



**ST GILES
BRIGHTON**

**SAFEGUARDING AND CHILD PROTECTION
POLICY**

Keeping our students safe from harm

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Safeguarding and Child Protection Policy

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

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

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 Brighton, 1-3 Marlborough Place, Brighton as teachers, administrators, managers or ancillary staff, or the main care giver in a homestay accommodating a child as arranged by St Giles Brighton.

1. Introduction

Around 8% of the students that study at St Giles Brighton are aged 14-17, with greater concentrations of students of 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 Brighton is 14 and St Giles publicity makes it clear to parents and guardians on its website that these children will be studying in an adult educational environment.

Adults 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 Brighton mentioned below. At the end of this policy there are contact details for the Local Child Safeguarding Board and the NSPCC, who adults may wish to contact for help or advice. Adults may also contact the Police or the local Multi-Agency Safeguarding Hub (MASH) 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 procedures for safe 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 by the end of the first quarter of the year or when changes in the law or other guidance dictates. This is done by the Designated Safeguarding Lead, currently the Acting Principal, and draws on feedback from staff, homestay providers and students.
- Holding quarterly forums with children at St Giles Brighton 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 an equal entitlement to be protected.

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

2. Designated Safeguarding Person and Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is Katie Wash, the Acting Principal, who has overall responsibility for implementing this policy, providing training and who will be involved with any major decisions relating to child protection. The DSL will liaise when necessary with the Local Child Safeguarding Board. The DSL has received Level 3/Designated Safeguarding Officer Specialist training. She can be reached on 223 on the St Giles internal phone network or via the emergency phone on 07816 414660. In the DSL's absence, the Director of Studies, Richard King, will take on the responsibility of reporting concerns to the appropriate authorities. He can be reached on 204 on the St Giles internal phone network or via the emergency phone on 07816 414660. Richard has also had Level 3/Designated Safeguarding Officer Specialist.

St Giles Brighton also has a Designated Safeguarding Person (DSP). The identity of the Designated Safeguarding Person is advertised in the Student Guide and around the school and is made known to all students on their arrival. The DSP meets newly arrived under-18s during their first week and is their point of contact for day-to-day matters throughout their course. The DSP is currently Bryony Devitt, who is based at Reception on the ground floor of 1 Marlborough Place at St Giles Brighton. Bryony can be reached on 226 on the St Giles internal phone network or on 01273 682747 from outside the school, or via the emergency phone on 07816 414660. The DSP has received Level 2/Advanced Safeguarding Children training.

If any student, homestay provider or staff member has any concerns about the welfare of any child, this should be reported to the DSP or to the DSL.

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 Policy.

In addition to the training undergone by the DSP and the DSL all staff at St Giles Brighton undergo Level 1/Introduction to Safeguarding Children training as a matter of course. This takes the form of an online course delivered by the British Council/Accreditation UK.

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

3. Staff Recruitment Policy

St Giles Brighton 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 prospective staff must submit a CV with their application and all gaps in CVs must be explained satisfactorily. Proof of qualifications will be required, and two references will be followed up. The reference requests 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 always 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. The DBS check will also flag up any concerns relating to other adults registered to that address. The enhanced DBS checks we secure include a check on the Children's Barred List.

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 Senior Accommodation and Welfare 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.

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 proper references, 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 judgement is made with regard to suitability for the role and the level of supervision.

Guidance on handling delayed suitability checks

St Giles Brighton requires all members of staff to submit to a pre-employment DBS Enhanced check **prior** to taking part in regulated activity. In rare cases the results of these DBS checks may not be available to the school prior to the start of the employment period, in which case the new employee will not be permitted to take part in regulated activity.

All prospective employees

The DOS (for teachers) or the Principal (for admin staff) should:

1. Conduct an online check of List 99 (**List 99** is a register of men and women who are barred from working with children by the Department of Education and Skills (DfES). It is also called the Children's Barred List)
2. A rationale explaining why that individual has been employed must be produced and the following controls must be put into effect.
3. Be vigilant for any unreasonable or unexplained delays in the processing of either part one or part two of the DBS Enhanced application.

In addition to the above managers should risk assess the potential threat that the unchecked employee may pose to under-18s and vulnerable adults and introduce appropriate safeguarding controls. Some suggestions are outlined below:

Risk Management Measures for Teachers

The member of staff must:

1. Wear a red lanyard while in the building. The red lanyard signifies to other members of staff that the vetting process to ascertain the suitability of that individual to work with under-18s has not been concluded. The lanyard must be easily visible at all times.
2. Not take part in any social programme activity.
3. Not take any group of students off the school premises.
4. Not remain alone with any student who is under the age of 18 or any vulnerable adult unless the meeting is part of the school's formally supervised range of activities including: placement testing and 1-2-1 feedback.
5. Follow the staff code of conduct as outlined in the safeguarding and child protection policy.

Risk Management Measures for Administrative Staff

The member of staff must:

1. Wear a red lanyard at all times in the building. The lanyard must be easily visible.
2. Not take part in any social programme activity.
3. Not remain alone with any student who is under the age of 18 or any vulnerable adult unless the meeting is part of the school's formally supervised range of activities.
4. Follow the staff code of conduct as outlined in the safeguarding and child protection policy.

Regulated activity: children

Regulated activity in relation to children can be split into two main categories, these include activities and places of work.

Those working in specified activities will be classed as engaging in regulated activity. Put simply, this is anyone who is **teaching/training/instructing/coaching/caring for or supervising children**.

Anyone who is carrying out such a role would most likely be eligible for an enhanced DBS check, with a Children's Barred List check.

Applicants would also be classed as working in regulated activity if they were working in a specified establishment. These are referred to as a limited range of establishments, and include, but are not limited to:

- Schools
- Children's homes
- Nurseries

Permanently working in these institutions would mean an applicant was engaging in regulated activity, e.g. those working as teachers, nursery nurses, or caretakers.

For those who work in these establishments sporadically, such as contractors or photographers, their eligibility for a check would be determined by the frequency of their work. To be eligible for a DBS check they would need to work in any one of these specified places **more than three times in a 30-day period**. [Source: <https://www.ucheck.co.uk/what-does-regulated-activity-mean/>]

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 Brighton. The Record is checked and updated regularly by the Principal.

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

4. Staff Code of Conduct

4.1 Statement of Intent

It is the policy of St Giles International to safeguard the welfare of all children 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 and homestay providers 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 and Homestay Providers

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.
- Recognizing 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 that 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 well intentioned.
- 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 trivialise 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 Brighton uses Ace Travel for its taxi transfer service. All taxi drivers employed by Ace Travel have undergone and passed enhanced DBS checks and have undertaken safeguarding and disability awareness training.

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

4.3 Electronic contact with students under-18 and Internet Policy

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 and homestay providers 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. On activities, staff are to use the school Social Programme or Office mobile phones. They are not to store student numbers on their personal phones.

In any electronic contact with students, staff and homestay providers must pay particular attention to use neutral, un-emotive language that will not be misconstrued. Staff and homestay providers must not exchange any information with a student that they would not be happy to share with the child's parent or carer.

When teachers wish to receive content, such as homework submission, electronically from students, this will be done using the open access staff email address.

The WiFi network and all computers at St Giles Brighton 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.

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 Handbook. A poster dealing with this issue is also displayed in each classroom.

5. Safeguarding Procedures

St Giles uses a range of ways to look after under-18s to ensure their safety and well-being.

The Maintenance Officer 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 an external assessor conducts a regular fire risk assessment of the school buildings. Our policy is to act promptly in response to recommendations made in the risk assessment reports.

There are Health and Safety representatives on the teaching and administration staff, currently Richard King and Nikita Beahan respectively, who 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 watch a slideshow presentation by the Principal prior to their first day at St Giles, during which they 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 a meeting with the Accommodation and Welfare Office, the Director of Studies, or the Principal.

All students are invited to complete a questionnaire at the end of 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 Office, 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, Bryony Devitt, to check that they have settled in with their homestay and have no particular welfare issues. Under 18s are invited to liaise with Bryony if they have any welfare concerns during their time at St Giles.

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

5.1 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 key staff and a copy is also held by the emergency phone holder. The emergency phone holder keeps up-to-date next of kin details with her or him.

From 1st January 2024 under 16's will take a course of 28 lessons per week.

These classes will 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.

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.

5.2 Absence from school

The Under 18's Officer follow up any incidences where students under 18 have not shown as being present on the online class register 20 minutes after the scheduled lesson start time. She will then attempt to make contact with the student to establish the reason for their absence and to ensure that they are safe.

If we are unable to reach the absent U18 student, we will in the first instance contact their homestay provider to ascertain whether the student is at home or has left for school. If we are still unable to establish the student's whereabouts, we will contact their emergency Next of Kin Contact using the information on our Class database. If the U18 is still not responding to our attempts to contact them, as a last resort we will contact the police.

Students under the age of 18 are instructed to keep their mobile phones charged and switched on so that we can contact them readily.

Any under 18s arriving more than 10 minutes late for lessons will not be barred from entering the class as adult students are but will be allowed to enter. Their late arrival will be reported to the Under 18's Officer, though, and any pattern of late arrival will be followed up.

If the teacher of a class containing a student under 18 fails to complete the register by 9.20am , the Under 18's Officer will go to the classroom and remind the teacher to complete the register.

The age of students is also clearly indicated in class registrars and teachers must report the absence of any students who are under the age of 18 immediately if they are in class and subsequently leave before the scheduled end of lesson time.

If a student under the age of 18 is absent more than once in a week, the Designated Safeguarding Person will inform the student's parents or guardian and, where applicable, their agent.

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.

5.3 Identifying Under-18s

All U-18 students at St Giles Brighton are given a wristband on their first day and are required to wear them at all times. 16 & 17 year olds are identified by the wearing of a yellow wristband and 14 & 15 year old wear a red one. Class registers show students' dates of birth to allow teachers to identify under-18s in their care and such students' names are highlighted in yellow. Records of Student Progress, the document completed by an interviewing teacher on Day One have an indicator on them for students aged under 18.

5.4 Accommodation and Private Fostering

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 homestay accommodation. There is a curfew in place for students who are 16 and 17 which is 11 pm Sunday to Thursday, 12 am on Friday and Saturday. For 14 and 15 year

olds it is 9pm Sunday to Thursday and 10pm on Friday and Saturday. The main care provider in all homestays accommodating under-18s is DBS checked. 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 the next day. If the homestay provider is unable to contact the child, they should phone the St Giles emergency phone on 07816 414660. The emergency phone holder will continue to attempt to make contact with the child and if necessary will inform the Police.

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 Front Door for Families, based in Brighton, to inform them that a child will be living in a private fostering arrangement with one of St Giles' homestays. They can be contacted on 01273 290400 or by email at FrontDoorForFamilies@brighton-hove.gov.uk

5.5 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. Attendance at some activities are advertised and restricted for students who are over 18 only. Some are for Under 18's only.

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.

Activities are supervised by a member of staff who will have responsibility for ensuring that all under-18s are safe and accounted for. If an under-18 goes missing the supervisor should phone the St Giles emergency phone on 07816 414660. The emergency phone holder will continue to attempt to make contact with the child and if necessary will inform the Police.

Risk assessments are in place for all social programme activities and participating students of all ages are made aware of the potential risks by the staff member(s) supervising the activity.

Supervision ratios are usually one teacher to every 20 students although certain activities, deemed riskier than others, will have a supervision ratio of one teacher to every 10 students.

5.6 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.

It is compulsory for students aged 14 and 15 to book a taxi transfer through the school.

5.7 Outside of school

All under-18s are given a wristband on their first day with the school's emergency phone number on it. A member of staff is available to take calls outside of the school's normal opening hours. Under-18s are given advice about how to stay safe in Brighton during their induction by the Designated Safeguarding Person.

Advice includes, but is not limited to, the following: ways of travelling (stay in pairs and groups), plan how to get home in advance of evenings out, ensure the mobile phone is fully charged, save the number of a reputable taxi firm, information about the laws that apply to under-18s, and tell friends and hosts where they are going.

5.8 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.

Normally visitors to the school buildings must not be allowed past the reception area without being escorted by a member of staff.

There are certain instances, however, where visitors are permitted to visit designated parts of the building but they must report to Reception and wear a lanyard with visitor ID at all times. These include:

- Known contractors and regular delivery staff. They would normally be expected to wear a uniform and ID badge provided by their employer while they are on site. If the visit is not a regular visit, contractors would normally need to be escorted.
- Students attending the free lesson in the afternoons of a CELTA teacher training course. The movements of these students will be restricted to the areas designated by the teacher training team (Rooms 4 and 29) and their presence will be supervised by the teacher trainers.

5.9 E-Safety

All PCs on the school premises and the student Wifi 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 U-18 Student Guide offers advice to under-18s about what to do if they receive unwanted contact online and how to stay safe.

5.10 Fire Safety

When we have Under 18's only classes we place them in classrooms nearer to fire exits so that they have the shortest possible escape route.

5.11 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.

5.12 Behaviour and Discipline

Under-18s are expected to follow our school rules in the same way as adult students. Where the safety of an under-18 may be jeopardized by the enforcement of school rules relating to adults, most notably our policy of not allowing students who are more than 10 minutes late into class, Safeguarding takes precedence and under-18s are allowed into class.

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 disciplinary code.

5.13 Radicalization and Extremism / Prevent

Prevent is a government-backed strategy designed to engineer a greater degree of social cohesion by tackling violent and non-violent extremism and to reduce the threat of radicalisation in our community.

In an ELT context we need to bear in mind that while international students can certainly benefit from a degree of integration into our local communities and from an awareness of British values and characteristics, they are under no obligation to integrate or to adopt these values and characteristics. The vast majority of students come to the UK to improve their level of English for instrumental reasons: employment, study, participation in the global world and for relatively short periods of time.

We should also be sensitive to the fact that language is not free from its relationship with power and that the English language has had its associations with notions of empire and hegemony. This is one reason why our industry has always been very sensitive to issues of identity and intercultural harmony.

Students and indeed members of staff should, however, respect core British values, follow the laws of this country and refrain from the promotion of radical and extremist views and acts. Our role is to challenge intolerance, to encourage open debate and critical thinking and to identify and protect any individuals who may be at particular risk from radicalisation.

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.

In keeping with the UK Government's Prevent strategy to combat radicalization, St Giles Brighton expects all staff, students and homestay providers to respect the core British values of Democracy, The Rule of Law, Tolerance and Individual Liberty. All staff undergo

Prevent training and are made aware of how the Prevent policy is implemented in the school. The Principal is the Prevent Officer and any concerns about individuals deemed at risk of radicalization should be reported to the Principal or to the Director of Studies in her absence.

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 have a small bank of materials for teachers to use if any issues of intolerance or extremism arise.

We ensure that the school buildings and the George Street residence are environments where everyone feels safe and supported and we do not allow the display or promotion of inappropriate materials or organisations. The school's and the Residence'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.

Given that the Principal is the Designated Safeguarding Lead for the school, it is logical that she is also the Prevent Officer as Prevent forms part of our overall safeguarding obligations.

The Prevent Officer is responsible for the following:

- Liaising when necessary with the other Prevent Officers in the St Giles Group
- Representing the school to external bodies such as the police, local safeguarding authorities and local Prevent partnerships
- Ensuring all staff have basic Prevent training before or shortly after they start work at St Giles Brighton
- Acting as the primary point of contact for staff and students for advice and guidance
- Reporting to the Chief Executive Officer in a timely fashion on any Prevent issues at St Giles Brighton

All staff undergo basic Prevent training through HM Government's free online course. This is supplemented by in-house materials that have been developed to provide teachers and admin staff with more specific information relating to Prevent in the context of the school.

5.14 Female Genital Mutilation (FGM)

Female genital mutilation is the ritual removal of some or all of the external female 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 that 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 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 on a trip overseas.

5.15 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.

5.16 Vulnerable Students

We issue a weekly report listing students with Special Educational Needs or Medical Conditions and this is distributed to key administrative staff and a copy is displayed in the Staff Room. Staff and homestay providers need to be particularly vigilant to safeguard under-18s listed in the report. The school has a designated Learning Support Officers (LSOs), Erica Lindley and Fran Perry, who can offer help and advice to students and staff in relation to learners with Special Educational Needs.

We provide personal fire evacuation plans for any students with permanent or temporary mobility issues and will try to ensure that any such students are placed in classrooms nearest to the main fire escape routes.

5.17 Use 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.

5.18 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.

5.19 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.

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.

6. Sharing Information Regarding Child Protection

Good communication is essential in any organization. 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.

Designated Safeguarding Staff

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

Bryony Devitt	Designated Safeguarding Person	07816 414660
Katie Wash	Designated Safeguarding Lead / Prevent Lead	07462 343544
(Richard King	Director of Studies and cover for Katie Wash)	07951 012423

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 child's welfare at all times, and they should be assured that their child is involved with a credible organization. We achieve this by having a full copy of this Safeguarding Policy available for anyone to view.

6.3 Staff

As an organization 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 child protection and safeguarding policy and completing a training module on child protection equivalent to a level one course. Several members of staff will also have received training at level two. The Principal has completed training to level three. There will also be regular refresher training sessions for all staff members.

6.4 Other Bodies

A copy of our Safeguarding and Child Protection Policy will be made available to any other appropriate body that might request it.

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, any one of which may lead an adult to have safeguarding concerns about a child:

- 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, clinging to staff etc. are just some of the possible signs. Please see the Appendix at the end of this policy for a more comprehensive guide to recognizing symptoms of abuse.

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:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of the school; and
- 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:
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	<ul style="list-style-type: none"> 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	<p>Any concerns that an adult may have acted in a manner which:</p> <ul style="list-style-type: none"> 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) or the Principal in his capacity of Designated Safeguarding Lead 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 a Designated Safeguarding Person or the Principal 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 a Designated Safeguarding Person or the Principal in confidence.

Please note that if, at any point, there is a risk of immediate serious harm to a child and no designated safeguarding persons are available, then a referral should be made to children’s social care immediately. Anybody can make a referral.

8.2 What to do if abuse is suspected or disclosed by a child:

- 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 judgement.
- 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 are kept by the Designated Safeguarding Lead (The Principal) in separate files in a locked room or in secure electronic files. Only the Principal or Director of Studies and the Designated Safeguarding Persons 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.

If practicable, this information should be recorded on a St Giles International Brighton Concern Form, available in the Staff Room, the Main Office and the Accommodation and Welfare Office. Alternatively, notes can be taken and later transcribed to a Concern Form. A blank Concern Form is included as an Appendix to this policy. This form must be signed and dated by the person who made the allegation or heard the allegation from a child.

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 Acting Principal (Katie Wash) or in her absence, the Director of Studies (Richard King); the Designated Safeguarding Person, Bryony Devitt. The DSP will report to the Acting Principal in her capacity as Designated Safeguarding Lead or in her absence, to the Director of Studies.

9. What happens when an allegation is made against an adult?

Once a statement has been collected from a student further questioning should be avoided unless it is to gain necessary 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 inform the Director of Studies and contact the CEO, Mark Lindsay, via St Giles Head Office on 020 7837 0404.

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 officers at this stage, and also whether to inform the student's agent and parents. The Principal will contact the Brighton & Hove Front Door for Families (previously MASH) immediately on 01273 290400. You can also use the [Online Referral Form](#) to make a Child Protection Referral to the Front Door for Families. No decisions will be made on further action without referring to the BHSCP.

The Chief Executive Officer 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 BHSCP'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 Partnership (BHSCP), 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 Brighton & Hove SCP immediately on 01273 290400. No decisions will be made on further action without referring to the BHSCP.

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 Brighton & Hove SCP immediately on 01273 290400. No decisions will be made on further action without referring to the BHSCP.

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 Brighton. Anyone who is concerned about the well-being of a child can also contact any of the agencies listed below.

The Brighton & Hove Safeguarding Children Partnership (BHSCP) can be reached on 01273 290400.

The Local Authority Designated Officer (LADO) at Brighton & Hove City Council, Kay Whitcroft, can be reached by emailing LADOenquiries@brighton-hove.gov.uk

9.2 Referrals to the Disclosure and Barring Service

A referral must be made to the DBS when the St Giles 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 Brighton 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 Brighton 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.

11. Additional Resources

1. "Working Together to Safeguard Children" is statutory guidance published in March 2015 and last updated in December 2020. It is available here:

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

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. Brighton & Hove Safeguarding Children Partnership (BHSCP)

<https://www.bhscp.org.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. NSPCC advice relating to Female Genital Mutilation (FGM)

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

10. 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=yCIHVb3_PMne7AbxroCIAg&usq=AFQjCNGfvIB9n8BgLH_XVA7M2gt4HtgClg&bvm=bv.88198703,d.ZGU

12. "WHISTLEBLOWING" POLICY

(Making a Disclosure in the Public Interest)

Introduction

St Giles International is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other stakeholders in St Giles to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. St Giles has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by St Giles nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside St Giles.

Scope of Policy

This policy is designed to enable employees of St Giles to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Safeguards

i. Protection

This policy is designed to offer protection to those employees of St Giles who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

ii. Confidentiality

St Giles will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

iii. Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of St Giles.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

iv. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the Principal unless the complaint is against the Principal or is in any way related to the actions of the Principal. In such cases, the complaint should be passed to the Chief Executive Officer for referral.

- In the case of a complaint, which is any way connected with but not against the Principal, the Chief Executive Officer will nominate a Senior Manager to act as the alternative investigating officer.
- Complaints against the Chief Executive Officer should be passed to the Deputy Chief Executive Officer who will nominate an appropriate investigating officer.

If there is evidence of criminal activity then the investigating officer should inform the police. St Giles will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of St Giles auditors and the Police at this stage and should consult with the Chairman / Chief Executive Officer.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Chief Executive Officer or Chairman as appropriate.
- The Chief Executive Officer / Chairman will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcome will be passed to the company auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Chief Executive Officer / Chairman, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, St Giles recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.



Concern (& Disclosure/Allegation) Form

Please complete and give to a Designated Safeguarding Person (Niall or Jessica) 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	
<p>Concern <i>(Please provide as much detail as possible)</i></p> <p><i>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.</i></p>	
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

Referral Form

(information to be sent to Brighton & Hove SCP)

Date & Time (form submitted)	
Name of School	St Giles International Brighton 1-3 Marlborough Place, BN1 1UB
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)	
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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 Brighton 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: 07816 414660
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