

## **A.17 Student Safeguarding**

### **Introduction**

Holmes Education Group fully recognises its moral and statutory responsibility to safeguard and promote the welfare of children and vulnerable adults. This policy sets out how the School, through its staff, discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are students at the School.

HEG is determined to ensure that all necessary steps are taken to protect children and young people from harm. Every child and young person enrolled at colleges in the group must be able to participate in an enjoyable and safe environment and be protected from harm. It is the responsibility of the organisation and its staff members to safeguard and promote the welfare of all children and young people by protecting them from physical, sexual or emotional abuse, neglect and bullying.

The School endeavours to provide a safe and welcoming environment where children are respected and valued. Through their day-to-day contact with students and direct work with families, staff at the School have a crucial role to play in noticing indicators of possible abuse. All staff are under an obligation to report any concerns to the college's designated staff.

### **Safeguarding legislation and guidance**

This policy has been developed in accordance with the principles established by the Children Act 1989; and in line with government publications:

- The statutory guidance 'Working Together to Safeguard Children' (2018) covers the legislative requirements to safeguard and promote the welfare of children. It also provides the framework for Local Safeguarding Children Boards (LSCBs) to monitor the effectiveness of local services, including safeguarding arrangements in schools.
- The statutory guidance 'Keeping Children Safe in Education' (2021) is issued under Section 175 of the Education Act 2002. All members of staff **WILL be** provided with a copy of part 1 of 'Keeping Children Safe in Education' and new staff are provided with a copy as part of the School's induction programme.
- Safeguarding Children: Child Protection - Guidance about Child Protection Arrangements for the Education Service, 2004.

The School follows the Local Safeguarding Children Boards' child protection procedures (in London available at: <http://www.londoncp.co.uk/> )

The Governors take seriously their responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements within the School to identify, assess, and support those children who are suffering harm. The Governors undertake an annual review of the school's child protection policies and procedures and of the efficiency with which the related duties have been discharged.

### **Roles and responsibilities (October 2021)**

- The Designated Safeguarding Lead (for the group, based in OHC London) is Howard Smith; the deputy Designated Person is Tim Matthew (based in OHC London)
- The liaison Governor for child protection issues is Georgie Collier.
- The Group Principal is Tim Matthew (based in OHC London)

The Designated Safeguarding Lead:

- Has the status and authority within the organisation to carry out the duties of the post, including committing resources and supporting and directing other staff
- Is trained to 'Specialist' level and receives updated child protection training at least every two years.
- Acts as a source of support and expertise to the School.
- Encourages a culture of listening to children and taking account of their wishes and feelings.
- Is alert to the specific needs of children in need, those with special educational needs and young carers.
- Has a working knowledge of LSCB procedures.
- Keeps detailed written records of all concerns, ensuring that such records are stored securely and kept separate from the student's general file; the student's School records will be 'tagged' to indicate that separate information is held.
- Refers cases of suspected abuse to children's social care or police as appropriate.
- Attends and/or contributes to child protection conferences.
- Develops effective links with relevant statutory and voluntary agencies, particularly LSCB.
- Liaises with representatives of accommodation agencies to ensure required safeguarding standards are met and mutual familiarity with safeguarding procedures and policies
- Ensures that the child protection policy is available publicly, on the School's website or by other means.
- Ensures parents are aware of the School's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- Works with the Liaison Governor and Centre Managers to ensure cases concerning a member of staff are referred appropriately and promptly to the Local Authority Designated Officer (LADO) and/or the Disclosure and Barring Service (DBS).
- Has responsibility for making staff aware of training opportunities and the latest Child Protection procedures
- Ensures staff are appropriately trained for their role and conducts regular in-house safeguarding training.

The Deputy Lead Person is appropriately trained and, in the absence of the designated lead, carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above.

Local designated staff are appropriately trained and acts as the immediate local points of contact for students, staff, hosts and other stakeholders, reporting all safeguarding issues or concerns to the DSL

The Governors ensure that the School:

- Appoints a DSL for child protection who is a member of the management team and who has undertaken child protection training.
- Has a safeguarding policy that is consistent with LSCB and statutory requirements, is reviewed annually and made available publicly on the School's website or by other means.
- Has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Centre Director and allegations against other children.
- Follows safer recruitment procedures that include statutory checks on staff suitability to work with children.

- Develops a training strategy that ensures all staff, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated in line with any requirements of LSCB.
- Ensures that all temporary staff and volunteers are made aware of the School's Safeguarding and Child Protection Policy
- Provides a coordinated offer of early help when additional needs of children are identified.
- Considers how students may be taught about safeguarding.

The Governors nominate a member to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against a member of staff. The current liaison Governor is Georgie Collier.

It is the responsibility of the Governors to ensure that the School's safeguarding, recruitment and managing allegations procedures are in accordance with LSCB and national guidance.

The Group Principal:

- Ensures that the child protection policy and procedures are implemented and followed by all staff.
- Allocates sufficient time, training, support and resources, including cover arrangements if necessary, to enable the DSL to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Works with the Liaison Governor to liaise with the LADO where an allegation is made against a member of staff.
- Ensures that anyone who has harmed or may pose a risk to a child is referred to the DBS.
- Has management responsibility for safer recruitment.
- Ensures that all prospective employees provide relevant compliance documentation on arrival at interview, and takes copies.
- Manages DBS applications and records, keeping a Central Register.
- Arranges child protection training with DSL and keeps a record of staff attendance.
- Ensures that all staff sign to indicate that they have read and understood their responsibilities under part 1 of 'Keeping Children Safe in Education'.

### **Good practice guidelines and staff code of conduct**

To meet and maintain our responsibilities towards students we need to agree standards of good practice which form a code of conduct for all staff. Good practice includes:

- Understanding that the welfare of the child is paramount.
- Treating all students with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving students in decisions that affect them.
- Encouraging positive, respectful and safe behaviour among students.
- Being a good listener.
- Being alert to changes in students' behaviour and to signs of abuse and neglect.
- Recognising that challenging behaviour may be an indicator of abuse.
- Reading and understanding the School's child protection policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact and information-sharing.
- Maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language.

- Being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.
- Applying the use of reasonable force only as a last resort and in compliance with School and LSCB procedures.
- Referring all concerns about a student's safety and welfare to the CPO and/or DSL.
- Following the School's rules with regard to communication with students and use of social media and online networking.

### **Abuse of Trust**

All School staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be above reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust. This means that any sexual activity between a member of the School staff and a student under 18 may be a criminal offence.

If the School dispenses with the services of a member of staff because of unsuitability to work with children, or would have done so had the person not resigned, a report will be sent promptly to the Disclosure and Barring Service.

### **Children who may be particularly vulnerable**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

### **Missing children**

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

The attendance monitoring policy in place for students monitors this.

### **Complaints procedure**

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying or belittling a student or discriminating against them in some way. Complaints are managed by senior staff, the Principal and Governors.

### **Concerns about a colleague**

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The School's whistle blowing policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Principal. Complaints about the Principal should be reported to the Chair of Governors.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

Any allegations against staff will be reported to the LADO immediately; within one working day at most. The School will not investigate an allegation before informing the LADO. The School will contact the police if a criminal offence is suspected.

### **Allegations against staff**

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

- A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to students and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.
- Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.
- Allegations against staff should be reported to the Group Director or to the Group Principal in the Group Director's absence. Allegations against the Group Director should be reported to the Group Principal for reporting to the board without the Group Director's being informed first. Staff may also report their concerns directly to police or children's social care if they believe direct reporting is necessary to secure action. Should the allegation of abuse concern the DSL the member of staff should inform the Group Director and the deputy to the DSL who will act in the place of the DSL. Parental consent is not required if a child is at risk of harm and the School does not require consent from the parent to refer allegations to the LADO.
- Allegations against staff will be dealt with according to the statutory guidance set out in part four of 'Keeping Children Safe in Education' (DfE, 2021).
- Staff, parents and the Governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

### **Staff training**

All staff are trained to enable them to recognise the possible signs of abuse and to know what to do if they have a concern.

New staff and Governors will receive training during their induction period which includes the School's child protection policy, reporting and recording arrangements, the staff code of conduct and details for DSL. All staff, including the Centre Director and Governors will receive training that is regularly updated and the DSL will receive training updated at least every two years.

The DSL and Deputy DSL produce a wide variety of documents which give staff guidelines to cover situations posing potential risks such as giving gifts to a child, one to one tuition, offering a child a lift or inviting a child to your home. Scenarios such as these are discussed in staff training and guidance documents.

### **Safer recruitment**

The School endeavours to ensure that we do our utmost to employ 'safe' staff and homestay hosts by following the guidance in Keeping Children Safe in Education (2021).

Safer recruitment means that all applicants will:

- Provide a CV which includes their employment history
- Provide two referees, including at least one who can comment on the applicant's suitability to work with children

- Provide evidence of identity and qualifications
- Be checked in accordance with the DBS regulations as appropriate to their role
- Provide evidence of their right to work in the UK
- Be interviewed, and during the interview will be questioned about any gaps that appear in their application form or CV, providing suitable reasons for gaps
- Be questioned about their knowledge of safeguarding issues and whether they have received training.
- The School will also verify the candidate's mental and physical fitness to carry out their work responsibilities.
- At least one member of each recruitment panel will have attended safer recruitment training.
- All new members of staff will undergo an induction that includes familiarisation with the School's Safeguarding and Child Protection policy, and identification of their child protection training needs.
- All staff sign to confirm they have received a copy of the child protection policy.
- The School maintains a single central record of recruitment checks undertaken.
- Volunteers: Volunteers, including Governors, will undergo checks commensurate with their work in the School and contact with students.

Supervised volunteers: Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, in accordance with the School's risk assessment process and statutory guidance

**Delayed suitability checks:** Though every attempt is made to obtain a DBS disclosure before a staff member starts work, in a busy ELT environment it is sometimes necessary to recruit teachers at short notice. Results of DBS checks can also be delayed. In these instances, we may find that we do not have a current DBS disclosure for a teacher starting with us. Such instances will be considered on a case by case basis, but as a matter of policy:

**Teachers/Admin staff:** References are taken, including a statement that the referee does not know of any reason the teacher/SSO should not work with under 18s. All staff complete a declaration disclosing criminal convictions, affirming they have not been placed on a barred list and have not had a prohibition order imposed upon them. They are also required to state that there is no reason they should not work with under 18s. In addition, OHC checks teachers against the children's barred list (formerly 'list 99') and the staff member is required to submit an application for DBS checking. If the disclosure has not been received when the staff member starts employment: If feasible, the teacher is assigned to classes with no students under 18. Where this is not possible, the teacher may begin to teach under 18s, but will be assigned to class rooms which are in 'high traffic' areas of the college, where possible with windows allowing passerby to see into the room or the door kept open and the class will be monitored by managers passing, in initial observation and through focus interviews with students.

### **Site security**

Visitors to the School, including contractors are given a brief notice to make them aware of the college's safeguarding responsibilities and policies. Visitors are also required to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the School's safeguarding and health and safety regulations to ensure children in School are kept safe. Any visitor who has not been DBS checked will be escorted or monitored when on site.

### **Extended School and off-site arrangements**

Where extended School activities are provided by and managed by the School, our own child protection policy and procedures apply.

Where services or activities are provided separately by another body, the School will seek assurance that the body concerned has appropriate policies and procedures in place for safeguarding children and child protection and there are arrangements to liaise with the School on these matters where appropriate.

When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

### **Photography and images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have safeguards in place. To protect students, clear procedures are outlined in the School policy entitled Capture and Use of Photographic and Video Images of Students.

When signing the Acceptance Form and agreeing to School's terms and conditions, parents give specific consent to the School obtaining and using photographs or images of the student for:

- Use in the School's promotional material such as the website or social media
- Press and media purposes
- Educational purposes as part of the curriculum or extra-curricular activities.

Parents have the right to request in writing that a student's photograph or image does not appear in any of the School's promotional material.

### **E-safety**

Our students increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children.

The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The School's e-safety policy explains how we try to keep students safe in School. Cyberbullying and sexting by students, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and students are not allowed to access these sites in School.

### **Child Sexual Exploitation (CSE)**

As visitors to a foreign country, sometimes travelling alone for the first time, HEG recognises that our students may be vulnerable to Child Sexual Exploitation. Child Sexual Exploitation involves exploitative situations, contexts and relationships where young people (or a third person/s) receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, gifts money or in some cases simply affection) as a result of engaging in sexual activity. CSE can range from the seemingly 'consensual' relationship in which sex is exchanged for affection or gifts, to serious organised crime by gangs or other groups. CSE can also occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. What marks out exploitation is that the perpetrator holds some kind of power over the victim by virtue of their age, position, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the limited availability of choice to the young person resulting from their social/economic and/or emotional vulnerability.

All staff are encouraged to:

- Recognise where CSE may be taking place and treat the young person as a victim of abuse

- Understand the perspective of the young person and be patient with them.
- Help the young person to recognise they are being exploited
- Collate as much information as possible
- Report any suspicions to the designated person

HEG:

- Will ensure safeguarding policies and procedures are robust and cover CSE
- Will engage with outside agencies to help promote recognition and prevention of CSE
- Co-operate to enable successful investigations and prosecutions of perpetrators

### **Female Genital Mutilation (FGM)**

Female Genital Mutilation is child abuse and a form of violence against women and girls. FGM is illegal in the UK – other than in excepted circumstances (which relate to necessary medical procedures) it is an offence for any person, regardless of their nationality or residence status to:

- Perform FGM in England, Wales or Northern Ireland
- Assist a girl to carry out FGM on herself in England, Wales or Northern Ireland
- Assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident.
- OHC will:
- Raise awareness of FGM among staff and ensure information (guidance at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf)) is available
- Ensure the designated person is familiar with issues surrounding FGM

### **Under18 Management**

OHC enrolls students who are 16 years and over into Adult classes. Year round we accept closed groups of students who may be aged from 11-17.

### **Classroom Administration**

On a weekly basis students' ages are listed on the class register so that teachers are aware of the younger students in their care.

In addition, a weekly register of underage students is kept at Reception. All students on the register must sign in and out on a daily basis. Reception staff will attempt to contact any underage student who has not arrived within 30 minutes of commencement of the first class. If contact cannot be made with the student via telephone or homestay contact, parents/police will be notified as is relevant.

In the case of students in a group the group leader will immediately be informed if a student is absent. The usual procedure for such students will be:

- The group leader will call or visit the student.
- The school will also try to contact the student and the host family.
- If the whereabouts of the student is unknown a meeting will be called to be attended by the group leader, the Centre Director and the CPO. If the safety of the student is a serious concern, the police will be informed without delay.



### **Accommodation**

All students under the age of 18 who are travelling independently must be in homestay accommodation or reside with their parent/guardian or family members approved by the parent/guardian. Travel agents sending organised groups to colleges in the group may arrange their own accommodation but must notify the college of details of the accommodation arranged.

Students and host families will be provided with clear guidelines for underage students in homestay. DBS disclosures are required and recorded. When applying for or renewing DBS checks, hosts must indicate that the regulated activity takes place in the home ('question 66') to allow checks to be carried out on all adults at the address.

All under-18's and their hosts follow the school's agreed evening curfew which is

9.00pm for 14 year olds

9.30pm for 15 year olds

10.30pm for 16 & 17 year olds

For activities outside of the agreed curfew, students' parents or guardians must provide written consent. The school has the right to amend or refuse such requests in accordance with school policy and regulatory body guidelines

Residential accommodation is not made available to under 18's.

### **Other**

Students will be provided with 24-hour emergency telephone number

### **Social Activities**

All activities are led by an Activities Leader.

Supervision: Our default policy provides that, for activities where the group is all under 18, the staff ratio will be 2 adults to every 15 students and never less than 2 adults.

For activities where the group age range is 16+, there will be an additional adult required to attend for the under-age students. One further additional adult will be required for every 10 students aged 16-17.

However, we recognise that activities differ greatly in terms of the potential risk involved, as do different individuals and groupings. We also recognise that 16/17-year-old students are travelling independently. Therefore, when 16/17-year-old students wish to join an activity on the social programme, the activity may be risk assessed on a case by case basis, considering: the risks inherent in the activity (including the time of day, the venue/location, travel arrangements to and from the activity etc) and the number, age(s) and level of maturity of any student(s) under 18. In the light of the risk assessment, it may be decided that default supervising ratios may be adjusted (upwards or downwards). This determination will usually be made by designated staff, usually in consultation with the DSL/Deputy DSL– Where an extra supervisor is not deemed necessary, activity leaders are reminded that their first duty is to ensure the well-being of junior students.

Several activities are restricted to students over 18 only. For example, the School Pub night.

## **Contacts**

### **School**

Group Designated Lead Person – Howard Smith ([h.smith@holmeseducation.group](mailto:h.smith@holmeseducation.group)) T: 020 7580 9785

Deputy Designated Lead Person – Tim Matthew ([t.matthew@holmeseducation.group](mailto:t.matthew@holmeseducation.group)) T: 020 7580 9785

Governors Contact – Georgie Collier ([g.collier@holmeseducation.group](mailto:g.collier@holmeseducation.group)) T: 020 7580 9785

Group Principal – Tim Matthew (see above)

To report a concern:

### **London**

**Westminster Access Team** – Tel: 020 7641 4000

(Out of hours – 020 7641 6000)

Email: [AccesstoChildrensServices@westminster.gov.uk](mailto:AccesstoChildrensServices@westminster.gov.uk)

For consultation and advice, in the first instance contact the **Duty Child Protection Adviser** on:  
020 7641 7668

For LADO consultations and referrals contact the duty child protection adviser (number above or email [LADO@westminster.gov.uk](mailto:LADO@westminster.gov.uk)) or if you cannot reach a duty CP Adviser you can reach:

### **Kembra Healy**

**Safer Organisation Manager and Local Authority Designated Officer (LADO)**

Telephone: 07823 532 538

Email: [kembra.healy@rbkc.gov.uk](mailto:kembra.healy@rbkc.gov.uk)

### **Disclosure and Barring Service**

PO Box 181

Darlington

DL1 9FA Telephone: 01325 953795

### **Children's Safeguarding Operations Unit**

Mowden Hall Staindrop Road Darlington

DL3 9BG Telephone: 01325 391302

### **Oxford**

**Oxford Education Safeguarding Advisory Team (ESAT)** – Tel: 01865 810603

Email: [Esat.safeguardingchildren@Oxfordshire.gov.uk](mailto:Esat.safeguardingchildren@Oxfordshire.gov.uk)

### **LADO – Jo Lloyd**

LADO team contact: Tel - 01865 810603

Email - [lodo.safeguardingchildren@oxfordshire.gov.uk](mailto:lado.safeguardingchildren@oxfordshire.gov.uk)

(policy reviewed and updated October 2021 - HS)