Rose of York
Language School
London

FULL SAFEGUARDING POLICY

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Policy Statement

Who are we?

Rose of York Language School is a small school based in central London that teaches English to international students aged 16 years and over throughout the year. Throughout the year, usually in the summer months (May-September), Rose of York also runs courses for students aged 12 years and over. The school provides accommodation for students in homestay accommodation or in student residences, all of which are thoroughly checked and inspected by our Accommodation Officer or by a British Council-registered company.

What is Safeguarding?

Safeguarding is a broad term that means 'looking after' and Rose of York takes its responsibility to safeguard any children and vulnerable adults learning at the school seriously.

Children are defined as people under 18. Vulnerable adults are defined as any adult who may be unable to take care of him/herself or protect him/herself from risk or harm due to age, illness, mental or physical disability or anyone who has been in the UK for fewer than 9 months.

At Rose of York, all staff are aware of their responsibilities with regards to working with children and vulnerable adults. All teachers and members of staff (including interns) are made aware of any student who is under 18 and will consequently provide any special help and attention that is required of them.

We aim to provide a safe environment for all our students while they are studying at Rose of York, attending any of our social activities or living in accommodation provided by us.

We believe that all students – including children and vulnerable adults – should be able to study in a safe and supportive environment that protects their rights, safeguards them from abuse and respects their needs as individuals. All teachers, staff and other people working on the premises are expected to abide by the Rose of York Safeguarding Policy (see our Abusive Behaviour Policy for our definition of 'abuse').

It is the responsibility of everyone within the organisation, including teachers, other school staff and students, to report any concerns about risks or incidents of abuse or exploitation of children and vulnerable adults to a Designated Safeguarding Lead (DSL).

Please note that all policies and handbooks mentioned in this document can be found on the Rose of York website: https://www.roseofyork.com/handbooks-and-policies/

Aims of the Safeguarding Policy

The central aim of the policy is to ensure the safety and well-being of students in line with Safeguarding legislation. The DSL's main responsibility is to implement the policy by raising awareness amongst staff members and other adults who work with under 18s.

Main Aims:

- To educate students on how to keep safe and how to recognise behaviour that is not acceptable.
- To recognise and support any child or vulnerable adult who has been subject to abuse (please see the section "*Recognising Abuse*" below).
- To ensure that all staff employed at the school understand their responsibility to be alert to signs of child abuse and to refer any concerns to the DSL (or any of the Safeguarding Officers (SO) if the DSL is unavailable).
- To ensure that new staff are only appointed when all the appropriate checks have been made in line with the safer recruitment procedure.

- To deal appropriately with every suspicion or complaint of abuse.
- To design and operate procedures which promote this policy.
- To design and operate procedures, which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations.
- To be alert to the medical needs of children and vulnerable adults with medical conditions.
- To take all practicable steps to ensure that school premises are as secure as circumstances permit.
- To assess the risk of all students being drawn into terrorism, including support for extremist ideas that are part of (refer to our Prevent Policy)
- To identify students who may be vulnerable to radicalisation, and know what to do when they are identified (Prevent Policy)
- To have regard for and awareness of Section 17 and Section 47 of The Children Act 1989 – a duty to safeguard and promote the welfare of children.

We recognise that:

- the welfare of the child/young person is paramount
- all children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have the right to equal protection from all types of harm or abuse
- all staff working in our school have a responsibility to report concerns to the appropriate person - the DSL.
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

Legal Framework

Key documents in developing this policy are:

- Children's Act 1989 & 2004
- UN Conventions on the Rights of the Child 1989 (ratified 1991)
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedom Act 2012
- Working Together to Safeguard Children (HMRC Guidance March 2015)
- Counter-Terrorism & Security Act 2015
- Keeping Children Safe in Education + Summer for Staff (July 2015)

This policy applies to all staff, including senior managers, paid staff, self-employed staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of Rose of York.

Rose of York expects a strong Safeguarding ethos amongst all adults working with children.

Who is responsible?

The key personnel are:

Director of Studies - Designated Safeguarding Lead – Specialist Safeguarding for Designated Lead (formerly Level 3)
Head of Operations - Deputy Safeguarding Lead - Specialist Safeguarding for Designated Lead (formerly Level 3)
Welfare Officer - Deputy Safeguarding Lead - Specialist Safeguarding for Designated Lead (formerly Level 3)
Accommodation Officer - Safeguarding Officer – Advanced Safeguarding for Designated Staff (formerly Level 2)
Student Services Officer - Safeguarding Officer – Advanced Safeguarding for Designated Staff (formerly Level 2)

However, all staff are responsible for the Safeguarding of students and are trained in Basic Safeguarding awareness.

In case of emergency, call the Rose of York emergency telephone (+44 (0)7551 484563). The emergency telephone is rotated amongst the Accommodation Officer, Student Services Officer and the Welfare Manager; all of whom have been trained in advanced safeguarding.

Useful telephone numbers:

Rose of York Language School: +44 (0)207 5809888		
Emergency 24-hour school telephone: +44 (0)7551 484563		
Emergency Services: 999 (or 112)	ChildLine: 0800 1111	NSPCC: 0808 800 5000

Implementation of the Safeguarding Policy

We will do this by implementing and reviewing the arrangements recorded within this policy – under the following headings:

1. Code of Conduct – for children and staff
2. Safer Working Practice for Staff
3. Safer Recruitment - recruiting staff safely, ensuring all necessary checks are made
4. Staff Training - ensuring that staff with specific Safeguarding responsibilities receive certified training and that all staff working within the company receive Basic Awareness Safeguarding training
5. Welfare and Implementing Safeguarding – implementing security procedures, providing staff and students with appropriate safety equipment and protection, valuing, listening to and respecting children, sharing information about Safeguarding with children, parents and relevant agencies
6. Recognising Child Abuse
7. Handling Allegations - implementing clear procedures for responding to concerns and allegations

This policy will be reviewed annually.

Code of Conduct

Rose of York wishes to protect both staff and children/vulnerable adults from any behaviour/action which might be misinterpreted and, therefore, has set out the following principles:

Code of Conduct for Staff

All staff (including teachers, other school staff and accommodation hosts) are encouraged to demonstrate exemplary behaviour in order to promote children's welfare and reduce the likelihood of allegations being made. The Code of Conduct for staff allows the school to maintain a positive culture and climate.

Rose of York staff safeguard the students and are required to set and maintain high standards of personal behaviour, and to adhere to the following Code of Conduct:

DO:

- behave appropriately at all times and be an excellent role model to under 18 students; including appearance, dress code and appropriate use of language
- wherever possible, work in an open environment and be visible to others when working with young people e.g. avoiding private or unobserved situations

- always put the welfare of students first and be alert to signs of abuse or information that suggests abuse
- report any concerns and suspicions and pass on relevant information to the DSL
- be aware, as far as practically possible, of the support agencies available to young or vulnerable people e.g. Childline and the NSPCC
- maintain a safe, professional distance in all relationships with learners, e.g. if a learner makes sexual approaches or suggestions, tell them that this is inappropriate, explain why and remove yourself from the situation and inform the DSL
- treat young and vulnerable people with dignity and be fair. It is important to encourage learners to respect each other's boundaries and so help them to develop their own sense of rights, as well as helping them to know what they can do if there is a problem
- give enthusiastic and constructive feedback rather than negative criticism
- actively prevent learners from accessing any form of inappropriate material via the Internet and social networking sites by having a filtering device installed
- promote and exemplify core British values of democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs. (see our Prevent Policy)
- educate students on E-Safety:
    - do not give personal details or photos to anyone online (e.g., full name, contact details)
    - do not meet with someone you have only met online as it could be dangerous
    - do not accept messages, emails or open files from someone you do not know or trust as some can contain viruses or unpleasant messages
    - do not to believe all online information as some may be untrue
    - if something makes you feel uncomfortable or worried, tell a parent, homestay or staff member.
- keep a written record of any injury that occurs, along with the details of any treatment given
- secure parental consent in writing to act in loco parentis, if the need arises to administer emergency first aid and/or other medical treatment

DON'T:

- spend excessive time alone with a child or vulnerable adult away from others
- allow situations where visitors are left alone with the learners without supervision
- socialise with young or vulnerable learners on occasions when it does not constitute part of your normal duties, on or offline
- fail to act upon and record any allegations made by a child
- use any visual, audio-visual or written material in the classroom that exposes young adults to harm; be it physical, emotional or sexual
- give young or vulnerable people prescription drugs or medication
- use inappropriate or offensive language
- drink alcohol, smoke or use drugs when working with under 18s, nor make jokes with reference to them
- wear revealing clothing, especially when sharing accommodation with under 18s

Code of Conduct for Students

- No knives or other weapons
- No drugs – unless prescribed by a doctor for a medical condition, these must be handed to the DSL on arrival for safe and correct storage and dosage
- No bullying or harassment, either verbal or physical
- No fighting or swearing
- No stealing
- No smoking on the premises

- Students must show respect to all staff and other students at all times
- No mobile phones to be used during English classes unless permitted by the teacher.

School Rules

- Are given during the first day induction, including information on staff members, school rules, available facilities at the school, health and safety, and evacuation and first aid procedures.
- The rules and emergency contact details are further promoted through the Student Handbook, online publicity and on posters around the school
- Social Programme: ages are clearly marked if for over 18 years only (e.g. pub night)

Safer Working Practice for Staff

Responsibilities

Overall responsibility for this policy rests with the Managing Director. Day to day responsibility is taken by the Director of Studies (DOS) and Head of Operations as DSLs.

The DOS and Head of Operations at Rose of York are the DSLs and are responsible for all Safeguarding issues which arise, their recording as well as staff training. The DSL will receive support from the other Safeguarding Officers (SOs) to ensure that matters are dealt with in accordance with this policy.

All staff have a personal responsibility to ensure that they conduct themselves in line with the Code of Conduct, to be vigilant and report any concerns they observe personally or to respond in line with this policy to a disclosure or allegation. Staff will not be penalised for reporting any concerns and their report will remain confidential.

Electronic Equipment and Social Media

Mobile Phones

Under no circumstances are staff or accommodation hosts to use phones to photograph or video children. Phones should be out of sight unless being used for a legitimate reason. No personal staff phone number should ever be given to a child. When children are taken off site, they should be provided with the school landline and emergency 24-hour mobile phone numbers, in case of an emergency.

Social media

Students should be aware of the Internet Safety Policy. They should know how to stay safe online and should not visit Internet sites, make, post, download, upload or pass on material, remarks, proposals or comments that contain or relate to any information which may be offensive to other students, teachers, staff or homestay hosts. Teachers and staff are prohibited from contacting students on any form of social media.

Whistleblowing

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work or colleagues with whom they work.

Qualifying Disclosures

1. Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the company or an individual has committed a "relevant failure" by:
    a. committing a criminal offence;
    b. failing to comply with a legal obligation;

c. a miscarriage of justice;
d. endangering the health and safety of an individual;
e. environmental damage; or
f. concealing any information relating to the above.

2. These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The company will take any concerns that you may raise relating to the above matters very seriously.
3. The Employment Rights Act 1996 provides protection for workers who 'blow the whistle' where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be "in the public interest". We encourage you to use the procedure to raise any such concerns.

The Procedure

- In the first instance, you should report any concerns you may have to the Principle who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.
- If you do not report your concerns to the Principle you should take them direct to the appropriate organisation or body.

Treatment by Others

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

Safer Recruitment

To ensure unsuitable people are prevented from working in our organisation:

- Job advertisements will make explicit reference to the commitment of the organisation to Safeguarding, including the requirement for an Enhanced DBS check
- Job descriptions will be supplied to all staff. These outline tasks that staff will be expected to perform, the skills, qualifications and experience necessary to undertake the role and Safeguarding references
- All applicants will complete an application form. The application form will elicit information about an applicant's past and a self-disclosure about any criminal record as well as asking each applicant to certify that all information given is correct
- A shortlist of applicants will be invited to interview. The job description will provide the criteria for each role and evidence of a candidate's suitability will be sought in the application form and CV
- Applicants will be assessed by at least one member of senior management (e.g. the Director of Studies or Head of Operations) and notes will be taken
- Applicants will be asked about gaps in work history
- All candidates will be interviewed by senior management, preferably in person; Skype will be used for applicants who are not in the UK at any time during the recruitment period. All interviews will include questions to find out the applicant's motivation for and experience of working with children
- An Enhanced DBS check will be undertaken by the school prior to taking up a position; photographic evidence of identity is required for these checks, which also serve to confirm the applicant's identity.
- For any applicants who are not resident in the UK a Police Certificate of Good Conduct will be obtained, according to the process that is in place in the country of residence. For any check written in a language not understood by a member of senior management,

a certified translation will be obtained. As Police Checks in foreign countries will be obtained by the applicant, two forms of photographic identity will be obtained for these applicants in addition to the Police Check, to confirm identity.

- The original documents of all forms of ID will be seen by a member of the Rose of York management staff.
- Two confidential references will be provided, including one regarding previous work with children with a question specifically about suitability to work with children and whether there have ever been any concerns about work with children and young people
- Qualifications will be evidenced and copied
- Shortly before start of operations each member of staff will be checked on the barred list
- For candidates who have a criminal record or other notification on the DBS Check or Police Check, further information will be sought from the applicant. A decision as to whether to proceed with employment will be made by the Managing Director that depends on the nature of the offence and whether it would have a negative bearing on the applicant's suitability for working with children.
- No applicant will start work without a successful barred list check. For any applicant whose DBS or Police check has not arrived before the start of his/her employment, unsupervised access to the students will not be allowed until a satisfactory check has been obtained. This will be achieved by implementing the following procedures:
    - A third reference will be requested
    - Teachers will only teach with the door open and the DOS will maintain a frequent presence in the corridor throughout the lesson
- Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the details of the Protection of Children Act 1999.

Staff Training

All staff will be required to complete the online Basic Awareness Course provided by an appropriate body as well as the Prevent online training. All staff will be provided with the Rose of York Staff Handbook at induction. Additionally, all staff will receive an induction prior to commencing work which includes:

- Clarification of their job role and requirements
- The Code of Conduct, including this Safeguarding Policy
- Health & Safety and emergency procedures
- First Aid training where relevant
- Specific training on Safeguarding practice and policy will also be provided to include:
    - Personal responsibility and reporting of concerns of poor practice amongst staff or possible abuse
    - How to respond to concerns or allegations made by a child or young person
    - Guidance for working safely and effectively with children and young people, with specific reference
    - Ongoing training about Safeguarding and good practice, to facilitate the development of a positive culture towards good practice
- The DSLs will receive training on what to do in the event of an allegation against a member of staff, or where concerns about poor practice have been made

Our policy is to ensure that:

- The DSL has received Specialist Safeguarding Training for Designated Lead (formerly Level 3).
- All teaching staff complete Basic Awareness Safeguarding training (formerly Level 1) online

Welfare and Implementing Safeguarding

Welfare meeting

- Advising under 18s on their first day, making an appointment for them with the DOS/DSL
- Highlighting it in the U18s Handbook on the student's first day
- Students aged 12-15 will have a meeting with the DSL once a week
- Students aged 16-17 will meet with the DSL every two weeks.

Accommodation

From the various types of accommodation offered, under 18-year-old individuals are strongly advised to book homestay accommodation.

All accommodation placements must meet British Council guidelines:

- The School ensures that under 16s are not placed in the same accommodation where they will have to share facilities with over 18 students, the School always endeavours not to place under 18s in homestays with mixed gender students.
- 16 and 17-year olds may be placed in a homestay with guests of over 18 years but this is confirmed by the parent/guardian before booking and the main homestay host will always be DBS checked. The students will also be in separate rooms.
- Curfews*: The School ensures that under 18s return by curfew times by informing the homestays and group leaders (under 16s at their homestay's specified dinner time / 16 & 17-year olds at 10pm Sunday to Thursday and 11pm on Friday and Saturday at the latest).
- Homestays/residence staff and accommodation providers are made aware of our Safeguarding Policy through our website.
- On occasion, under 18-year olds may be placed in residences, but only when ensuring they comply with our Safeguarding Policy (a responsible and vetted adult must always be present, especially overnight). This must be authorised by the parents and agreed by our DSLs before booking.
- Students understand that it is their responsibility to contact the homestay if they are going to be late for dinner (if applicable) or if they think they will miss their curfew and give reasons.
- When staying in Residential accommodation, the ratio of residential adults to student will be at least 1-20 for students aged 12-17.
- First aid facilities and an appropriately trained member of staff will always be available together with information on the closest A&E service.

*If under 18s do not return to their homestay by curfew time the school will default to the Missing Student Policy (please see below).

Missing Student Policy

1. The homestay is required to inform the school or the accommodation provider
2. The school will try to contact the missing student or group leader, where applicable
3. The School will try to contact the missing student's friends (if known)
4. The school will contact the emergency contact or next of kin
5. If the student is not found, they will be reported missing to the Police (via 101). The person with the emergency phone must keep the homestay and student's emergency contact/next of kin updated
6. Any updates must be communicated with all parties involved, including the Police and a report must be written on return to work and kept in the student's file
7. In order to prevent a reoccurrence, a written agreement must be signed by the student and their parent/guardian to agree that any reoccurrences may result in expulsion from the school and its services, with no refund offered.

Code of conduct for homestay hosts

- Homestay hosts should inform students in advance if they wish to clean or inspect their bedrooms
- If sharing the same accommodation with under 18s, prepare a bathroom rota in order to ensure they have their own privacy
- Use licensed taxi drivers who are DBS-checked
- Respect the privacy of students, knock before entering their rooms and allow privacy when using the bathroom.
- Do not take photographs or videos of students under the age of 18 on personal recording equipment (including smartphones and tablets), Similarly, adults may not request copies of photographs or videos taken by students under the age of 18.

Private Fostering

Private fostering is a private agreement whereby a child under the age of 16 (or 18 if the child has a disability) is placed in the care of someone who is not the child's parent(s) or a direct relative for 28 days or more.

To ensure a suitable level of care, welfare and safeguarding is being maintained, the local council must be informed of the arrangement at least 6 weeks prior to the student's arrival in the United Kingdom. It is a legal requirement to inform the council of a Private Fostering Arrangement.

Airport Transfers

Rose of York strongly recommends organising airport transfers for under 18s and it is compulsory for under 16s if travelling without a responsible adult.

The school works with a provider who only uses trained, licensed and DBS-checked drivers.

- As soon as a taxi transfer is booked and confirmed, the School sends a confirmation document to the student/parent/agent with instructions, contact numbers of the transfer company, the School and the School's emergency phone.
- If the student is not present at the collection point: the driver will contact the School who will verify the arrival details or contact the student. If the student is not contactable, the School will try another number which has been provided (parent/agent). The School will advise the driver accordingly.
- If the homestay host is not present or if there is a problem with the booking: the driver or student will call the School who will contact the homestay or accommodation provider. The School will advise the driver accordingly. In cases of emergency, another accommodation will be arranged.

Rose of York allows 16 and 17-year olds to travel independently from their entry point in the UK to their accommodation providing the details of how they do this are given on the Parental Consent form.

School security procedures

The premises

The school site consists of one building with 4 floors. When the School has Young Learner (under 16 years) groups and classes, they are usually situated in a classroom on the first floor, separate from adult learners (16 years+) and with supervised access to toilets and the recreation area.

CCTV

There is CCTV throughout the school, which is under surveillance by the Managing Director.

Contact

Students are all issued with a Student card on arrival; this has the School's contact details on and is compulsory for all students. The parents/guardians also know this information because it is included on the Parental Consent Form.

Classes and Registers

All teachers and members of staff are DBS-checked. Students over 16 are able to study in classes with students over 18 with a teacher present but students below 16 years old will not be in the same classes as over 18s. Where group study is not available (for example, if we receive an individual booking and there is no group to join – usually outside of summer), individual lessons are offered. Ages are added to all registers, students under 18 are highlighted, and any students under 18 are immediately reported to reception if they are not in attendance within 15 minutes of the start of class (see our Attendance Policy and Missing Student Policy).

Visitors

Any visitors must sign in at reception and be issued with a Visitor's badge (to be returned when they leave the building). Upon arrival, all visitors will have need to read the Fire Procedure and Health and Safety Policy.

Educating over 18s

- Ensuring visitors are aware of under 18s in the school by noting in the Visitors' book at reception.
- Ensuring our students are aware of different age groups in the school by including the information in the Student Handbook and informing them during their first day induction.

Accommodation

Homestays /residence staff and accommodation providers are made aware of the Safeguarding Policy. Homestays understand that it is their responsibility to contact the school's Accommodation Officer in the event of any problems or concerns. If under 18s do not return to their homestay by curfew time, the school will default to the Missing Student Policy. Students understand that it is their responsibility to contact the homestay if they are going to be late for dinner (if applicable) or if they think they will miss their curfew and give reasons.

Risk Assessments and Health & Safety

- Completing weekly checks of the premises.
- Completing all required risk assessments including fire safety on a regular basis (weekly, fortnightly and annually, as per guidelines). Please see our Fire Safety Procedure.
- Completing risk assessment for off-site activities, including supervision ratios.
- If we receive an enquiry from a student with a disability, which may affect their stay with us, we shall complete a risk assessment form. After completing the risk assessment form, we shall inform the student and discuss possible options.

Supervision ratios

The ratio of 1 Group Leader to 16 Students (i.e. 1:16) apply for both on and off-site activities. The School would exceed these ratios if the safety and welfare of the students required it. There should be enough supervisors to deal with an emergency.

Risk Assessments and Safety Equipment for Activities

Risk Assessments are done for all activities offered by Rose of York. Risk assessments also serve to ensure that activities are age appropriate. In case of accidents and injuries – there are at least two trained first aiders in the school who can administer basic First Aid. Please see our First Aid policy for your reference.

Behaviour and Discipline

Both staff and students are given clear Codes of Conduct to adhere to, in writing and prior to their appointment/arrival. In addition, rules and regulations concerning behaviour are made clear to staff during their induction training. Student rules are reiterated and made clear during induction on their first day.

Among the information reiterated to students during their welcome meeting:

- Senior staff are introduced to the students. The names, photos and job roles of all staff are displayed in notice boards to help students to know who is who. Notices are also put up to direct the students to whom they should go to for various problems and in case of illness or injury
- What to do in the event of a fire. Fire drills are held regularly and written records of each held in the office. Fire Safety instructions are also displayed on notice boards.
- Mutual respect is to be shown at all times between students and staff. Bullying and harassment are not tolerated.

Internet Safety and Access

The breadth of issues classified within Internet Safety is considerable, but can be categorised into three areas of risk:

- **Content**: being exposed to illegal, inappropriate or harmful material. This includes, but is not limited to:
    - online pornography
    - ignoring age ratings in games
    - lifestyle websites (e.g. pro-anorexia/self-harm sites)
    - hate sites
- **Contact**: being subjected to harmful online interaction with other users. Examples include:
    - grooming
    - cyber-bullying
    - identity theft, including "frape" and sharing passwords
- **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm. Examples include:
    - disclosure of personal information
    - digital footprint and online reputation
    - health and well-being (amount of time spent online)
    - sexting
    - copyright / plagiarism

Student e-safety will be ensured by the following procedures:

- Internet access for students will require a login and password and the sites available for them to access will be restricted to exclude all inappropriate sites including, but not limited to, online pornography, gambling and gaming sites, or other sites with age restrictions.
- Internet access is monitored and any attempt to access restricted sites will be flagged to the DSL. All students will then be reminded of the School's Internet Safety Policy.
- Any reports or evidence of cyber-bullying will be investigated and dealt with accordingly.

Parental Consent Forms

Every student under 18 must have a completed Parental Consent Form before they start their course and is given a handbook with relevant information prior to arrival. This provides full and comprehensive information about the school, including school / accommodation rules,

information for under 18s, the Prevent Policy and the Safeguarding summary. It also provides the School emergency number and asks for the parent's/guardian's contact details in order to ensure contact can be made at any given time.

Group Leader Forms

All group leaders will be police-checked (or the equivalent) and will be inducted by one of our Safeguarding Officers on their first day at school and a summary of our Safeguarding Policy is also printed and handed to them.

Group Inductions

Groups are inducted separately by combining the Monday induction and, if appropriate, the Under 18 students.

The Multi-National Environment and PREVENT

Rose of York is a multi-national and multi-cultural environment, where students are able to broaden their horizons, make new friendships and develop greater understanding of each other through mixing with others from different countries and cultures. We welcome students from all backgrounds and will not permit discrimination by students or staff on the grounds of religion, gender, sexual orientation, or ethnicity. In addition, even greater sensitivity will be shown to students who are arriving in the UK from territories currently in the midst of internal or international conflict.

Rose of York understands its responsibilities under the Counter Terrorism & Securities Act 2015 to prevent all people of different ages being radicalised or drawn into terrorism and seeks to meet its obligations by educating staff in the terminology and risks covered by the Act. (See the Prevent Policy).

Terminology

Radicalism: act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Extremism: holding extreme political or religious views which may deny rights to any group or individual. Extremism can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as religious extremism. It can be expressed vocally or via active opposition to:

Core British Values: including democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs.

Risks of Extremism

- Staff, students and other adults (e.g. Group Leaders) may arrive at school already holding extremist views or…
- Whilst part of the school, staff or students may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials via hardcopy or online, inspirational speakers, friends or relatives being harmed, social networks
- People who are vulnerable are more likely to be influenced. Vulnerability could stem from a range of causes: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate or discrimination, bereavement.

Counteracting Risk

- Promote a safe and supportive international environment via clear expectations of accepted behaviours and those that will not be tolerated

- Promote core British values through the Code of Conduct and via lessons on British culture and traditions
- Challenge radical or extremist views in any context (formal or informal) via usual procedures for unacceptable behaviour
- Have strong filters on IT equipment to prevent students accessing terrorist websites or using social networks to exchange terrorist and/or extremist views
- Ensure that extremist speakers do not use Rose of York premises to distribute materials or expound views

Signs that may cause concern

- Students talking about exposure to extremist views or materials outside the school
- Changes in behaviour, e.g. becoming isolated
- Fall in standard of work, poor attendance
- Changes in attitude, e.g. intolerant of differences/having a closed mind
- Asking questions about certain topics (e.g. those connected to extremism)
- Offering opinions that appear to have come from extremist ideologies
- Attempts to impose own views/beliefs on others
- Use of extremist vocabulary to exclude others or incite violence
- Accessing/attempting to access extremist material online or via social network sites
- Drawings or posters showing extremist ideology/views/symbols
- Students voicing concern about anyone

Recognising Child Abuse

Child abuse can take four forms, all of which can cause long term damage to a child:

1. physical abuse – may include hitting, shaking, burning, poisoning or any way of causing physical harm to a child
2. emotional abuse – persistent emotional maltreatment of a child. Usually involved in most types of ill treatment but can occur alone
3. neglect – persistent failure to meet a child's basic physical and/or psychological needs
4. sexual abuse and/or exploitation – forcing or enticing a child, that is any person under the age of 18, to take part in sexual activities, including prostitution and can include non-contact activities such as involving children in looking at pornographic material or encouraging children to behave in sexually inappropriate ways.
    a. This includes abuse of trust – please see Sexual Offences Act 2003 for further information.
    b. Child Sexual Exploitation (CSE) is another type of sexual abuse in which children are sexually exploited for money, power or status. Children may be tricked into believing they are in a loving, consensual relationship or may also be groomed online.
    c. Female Genital Mutilation (FGM) is included within this broader definition. This is the partial or total removal of external female genitalia for non-medical reasons. Religious, social or cultural reasons are sometimes given for FGM. It's dangerous and a criminal offence and any adult has the legal duty to report this if they find out it has happened.

Most types of child abuse can take one or several of these forms, for example, bullying and domestic violence are often both physical and emotional forms of abuse.

It is important to note that any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law (regardless of the fact that the legal age of consent is 16).

Signs of Abuse

A child may be experiencing abuse if he or she is:

- frequently dirty, hungry or inadequately dressed
- left in unsafe situations (being left alone or unsupervised) or without medical attention
- constantly "put down", insulted, sworn at or humiliated
- demonstrating changes in behaviour – withdrawn behaviour, attention seeking or depression
- seemingly afraid of parents or carers
- severely bruised or injured
- displaying sexual behaviour which doesn't seem appropriate for their age
- growing up in a home where there is domestic violence
- living with parents or guardians involved in serious drug or alcohol abuse
- victim of FGM.

Remember, this list does not cover every possible type of child abuse. Other things may be seen in the child's behaviour or circumstances which may cause reason for concern. Abuse can also be disclosed by the child in question or reported by another child.

Handling Allegations

Responding to allegations or suspicions

It is not the responsibility of anyone working for Rose of York to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns by reporting these to the appropriate officer (DSL) or the Local Safeguarding Children Board (LSCB). Rose of York assures all staff that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child.

Concerns about suspected abuse/disclosure by a child or young person:

- Any suspicion that a child has been abused by a member of staff or by another student (whether it is a personal suspicion, a confidential disclosure by the student in question, or a third party) should be reported to the DSL who will act as considered necessary to ensure the safety of the child in question and any other child who may be at risk
- The DSL will refer the allegation to the relevant agencies such as the LSCB or the Police
- The parents or guardians of the child will be contacted as soon as possible following advice from the LSCB
- The DSL should also notify the Managing Director who, in turn, will inform the appropriate authorities who will deal with any media enquiries, if necessary
- If the DSL is the subject of the suspicion/allegation, the report must be made to the other DSL or the Managing Director directly; follow the referral procedures above
- Staff should use a Record of Concern Form to make accurate, detailed and factual records of what has happened, what has been said, where and when, as soon as possible after reporting to the DSL.

Dos and Don'ts when completing a Record of Concern:
DO:

- stay calm and be available to the student
- ask general questions i.e. Can you tell me what happened? What is it about?
- listen carefully and record the facts in as much detail as possible. Ask 'Is there anything else you want to tell me?', if appropriate.
- go somewhere that is safe and quiet, yet visible
- tell another member of staff where you are and that you are having a private meeting with a student
- remain composed

- advise the child/young person that you have to tell someone else by saying 'If necessary, I will have to tell another person (who may help more than I can).'
- reassure them that they have done the right thing by 'telling'
- ensure the record is filed in a secure place
- get the support you need once you have handed the matter over to the DSL and ensured that the child is being looked after and procedures being followed. Being told information about child abuse can be very upsetting; look after yourself.
- tell the appropriate person, i.e. the DSL, about the disclosure
- ask a responsible adult, usually a member of staff, to sit with the student to be a reassuring presence but not to ask any questions
- write a full report of the meeting using the student's exact words and giving only facts and dates, times etc. If the student's language level is low, state this in the report

DON'T:

- ask leading questions
- close the door or spend a prolonged time alone with the child
- show any emotion or anger
- promise confidentiality
- tell any colleagues about the details of the disclosure / meeting
- leave the student alone after they have disclosed
- try to correct or 'improve' the student's use of English in your record
- make assumptions, draw conclusions or write any opinions in your record

It is not for staff to decide if the allegations are true or not. Their role is only to listen, report as accurately as possible and allow the official procedure to take over.

Disclosures made by children or vulnerable adults

- Advise the child/young person that you have to tell someone else; reassure them that they have done the right thing by 'telling'.
- Encourage the child to TED – Tell, Explain and Describe. Listen calmly without interrupting and do not ask questions except for clarification purposes
- Make notes/record everything that is said and done, no matter how trivial it may seem.

Confidentiality

The welfare of the child is paramount and every effort should be made to ensure that confidentiality is maintained for all concerned. Privacy and confidentiality should be respected where possible but if doing this leaves a child at risk of harm then the child's safety has to come first. Legally, it is fine to share information if someone is worried about the safety of a child.

Not everyone needs to know when a concern or worry is raised. This respects the rights to privacy of all those concerned. Therefore, only people who need to know should be told about it. Otherwise, there might be gossip and rumours or other people may be genuinely concerned. It is fine to say a "concern has been raised, it is being dealt with as per the school's procedures."

Information should be handled and disseminated on a need to know basis only. This includes:

- the Designated Safeguarding Lead (DSL)
- the parents/guardians of the child or young person who is alleged to have been abused
- the person making the allegation
- LSCB, Police
- the Managing Director

Staff should only take action as advised by LSCB, Police or Children's Services once the referral has been made.

Information will be stored in a locked facility within the school (usually an office), with limited access to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

Bullying and Harassment

Bullying is defined as "the use of superior strength or influence to intimidate (someone), typically to force them to do something." Bullying is essentially unwanted, aggressive behaviour that involves a real or perceived power imbalance.

The behaviour is repeated, or has the potential to be repeated, over time and can be seen in both staff and student behaviour. Bullying can be:

- verbal (e.g. teasing, name-calling, inappropriate sexual comments, taunting, threats)
- physical (e.g. hitting, kicking, punching, pushing etc)
- social (e.g. excluding people, spreading rumours, embarrassing others in public)

It is often covert and may take the form of cyber-bullying. Harassment – aggressive pressure or intimidation – is a common form of bullying. All staff remain vigilant to make sure any cases of bullying are reported and dealt with. Forms of bullying that are illegal may be reported to the police. These include, but are not limited to:

- violence or assault
- theft
- repeated harassment or intimidation, e.g. name calling, threats and abusive phone calls, emails or text messages
- hate crimes

Action if bullying is suspected

If bullying is suspected (by students or staff), the same procedure should be followed as set out in 'Responding to suspicions or allegations' above.

Action to help the victim and prevent bullying while at Rose of York:

- Take all signs of bullying very seriously
- Encourage all children to speak and share their concerns (It is believed that up to 12 children per year commit suicide as a result of bullying, so if anyone talks about or threatens suicide, seek professional help immediately). Help the victim to speak out and tell the DSL or someone in authority. Create an open environment
- Investigate all allegations and take action to ensure the victim is safe. Speak with the victim and the bully(ies) separately
- Reassure the victim that you can be trusted and will help them, although you cannot promise to tell no one else
- Keep records of what is said (what happened, by whom, when)
- Report any concerns to the DSL

Action towards the bully(ies):

- Talk with the bully(ies), explain the situation, and try to get the bully(ies) to understand the consequences of their behaviour. Seek an apology to the victim(s).
- Inform the bully's parents
- Insist on the return of 'borrowed' items and that the bully(ies) compensate the victim
- Provide support for the victim's teacher and/or homestay
- Impose sanctions as necessary
- Encourage and support the bully(ies) to change behaviour
- Keep in contact with the families to report on progress
- Inform school staff of action taken
- Keep a written record of action taken

Most 'low level' incidents will be dealt with at the time by teachers. However, if the bullying is severe (e.g. a serious assault), or if it persists despite efforts to deal with it, incidents should be referred to the DSL as in "responding to suspicions or allegations" above.

Concerns outside the immediate school environment (e.g. a parent, guardian or homestay)

- Report concerns to the DSL, who should contact the LSCB/the Police as soon as possible.
- If the DSL is not available, the person being told of or discovering the abuse should contact the Manging Director and then the LSCB and/or Police immediately
- The LSCB will advise on how to involve the parents/guardians
- The DSL or Managing Director should ascertain whether or not the person/s involved in the incident play a role in the school's operations and act accordingly
- Maintain confidentiality on a need to know basis only

Information for the LSCB or the Police about suspected abuse

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern, which should include the following:

- The child's name, age and date of birth
- The child's home address and telephone number
- Whether or not the person making the report is expressing their own concerns or those of someone else
- The nature of the allegation. Include dates, times, any special factors and other relevant information
- Make a clear distinction between what is fact, opinion or hearsay
- A description of any visible bruising or other injuries. Also, any indirect signs, such as behavioural changes
- Details of witnesses to the incidents
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred
- Whether parents are aware – and what has been divulged
- Whether any other organisations have been consulted/advised – and the details
- If the child was not the person who reported the incident, details of what the child has said when given the opportunity (without leading or direct questions)
- Has anyone been alleged to be the abuser? Record details
- Where possible referral to the LSCB or police should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact your LSCB or the Police direct, the NSPCC Helpline on 0808 800 5000, or ChildLine on 0800 1111.

Accusations against an Adult

Where there is a complaint against a member of staff there may be three types of investigation:

- a criminal investigation
- a child protection investigation
- a disciplinary or misconduct investigation

The results of the police and child protection investigation may well influence and inform the disciplinary investigation, but all available information will be used to reach a decision.

Allegations of previous abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children)

Where such an allegation is made, the DSL should follow the procedures as detailed above and report the matter to the Managing Director and contact the LSCB and/or the Police. This is because other children may be at risk from this person.

Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the details of the Protection of Children Act 1999.

Concerns about poor practice

If, following consideration, the allegation is clearly about poor practice, the DSL will deal with it as a misconduct issue. If the allegation is about poor practice by the DSL, or if the matter has been handled inadequately and concerns remain, it should be reported to the other DSL or the Managing Director who will decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

Internal enquiries and suspension

The DSL will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further Police and Children's Services inquiries. In some cases, this will be an immediate suspension; in the event of suspension the school will appoint someone to support the employee. The employee should also contact his/her professional organisation or a legal representative.

Irrespective of the findings of the social services or police inquiries the Senior Management will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. All internal complaints will be dealt with in adherence to the Rose of York Complaints Procedure.

Support to deal with the consequences of abuse

Consideration should be given to the kind of support that children, parent/s, homestays and members of staff may need. Use of helplines, support groups and open meetings will maintain an open culture and help the healing process.

The British Association for Counselling Directory is available:
1 Regent Place
Rugby
CV21 2PJ
Tel: 01788 21 550899
Fax: 01788 562189
E-mail: bac@bacp.co.uk
Internet: www.bacp.co.uk

Consideration should be given to what kind of support may be appropriate for the alleged perpetrator.

This policy is kept up to date and reviewed annually.

Policy reviewed: August 2018 Due to be reviewed: February 2019