



## Safeguarding Policy

**BEST in Bath** is a language school based in the centre of Bath. It teaches English to adults and teenagers, some of whom travel in 'closed groups' arranged by their school and others who travel individually in the summer. The students generally stay with homestay providers in the city, although some are accommodated with relatives or friends or stay in residential accommodation.

This policy is aimed at all adults working with children (Managers, Teachers, Homestay Providers, Student Services Manager, Caretaker, Group Leaders, Activity Leaders). It covers both safeguarding ('looking after') and child protection ('protecting children from direct harmful behaviour'). A child is defined as a person under the age of 18 (The Children Act 1989).

All members of staff have a responsibility to promote safeguarding, but in addition to these general responsibilities, the following have key roles:

Designated Safeguarding Lead (DSL) - Jo Blackburn 01225 424114 (Specialist Training)  
Designated Safeguarding Deputy Lead - Mark Appleton (available 24/7 on emergency phone)  
07769336522 (Specialist Training)  
Designated Safeguarding Officer - Tina Appleton 01225 424114 (Advanced Safeguarding)

Local Authority (LSCP) contacts:

Children Social Care Duty	01225 316393
Adult Social Care Duty	01225 396000
Local Area Designated Officer	01225 396810
Emergency Duty Service	01454 615165 (out of working hours)
NSPCC Helpline	0808 800 5000
NSPCC Whistleblowing Helpline	0800 028 0285

### Our Child Safeguarding Policy Statement

**BEST in Bath** has a legal duty of care to safeguard all children from harm. All children have a right to protection, and the needs of disabled children, those with Special Educational Needs, and others who may be particularly vulnerable must be taken into account (as set out in Article 19, UNCRC 1989). BEST in Bath will ensure the safety and protection of all children through adherence to the Child Protection guidelines adopted. We will always act in the best interests of the child and consider Safeguarding to be a top priority in every area of the school.

This policy is also available on our website: [www.bestinbath.co.uk](http://www.bestinbath.co.uk)

## Policy aims

**The aim of the BEST in Bath Child Safeguarding Policy is to promote good practice by:**

- Providing children and young people with appropriate safety and protection whilst in the care of BEST in Bath
- Ensuring all adults, especially staff/volunteers/homestay providers are aware of their responsibilities and can make informed and confident responses to specific child protection issues by:
  - following the policy
  - sharing the organisation's commitment to safeguarding
  - undertaking training
  - being ready to report *any* concerns or allegations
  - knowing who to contact

**BEST in Bath are committed to ensuring the following:**

- The welfare of the child is paramount.
- All children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- All staff (paid/unpaid) have a responsibility to report concerns to the appropriate officer.

## Codes of Conduct

All adults who have contact with children and other adults should be encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations. The following are common sense examples of how to create a positive culture and climate.

**Good practice means:**

- Always putting the welfare of each child first.
- Treating all children/vulnerable adults equally with respect and dignity.
- Always working in an open environment, avoiding private or unobserved situations and encouraging open communication.
- Avoiding physical contact with children unless appropriate or necessary.
- Maintaining a safe and appropriate distance with students (eg it is not appropriate for staff or volunteers to socialise with under 18s, have an intimate relationship with a child or to share a room with them).
- Ensuring that adults should not enter children's bedrooms or invite children into their bedrooms.(eg. If a homestay provider needs to go into a child's room, they should knock and ask permission. If there is no reply they should knock again and announce they will enter in 10 seconds).
- Ensuring that bathroom arrangements are private.
- Dressing appropriately at all times - not wearing clothing which a child might perceive as provocative.
- Building balanced relationships based on mutual trust and empowering children to share in decision making.
- Being an excellent role model – this includes not smoking, taking drugs or drinking alcohol in the company of children. (Students are informed about UK laws in their induction on the first day).

- If appropriate, educating under 18s about addictive substances and not treating their use lightheartedly.
- Ensuring that communication using IT or social networks is appropriate (eg a student getting in touch with a homestay provider to explain what time they will be home).
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Keeping a written record of any injury that occurs, along with the details of any treatment given.
- Reporting all allegations or disclosures to the appropriate staff member
- Keeping a child and their responsible adult informed of the process following an allegation or disclosure

### **Practices to be avoided**

The following should be **avoided** except in emergencies. If a case arises where these situations are unavoidable (eg the child sustains an injury and needs to go to hospital), it should be with the full knowledge and consent of someone in charge or the child's parents.

Otherwise, avoid:

- Spending time alone with children away from others.

### **Practices never to be sanctioned**

**The following should never be sanctioned. You should never:**

- Have sexual activity of any kind (including kissing, touching, etc) with a child. This is against the law according to the Sexual Offences Act (2003)
- Share a bedroom with a child.
- Allow or engage in any form of inappropriate touching or physical contact.
- Engage in rough physical or sexually provocative games, including horseplay.
- Make sexually suggestive comments to a child, even in fun.
- Reduce a child to tears as a form of control.
- Allow children to use inappropriate language unchallenged.
- Do things of a personal nature for children or vulnerable adults that they can do for themselves.
- Invite or allow children to stay with you at your home unsupervised, unless acting as a homestay provider for BEST in Bath by prior arrangement.
- Have an online relationship with a student.
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon.
- Promise a child that you will not disclose information and allegations regarding safeguarding.
- Share confidential information with anyone other than the appropriate Child Safeguarding Officer unless advised to do so by the latter

### **Child protection**

All adults have a responsibility to protect children. If you have any concerns, you should contact one of the named safeguarding staff. If it is a serious concern (ie if the child is in any danger of harm or abuse) you should report the issue immediately.

### **Incidents that must be reported/recorded**

**If any of the following occur you should report this immediately to the Child Safeguarding Officer and record the incident.**

- if another person (child or adult) makes an allegation or discloses a concern
- if you accidentally hurt a student
- If a student seems distressed in any manner
- if a student appears to be sexually aroused by your actions
- if a student misunderstands or misinterprets something you have said or done
- if you have any concern, no matter how small, regarding a child
- if you have a concern about the behaviour of a member of staff

### **Procedure for responding to a disclosure:**

A child may choose any adult to talk to. If a child discloses a concern to you, use the following procedure:

1. Listen
2. Reassure
3. Report
4. Record

Do not ask leading questions and do not promise to keep what the child tells you a secret. The allegation should be shared with a safeguarding officer, but nobody else should be told, including your family. Confidentiality must be maintained.

### **What happens next**

If a member of staff, homestay provider, group leader or volunteer has a concern about the welfare of a child or the conduct of a staff member, homestay provider, volunteer, or another student they **must** report it immediately to a member of the Safeguarding team. If the Designated Safeguarding Lead or one of the other Designated Safeguarding Officers is accused of inappropriate behavior or abuse, it will be dealt with by one of the other members of staff who has Advanced Safeguarding training, or referred straight to the appropriate external agency.

The process is as follows:

1. The concern is reported to one of the Designated Safeguarding staff.
2. A concern form is completed by the member of the Designated Safeguarding team - the nature of the concern must be recorded clearly and without bias. The date and time of the disclosure/incident, persons present and who is reporting the concern should be included. If it is an under-18 who is accused, they will be supported by a member of the designated safeguarding team.
3. The member of the Designated Safeguarding team will contact the parents/legal guardians of the child involved, the necessary authorities and external agencies (eg the Local Safeguarding Children Partners) as appropriate and ensure that appropriate action is taken.
4. A record of any concerns will be kept securely on a computer and on file in a lockable cupboard, with access only to the designated safeguarding staff and, if necessary, an official outside agency. The record will be deleted/destroyed after five years or once the issue has been resolved.

## **Responding to allegations or suspicions**

It is not the responsibility of anyone working for BEST in Bath to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate authorities. S47 of the Children Act 1989 says the Local Authority (LSCP - Local Safeguarding Children Partners) has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to the actions or inactions of others.

## **Recognising symptoms of abuse**

The four main areas of abuse are physical, sexual, emotional and neglect. Some of the signs which may lead to a cause for concern could include unusual bruising or other injuries, the young person showing a particular attachment to an adult or a change in behaviour. Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about the appropriate action to take.

## **Other types of abuse**

**Child Sexual Exploitation** – a form of sexual abuse where a child is forced by an adult to take part in sexual activity in return for something the child needs.

**Honour Based Violence** – where family honour is considered more important than UK law (eg. forced marriage), including **Female Genital Mutilation** - this is where a girl's external genitals are cut or changed for no medical reason. This practice is illegal in the UK and there is a legal duty to report it to the Police as well as the Safeguarding staff if an adult finds out that it has happened in the UK.

## **Use of Internet and Technology**

Abuse can occur through the use of the internet and modern technology. BEST in Bath are committed to safeguarding children in its care through our Acceptable ICT Use Policy.

## **Peer-on-peer abuse**

Bullying and any type of sexual harassment (eg skirt-raising, inappropriate touching) are unacceptable and upskirting has been illegal since April 2019. BEST in Bath gives guidance on what is acceptable and how unacceptable behavior is dealt with in the induction lesson on the first day.

## **Abusive behaviour**

Abusive behaviour includes verbal abuse, harassment, bullying, actual or threatened violence, damage to personal property or behaviour which may lead to extremist radicalisation. (Please see Policy for dealing with Abusive Behaviour).

## **Whistleblowing**

**BEST in Bath** will assure all staff that it will fully support and protect anyone who in good faith reports his/her concern that a colleague is, or may be, abusing a child. Staff have a legal obligation to inform management of any concerns about colleagues not following the Code of Conduct. Any concerns can also be reported through the NSPCC Whistleblowing Helpline on 0800 028 0285.

## **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 the disciplinary investigation, but not necessarily.

### **Confidentiality**

Every effort will be made to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know basis only. All sensitive information will be stored in a secure place with limited access to designated people, in line with data protection laws (ie that information is accurate, regularly updated, relevant and secure).

### **Internal enquiries and suspension**

- BEST in Bath management will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries.

### **Recruitment**

**BEST in Bath** has a commitment to ensure the protection of children in its care through a careful recruitment process (please see Recruitment Policy). All members of staff and homestay providers are expected to share the ethos of the school and actively engage in looking after the safety of under 18s. They are required to complete specific checks during the recruitment process, including DBS checks (or Barred List check if DBS check is delayed beyond the start date), giving proof of identity, explanation of any gaps in employment (if relevant) and references will be followed up to confirm the applicant's suitability to work with children. BEST in Bath requires written confirmation that DBS checks have been carried out for drivers of coaches, taxis etc. Group leaders are requested to bring copies of equivalent national checks, or letters on headed paper from their schools/agents.

### **Training**

Members of staff, homestay providers and group leaders will be made aware of their responsibilities and the process for reporting concerns during their induction and/or through the role-specific handbook. Senior members of staff will have Specialist or Advanced Safeguarding and all other adults will have Basic Awareness training. Teaching staff and Activity Leaders will complete Basic Awareness online and this will be supported by face-to-face initial and refresher training by one of the Designated Safeguarding team. This will be carried out annually, with regular refresher training. Homestay providers will complete Basic Awareness Training online (Accreditation UK Safeguarding Training).

Students will be given guidelines about how to keep themselves safe in their induction lesson as well as in the induction booklet they are given on the first day. As far as possible, this will include some input from the students themselves.

### **Implementing safeguarding**

#### **Risk assessments**

BEST in Bath has risk assessments to help safeguard under 18s for the time they are in the school and for all trips and excursions. The Principal (Mark Appleton) has overall responsibility for producing

these. Members of staff are required to read them and sign to confirm they have done so. Teachers/Activity leaders are aware that it is their responsibility to communicate key information to the students. Members of staff sign the 'Offsite Activities' list when they take students out during class time.

### **Welfare**

Student Services Manager, Jo Blackburn, has overall responsibility for welfare.

### **Supervision**

Supervision takes place during class time and on trips and excursions. The school's policy is to have at least one responsible adult present for every 15 children, and if possible to have at least one adult for every 12 children.

### **Unsupervised Activities**

There are certain times of the day when students will not be under the direct supervision of school staff or their group leaders. This time is usually at the end of the school day, when they have the opportunity to spend some free time in the city centre. There are also occasions when this is the case on excursions (e.g free time for shopping) and as part of a class activity (e.g when doing research interviews with local people). Students are also expected to travel from the homestay to school in the morning, and back to the homestay in the evening using the public bus service, or on foot if they choose to. During this time they will be unsupervised. The school requires students to be with another member of their group at all times when unsupervised.

### **Missing students**

From class - a member of the administrative/academic staff checks that all students are in class, ideally no later than fifteen minutes after classes start. (If, for operational reasons, this check is not possible, then any absence is reported to administrative staff at break time.) Admin staff then contact the Group Leader (where appropriate), student and/or homestay provider, seeking an explanation and to check welfare.

On activities/excursions – all under 18s are required to stay with another student while on excursions. If a student goes missing, the member of staff accompanying the group tries to contact the missing student(s) (with the assistance of Group Leaders if they are part of a group). If they are unable to contact the missing student, a senior member of staff (usually Mark Appleton via the emergency number) is informed. A decision is made on what action to take depending on the particular circumstances. Police may be informed if the situation requires this.

Not arriving at homestay by curfew time – the homestay provider contacts Mark Appleton via the emergency number. He tries to contact the missing student(s) (with the assistance of Group Leaders if they are part of a group). A decision is made on what action to take depending on the particular circumstances. Police may be informed if the situation requires this.

Curfew times:

Groups – homestay providers are notified of curfew times given by the Group Leaders

Summer school – 14-15 year olds 10.00pm (10.30pm on the evening of an activity)

16-17 year olds 10.30pm (11.00pm on the evening of an activity)

### **Emergency contact details**

Mark Appleton holds the 24-hour emergency phone (07769 336522).

All students complete parents' contact details on arrival.

### **Accommodation**

Under 18s are housed in homestay accommodation. Occasionally, parents arrange for children to stay with family members or friends. The school may not agree to this if the location or premises are unsuitable. They must provide their address and contact details.

### **First Aid**

Key members of staff are first-aid trained. This includes the Student Services Manager, caretaker, senior managers, some teachers and some activity leaders. First aid kits are provided on the school premises and are taken on excursions. We aim to have at least one member of first-aid trained staff for each excursion.

### **Behaviour and discipline**

All students are expected to behave well during their stay and adults are expected to provide good examples of behaviour. Laws and school rules are given during the induction lesson and in the Students' Handbook. There is a procedure for dealing with abusive behaviour. (Please see Policy for dealing with Abusive Behaviour).

### **Fire safety**

Fire evacuation procedures are explained in the induction lesson on the first day and in the Students' induction booklet. Teachers are encouraged to take under 18s to the evacuation meeting point before break on the first day.

### **Airport transfers**

Unless transport for under 18s is organised by their parents, or they are travelling as part of a group, students are met and taken to their homestay by a pre-booked taxi service. On departure, they are collected from the homestay and taken to the check in desk at the airport. If parents choose to organise their own transport, we require all travel details in writing.

If a flight is cancelled, we respond on an individual basis in close collaboration with parents and taxi company. The taxi driver may be asked to bring the child back to Bath where he/she will be found accommodation.

### **e-Safety**

Students are given guidelines about being safe online in the induction lesson and during regular lessons. (Please see Acceptable ICT use policy)

### **Prevent**

All students are expected to show respect and tolerance for each other. Core British values are covered in the induction lesson. All adults must be vigilant about signs which may suggest extremist views. (Please see Prevent Risk Assessment).

### **Parental Consent**

Parents complete a parental consent form to confirm that they agree to certain aspects of safeguarding: medical consent, discipline and behaviour, supervision, etc. School groups are asked to bring documentation that parental consent has been granted for each child.



**Private fostering**

This refers to students who are under the age of 16 (or under 18 year old if disabled) who are staying with a family which is not his/her own immediate family for more than 27 nights.

BEST in Bath acknowledges its duty to inform social/children's services of any under 16 year old staying for longer than 27 nights at least 6 weeks before the arrangement starts. BEST in Bath has a policy of accommodating students under 16 years old for 27 nights or fewer. Students and their families will be advised of this prior to booking their course if a longer stay is requested.

**GDPR**

If necessary, BEST in Bath will, where possible, share information with consent. Information may be shared without consent if there is a lawful basis for doing so, such as where safety may be at risk (GDPR and Data Protection Act 2018). Information which is shared will be necessary, proportionate, relevant, adequate, accurate, timely and secure. (Please see Privacy policies).

**Policy Review**

This policy will be reviewed annually by the Designated Safeguarding staff.

**Declaration**

On behalf of Best in Bath, we, the undersigned, will oversee the implementation of the Child Safeguarding Policy and take all the necessary steps to see that it is adhered to.

Signed

*Mark Appleton*

*Jo Blackburn*

Principal

Student Services Manager

Reviewed by: Mark Appleton and Jo Blackburn

Date: 15<sup>th</sup> May 2022

Date of next review: not later than 15<sup>th</sup> May 2023