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ST GILES
EASTBOURNE

SAFEGUARDING AND CHILD PROTECTION POLICY

Keeping our younger students from harm



Contents

1. Introduction	4
2. Designated Safeguarding Officers and Training	5
3. Staff Recruitment Policy	6
4. Staff Code of Behaviour	8
4.1 Statement of Intent	8
4.2 Guidelines for all St Giles Staff	8
4.3 Electronic contact with students under-18	9
4.4 Anti-bullying policy	10
5. Safeguarding Procedures	10
5.1 Courses	11
5.2 Visible ID	11
5.3 Age of Consent	11
5.4 Weekly lists	11
5.5 Absence from school	11
5.6 Supervision at the school	11
5.7 Accommodation	12
5.8 Leisure activities	12
5.9 Taxi transfers	13
5.10 Outside of school	13
5.11 Vetting of other adults	13
5.12 Private Fostering	13
5.13 E-Safety	14
5.14 Fire Safety	14
5.15 First-Aid and Medical care	14
5.16 Behaviour and Discipline	14
5.17 Radicalisation and Extremism	14
5.18 Vulnerable Students	14
5.19 Female Genital Mutilation	15
5.20 Child Sexual Exploitation	15
5.21 Use of images	15
5.22 Sharing nudes and semi-nudes	15



5.23 Visitors, contractors and trespassers	16
6. Child Protection	166
6.1. Children and young people	16
6.2. Parents	177
6.3. Staff	177
6.4. Other Bodies	177
6.5 Safeguarding Governor	17
7. What is Child Abuse?	177
7.1. Awareness of actual or likely abuse	177
7.2. Signs of neglect or abuse	188
7.3 Low Level Concerns	18
8. Procedure for Reporting Allegations or Suspicions of Abuse	199
8.1. Responsibility of staff to report	199
8.2. What to do if abuse is suspected or disclosed	199
8.3. Record keeping	20
8.4. The Records	20
9. Further Action	20
9.1 Contacting the Local Authority	22
9.2 Referrals to the Disclosure and Barring Service	22
9.3 Raising Awareness of Associated Areas of Child Protection	22
10. Annual Audit and Report	22
Additional Resources	22
Appendix A: Concern Form	24
Appendix B: Safeguarding Incident Referral Form	25
Appendix C: Action to be taken if a student goes missing from an off-site activity	26
Appendix D: Action to be taken if a student does not return to the homestay at the required	26



St Giles Eastbourne Safeguarding and Child Protection Policy

St Giles International Eastbourne is committed to a practice which protects children from harm. This includes both Safeguarding and Child Protection. This is of paramount importance in our organisation.

Safeguarding is:

- the school's duty of care to look after children and help them to achieve their potential
- concerned with strengthening relationships of trust between under 18s and adults
- ensuring safe systems are in place for the well-being of under 18s
- considering measures that can be taken to address any specific issues that arise from the presence of Under-16s in a largely adult environment

Child protection

- involves protection from the threat of direct harm
- is concerned with abuse that includes neglect, sexual, physical, or psychological and emotional abuse
- involves procedures for dealing with abuse when it arises

For the purposes of this policy a child is defined as a person under the age of 18.

The people who should abide by the policy are all the adults working with the children at St Giles International Eastbourne, 13 Silverdale Road, Eastbourne, as teachers, administrators, managers or ancillary staff, or the main carer in a homestay accommodating a child as arranged by St Giles International Eastbourne

1. Introduction

Annually, around 50% of the students that study at St Giles Eastbourne are under-18s with greater concentrations of students at this age in the summer. For many, this will be their first experience of living away from home and in a foreign country. The minimum age of students at St Giles Eastbourne is 14 and school publicity makes it clear to parents and guardians on its website and in enrolment documentation that these children will be studying in an adult educational environment.

Staff in this organisation accept and recognise our responsibilities to develop awareness of issues which cause children and young people harm. Adults must be aware and vigilant and must report any concerns to the Designated Persons at St Giles Eastbourne mentioned below. At the end of this policy there are contact details for the Local Child Safeguarding Board (LSCB) and the NSPCC, who adults may wish to contact for help or advice. Adults may wish to contact the Police or the LSCB if they have concerns about a child's safety.

We will endeavour to safeguard children and young people by:

- Adopting child protection guidelines through a code of behaviour for staff.
- Sharing information about child protection and good practice with children, parents, group leaders, homestay providers and staff.
- Sharing information about concerns with agencies who need to know, and involving parents and children appropriately.



- Following stringent procedures for recruitment and selection of staff including mandatory DBS checks for staff and homestay providers.
- Providing effective management for staff through supervision, support and training.
- We are also committed to reviewing our policy and good practice on an annual basis in the
 first quarter of the year or when changes in the law or other guidance dictate. This is done
 by the Designated Safeguarding Lead, currently the Principal, and draws on feedback from
 staff, homestay providers and students.
- Holding regular forums with children at St Giles Eastbourne to enable them to suggest changes to our policy

This policy is for all children in our care, regardless of their nationality, race or gender. They all have equal entitlement to be protected.

This full policy is given to all staff and to homestay providers accommodating children. It is available on our web site www.stgiles-international.com. There is also a condensed version for students and visitors to the school.

2. Designated Safeguarding Persons and Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is David Hannon, the Acting Principal, who has overall responsibility for training and will be involved with any major decisions relating to Child Protection. He has been trained in Inter-Agency/Multi-Agency Safeguarding. This designated person will liaise when necessary with the Local Child Safeguarding Board. The Assistant Director of Studies, Vicky Harris, has received Advanced Safeguarding for Designated Staff training, and will deputise for the DSL in his absence.

St Giles Eastbourne also has a Designated Safeguarding Person (DSP) – Francisca Matos. The identity of the Designated Safeguarding Person is advertised around the school and on the students' arrival, and the Designated Safeguarding Person meets newly-arrived under-18s during their first week and is their point of contact for day-to-day matters throughout their course. The Designated Safeguarding Person has received Advanced Safeguarding for Designated Staff training.

If any student or staff member has any concerns about the welfare of an under-18 this should be reported to the Designated Safeguarding Person or any other staff member that is trusted by the individual.

Training

The Principal has responsibility for ensuring that all adults working for or with St Giles have Safeguarding training to an appropriate level.

As a starting point all members of staff and homestay providers receive a copy of the School's Safeguarding & Child Protection Policy.

In addition to the training undergone by the DSP and DSL all staff at St Giles Eastbourne undergo Basic Awareness Safeguarding training. All staff will have refresher training and may be asked to complete the next level of Child Protection training if appropriate.



All staff are asked to redo their training every three years and may be asked to complete the next Level of Child Protection training if appropriate. The Principal keeps a record of training done so that updates are done within the prescribed period.

The DSP and DSL will also participate in relevant local and national training events in relation to their Safeguarding roles.

3. Staff Recruitment Policy

St Giles Eastbourne is committed to the safer recruitment of staff, homestay providers, group leaders and other service providers. The St Giles International Staff Handbook states that St Giles has a commitment to safeguarding children in our care and that all adults associated with the company will be expected to share our ethos of active engagement in looking after under-18s safely.

To ensure that employees working for St Giles are suitable for work with children, the following procedures will be followed:

All staff must submit a CV with their application and all gaps in CVs must be explained satisfactorily. Proof of qualifications will be required and a minimum of two references will be followed up. The reference request will ask if the referee has any reason to believe that the employee is unsuitable for work with children. Staff will be required to affirm that there is no reason why they should not be employed in situations where they have responsibility for, or substantial access to, persons under 18. At interview prospective employees will be asked about their attitude to working with under-18s.

Staff members are asked to agree to undergo a fresh enhanced DBS check before they commence employment with the school. Recent DBS checks requested by previous employers are not transferable. The School will note the date and reference number of the application but will not retain any original DBS certificates on file. The DBS check is valid with the school for a period of three years. The main carer in homestay providers accommodating under-18s will also undergo a DBS check prior to receiving students.

A record will be kept of decisions reached by the Principal and the Director of Studies in relation to teaching or administrative staff, or by the Principal and the Accommodation Officer in relation to homestay providers, in the case of a criminal record being revealed by the DBS check.

We encourage all applicants called for interview to provide details of any criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to the Principal, and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process. Unless the nature of the position allows St Giles to ask questions about a person's entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

At the same time, if a DBS check subsequently reveals matters which materially affect the suitability of a person for employment with St Giles, the school will discuss matters with the prospective employee and reserves the right to withdraw any provisional offer of appointment or to terminate a contract under the Disciplinary Procedure for misrepresentation or failure to disclose material facts during the job application/interview process.

It is against the law for the school to knowingly employ anyone who is on the DBS children's barred list.

If a DBS check has not come back by the time the applicant is due to start work, there should be exceptional and justifiable circumstances for employment to commence prior to receiving clearance. However, under such circumstances the employee would not be permitted to have unsupervised access to under-18s. Homestay providers will not be given students to accommodate until we have



completed the DBS check.

St Giles has a written policy on the recruitment of ex-offenders, which is available to all Disclosure applicants at the outset of the recruitment process.

Further details of St Giles' policy on Disciplinary and Grievance procedures are to be found in the Staff Handbook and Contract of Employment.

An applicant's suitability to work with children will be judged on a case by case basis and in light of the results of the relevant pre-appointment checks carried out on him or her. The fact that a person has a criminal record does not automatically make him or her unsuitable to work with children. St Giles will make a judgement about suitability taking into account only those offences which may be relevant to the particular job or situation in question. In deciding the relevance of convictions a number of points will be considered

- Seriousness and nature of offence/s in general, serious convictions for sexual, violent or drug offences will be particularly strong contra-indicators for work with children. This includes assault and violence against a person, affray, riot and violent disorder, aggravated criminal damage, arson, drink and drug induced driving, drug offences, robbery and sexual offences.
- Nature of appointment will help to assess the relevance of the conviction. For example, serious sexual, violent, drug or drink offences would give rise to particular concern where a position involves the care or supervision of children or teaching, training or instruction of children. Driving or drinking offences would be relevant in situations involving transport of children.
- Age of offence/s offences which took place many years in the past may often have less relevance than recent offences. However, convictions for serious violent or sexual offences are more likely to give cause for concern than for instance an isolated case of dishonesty committed when the person was young. The potential for rehabilitation must be weighed against the need to protect children.
- Frequency of the offence/s a series of offences over a period of time is more likely to generate cause for concern than an isolated minor conviction.

The disclosure should be discussed with the prospective employee. It is necessary to verify that the information contained on the disclosure does indeed relate to the person concerned. This verification must be sought prior to any judgements being made. The discussion will also aid the decision making process, and should again broadly focus on the seriousness and nature of the offence/s, the nature of the appointment, age of offence, frequency of the offence/s and any concealment of offences at the application process.

Based upon the findings of this discussion, a judgement will be made with regard to the suitability of the prospective employee. This decision is not taken in isolation – at least two people should be involved; the Local Safeguarding Children Board may be able to offer support. A record made of the decision, bearing the judgement and the Principal's signature is kept on record in the Principal's office.

On occasions it is not possible for certain applicants to get a criminal record check. For a British national returning to the UK after working overseas where the authorities have refused to provide a record check because they are a British national, we will request a DBS check for their UK records and will take additional care with the other recruitment checks: checking identification and qualifications and obtaining a proper reference, and supervision.



For an overseas national, we will document what action has been taken to obtain a check and why this has not been possible, and take additional care with identity and qualification checks, exploring employment history and obtaining references. Based upon our findings, a judgment is made with regard to suitability for the role and the level of supervision.

Regarding the recruitment of homestay providers, it is now normal practice for St Giles to require the primary care giver in each homestay to undertake a DBS Enhanced check. Hosts are expected to be available to host any student who is under 18 and are also expected to complete an online course in safeguarding and child protection.

When the primary caregiver completes a DBS Enhanced check they must indicate that the activity will take place in their home. This results in the address also being checked and if there are any residents who may pose a risk to under-18s in the household the information will be shared with the school by the DBS service. A host must not accommodate an under-18 if they are not DBS checked.

We maintain a Single Central Record of the recruitment and vetting checks undertaken in respect of all staff in regulated activity with under-18s before they start employment at St Giles Eastbourne. The Record is checked and monitored regularly by the Principal

A similar record for homestay hosts who have been DBS checked is kept by Sarah Keith in the Accommodation Office.

4. Staff Code of Behaviour

4.1 Statement of Intent

It is the policy of St Giles International to safeguard the welfare of all children and young people by protecting them from all forms of abuse including physical, emotional and sexual harm. This organisation is committed to creating a safe environment in which young people can feel comfortable and secure while engaged in any of St Giles' programmes. Staff should at all times show respect and understanding for the individual's rights, safety and welfare, and conduct themselves appropriately.

4.2 Guidelines for all St Giles Staff

The following guidelines are intended to protect both adults and children from any behaviour or actions that may be misconstrued:

Attitudes

Staff and homestay providers should be committed to:

- Treating children and young people with respect and dignity.
- Always listening to what a child or young person is saying.
- Valuing each child and young person.
- Recognising the unique contribution each individual can make.
- Encouraging and praising each child or young person.

By Example

Staff and homestay providers should endeavour to:

- Provide an example, which we would wish others to follow. This includes presenting oneself appropriately. Teachers and staff should be dressed smartly and homestay providers must be careful to ensure they are not seen in a state of undress by children in their care.



- Use appropriate language with children and young people and challenge any inappropriate language used by a young person, child or an adult working with young people.
- Not to interact with children in their care if they are under the influence of alcohol or drugs.
 Adults have a responsibility not to encourage children to drink alcohol, take drugs or smoke.
- Respect a young person's right to privacy.

One To One contact

Staff and homestay providers should:

- Not spend excessive amounts of time alone with children, away from others.
- In the event of having to meet with an individual child or young person make every effort to keep this meeting as open as possible.
- If privacy is needed, ensure that other staff are informed of the meeting and its
 whereabouts. For these meetings there should be two members of staff, one male and one
 female, present. Staff members are strongly advised against meeting a child alone in a
 closed space, especially of the opposite sex.

Physical contact

Staff and homestay providers should never:

- Engage in sexually provocative or rough physical games, including horseplay.
- Do things of a personal nature for a child or a young person that they can do for themselves.
- Allow, or engage in, inappropriate touching of any kind.

General

Staff and homestay providers should:

- Be aware that someone might misinterpret their actions no matter how wellintentioned.
- Never draw any conclusions about others without checking the facts
- Never allow themselves to be drawn into inappropriate attention-seeking situations such as tantrums or crushes
- Never exaggerate or trivialize child abuse issues or make suggestive remarks or gestures about, or to a child or young person, even in fun

Bathrooms and Bedrooms

Homestay providers for children must be particularly careful to ensure that children enjoy privacy in the bathroom and bedroom whilst they are in their care. All bathrooms should be fitted with a lock that can only be activated from inside the bathroom and windows or glazing in doors must allow for complete privacy. Adults should knock before opening the door to the bedroom of any child in their care and should not enter the child's bedroom unless in an emergency.

Transport

St Giles Eastbourne uses Direct Travel Journeys for its taxi transfer service. All taxi drivers employed by Direct Travel Journeys have undergone and passed enhanced DBS checks.

St Giles Eastbourne uses UK Study Tours for its weekend excursions on the Social Programme. All tour guides employed by UK Study Tours have undergone and passed enhanced DBS checks.

St Giles Eastbourne recommends two local taxi companies. The drivers working for both companies have undergone and passed enhanced DBS checks

4.3 Electronic contact with students under-18

Electronic contact is defined as the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment and computers.



Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.

This policy applies to the relationship between students and staff before, during or after a course.

Staff and homestay providers must request permission from the employer for any electronic contact with a student which is of a non-professional nature before, during or after a course. This may be necessary when needing mobile phone numbers from students for an excursion but social-networking on Facebook etc. is strictly prohibited. Staff should ensure that their Facebook page is set to an appropriate security setting so that students cannot access information about the staff member that might bring disrepute to the school.

In any electronic contact with students, staff must pay particular attention to use neutral, unemotive language that will not be misconstrued. Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer. The Wi-Fi network and all computers at St Giles International Eastbourne have a robust firewall that prevents anyone accessing inappropriate content on the Internet. Homestay providers must ensure that children in their care are not able to access inappropriate content on the Internet.

Inappropriate content includes websites displaying pornographic material, facilitating suicide, or encouraging extremism or radicalization.

N.B. Parents/guardians are asked at the enrolment stage if they give their permission for their child to be photographed or filmed for promotional purposes.

4.4 Anti-bullying policy

St Giles has a written policy on bullying for staff in its Staff Handbook, and one for students in the Student Guide. A poster dealing with the issue of respect for other students is also displayed in each classroom.

5. Safeguarding Procedures

The following safeguarding measures are followed at St Giles Eastbourne in order to look after under-18s to ensure their safety and well-being.

The Principal conducts daily tours of the school's common ways to check for any fire or health and safety risks that might present a danger to students or staff. In addition there is an annual fire risk assessment of the school buildings and a general risk assessment of the premises. Our policy is to act promptly in response to recommendations made in the risk assessment reports.

There is a Health and Safety representative on the teaching staff who can flag up any H&S concerns to the Principal. Individual staff members or students can also approach the Principal directly with H&S concerns.

All new students on their first day at St Giles are made aware of our fire safety and first aid policies.

All students have 1-1 feedback meetings with their main class teacher every two weeks. This affords the school an opportunity to check on the general welfare of each student as well as eliciting feedback from the student about their course and their accommodation.

Any serious concerns expressed by students are followed up by arranging for a meeting with the Accommodation and Welfare Office, the Under-18 Welfare Officer, the Director of Studies, or the Principal.



All students are asked to complete a questionnaire during their first week at St Giles in which they are asked for their opinion about the school and its services. Any serious concerns expressed by students are followed up by the Accommodation and Welfare Officer, the Director of Studies or the Principal.

During their first week in the school all students under the age of 18 have a meeting with the Designated Safeguarding Person, Francisca Matos, to check that they have settled in with their homestay and have no particular welfare issues. The Designated Safeguarding Person will conduct weekly meetings with all under-18s. These meetings are obligatory. Under-18s are invited to liaise with David at any time if they have any welfare concerns during their time at St Giles.

The following specific safeguarding measures are followed at St Giles Eastbourne in order to help keep students who are under-18 safe from harm:

5.1 Courses for under-16s of 28 lessons per week

These classes consist of students aged under-18. On occasion, an U16 student may be placed in an adult class, as this may be considered the 'best fit' for the student. The reasons for this decision must be discussed and agreed upon by the DoS and the Principal and the document 'Rational and Risk Assessment for placing under-16 students in adult classes' must be completed and kept on file.

5.2 Visible ID

All students, staff and visitors are given a wristband and they are asked to wear this whilst they are at the school and whilst attending any activities outside of class time organised by the school. The lanyards are coloured according to age and the reason for being on site:

Grey = Staff

Blue = Students aged 18+
Red = Students aged 16/17
Yellow = Students aged 14/15

Pink = Visitors

Students who are not wearing their visible ID may not be allowed into class.

Any person on the school site who is not known to staff and/or is not wearing visible ID may be approached and asked to prove their identity.

5.3 Age of sexual consent

All students are informed on their first day at the school that there will be students aged from 14 upwards in the school and that the age of sexual consent in the UK is 16. This information is also available in the school's Disciplinary Policy

5.4 Weekly lists

The Principal compiles a weekly list of new and existing students who are under the age of 18. The list is circulated to all relevant staff and a copy is also held by the duty officer. The out of hours' duty officer also has access to up-to-date next of kin/emergency contact details (these details are obtained and recorded prior to arrival).

5.5 Absence from school



The age of students is clearly indicated in class registers. All teachers are instructed to inform the School Office immediately if an under-18 is absent from their class. This absence is then followed up by the Designated Safeguarding Person.

In instances of repeated lateness or absence, the Designated Safeguarding Person will discuss the matter with the Principal, who will inform the student's parents or guardian and, where applicable, their agent.

5.6 Supervision at the school

During breaks the Principal, in a supervisory role, walks around the school site. In their absence this duty is covered by the Director of Studies or their deputy.

5.7 Accommodation

Students under the age of 18 who do not form part of a group and are not accompanied by an adult family member or guardian are only permitted to be accommodated in what is defined as homestay accommodation and not a private home. The main care provider in homestays accommodating under-18s is DBS checked. Under-16s are not accommodated with students aged 18 and over.

For students who are under the age of 16 there is a 21.00 pm curfew in place Sunday to Thursday inclusive and 22.00 Friday and Saturday; for students aged 16 and 17 the curfew times are 23.00 (Sunday to Thursday) and 00.00 (Friday and Saturday). In cases where a child does not return before the curfew begins the homestay should phone the child to ensure they are safe and should inform the school. If the homestay provider is unable to contact the child they should phone the St Giles emergency phone on 07833788118. The emergency duty officer will continue to attempt to make contact with the child and if necessary will inform the police and parents/guardians.

The school requires hosts to take under-16s to the school on their first day. The school will also show students the safest route to and from the school. Risk assessments have been conducted for these journeys.

All complaints made by under-18 students about their accommodation must in the first instance be treated as a safeguarding issue and therefore be discussed by the Accommodation Officer and either the Designated Safeguarding Person or, in serious cases, the Designated Safeguarding Lead (the Principal).

All communication between the school and the host (or any other third party) must be conducted from a safeguarding perspective, thus protecting the interests of the child above all other concerns. It is strongly advised that any complaints made by students about their accommodation is handled sensitively and discreetly to maintain confidentiality and to avoid any possible tensions between the student and the host.

5.8 Leisure activities

The School runs a series of activities for students as part of its social programme. Risk assessments are created for onsite and offsite events and include consideration of under-18s.

Students aged 14 and 15 who have booked a J course (see St Giles Course Dates and Prices brochure) are entitled to three weekday social programme events per week – these are included in the tuition fees. Students of this age are strongly encouraged to participate in the school's social programme. The DSP, Social Programme Organiser or Principal will follow up cases of non-attendance to ascertain the reason. Students aged 14 or 15 who are accompanied by a group leader may be exempt from these activities at the discretion of the Principal.



Attendance at some activities is advertised and restricted for students who are over 18 only. Activities are supervised by a member of staff who will have responsibility for ensuring that all under-18s are safe and accounted for. The supervisor will ensure their phone is fully charged and they have contact details for the Under-18s. Supervisory ratios are consistent with the AUK guidelines, ages 14-17: 1 adult to 15 children. If an under-18 goes missing the supervisor should phone the St Giles emergency phone on 07833788118. The emergency duty officer will attempt to make contact with the child and establish their whereabouts and if necessary will inform the police. Please refer to Appendix C for a more detailed procedure.

5.9 Taxi transfers

We ask that students aged 14 and 15 have a pre-booked return taxi transfer, and we strongly recommend that students aged 16 and 17 book a taxi transfer through the school to facilitate their safe arrival and departure. However, parents may elect to opt out of this arrangement on behalf of their child and should forward the school the details of any relatives or guardians who will be meeting the child. Parents are informed that such arrangements may not be deemed adequate by the UKVI and may hinder their child's entry into the UK.

5.10 Outside of school

All under-18s receive a student ID card with the school's contact details. Callers to this number out of hours will be informed of the emergency phone number (07833788118). A duty officer is available to take calls outside of the school's normal opening hours. Under-18s are given advice about how to stay safe in Eastbourne in their first week by the Designated Safeguarding Person. Advice includes but is not limited to the following: ways of travelling (stay in pairs and groups), planning how to get home in advance of evenings out, ensuring their mobile phone is fully charged, saving the number of a reputable taxi firm, information about the laws that apply to under-18s, E-safety, and telling friends and hosts where they are going.

The school's Under-18s Guide for Students Aged 14 to 17 and Disciplinary Policy for Students Aged 14 to 17, which are given to Under-18s and their parents/guardians contain more detailed information on what students may and may not do in their free time outside of the school.

5.11 Vetting of other adults

The School will ensure that it receives written confirmation from its partner organisations including its taxi transfer partner that they have effective and rigorous staff vetting procedures in place that include an enhanced DBS check for their staff members.

Agents will also be asked to provide confirmation that they have obtained a certificate of good conduct provided by the local law enforcement agency for any group leaders escorting groups that include under-18s.

5.12 Private Fostering

Private fostering is when a child under the age of 16 (or 18 if disabled) is cared for by someone who is not their parent or a close relative. This is a private arrangement made between a parent/school and a carer/homestay provider for 28 days or more. It is a legal requirement that St Giles contacts the East Sussex County Council Duty & Assessment Team, based in Eastbourne, to inform them that a child will be living in a private fostering arrangement with one of St Giles' homestays. The Duty & Assessment Team can be contacted on 01323 747040 or by email at Jenni.Tompkins@eastsussex.gov.uk



5.13 E-safety

All PCs on the school premises and the student Wi-Fi network in the school are protected by secure firewalls that prevent anyone accessing inappropriate content online. This software allows for effective filtering and monitoring. Our Student Guide includes advice on E-safety and offers advice to under-18s about what to do if they receive unwanted contact online or via text.

5.14 Fire Safety

All students are informed about fire safety at their induction. Classes of Juniors or exclusive classes of under 18's are placed in the outside classrooms or those with the shortest possible escape routes.

5.15 First Aid and Medical Care

Under-18s are reliant on adults for proper medical and first aid provision and may not themselves be the best judge of when to seek assistance. We therefore ask all staff and homestay providers to be especially vigilant in relation to the health of under-18s under their supervision or in their care. Within the school we have trained First Aiders. Staff members supervising social programme activities who are not First Aid trained will contact the emergency services in the case of injury to a child in their care. Homestay providers may be able to offer limited medical care but should help under-18s in their care receive all necessary medical attention through their own GP.

5.16 Behaviour and Discipline

Under-18s are expected to follow our school rules as laid out in the separate Disciplinary Policy for Students Aged 14 to 17.

St Giles' Student Disciplinary Code extends to excluding students from the school for more serious misdemeanours. Safeguarding takes precedence and we would not exclude an Under-18 unless we had informed their parents and made provision for their safe return home. Please see the St Giles website for our full Under-18 and our Adult Disciplinary Codes.

5.17 Radicalization and Extremism/ Prevent

ELT organizations have been identified as areas where extremists may expound their views and try to involve others. Consequently, we have introduced measures to combat this risk.

From Day One we state our expectations to staff and students about respecting others' views and challenging any behaviour which does not allow students and staff to work easily together. We aim to make our staff and students aware of the risk of radicalization and extremism, especially amongst under-18s from overseas, and to reassure them that they will be supported if reporting any concerns. Our advice to under-18s includes educating them about the need for tolerance and acceptance of a range of views and this is positively encouraged by teachers during lessons. We ensure that the school building is an environment where everyone feels safe and supported and we do not allow the display or promotion of inappropriate materials or organisations. The school's IT firewalls ensure that appropriate filters are in place and we aim to foster e-safety amongst students so that they are aware of what terrorist and extremist material may look like.

Staff are made aware that they should speak to the Principal or his deputy in his absence if they are concerned about a particular student.

Please see the school's separate Prevent Policy for further details

5.18 Vulnerable students

A list of students with Special Educational Needs or Medical Conditions will be distributed to key administrative staff and the relevant class teacher. Staff and homestay providers need to be particularly vigilant to safeguard any under-18s so listed.



Students with permanent or temporary mobility issues will be provided with personal fire evacuation plans, and the school will try to ensure that any such students are placed in classrooms nearest to the main fire escape routes.

5.19 Female Genital Mutilation (FGM)

Female genital mutilation is the ritual removal of some or all of the external genitalia for non-medical reasons. The practice is most prevalent in 27 countries in Africa and parts of Asia and the Middle East. Victims are usually pre-pubescent and the typical age this ritual takes place is under the age of 5.

There are no known health benefits for this procedure and the practice is rooted in gender inequality, attempts to control women's sexuality and ideas about purity, modesty and aesthetics.

There is a mandatory duty to report to the police any known cases that come to light of FGM in female students under the age of 18 which are reported by the individual concerned and are verified. The requirement also includes a duty to report any suspicions that an individual may be at risk of suffering FGM either in the UK or in the UK or on a trip overseas.

5.20 Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. The School is developing an information sheet for students under the age of 18 that includes a warning about CSE

5.21Use of Images

It is sometimes necessary to take photographs or videos of students for educational or publicity purposes. To ensure the safety of every student, the following procedures will be adhered to:

- 1. Adult students will be asked to give their consent for their photographs to be taken and their images to be used for school purposes. In the case of students under the age of 18 their parents/guardians will be asked to give permission. This is a parental choice and if no permission is received, then the pupils in question will not have photographs or videos taken of them.
- 2. When photographs are used for publicity purposes, for example on the school website the school will be mindful of the way pupils may appear in them, and will not include images which are in any way inappropriate, such as close-up portrait shots of individual pupils.

5.22 Sharing Nudes and Semi-nudes

The Safeguarding Lead keeps a document from The UK Council for Internet Safety offering advice on identifying and reporting risk in relation to nudes and semi-nudes.

If any member of staff has concerns relating to U18's sending, receiving or requesting nudes or semi-nudes then this should be immediately reported to the DSL. The DSL may seek further advice before acting.

All staff should note that the sharing of nudes or semi-nudes by an adult with an U18 constitutes child sexual abuse and should be reported to the police.



5.23 Visitors, contractors, and trespassers

We require all visitors to the school premises and contractors carrying out work in our buildings to sign in on arrival and to wear a Visitor's Pass on a blue lanyard. Visitors and contractors are given our Welcome Guide, which specifies what they should do in an emergency, and stresses the paramount importance of safeguarding. People coming in to the school to make enquiries at reception or in the main office are not required to sign in on arrival.

Trespassers are individuals who enter the school buildings without a valid reason. Trespassers may present a risk to students and staff and should be escorted from the premises as soon as possible if it is safe to do so. Staff or students who encounter a trespasser should alert the Principal, the Maintenance & Security Officer, or the Student Services Officers. If the trespasser refuses to leave the building or presents a threat, we will phone 999 for the Police.

We have conducted an assessment of the risks posed by visitors, contractors, and trespassers, which has informed this policy.

6. Child Protection

Introduction

The School meets its Child Protection responsibilities by making all staff and homestay providers aware of their responsibilities, having nominated people available to consult at all times, making staff and homestay providers aware of different child protection scenarios, training them in recognizing symptoms of abuse, and offering guidance on how to respond to any allegation.

Sharing Information Regarding Child Protection

Good communication is essential in any organisation. At St Giles every effort will be made to assure that, should individuals have concerns, they will be listened to and taken seriously.

It is the responsibility of the management to ensure that information is available to, and exchanged between all those involved in this organization and its activities. Some information is confidential and should only be shared on a strictly need-to-know basis.

N.B. St Giles International complies with the requirements of the Data Protection Act 1998

Designated Safeguarding Staff

The School has the following nominated staff with designated roles with regard to Safeguarding and Child Protection:

Francisca Matos Designated Safeguarding Person 01323 729167/ 07794 845624

David Hannon Designated Safeguarding Lead/ Prevent Lead 01323 729167/ 07502 546658

Vicky Harris ADoS and cover for David Hannon 01323 729167/ 07903 903585

At least one of the above mentioned staff members will be available 24/7.



6.1. Children and young people

St Giles will act to ensure that young students have information about how, and with whom, they can share their concerns, complaints and anxieties. When sharing information, St Giles' personnel will be sensitive to the level of understanding and maturity, as well as to the level of responsibility, of the people with whom they are sharing information.

6.2. Parents

Parents / persons with parental responsibility are ultimately responsible for their children's welfare at all times, and they should be assured that their children are involved with a credible organisation. We achieve this by having a full copy of this Child Safeguarding and Protection Policy available for anyone to view.

6.3. Staff

As an organisation which works with children and young people, it is imperative that each member of the St Giles staff is aware of their responsibilities under the Child Protection legislation and has a working knowledge of St Giles procedures.

Each member of staff will receive training at induction. This training will include being given a copy of the school's Safeguarding & Child Protection Policy and completing a training module on child protection equivalent to a level one course. There will also be regular ongoing training sessions for all staff members.

6.4. Other Bodies

A copy of our Safeguarding & Child Protection Policy will be made available to any other appropriate body.

6.5 Safeguarding Governor

The Chief Executive Officer of St Giles International, Mark Lindsay, takes the strategic lead on safeguarding for the organisation. The Designating Safeguarding Lead must submit an annual report on safeguarding and child protection on the School to the Safeguarding Governor. Individuals are not named in this report.

The submission of the report is followed by an annual group meeting normally held in the middle of March each year where the Group's safeguarding policies are placed under scrutiny.

7. What is Child Abuse?

Child Abuse is a term to describe a range of ways in which people harm children. Often the person is known and trusted by the child. All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

Child abuse is defined as neglect, physical injury, sexual abuse or emotional abuse inflicted or knowingly not prevented, which causes significant harm or death. (NSPCC 1999)

7.1. Awareness of actual or likely abuse

Cases of abuse become apparent in a number of ways:

- A child may tell someone they are being abused.
- Someone may disclose that a child has told them, or they believe a child is or has been abused.



- A child may show signs of physical injury with no satisfactory explanation for its cause.
- A child's behaviour may indicate that it is likely he / she is being abused.
- A member of staff's behaviour or way he / she relates to a child causes concern.

7.2. Signs of neglect or abuse

Eating disorders, being withdrawn, aggression, being disruptive, absence, self-harm, change of conduct, homesickness, not wanting to return home, being inattentive, lack of hygiene, clinqing to staff etc. are just some of the possible signs.

7.3 Low Level Concerns

A 'low-level' concern could be described as an action or behaviour towards a child that may not meet the threshold for reporting to the DSP or does not appear to cause a direct threat or harm to a child. However, 'low-level' concern does not mean that the action is insignificant,

A low-level concern is any concern – no matter how small, that an adult working in or on behalf of the school may have acted in a way that:

- \cdot is inconsistent with the staff code of conduct, including inappropriate conduct outside of the school; and
- \cdot does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral

The Keeping Children Safe in Education Act states:

407. As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

408. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a low-level concern should inform the Safeguarding Lead or Deputy Lead.

Some examples of behaviour that may constitute low-level concern are as follows

- Being over friendly with students including light touching
- Taking photographs of children on mobile phones
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate language or talking about inappropriate subjects

Allegations Vs Low-Level Concerns



Allegation	 Behaviour which indicates that an adult who works with children has: Behaved in a way that has harmed a child, or may have harmed a child Possibly committed a criminal offence against or related to a child Behaved towards a child in a way that indicates they may pose a risk or harm
Low-Level Concern	 Any concerns that an adult may have acted in a manner which: Is inconsistent with the organisations code of conduct Relates to their conduct outside of work which caused a sense of unease or concern about their suitability to work with children
Appropriate Conduct	Behaviour which is entirely consistent with the organisation's code or conduct, guidelines, and the law

8. Procedure for Reporting Allegations or Suspicions of Abuse

8.1. Responsibility of staff to report

It is not only the duty of St Giles staff but a legal requirement to disclose cases of abuse or allegations of abuse to the Designated Safeguarding Person(s) without delay. It is **NOT** for staff to decide whether or not a suspicion or allegation is true. All suspicions or allegations of abuse must be taken seriously.

If a member of staff has suspicions, they should contact the Designated Safeguarding Person in confidence. If a child or young person starts to talk to the staff member directly, they should allow that person to disclose and should allow them to continue talking following the guidelines below. They should then see the Designated Safeguarding Person or Principal in confidence.

8.2. What to do if abuse is suspected or disclosed

- Never guarantee absolute confidentiality, as Child Protection will always have precedence over any other issue.
- Endeavour to meet the child in a semi-public or visible space if possible
- Listen to the child, rather than question him / her directly.
- Offer him / her reassurance without making promises, and take what the child says seriously.
- Allow the child to speak without interruption.
- Accept what is said it is not your role to investigate or question.
- Do not overreact.
- Alleviate feelings of guilt and isolation, while passing no judgment.



- Advise that you will try to offer support, but that you must pass the information on.
- Explain what you have to do and who you have to tell.
- Record the discussion accurately, as soon as possible after the event,
- Use the child's words or explanations do not translate into your own words, in case you have misconstrued what the child was trying to say.

8.3. Record keeping

All records, information and confidential notes should be kept by the Designated Safeguarding Person in separate files in a locked room or in secure electronic files. Only the Principal and Director of Studies or another nominated senior manager and the Designated Safeguarding Person will have access to these files.

8.4. The Records

In any case where an allegation is made, or someone in St Giles has concerns, a record should be made. *Details must include, as far as practical:*

- Name of child or young person
- Age
- Home address (if known)
- Date of birth (if known)
- Name/s and Address of parent/s or person/s with parental responsibility
- Telephone numbers if available
- Is the person making the report expressing their own concerns, or passing on those of somebody else? If so, record details
- What has prompted the concerns?
- Include dates and times of any specific incidents
- Has the child or young person been spoken to?
- If so, what was said?
- Has any individual been identified in the allegation?
- If so, record details
- Who has this been passed on to, in order that appropriate action is taken? E.g. school Principal, Accommodation & Welfare officer, Director of Studies, local social services, police etc.
- Has anyone else been consulted?
- If so, record details
- ACTION TAKEN: this must be recorded.

Designated Child Protection Persons

For reasons of confidentiality the only people who need to know this information are the following designated Child Protection Persons: The Principal, Director of Studies, Accommodation and Welfare Officer, and any other staff members with specific responsibility for under-18s. These will report to the Principal in his capacity as Designated Safeguarding Lead or in his absence to the Director of Studies.

9. Further Action

What happens when an allegation is made against an adult

Once a statement has been collected from a student further questioning should be avoided apart from important clarification of factual detail.

A senior management representative (usually the Principal) and the Designated Safeguarding Person will meet at the earliest possible opportunity to consider an appropriate course of action in response to the information revealed by the student and consider any other relevant information.



We will ensure that the child is safe, supported and reassured. If/when it is safe and appropriate, we will try to return the child to their normal routine.

If the allegation refers to the Principal, the DSP should contact the Managing Director, Mark Lindsay on 07941 326087.

The Principal will decide if it is appropriate to involve other members of the school staff, e.g. the Director of Studies, the Accommodation & Welfare officer at this stage, and also whether to inform the student's agent and parents. The Principal will contact the LSCB. No decisions will be made on further action without referring to the LSCB. There may be no need to take any further action in which case this decision should be recorded in writing.

The Managing Director should also be briefed of developments and further action may include the immediate removal of any imminent threat of danger, seeking advice from the Local Authority Designated Officer, contacting the police, or making a referral to the Disclosure and Barring Service (DBS) depending on the severity of the allegation.

The LSCB's role is to provide advice and guidance to schools dealing with allegations and, if necessary, to liaise with the police and other agencies and to monitor the progress of cases to ensure they are dealt with quickly and consistently. St Giles has a duty of care to its employees and will provide adequate support for anyone facing an allegation and provide them with a named contact if they are suspended.

There will be an initial discussion between the DSL (The Principal) and the Local Safeguarding Children Board (LSCB), at which some actions will be agreed:

- Immediate action to protect the child
- When and what parents should be told
- What should be said to the adult facing the allegation
- Whether the adult facing the allegation should be suspended

Suspension is not an automatic response and should only be considered where children are at risk of serious harm or the concern is so serious that it would result in immediate dismissal. If the person is suspended, the reason must be communicated to them within one day.

The school must maintain confidentiality regarding the accused. Until any investigation, either internal or external, has been completed, the identity of the accused must not be released.

If the allegation is unsubstantiated, unfounded or malicious, St Giles will support the member of staff on their return to work, especially if they have been suspended.

What happens when an allegation is made against a child?

It may happen that the person being accused of abusing a child is also a child. In such circumstances the school has a duty of care to both children involved. The procedure is the same as for dealing with an allegation of abuse made against an adult but the school will take particular care to offer support and confidentiality to the alleged perpetrator. The Principal will contact the LSCB immediately. No decisions will be made on further action without referring to the LSCB.

What happens when an allegation is made against a St Giles student?

It may happen that the person being accused of abusing a child is a student at St Giles, either an adult or a child themselves. In such circumstances the school has a duty of



care to both parties involved. The procedure is the same as for dealing with an allegation of abuse made against an adult but the school will take particular care to offer support and confidentiality to the alleged perpetrator. The school will ensure that the alleged victim is kept safe and the alleged perpetrator may be excluded from the school or asked to change class or homestay in order to avoid further contact with the alleged victim. The Principal will contact the LSCB immediately. No decisions will be made on further action without referring to the LSCB.

9.1 Contacting the Local Authority

The Principal will contact the Local Authority if an allegation of child abuse is brought against an adult or child at St Giles Eastbourne. Anyone who is concerned about the well-being of a child can also contact any of the agencies listed below.

The East Sussex Safeguarding Children's Board can be reached on: 01273 481544 or lscbcontact@eastsussex.gov.uk

The Local Authority Designated Officer (LADO) at East Sussex Safeguarding Children Board can be reached at Paul Startup, telephone 01323 466606 or 07825 782793, email paul.startup@eastsussex.gov.uk

9.2 Referrals to the Disclosure and Barring Service

A referral must be made to the DBS when the school: withdraws permission for an individual to engage in *work with under-18s* or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which does not involve contact with under-18s, because they think that the individual has:

- engaged in relevant conduct; i.e. action or inaction that has caused: neglect, emotional/psychological, sexual, or physical harm
- satisfied the *Harm Test*; to harm or cause harm, put a child at risk, attempt to harm or incite others to harm
- received a caution or conviction for a relevant offence

If these conditions have been met the information must be referred to the DBS.

The referral should be made to the DBS when the provider has gathered sufficient evidence as part of their investigations to support their reasons for withdrawing permission to engage in *work with under-18s* and in following good practice, consulted with their Local Authority Designated Officer (LADO).

9.3 Raised awareness of associated areas of child protection

St Giles Eastbourne wants all staff and homestay providers to be aware of associated areas of child protection. Child Sexual Exploitation, Female Genital Mutilation and Radicalization are all issues that have been in the news recently and everyone working for or with the School should be aware of these potential threats to child safety.

10 Annual safeguarding Audit and Report

St Giles Eastbourne conducts an annual audit of its Safeguarding and Child Protection provision and produces an annual report covering training, incidents, and future initiatives. The audit is kept in the Principal's office and can be submitted to the Local Authority if requested.

Additional Resources

1. "Keeping Children Safe in Education" is statutory guidance published in April 2014 and updated in October 2014. It is available here:

http://www.gov.uk/government/publications/keeping-children-safe-in-education



2. Free online Child Protection training from Barnardos

http://www.barnardos.ie/what-we-do/training/elearning/elearning-course-introduction-to-child-protection.html

3. East Sussex Safeguarding Children Board

Tel: 01273 481544

E-mail: lscbcontact@eastsussex.gov.uk

4. The Safe Network provides safeguarding information related to activities outside the home. http://www.safenetwork.org.uk/Pages/default.aspx

5. Further information about child abuse www.nspcc.org.uk/preventing

6. British Council guidance on under-18s

http://www.britishcouncil.org/education/accreditation/information-centres/care-children

7. UK Safer Internet Centre

This site contains advice on how to use the internet and new technologies safely and responsibly. www.saferinternet.org.uk

8. NSPCC advice relating to Child Sexual Exploitation

http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/what-is-child-sexual-exploitation/

9. Childline provides advice and help on a wide range of issues

Tel. 0800 1111

www.childline.org.uk

10. NSPCC advice relating to Female Genital Mutilation (FGM)

http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/

11. A link to Sussex Police Prevent booklet

http://www.safeineastsussex.org.uk/content/files/file/PREVENT-booklet.pdf

A link to Brighton & Hove City Council's Prevent Strategy to counter extremism and radicalization in schools:

http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=11&ved=0CCAQFjAAOAo&url=http%3A%2F%2Fwww.school-

portal.co.uk%2FGroupDownloadFile.asp%3FGroupId%3D1244394%26ResourceId%3D4997080&ei=y CIHVb3_PMne7AbxroClAg&usg=AFQjCNGfvIB9n8BgLH_XVA7M2gt4HtgClg&bvm=bv.88198703,d.ZG U



Appendix A: Safeguarding Incident Concern Form

Concern (& Disclosure/Allegation) Form

Please complete and give to a Designated Safeguarding Person (Richard, David or Keely) if you have any Safeguarding concerns about an under 18 student. You must complete the boxes in bold; the other information can be filled in by the DSP later.

Date	
Student first name	
Student family name	
Gender	
Date of birth	
Nationality	
Group / individual	
Student ID	
Name of person noting concern	
Role/Connection with St Giles	
Date and time concern noted	
Location	
Concern (Please provide as much detail	
as possible)	
NB: If reporting a disclosure /	
allegation made by a student, please	
use this space to describe verbatim (or	
as close as you can remember) the	
conversation. Use the other side or	
additional sheets to write more.	
Signed	

Response to concern This section to be filled in by the DSP/DSL. Do parents / group leader / agent / homestay /others need to be informed?

Response	By whom	When



Appendix B: Safeguarding Incident Referral Form

Referral Form

(Information to be sent to Eastbourne LSCB)

Date & Time (form submitted)	
Name of School	St Giles International Eastbourne
	13 Silverdale Road, BN20 7AJ
Referrer's name & contact details	

Details of Staff / Other Adult / Student involved

Full name	
Date of birth	
Gender	
Nationality	
Any disability?	
Role / connection with school	
Home address	

Details of Student under 18 involved

Full name	
Date of birth	
Gender	
Nationality	
Any disability?	
Address in Brighton	
Parents' name & email	
Is student known to be at risk?	

Details of Alleged Incident

Date & time of incident	
Place of incident	
Brief circumstances of incident	
Names of potential witnesses	
Any other information?	

Nature of Allegation

Category (physical / sexual)	
Was technology involved?	
If Yes, what type?	

Signed (by referrer)	



Appendix C: Action to be taken by staff if a student under 18 years goes missing from a school excursion/off-site activity

- 1. Check that all the other students are present. All staff and students should be asked to explain when they last remember seeing the missing student
- 2. A member of staff will search the immediate vicinity and if at a venue the venue manager should be informed to arrange a search
- 3. A member of staff (or other students) should phone the student's mobile number (staff leading the trip will have full list of contact details for the students on the trip.
- 4. The Principal (or his/her deputy) should be informed if the student is still missing.
- 5. A decision will be made as to whether the group should travel back to Eastbourne or should be moved to a different location where the rest of the group can be safely supervised
- 6. Depending on the precise circumstances, the Principal, or deputy, or the staff on the trip will call the police. Precise information, timings and description should be readily available
- 7. The Principal will contact the student's parents/guardians
- 8. A full record of all activities taken up to the stage at which the student is found will be made for an incident report
- 9. The student's parents/guardians will be informed about what happened

Appendix D: Action to be taken by hosts/staff if a student under 18 years does not return to the homestay at the required times

- 1. The host will phone the student's mobile phone. If the student does not answer, the host will leave a message asking the student to get in contact as soon as possible.
- 2. If the student does not return to the homestay or does not return the host's call within 30 minutes, the host will phone the school. If this is outside of normal working hours, the host will phone the school emergency number: 07833788118
- 3. The emergency duty officer will attempt to call the student and, if known, friends of the missing student.
- 4. If the emergency duty officer is unable to contact the student or friends, he/she will contact the parents/guardians of the missing student and ask for further contact details. The emergency duty officer will also ask the parents/guardians to try and contact the student
- 5. If no contact can be made, the emergency duty officer will contact the police and the Principal
- 6. A full record of all activities taken up to the stage at which the student is found will be made for an incident report
- 7. The student's parents/guardians will be informed about what happened