



# Child Protection and Safeguarding Policy for ELT

## **Key Terminology:**

### **All Adults**

Teachers

Junior Activity Leaders

Other people who work for Bath Academy

Service providers including: Homestay hosts, Drivers, Group leaders, Visitors and Volunteers Students

### **Abuse**

Abuse is seriously harming a child or failing to act to prevent harm. Child abuse is more than bruises or broken bones. Physical abuse might be the most visible sign, but there are also other types of abuse, such as emotional abuse, which are not always obvious. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g.

via the internet). They may be abused by an adult or adults or by another child or children.

### **Children**

Anyone who is not 18 years old yet.

### **Duty of Care**

According to UK law all adults have “duty of care” (a responsibility) to safeguard children well.

### **Safeguarding**

Safeguarding children is what you do to help them to grow up in a safe, healthy and caring environment.

For example,

- Providing enough food that is healthy and helps them to grow and develop
- Keeping them warm and clean and protected from the weather with right clothing
- Arranging medical help when it is needed (remember you must not give out medicines to children in the UK unless you are properly qualified to do so in the UK)
- Helping them to feel good about themselves and grow up happy
- Keeping them safe by having sensible rules, supervising them and teaching them to avoid things which can harm them
- Stopping bad things happening to them

In the UK, Safeguarding applies to anyone who is vulnerable because of age (children: under the age of 18), health or culture. Aspects of safeguarding can also apply to adult international students who are away from home, in an unfamiliar culture and have a limited level of English language.

### **Child Protection**

Child protection is the protection of children from violence, exploitation, abuse and neglect. Article 19 of the UN Convention on the Rights of the Child provides for the protection of children in and out of the home.

## **Policy Statement of Intent**

This policy applies to **the English as a Foreign Language Department** of Bath Academy. This policy will be made known and available to all students, students' parents, all adults who are working for and with Bath Academy and is published on the College web site. A separate Safeguarding policy is in force for our main College.

All adults and children are obliged to read this policy carefully and to abide by it at all times. Any member of staff other stakeholders who does not understand any aspect of this policy must seek clarification from the Director of Studies or Designated Safeguarding Lead.

All children and vulnerable adults are entitled to be protected under this policy regardless of their race, nationality, gender, sexual orientation or religious belief. Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment.

English as a Foreign Language Department of Bath Academy provides following courses with Homestay and Boarding Accommodation provided:

- IELTS Preparation to students from 16yo and older
- General English to students from 16yo and older
- Junior Summer School in Bath to students from 12yo to 17yo
- Residential Junior Summer School in Milton Abbey from 9yo to 17yo

Bath Academy has Safeguarding as top priority in every area of the organisation's operation. Safeguarding is every member of staff's responsibility and is a daily event. All adults working with children and vulnerable adults whether paid or unpaid, have a responsibility to report concerns to the Safeguarding Team.

Bath Academy is committed to safeguarding and promoting the welfare of children and young people and expects all adults and students to share this commitment.

The duty of care applies to all members of staff and visitors to the Bath Academy, and whether or not students are on the premises, are on their way to or from the course centre, on an excursion or doing an activity organised by the college.

All adults working with under 18s must act as a caring and responsible UK parent, protecting children from that which is not in their best interest.

This policy is available to parents on request and is published on the College website.

It applies wherever staff or volunteers are working with students even where this is away from the College, for example at an activity centre or on an educational visit. This policy has regard to the following documents:

- Keeping Children Safe in Education (September 2020);
- What to do if you're worried a child is being abused (March 2015, last updated 31 August 2018);
- Working Together to Safeguard Children (March 2015, last updated 21 February 2019);
- Information Sharing (March 2015, last updated 4 July 2018);
- Prevent Duty Guidance: for England and Wales (March 2015, last updated 10 April 2019);
- The Prevent Duty: Departmental Advice for Schools and Childminders (June 2015);

The College's Designated Safeguarding Lead (DSL) is Tim Naylor, Principal, who may be contacted on 01225 334577 In his absence the deputy DSL is Natalia Knott, the Welfare and Accommodation Officer who may be contacted on 01225 334577 and 01225474401. The DSL and deputy DSL are fully trained in child protection and interagency working. Both the DSL and deputy DSL attend regular courses with child support agencies to ensure that they remain conversant with best practice. They undergo refresher training every two years and they both have a job description for their safeguarding roles and key activities. Their training meets the requirements of KCSIE (Keeping Children Safe in Education).

Parents are welcome to approach the DSL if they have any concerns about the welfare of any student in the College, whether these concerns relate to their own child or any other. If preferred, parents may discuss

concerns in private with the student's tutor or the Principal, who is also the DSL. The DSL reports to the Director and his main responsibilities are to be the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection

### **Involvement of Students**

A simplified version of this policy is shared as the school rules for students, which they receive at induction and reinforced by House Parents, Teachers, Social Activities Leaders and any all other members of staff. Students are also informed during their induction of who to speak to if they feel threatened, bullied, or uncomfortable in any way. Feedback from students is sought on all aspects of the course. Where relevant, student feedback may help to inform future versions of this policy. Students discuss safeguarding topics e.g. On Line Safety, Bullying during the lessons.

Bath Academy is committed to safeguarding and promoting the welfare of children and young people and expects all adults to share this commitment. The College will take all reasonable measures to:

- ensure that we practice safer recruitment in checking the suitability of staff and volunteers (including Homestay Hosts and staff employed by another organisation or contractor) to work with children and vulnerable adults
- ensure that we carry out all necessary checks on the suitability of people who serve on the College's governing body. Carry out all DBS checks for all staff and volunteers including homestay hosts, transport providers and other services providers
- ensure that all adults have two references
- ensure that references for homestays ask about suitability to work with under 18s;
- ensure that where the College ceases to use the services of any person (whether employed, contracted, a volunteer, a supply person or student) because that person was considered unsuitable to work with children, a prompt and detailed report is made to the Disclosure and Barring Service (DBS);
- ensure that all overseas group leaders obtain Police "certificate of good conduct"
- ensure that where staff from another organisation are working with our students on another site, we have received assurances that appropriate child protection checks, and procedures apply to those staff;
- follow the local inter-agency procedures of the Bath and North East Somerset Local Safeguarding Children Board;
- protect each student from any form of abuse, whether from an adult or another student including sexting, upskirting, banter, sexual assaults, gender-based issues, initiation/hazing type violence and rituals
- protect particularly vulnerable children with SEND
- make provision for teaching children to keep themselves safe, including online
- be alert to signs of abuse both in the College and from outside;
- deal appropriately with every suspicion or complaint of abuse in line with the statutory guidance given in Dealing with Allegations of Abuse against Teachers and Other Staff (Published 29 March 2012).
- design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- support students who have been abused in accordance with his / her agreed child protection plan;
- be alert to the medical needs of students with medical conditions;
- operate robust and sensible health & safety procedures;
- take all practicable steps to ensure that College premises are as secure as circumstances permit;
- risk assessments done regularly for buildings, for the campus, for activities and excursions, for the journey between accommodation and the classrooms, for all aspects of the students' stay in the UK;
- staff and group leaders read and follow the risk assessments
- operate clear and supportive policies on drugs, alcohol and substance misuse;
- consider and develop procedures to deal with any other safeguarding issues which may be specific to individual students in our College or in our local area; and have regard to guidance issued by the Secretary of State for Education in accordance with Section 157 of the Education Act 2002 and associated regulations.<sup>2</sup>

Every complaint or suspicion of abuse from within or outside the College will be taken seriously and in all proper circumstances will be referred to an external agency such as the social services department of the local authority (SSD), the child protection unit of the police (CPU) or the NSPCC. In each of these cases, the matter will be referred by the Designated Safeguarding Lead (DSL) to the Local Authority Designated Officer (LADO), Bath and South East Somerset. All allegations against staff will be referred to the LADO for Bath and North East Somerset. All allegations against staff in Milton Abbey Summer School will be referred to the LADO for Dorset Patrick Crawford (01305-221122)

### **Responsibilities**

Safeguarding procedures are set by the **Local Safeguarding Children's Board for Bath and North East Somerset** (<http://www.bathnes.gov.uk/services/children-young-people-and-families/child-protection/local-safeguarding-children-board>).

Every employee and Director of the College as well as every volunteer who assists the College is under a general legal duty:

- to protect students from abuse;
- to be aware of the College's child protection procedures and to follow them;
- to know how to access and follow the procedures, independently if necessary; to keep a sufficient record of any significant complaint, conversation or event;
- to report any matters of concern to the DSL;
- to undertake appropriate training including refresher training at three-yearly intervals and part-time and voluntary staff who work with students are made aware of these arrangements

Safeguarding incidents can happen anywhere, and staff should be alert to possible concerns. All staff may raise concerns directly with Children's Social Care services.

### **Whistleblowing**

All staff are required to report to the Principal or the Directors in his/her absence, any concern or allegations about College practices or the behaviour of colleagues which are likely to put students at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. Please consult the college's Whistleblowing Policy.

### **Welfare provision**

All staff have the responsibility to ensure students are looked after properly and the exact role each member plays is clearly described in the handbook relevant to their role. The following members of staff have the following specific responsibilities:

**The Centre Manager** – the overall welfare provision of students and staff, ensuring that all rules and procedures are followed.

**The Welfare Officer with the Centre Manager** – the welfare provision of students and staff, ensuring rules and procedures are followed, and dealing with any issues that arise daily.

**The House Parent** - ensuring that students are safe and secure in the boarding houses and dealing with any issues that arise, such as homesickness and illness.

**Social Activities Leaders / Teachers / House Parents** - ensuring that students undertake afternoon activities with their safety first as a consideration and stopping/preventing any student behaviour that may cause any kind of harm. Safeguarding discussions are included in the boarding weekly meetings.

**Teachers / Director of Studies** - ensuring all materials used in class are age and culturally- appropriate for all students and to ensure that each member of the class feels comfortable and secure in their learning environment. Safeguarding topics are included in the classroom discussions.

All staff are expected to have read thoroughly the Handbook for All Staff and the specific handbook for their role.

## **Use of Risk Assessments**

The following types of risk assessments are in place:

- Buildings risk assessments, including the swimming pool;
- On-site activities risk assessments;
- Excursions risk assessments.

Risk assessments are carried out in the weeks prior to the start of the Summer School programme and are reviewed during the time the Summer Centre is open and amended when necessary. When carrying out a risk assessment the following are taken into consideration:

- How likely a student or staff member is to come to physical harm;
- The ratio of staff to students required for each activity and excursion;
- The particular risks to students of any activity, location or excursion;
- How likely a student is to become separated from their group on an excursion.

Before engaging on any afternoon activity or excursion, the staff members responsible in these activities are asked to read the relevant risk assessment and to sign that they have read and understood it. The main provisions of the risk assessments are also reinforced by the Summer School Co-ordinator and other relevant managers in their interactions with staff.

## **Supervision Ratios**

The following are the maximum number of students that a member of staff will be actively supervising, classed by activity. In practice, the number of staff employed means that the overall staff to student ratios are lower than this.

In class & non-sports social activities 1:15

Break time 1:15

Meal times 1:15 However, in practice all staff will be present during meals.

Sport activities 1:15

Excursions 1:15 Supervision off-site poses a greater risk to students. On any excursion no member of staff will be responsible for the supervision of more than 15 students.

## **Missing Students**

### **Students registered absent from a lesson**

- Students of compulsory school age must register at Reception at the start of the school day and also at the start of afternoon lessons (and sign out at the end of the school day).
- All students are registered electronically for each lesson within the first 10 minutes of the start of the lesson.
- If a student is missing from a lesson, office staff will immediately telephone
  - the student
  - the matron of the boarding house if the student is a boarder, or homestay family
  - parent or other emergency contact.

If the parent of a child is not able to explain where the child is, the office staff will telephone again at the end of the day to check the child has been found. If a student is judged to have 'gone missing' from school: The fact that the student is missing will be reported to the school office who will inform the Vice Principal (Pastoral) or one of the Senior Leadership Team (SLT) who will coordinate the procedure (The Coordinator).

- Attempts will be made to contact the student by mobile phone.
- The Coordinator will arrange a thorough search of the buildings and immediate grounds.
- The Coordinator will arrange a visual search of the surrounding area.
- Registers will be monitored to ensure that no other students are missing.
- Staff and the student's peers will be questioned to establish where and when the student was last seen and / or to understand why the student may have gone missing.
  - If the student is not found within 30 minutes the parents/carers will be informed by the Vice Principal (Boarding) or one of the Senior Leaders to try to establish the whereabouts of the student.
  - The Coordinator will liaise with the Head.
  - If the missing child is subject to a child protection plan or is a looked after child, the social worker for the child will be immediately informed

- If the student may be at serious risk or is missing in suspicious circumstances, the Vice Principal (Boarding) or another member of the SLT will contact the police to report the student missing immediately. This applies to all boarding students if they have been missing for more than 60 minutes.

**If a student goes missing from an outing:**

As soon as a student is reported to be missing, staff will ask students to stand with their designated adult in charge and carry out a head count. Staff will carry out a search of the immediate area and try to contact the student by mobile phone.

- The trip leader will be informed and they will inform the school office who will alert the Vice Principal (Boarding) or another member of the SLT (the Coordinator). If the incident occurs out of school hours the Duty Senior Leader will coordinate the response.
- If appropriate the leader will contact security for help in locating the student.
- The Coordinator will inform parents/carers.
- If the student is missing for more than 60 minutes the trip leader will contact the police and will remain in phone contact with the police and the Coordinator.
- If possible the remaining students will be taken back to school or to a safe area.

**If a student goes missing from a boarding house:**

The fact that the student is missing will be reported to the House Staff.

- The House Staff will arrange a thorough search of the boarding house, the school building and immediate grounds. Attempts will be made to contact the student by mobile phone.
- The House Staff will arrange a search in the immediate surrounding area.
- Registers will be taken in the house to ensure that no other students missing.
- Staff and the student's peers will be asked if they have seen the missing student, to establish where/when the student was last seen and understand why the student may be missing.
- If the student is not found, the parents/carers will be informed by the House Staff. It will be established whether they know the whereabouts of the student.
- If the missing student is subject to a child protection plan or is a looked after child, the social worker for the child will be immediately informed.
- The Principal will be informed (if not done already).
- If the student is missing for 60 minutes the House Staff or Senior Leader will contact the police to report them missing. This must be earlier if the student is felt to be vulnerable, may be at serious risk or is missing in suspicious circumstances.

**When the student is found:**

- A member of staff will care for the student and establish what happened. The student may be distressed and need to be comforted and the health and welfare of the student will be the immediate concern. Medical treatment will be arranged where appropriate.
- If the student is subject to a child protection plan or is a looked after child their social worker will be involved immediately to care for their welfare.
- The parents/carers, staff and any organisations that have been alerted will be informed that the student has been found as soon as is practicable.
- Children's Social Care will arrange for the transportation of the student if necessary.
- Where a missing child is over 16 years, discussion should take place between Children's Social Care and the Police regarding the legal powers to enforce a return.
- In light of what the student says about returning to their home or boarding house, and in relation to any previous knowledge and/or strategy meeting, the decision as to whether it is safe for the student to return to their home or boarding house must be made and the reasons for the decision recorded. If it is not deemed safe, the Police must contact Children's Social Care, or where a looked after child the child's social worker or manager or where outside working hours the emergency duty service manager for a joint police/social care decision to be made regarding immediate placement arrangements.
- Where appropriate a strategy discussion with involved agencies will occur within one day. After the Incident:
- The Duty Staff will discuss the events surrounding the disappearance of the student.
- Where a child indicates or there is suspicion that a criminal offence has taken place either during the absence or leading to the absence the Police must be notified.
- The student will meet with an appropriate member of staff (Vice Principal (Boarding), Student Welfare and Accommodation Officer). They will discuss the incident and ensure that appropriate support is put in place (e.g. problem solving, counselling)
- If the Police and Social Services were involved in the incident then they will conduct a return home / to boarding interview within 72 hours.
- If appropriate a letter will be sent home outlining the circumstances of the incident.

- If a student shows a pattern of going missing from school or, under some circumstances following a single incident, the Welfare Officer or Vice Principal (Boarding) may put in place a risk assessment for that student. This will be distributed to those with pastoral responsibility and the Educational Visits Coordinator who will be responsible for ensuring that members of staff who plan trips are made aware.
- Staff will talk to all students to ensure that they understand that they must not leave the group/building.
  - The Coordinator (day incidents) or House Staff (boarding incidents) should complete a Missing Student Form and submit it to the Vice Principal (Boarding). This should include statements taken from students and staff involved in the incident. All incidents should be recorded on ISAMS along with any completed forms.
  - Any appropriate agencies should be contacted by a member of the SLT depending on the nature/severity of the incident. OFSTED, RIDDOR etc

### **Accommodation**

- Accommodation Staff and students share the same accommodation, although they will be accommodated in separate sections with separate toilet and bathroom facilities. Under no circumstances should a member of staff use toilets or bathrooms assigned to students or allow a student to use the toilets or bathroom assigned to staff.
- Students must not be left alone in boarding houses without a staff member present. Staff are issued with codes to access the boarding houses and these must not be given to students to prevent them from accessing the boarding house when no staff member is present.
- House parents are the member of staff who are responsible for the running of the boarding houses and for the care of the students within them. The House Parent ensures that students go to bed at the correct time, are up and showered in time for breakfast and that they are happy and comfortable in the boarding house and at the Summer School in general. The House parents hold the weekly meetings and organise evening and weekend social activities.

### **Transport**

Parents of students are encouraged to book a taxi transfer through Bath Academy from the airport to the Summer School and back again for their children. This is the safest way for students to travel between their point of entry to the country and the Summer School Centre. Students are met at in the arrival areas of the airport by their driver. During busy arrivals and departure times a member of Bath Academy staff is present in the airport to oversee this. The taxi company provide written confirmation that all their drivers have an enhanced DBS check and have received the Code of Conduct for Drivers. Coaches for excursions are equipped with seat belts and meet the requirements for transporting children. The coach company provides written confirmation that all their drivers have an enhanced DBS check and have received the Code of Conduct for Bath Academy Staff. There should be no need for a member of staff to have to drive a student in their own car. However, this may be necessary if a student needs to be driven to a doctor's surgery or to hospital. In such cases, students must sit in the back seat and be accompanied a member of staff of the same gender.

### **College procedures for preventing unsuitable people working with children**

The College follows the Government's recommendations for the safer recruitment and employment of staff who work with children. In addition to carrying out safe recruitment procedures as set out in the DfE's guidance 'Keeping Children Safe in Education', members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work. All volunteers, contractors working regularly, such as contract catering staff, are also subject to the relevant statutory checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils at school or on another site.

A member of staff who has been trained in Safer Recruitment Training in accordance with KCSIE will take part in all interviews for teaching and non-teaching positions. Bath Academy has to take extra care in taking up references and carrying out checks on staff appointed from overseas including the EU.

The agreed Disclosure and Barring Service (DBS) disclosure should be completed before a new colleague commences work. If Bath Academy has made every effort to secure a disclosure in advance of starting employment but procedures are incomplete at the start of contract, the recruiting manager should inform the Principal, who will implement additional supervision.

## **Code of Conduct for All Adults**

This code of conduct must be followed by all Bath Academy adults. Full version is available as a separate document "Staff Behaviour and Code of Conduct Policy"

### **Dos and Don'ts for Working with Children Do**

- Remember the child comes first
- Listen to children
- Be aware, approachable and understanding
- Treat everyone with respect and communicate at their level
- Dress accordingly
- Be an excellent role model
- Report any suspicion within Bath Academy guidelines
- Be aware of the Policies and Procedures

### **Don't**

- Give lifts to students
- Smoke
- Touch inappropriately, slap a child
- Use inappropriate language
- Be alone with a child, if avoidable
- Threaten, shout or be aggressive
- Mistreat, demean, ignore or make fun of a child
- Let a child expose him/herself to danger
- Take photos of children without the consent of their parents
- Subject any child to any form of harm or abuse
- Do things of a personal nature for children that they can do for themselves, this includes going to the toilet with a child unless another adult is present
- Allow or engage in sexually suggestive behaviour within a child's sight or hearing, or making suggestive remarks to or within earshot of a child
- Give or show anything to a child that could be construed as pornographic
- Seek or agree to meet a child outside of their visit/stay with Bath Academy without the full prior knowledge and consent of the parents/guardians
- Seek or agree to have any electronic form of contact with a child during or after their visit/stay with Bath Academy without the full prior knowledge and consent of Bath Academy and the child's parents/guardians

The Sexual Offences Act 2003 states 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 (even though legal age of consent is 16).

## **Favouritism and Gifts**

Staff must not accept gifts of a high value from students at any time. Small gifts from students, such as a small souvenir from their country, are acceptable when a student, teacher or other staff member leaves. Likewise, staff should not provide gifts to students of any kind. This policy is in place to ensure staff are not accused of showing favouritism to any individual student(s) over others.

## **Incidents that must be Reported / Recorded**

If any of the following occur, you should report this immediately to an appropriate member of Bath Academy staff and record the incident:

- If you accidentally hurt a child or young person
- If he/she seems distressed in any manner
- If a child or young person appears to be sexually aroused by your actions
- If a child or young person misunderstands or misinterprets something you have done
- If a child has an accident which does not require hospital treatment

In such cases,

- ✓ Management should be notified and monitor the individual
- ✓ The child's parent should be notified of the incident at an appropriate time
- ✓ The accident/incident record should be completed

### **Types of abuse**

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Staff should be aware that children with Special Educational Needs or Disabilities are especially vulnerable.

1. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### **Signs of abuse:**

- Unexplained bruises, burns etc.
- Wearing clothes to cover injuries, even in hot weather

2. **Emotional abuse:** Emotional abuse: the persistent emotional maltreatment of a child. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

#### **Signs of abuse:**

- Delayed physical or emotional development
- Shows extremes of passivity or aggression
- Sudden speech disorders
- Overreaction to mistakes, or continual self-deprecation
- Neurotic behaviour (rocking, hair twisting, self-mutilation)

3. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### **Signs of abuse:**

- Acting in an inappropriate sexual way with objects or peers
- Nightmares, sleeping problems
- Becoming withdrawn or clingy
- Personality changes, seeming insecure
- Unaccountable fear/dread of particular places or people
- Changes in eating habits
- Physical signs such as unexplained soreness around genitals, sexually transmitted diseases.
- Becoming secretive
- Unexplained gifts

#### 4. Neglect:

**Children with special educational needs (SEN) and disabilities** can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children.

##### Signs of abuse:

- Often hungry
- May beg or steal food
- Badly dressed in clothes that need washing
- Poor appearance and personal hygiene; unwashed, hair not brushed
- Lacks needed medical or dental care Often tired Might abuse alcohol or other drugs

### Specific Safeguarding Issues

**Child Sexual Exploitation (CSE)** - The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

##### Signs include:

- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, 'swapping' sex
- Repeat sexually transmitted infections
- Receiving unexplained gifts or gifts from unknown sources
- Having multiple mobile phones and worrying about losing contact via mobile
- Going to hotels or other unusual locations to meet friends, seen at known places of concern
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends, hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders, drug or alcohol misuse [getting involved in crime], police involvement, police records involved in gangs, gang fights, gang membership, injuries from physical assault

**The Prevent duty** If BATH ACADEMY has a concern about a student and radicalisation then it will follow the procedure outlined by BANES LSCB. The DSL will speak to the Local Authority Prevent Contact and the LADO/police will be contacted as advised. In order for BATH ACADEMY to fulfil its Prevent duty, it is essential that staff are able to identify students who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting students from the risk of radicalisation is part of BATH ACADEMY' wider safeguarding duties, and is similar in nature to protecting our young people from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. To achieve this aim Bath Academy seeks to build students' resilience to radicalisation by promoting fundamental British values and enabling students to challenge extremist views. With that said, our Prevent duty does not stop the debating of controversial issues. On the contrary, BATH ACADEMY provides a safe space in which our young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The DFE dedicated helpline/mailbox for non-emergency advice for staff and Trustees:  
020 7340 7264 [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

The Police's Prevent Team can be contacted:

Telephone 0117 945 5539, or dial 101 (and ask for the 'Prevent Team' and explain you are calling about extremism or radicalisation)

Email [channelsw@avonandsomerset.pnn.police.uk](mailto:channelsw@avonandsomerset.pnn.police.uk), Always dial 999 in an emergency

### **Peer on peer abuse**

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Sexting (also known as youth produced sexual imagery);
- Initiation/hazing type violence and rituals

**Cyber-bullying** Cyberbullying is bullying that takes place over digital devices such as mobile phones, computers, and tablets. It can occur through text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour. The most common places where cyberbullying occurs are: Social Media, such as Facebook, Instagram, Snapchat, and Twitter SMS (Short Message Service) also known as Text Message sent through devices Instant Message (via devices, email provider services, apps, and social media messaging features), Email.

#### **Signs to look out for in under-18s include:**

- Appearing nervous when receiving a text, instant message or email;
- Unwillingness to share information about online activity;
- Unexplained anger or depression, especially after going online;
- Abruptly shutting off or walking away from computer or mobile device mid-use.

### **Guidance on Handling a Disclosure from a Child**

What should you do if a child comes to you and tells you that they are being abused? It's normal to feel overwhelmed and confused in this situation. Child abuse is a difficult subject that can be hard to accept and even harder to talk about. Children who are abused are often threatened by the perpetrators to keep the abuse a secret. Thus, telling an adult takes a great amount of courage. Children have to grapple with a lot of issues, including the fear that no one will believe them. So, care must be taken to remain calm and to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

**Receive:** Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down. Accept what is being said without judgement. Take it seriously.

**Reassure:** Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously. Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns. Tell the child that you will need to tell some people, but only those whose job it is to protect children. Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

**React:** Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions. Do ask open questions like "Is there anything else that you want to tell me?" Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English. Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to. Refer directly to the named child protection officer or designated person in your organisation (as set out in the organisation's child protection policy). Do not discuss the case with anyone outside the child protection team.

**Record:** Make some very brief notes at the time and write them up in detail as soon as possible. Do not destroy your original notes in case they are required by Court. Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang. Record statements and observable things, not your interpretations or assumptions – keep it factual.

**Preserving evidence:** All evidence, (for example, scribbled notes, and mobile phones containing text messages, clothing, and computers), must be safeguarded and preserved.

**Reporting:** All suspicion or complaints of abuse must be reported to the DSL or Deputy DSL, or if the complaint involves the DSL, to the Principal.

**External agencies:** Whether or not the College decides to refer a particular complaint to the SSD or the police, the parents and student will be informed in writing of their right to make their own complaint or referral to the Social Services Department or the Child Protection Unit of the police and will be provided with contact names, addresses and telephone numbers, as appropriate.

**Allegations against staff:** Any allegation of abuse made against a member of staff will be reported immediately to the DSL. The College will not undertake investigations of allegations without prior consultation with the Named Senior Officer, The Local Authority Designated Officer (LADO), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases discussions with the Named Senior Officer can be held informally and without naming Bath Academy or individual.

Where an allegation or complaint is made against the DSL or any other member of staff or a volunteer, the matter should be reported immediately to the Principal.

Where an allegation or complaint is made against the Principal, the person receiving the allegation should immediately inform the DSL, or in her absence, the Directors, without first notifying the Principal.

The DSL/Deputy DSL will refer **all** allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the local authority designated officer (LADO) within 24 hours.

**Allegations against students:** In the event of a disclosure about pupil on pupil abuse, all children involved will be treated as "being at risk", whether perpetrator or victim. A student against whom an allegation of abuse has been made may be suspended from the College during the investigation and the College's policy on behaviour, discipline and sanctions will apply. The College will take advice from the Local Authority Designated Officer (LADO) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the student or students accused of abuse. If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the College will ensure that, subject to the advice of the LADO, parents are informed as soon as possible and that the student is supported during the interview by an appropriate adult. In the case of students whose parents are abroad, the student's

Guardian will be requested to provide support to the student and to accommodate him/her if it is necessary to suspend him/her during the investigation.

**Suspected harm from outside the College:** A member of staff who suspects that a student is suffering harm from outside the College should seek information from the student with tact and sympathy using "open" and not leading questions. A sufficient record should be made of the conversation and the member of staff should refer the matter to the DSL immediately.

**Informing parents:** Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the LADO and/or the Principal before discussing details with parents.

### **Confidentiality and information sharing**

The College will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children and young people. The College will cooperate with police and social services to ensure that all relevant information is shared for the purposes of child protection investigations under Section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children.

### **Training**

All staff – both newly appointed and those already in post - are required to read at least part 1 of KCSIE. For staff who cannot read English the school will ensure that they understand key information. The DSL and deputy DSL will receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure every member of staff has access to and understands the school child protection policy especially new or part time staff who may work with different educational establishments
- Ensure that all staff have training to recognise and identify signs of abuse, and when it is appropriate to make a referral, and to understand how child safeguarding procedures operate
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- Obtain access to resources and attend any relevant or refresher training courses

### **In addition,**

- The Principal, and at least one other senior manager will have Safer recruitment training
- All staff will be trained regularly, in line with advice from the LSCB
- The DSL will supplement the regular, formal training of staff with informal updates, as required but at least annually e.g., by email, bulletins or items on the agenda of staff meetings
- All staff will receive training in online safety
- During induction all new staff, including temporary staff and volunteers will be provided with training that includes:
  - The College's Child Protection and Safeguarding Policy,

- The Staff Code of Conduct which includes the use of social media and communication with students,
- The Whistleblowing Policy,
- The identity of the DSL and deputyDSL,
- A copy of Part 1 of KCSIE
- Annex A of KCSIE
- The acceptable use of technologies
- Staff/student communication
- Missing Student policy
- Student Behaviours & Exclusions Policy

All staff must undergo training in at least a Level 1 Basic Awareness in Safeguarding in Education, online training and must be aware that they are at all times responsible for maintaining a safe environment for all under-18s and vulnerable adults. Bath Academy will provide details to all members of staff of how they can do this. It is the responsibility of all staff members to provide evidence to the Director of Studies that they have done this before the start of the course. Group leaders, homestay providers undergo British Council Safeguarding courses.

### **Monitoring**

The DSL will monitor the operation of this policy and its procedures and make an annual report to the Principal and Directors.

The Directors will undertake an annual review of this policy and how their duties under it have been discharged. This policy review will also draw upon the expertise of staff. The Directors will ensure that any deficiencies or weaknesses in regard to child protection arrangements are remedied without delay and that the school should consider at all times what is in the best interest of the child.

### **Physical intervention**

Staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others and that at all times it must be the minimal force necessary. Such events should be record and signed by a witness.

### **Anti-Bullying**

Our policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms of bullying.

**Remember – share any concerns, don't keep them to yourself!**

## Useful Phone Numbers:

### Bath Academy Designated Safeguarding Team

Name	Job title	Contact number
<b>Tim Naylor</b>	Principal Designated Safeguarding Lead (DSL)	00441225 334577
<b>Natalia Knott</b>	Welfare and Accommodation, Deputy DSL	00441225 334577
<b>Rachael Trainor</b>	Summer School Director of Studies, Team member	00441225 334577
<b>James Knott</b>	Milton Abbey centre Co- Ordinator, Team Member	07340176689

### Bath

- **Children's Social Work Services** on **01225 39 61 11** or **01225 47 79 29**
- Outside of office hours- the **Emergency Duty Team** on **01454 615165**
- **LADO Local Authority Designated Officer** Francesca Hepden Tel: 01225 396804 and Sarah Hogan Tel: 01225 396810
- **The Police's Prevent Team** can be contacted on **0117 945 5539**, or dial **101**

### Milton Abbey

- **Dorset Multi Agency Safeguarding Hub (MASH)** 01202 228866
- **Local Authority Designated Officer (LADO)**, Patrick Crawford 01305 221122
- **Out of Hours Service** 01202 657279
- **101** (non-emergency police number) or Dorset Police 01202 222222

**Always dial 999 in an emergency**

**The following telephone numbers may be useful for students and parents:**

- Childline **0800 1111**
- NSPCC **0808 800 5000**
- Parent Line **0808 800 2222**

*Reviewed: September 2020*

*Next Review: September 2021*

*Responsible Officer: Natalia Knott*

*Signature:*