid kits are taken on all off- site activities.

## **F7) U18 Behaviour and discipline**

NLA insists on appropriate behaviour in all its activities. Students are all sent a code of conduct in advance of travel, which must be signed by parents of U18 students. On arrival the code of conduct forms part of the induction, along with accompanying sanctions. In dealing with inappropriate behaviour, NLA staff follow the code of conduct at all times and apply the local sanctions consistently and proportionately. In the case of bullying, staff follow the procedures as laid out above. Students are informed of bullying in all its forms and what to do in response in the pre-course information as well as their welcome pack.

## **F8) Airport transfers**

U18 students are required to send details of who to contact in an emergency and, where possible, a contact number for the student themselves in advance of travel. We also require full details of the planned journey including flight information. Students are given the 24 hour emergency number prior to travel.

**For students arranging their own airport transfer (only 16+):** NLA requires signed confirmation from a parent/ guardian outlining the journey including taxi bookings/train tickets. All accommodation providers are required to contact the NLA emergency number if students are more than 3 hours later than expected.

**For NLA transfers:** Details of the transfer booked and procedures on the day are sent in advance to all students. This includes advice on what to do if they cannot find the meet and greet person, and specific information as to how they should identify their contact person. The NLA representative always carries a sign with the NLA logo and the full name of the student/group to be met.

### **F9) E Safety**

Use of internet is included in the Code of Conduct sent to every U18 student prior to the start of their course. Also refer to our E Safety Policy

### **F10) Radicalisation and Extremism**

NLA staff will encourage respect for others' views and challenge any which don't allow all students and staff to work easily together. Students are educated about the importance of mutual respect and tolerance in UK culture. We will ensure the school environment is one where everyone feels safe and supported; not allowing display or promotion of inappropriate materials or organisations.

DSPs have responsibility for extremism and radicalisation; and will develop and share links with other local organisations in a similar position

All staff and students are aware of and understand the terms 'radicalisation and extremism' and are reassured that they will be supported if reporting any concerns (whistle-blowing) in this area. Links have been established with the Police Inspector with responsibility for local policing:

Inspector Rob Wilson

Nottingham Central Police Station

### **F11) Provision for those more vulnerable**

Information about students with particular/special needs will be obtained before

the start of the course. In line with our Admissions Policy students will be accepted if we are able to make the necessary adjustments to meet their needs. A risk assessment will be carried out and shared with appropriate adults. A risk assessment will be carried out where a student's vulnerability only becomes apparent after the start of the course.

**Reviewed: September 2017**

**To be updated: September 2018**



