

Lions Bay Ltd. Safeguarding Policy

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POLICY STATEMENT

Lions Bay Ltd provides summer centre programmes for international teenagers in Salisbury. Our safeguarding policy matches the needs of this and future centres, acting in the best interests of the vulnerable person, whatever their individual circumstances. This policy has been updated according to government guidance from “Keeping Children Safe in Education 2018”, “Working Together to Safeguard Children”, DFE (July 2018) and Tri-Borough Local Safeguarding Children Board Procedure.

Salisbury

Minimum age: 12

Age range: 12 – 17, taught in age-appropriate groups

Accommodation: Primarily residential with a small element of homestay

TERMINOLOGY

“**Safeguarding**” refers to the systems that help us to protect students that are under 18 or vulnerable. These include child protection, welfare, accommodation, abusive behaviour policies, fire, and health and safety policies as relevant.

“**U18s**” refers to “under 18s”

“**Vulnerable**” refers to all students who are away from their home country and subject to the negative emotions that this entails. U18s are considered automatically to be vulnerable.

“**All adults**” refers to those adults who are in contact with U18s and vulnerable students while working for or with Lions Bay Ltd.

“**Designated safeguarding lead**” or “**DSL**” refers to the named person who formulates and updates the safeguarding policy for LIONS BAY LTD..

“**Designated safeguarding Deputy**” or “**DSD**” refers to the named person who formulates and updates the safeguarding policy for LIONS BAY LTD. in the absence of the DSL.

“**Designated safeguarding staff**” or “**DSS**” refers to the multiple people who implement the safeguarding policy.

DUTY OF CARE

Students should remain aware of the policy through induction, information provided in handbooks and on notices and by abiding to the codes of conduct.

All adults are expected to remain aware of this policy, share our commitment to safeguarding, be ready to report concerns and be aware of the designated safeguarding staff and lead. Staff are required to attend Level 1 Safeguarding training.

Designated Safeguarding Lead

Neil Harvey

Phone number: 07377 338 262

Email: neiladrainharvey@gmail.com

Required to formulate and update the safeguarding policy and to implement it through training for staff, especially the DSS. DSL is required to have Specialist Safeguarding for Designated Lead Safeguarding Training – formerly known as Level 3 and to establish contact with the relevant local authorities.

DSL Key Role:

- Monitor and update Safeguarding Policy and other related documents,
- Supports and advises staff and all DSS in day-to-day implementation of policies,
- Ensure staff are trained and inductions conveys all safeguarding responsibilities,
- Receives and records all information from any staff members, children, Group Leaders, or parents who have any safeguarding concerns,
- Makes a formal referral to a statutory child safeguarding agency or the Police.

Designated Safeguarding Staff

Required to be visible and named points of contact with (formerly) Level 2 safeguarding training, and to be prepared to bypass the DSL should the need arise. Required to attend safeguarding meetings to remain aware of student situations and updates to the policy.

Salisbury

Neil Harvey (DSL)

Tania Waghorn

Updated annually (or more often as required) and available on the website.

Other Members of Staff

All staff undertake a Basic Awareness online training course in Safeguarding and Prevent Duty. All staff have an induction giving further centre-specific safeguarding information.

Students

All students receive information during their induction, in their Student Handbooks and displayed in the classrooms with easy to understand information on who to speak to and what they can do if they feel threatened, bullied or uncomfortable in anyway.

LOCAL AUTHORITY CONTACTS

The DSL for Salisbury is in contact with Wiltshire Multi Agency Safeguarding Hub for Salisbury.

For Salisbury Summer Centre:

Salisbury (Wiltshire)
Anton Hamon LADO lado@wiltshire.gov.uk Tel: 01255 713945

ASSOCIATED POLICIES

There are a number of associated procedural documents, including the condensed version of this policy for all adults including homestay hosts, group leaders, teachers and activity leaders.

POLICY REVIEW

The safeguarding policy is updated annually (or more often as required) and new training is offered where relevant. Some elements of safeguarding policy are incorporated into class so that students can have input into the formulation of future policies. Last updated February 2022.

CODE OF CONDUCT

1. Staff are in a 'Position of Trust' concerning their students. This makes any sexual activity with students aged under 18 illegal, according to the Sexual Offences Act 2003.
2. All adults must observe the rules of appropriate behaviour with U18s. This includes but is not limited to: avoiding favouritism, the avoidance of inappropriate references to sex and drugs in class, management of other students to do likewise, and the avoidance of unnecessary physical contact with U18s. It is paramount to maintain a demeanour of friendly but professional neutrality with U18s.
3. Private contact with under 18s, outside of the bounds of the school, whether in person, by phone or by private social media is forbidden. Respect for GDPR legislation (i.e. security) should be taken into account when handling personal data, such as personal phone numbers on a school phone.

4. Staff have a duty to report concerns where U18s are displaying signs that might indicate abuse or neglect, as discussed in safeguarding training. These can either be witnessed by or reported to a staff member. Please request a refresher if these signs have been forgotten.
5. Staff should be aware that LIONS BAY LTD. has a Whistleblowing Policy to protect them if they report concerns. The NSPCC Whistleblowing Helpline, 0800 028 0285, can provide impartial assistance.
6. Guidance about the potential dangers of social media should be offered as appropriate, and relevant behaviour with host families should be incorporated into class whenever possible.
7. Homestay hosts should respect privacy by knocking on bedroom and bathroom doors before entering.

CHILD PROTECTION INFORMATION

The following information forms the basis of our safeguarding training for staff. Signs of the various types of abuse will be treated as causes of concern to be reported.

Understanding and recognising abuse

An allegation of abuse

This consists of Information which indicates a person may have:

- behaved in a way that has harmed a child
- committed a criminal offence against or related to a child
- behaved towards a child in such a way that indicates s/he would pose a risk of harm if working closely or regularly with a child

Different kinds of abuse:

Grooming

This is defined as showing interest in and/or forming an attachment with a young person with the ultimate aim of sexual gratification.

Abusers may also seek to gain the trust of other adults so that they are allowed to be in situations where they have access to potential victims.

Grooming of under 18s constitutes a criminal offence.

Sexual abuse

This is defined as forcing or enticing a young person to take part in sexual activities. If the person is under age, such attention constitutes sexual abuse, even if the victim is willing. The abuser may sometimes be based in a different country from their victim and may use the internet to contact them.

There is also a high incidence of teens abusing other teens e.g. by befriending/loving and then turning on their victim.

How to spot someone who may potentially have been sexually abused

The person may behave inappropriately e.g. sexualised play or awareness (drawings / promiscuous behaviour) or by being over- needy and attention-seeking.

Sexual Harassment

“Low-level” incidents should still be taken seriously, recorded and actioned as appropriate.

Emotional abuse

Here too, the victim may behave in an over-needy, attention-seeking way. This type of abuse is often persistent, for example in bullying, and may be compounded by the abuser making the victim wary of authority or other adults trying to help them. Victims of emotional abuse may exhibit both aggression and withdrawal within a short space of time. Emotional abuse is sometimes linked to conditions such as anorexia and self-harming.

Physical abuse

This is potentially the most dangerous as the victim may die as a result of the abuse.

How to spot physical abuse

Bruising - Symmetry (2 black eyes/bruising on both shoulders) indicates possible abuse

Burns or scalds – A clear edge indicates possible abuse

Finger marks - An inability to explain the presence of these in a plausible way indicates possible abuse.

Other

MSP (Munchhausen Syndrome by Proxy) – This involves fabricating, exaggerating, or inducing mental or physical health problems in another person, often a child, in order to gain attention or sympathy for themselves from others.

FGM (Female Genital Mutilation) this is illegal in the UK and suspected cases should be reported to the police as well as DSS.

Neglect

This may occur in all levels of society as it includes actions such as leaving a child unattended or ignoring their physical and medical needs. In Salisbury, U18s who are not fully independent may ‘self-neglect’ and this should also be reported as appropriate.

How to spot neglect

The child may thrive away from their home environment.

They may be unused to supervision and be unable to recognise boundaries of acceptable behaviour, possibly resulting in very aggressive or anti-social behaviour.

Controlling, coercive and threatening behaviours

These are often seen in teenage abusive relationships where one partner dominates the other in a range of ways, e.g. forced sexual activity, repeated insults and put downs, stopping a partner from seeing friends/family, checking on their partner all the time (texts/social media etc.), using physical violence, taking money, forcing their partner to work, controlling what their partner wears.

The dominant partner makes the other feel subordinate and deprives them of the means to be independent. Typical behaviours include threats, humiliation and intimidation to harm and punish their victim.

These behaviours are often evident in 'honour' based violence (HBV), female genital mutilation (FGM) and forced marriage.

Peer-on-peer abuse

Abuse is not only done by adults against children. Under 18s, notably teens, abuse their peers. This can be demonstrated through gang violence or gender-based violence – particularly against girls, hate and revenge crimes, bullying in all its forms are often done by peers to each other.

Identifying vulnerable students

All children are vulnerable to abuse, but some may be more at risk than others. This may include but is not limited to;

- Students with special education needs (SEN)
- Students that have a disability
- Students who are the only ones from a particular country and have no one to speak with in their mother tongue.

Procedure for reporting disclosures of abuse

Responsibility of staff to report

The responsibility to disclose an allegation or suspicion of abuse to the DSS immediately is not only a duty of Lions Bay Ltd. staff but a legal requirement. All suspicions or allegations of abuse must be taken seriously.

If a staff member has suspicions of any abuse, he/she should alert one of the DSS as soon as possible. If an under 18 starts to talk to the staff member directly, he/she should allow that person to disclose and should allow them to continue talking following the guidelines below. They should then see the DSL in confidence.

What to do if abuse is disclosed:

Receive

Listen to what is being said in a semiprivate area without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if one displays denial to a child, or shows shock or disgust at what he/she is saying, the child may be afraid to continue and will shut down.

Accept what is being said without judgement and take it seriously.

Reassure

Reassure the child, but only so far as is honest and reliable. Do not promise confidentiality and never agree to keep secrets as there is a duty to report such concerns. Reassure the child that he/she did nothing wrong. Explain to the child that some people, whose job it is to protect children, will need to be told. Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React

Listen quietly, carefully and patiently. Do not assume anything – do not speculate or jump to conclusions. Do not investigate, interrogate or decide if the child is telling the truth. An allegation of child abuse may lead to a criminal investigation, so do not do anything that may jeopardise the child's trust or a possible police investigation. Let the child explain in his/her own words what happened, but do not ask leading questions. Do ask open questions such as *"Is there anything else that you want to tell me?"*

Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English. Do not ask the child to repeat what they have said to another staff member. Explain what has to be done next and with whom you have to talk in order to help resolve the matter.

The following table outlines the DOs and DON'Ts when dealing with a disclosure, including some useful phrases:

DO	DON'T
Stay calm and be available. (The student has put their trust in you.)	Refuse to listen; e.g. tell them you're too busy or to see them later. Or over-react.
Find out the general subject area.	Assume it's something related to abuse.
Ask ' <i>What is it about?</i> '	Start asking more questions or show worry or concern with your facial expressions.
If subject matter does require privacy and you are in public place, suggest to student to go somewhere quieter, e.g. a quiet corner of a large space, or probably better, a classroom that has large windows. If you need to use a regular room without large windows, ensure the door is left open and you are sitting within view.	Be in a room on your own with a student with the door closed.
If possible, quickly and discreetly, tell another staff member where you are and that you are having a private meeting with a student.	Draw too much attention to the situation.
Try to sit at right angles to student rather than directly opposite or next to them. Be open and ready to listen. Ask ' <i>What do you want to tell me?</i> '	Promise confidentiality if they ask you to keep a secret. Explain ' <i>If it's necessary, I will tell somebody else (who can help more than I can.)</i> '
Be open, calm, patient and listen. Your role is only to hear what they have to say - and try and remember their exact words.	Put words in their mouth or make any comments on what they tell you.
If appropriate, you can say; ' <i>Is there anything else you want to tell me?</i> '	Write while they are talking to you.
If the student hasn't already told you, you are allowed to ask only ' <i>When did this happen?</i> '	Ask any direct or leading questions or start probing. (That could jeopardise any subsequent police investigation, if that becomes necessary.)
When student has told all they want to, reassure them and say ' <i>You've done the right thing by telling me.</i> '	Leave the student alone after they've disclosed. Make it clear to staff member sitting with student not to ask any questions; just be a reassuring presence.
Find somebody responsible (usually another staff member) to sit with them whilst you respond.	Tell any colleagues what the student has said (apart from one of those listed as needing to be told).
Tell the DSL what has happened.	Write any opinions or draw any conclusions about anything. Don't write any comments about the accused.

Immediately afterwards, write a report of the meeting using the student's exact words, giving only facts and record time, date, place, who was present etc. (the DSL will give you a form). If the student's language level was low, state that in your report.	Try and 'improve' the student's English if it wasn't grammatically accurate or vocabulary was wrong. (That is a job for any police or social services people to do)
The DSL will ensure report is filed in proper (secure) place.	Talk to any colleagues about what has happened.
Once you have handed matter over to the DSL (or other senior staff) and completed and filed your report, and you know the student is being looked after, (it may be appropriate to go and see the student again to make sure they are OK), make sure you look after yourself. Being told information about child abuse is often very upsetting.	

Refer directly to the one of the DSS as set out above. Once the DSL is involved, he/she will liaise with the Local Child Safeguarding Board to determine the correct course of action. This would be done where it is believed:

- there is a risk of significant harm to the student
- risk of harm to others
- a criminal act has taken place
- the student is at immediate risk or danger

Where the DSL decides that further action is necessary, this may be to:

- seek further advice from Social Services
- make a referral to Social Services
- report the incident to a designated Social Worker
- report the matter to the Police if a crime is suspected

Do not discuss the case with anyone outside the DSS.

If the DSL is accused, the DSS will contact MASH for Salisbury, and follow their directions.

If another U18 is accused, a member of DSS will be assigned to support the accused in addition to the accuser.

Record

Make brief notes at the time and write them up in detail as soon as possible.

Do not destroy any original notes in case they are required by Court.

Record the date, time, place, words used by the child and how the child appeared, be specific. Record the actual words used, including any foul language or slang.

Record factual statements and observable things. Once the report has been completed, these records must be kept confidential, as hard copies which are securely stored.

PREVENT

Lions Bay Ltd. understands its responsibilities under the Counter Terrorism & Securities Act 2015 to prevent people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations following its policies and procedures.

PREVENT training is considered part of safeguarding and so concerns about radicalisation would also be reported. All Academic staff and teachers have received training in this. Furthermore, the DSL has established contact with the local PREVENT police officer.

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic, or social conditions, institutions or habits of the mind.

Extremism may refer to elements such as racism, homophobia, right-wing ideology and religious extremism.

At LIONS BAY LTD., our aim is to provide vulnerable students of any age, faith, ethnicity or background with support to prevent them being exploited by pro-terrorism organisations and engaging in terrorist activity themselves.

Terrorist material could include:

- articles, images, speeches or videos that promote terrorism
- content encouraging people to commit acts of terrorism
- websites made by terrorist organisations
- videos of terrorist attacks
- messages intended to stir up hatred against any religious or ethnic group.
- bomb-making instructions

Additional useful contacts

Anti-Terrorist Hotline: 0800 789 321

Reporting terrorist material online at

https://eforms.homeoffice.gov.uk/outreach/terrorism_reporting.ofml

Anti-terrorist Hotline	0800 789 321
Reporting terrorist material online	https://eforms.homeoffice.gov.uk/outreach/terrorism_reporting.ofml

TRAINING

It is the DSL's responsibility to ensure that all adults have training as appropriate.

Level 1 Basic Awareness applies to homestay hosts, teaching staff and group leaders (through the use of group leader agreements).

Level 2 Advanced Safeguarding applies to members of the DSS.

Level 3 Specialist Safeguarding Training applies to the DSL.

Delivery

Initial

Level 1 Training is conducted in conjunction with the signing of the condensed safeguarding policy and code of conduct at induction.

Level 2 Training is conducted externally either face-to-face or online, according to availability.

Level 3 Training is conducted externally either face-to-face or online, according to availability.

Refresher

Level 1 refresher training occurs annually within the TD schedule for staff and during LIONS BAY LTD. inspections for homestay hosts.

Level 2 and 3 refresher training occurs every 2 years or after changes in the legislation.

Training is recorded by the collection of certificates, both internal and external.

WELFARE AND THE IMPLEMENTATION OF SAFEGUARDING

Arrival and Departure

When students who are under 18 arrive in the UK for the first time for our programmes, we make it our responsibility to make sure they arrive and depart safely. When booking a programme with us they must fill out parental consent form with their details, any medical issues and emergency contact details.

Salisbury

In our summer school all students are met at point of entry. Which means they are picked up from the airport when they arrive as well as being dropped off at the airport when departing.

In our summer school Residential Accommodation is provided for the students and supervised by adults at the ratio 1:20. Homestay accommodation can also be provided and is organised through Lions Bay Ltd.

Risk Assessments

Risk assessments are used to consider the risks that are posed to vulnerable students along with actions to address these. They are used for U18 students in closed groups and all students on excursions.

Responsibility for producing them lies with the DSL (especially for more stable, ongoing standards). They are also produced 'live' by DSS on an ongoing basis for excursions and the relevant members of staff who are taking the students out sign their agreement to these. The actions in these live risk assessments include informing students of relevant precautions.

Supervision

The following ratios of adults to U18s are observed:

Age	Supervision Ratio	Maximum Class Size
12-15	1:14	15
16+	1:20	15

In case of irregularity, such as parents visiting and taking students under their own supervision for some portion of their stay, this is recorded with relevant actions on the excursion risk assessment form.

Welfare Provision

Salisbury

Students are constantly aware of the provision of welfare through the wearing of wrist bands that have details of the emergency line and DSS.

There is an ethos of friendly concern and availability that extends to all adults, with lines of communication to the DSS for reporting purposes as necessary.

All teachers are told about our concern reporting system, which is a matter of telling the DSS about a concern below the level of disclosure with an emphasis on erring on the side of caution. The DSS takes a note of such concerns and decides on appropriate follow-up actions and keeps the reports securely.

Parental Consent

Parents are directed to our safeguarding procedures in summary and in detailed form, and they are required to check and agree to the level of safeguarding provision Lions Bay Ltd. provides.

Emergency contact details

When completing parental consent forms, the parents provide their details (with two separate numbers) to allow them to be contacted. This would not be the first recourse as other points of contact include the host family, the group leaders and the students themselves with numbers that have been collected and kept secure but accessible.

We adjust curfew times according to circumstances raised by risk assessments and these are updated on the website.

Medical Provision

We provide a parental consent form for every student who is under 18 enrolling for Salisbury. In this Consent form the parents/guardians must sign a document claiming that their child is of sufficient maturity to look after themselves for the duration of their course when not supervised by an adult. This form also states that if needed they are sufficiently mature enough to administer their own medication.

At the centre, we have first aid trained staff available at all times, however, they are not allowed to administer any medication to the students unless the student is incapacitated, and they need help.

Emergency Action Procedure

As part of their training, all staff are made familiar with the Lions Bay Ltd Emergency Event Procedure. In addition, all staff, students, and group leaders are encouraged to download the Citizen Aid Application on their phones as this provides live, relevant updates in the event of an emergency situation.

Online Lessons

Lions Bay Ltd. does not provide online classes

ACCOMMODATION

All student rooms are to be checked against the following criteria:

- Acceptable cleanliness
- Furniture and fittings
- Introduction of prohibited items
- Damage, misuse or loss of fire detection and fire-fighting equipment
- A representative will visit all accommodation provided to ensure that they meet the standards of the British Council prior to placing students.
- Accommodation providers are required to have an enhanced Disclosure and Barring Service (DBS) Certificate should they accommodate students under the age of 18.
- Accommodation providers are to be gas safety certified.
- Accommodation provided is fitted with smoke alarms that are in working order.
- Accommodation providers will not accommodate two students with the same first language unless unavoidable or specifically requested, in writing, by the students, Lions Bay Ltd, legal guardians/ agency representatives.
- Accommodation providers will ensure that under no circumstances will children be placed in the same room as an adult. Children sharing a room will be of the same gender.

Students' rooms and facilities

Accommodation providers are required to provide the following for students:

- A sufficiently spacious bedroom with natural light, equipped with a single or double bed
- A towel and bed linen which will be changed in a weekly basis and an adequate supply of duvets or blankets
- An adequately sized mirror
- A wardrobe or drawer space
- Facilities for a daily shower
- A desk and a chair or study space at the accommodation, where available
- Adequate heating and lighting
- Privacy from members of the opposite sex
- Access to washing and ironing facilities or a weekly laundry service, especially in the case of under 16s

Homestay accommodation

The regulations that govern homestay accommodation are as follows:

- Lions Bay Ltd. homestay accommodation providers will accept students into their home as temporary members of the household.
- Students will eat and live with their homestay accommodation providers and students will be given access to the property.
- The household must ensure a comfortable living environment.

- There will be an adult at the homestay accommodation to receive students on their arrival and overnight when students under the age of 16 are present.
- No student under the age of 18 will be accommodated with a student or person aged 18 or older.
- No more than four students will be accommodated in one homestay accommodation at any one time.
- No more than two students will be accommodated in the same bedroom unless specifically requested in writing by Lions Bay Ltd, the students, their agency representatives, or parents/legal guardians.
- English will be the language of communication within the homestay home.
- Contact names and telephone for Lions Bay Ltd. and homestay accommodation providers will be given to students and their legal guardians/ agency representatives for use in cases of emergency.
- Host family providers will ensure that under no circumstances will children be placed in the same room as an adult. Children sharing a room will be of the same gender.

Residential accommodation

In Salisbury, this is provided by Godolphin School (ISI accredited and inspected and an HMC school)

- Lions Bay Ltd provides appropriate residential staff to care for the students . This is done in conjunction with the School and the accompanying group leaders. These members of staff are DBS checked and trained by Lions Bay Ltd..
- Under-18 students booking residences are always catered.
- Lions Bay in conjunction with the School will organise periodic fire drills
- Prior to occupation Lions Bay Ltd and the School will carry out inspections of all rooms to ensure that they are ready and correct.

SAFER RECRUITMENT

Safer recruitment is the cornerstone of our safeguarding strategy, with the aim of serving the best interests of vulnerable students by not employing those with a history of harming the vulnerable and discouraging applications from them.

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Stages

To discourage unsafe applications, the principles of safer recruitment (i.e. DBS checks, references, proof of identity and address) is alluded to in the advertising and job description, is incorporated in the interview and then fulfilled before adults are allowed to work with U18s.

DBS Applications and renewals

Obtaining criminal record checks for

Teacher

- I. when a new DBS is required

We obtain permission to run enhanced DBS upon passing interview.

While awaiting DBS, we run a barred list check as a minimum, and do not allow unsupervised access to U18s. The teacher is asked to complete a declaration about the main questions answered by the DBS, with the understanding that inaccuracy will lead to dismissal.

Two references are checked prior to starting with a question about suitability for work with under 18s.

- II. when a teacher has an existing DBS from elsewhere

This is checked on the update system. If the teacher is not on the update system, they are asked to join.

- III. renewal for active employees

DBS is checked annually via the update system and we hold a DBS records database.

- IV. When a teacher is pending a DBS but through the needs of the company the teacher may have to teach a class

If a teacher or staff member has a DBS pending but needs to teach a class, then the Academic Team/line manager will run a Basic DBS for the teacher to make sure there are no immediate things to be aware of. The teacher/staff member then has to wear a yellow lanyard to show they are not fully inducted yet. The Academic Team will try their best to not place that teacher in any classes involving U18s, but if necessary then they will be either observed or leave the door open to the classroom, so that a member of staff can check on them regularly. They will also only use the toilet on the 5th floor to avoid any U18 students in the building. The Academic Team/line manager will then ensure these restrictions are carried out before they receive their Enhanced DBS and a risk assessment is signed to make sure the teacher/staff member understands.

Homestay & Residential accommodation

- I. new

We adhere to the following procedures, either through accommodation agencies or ourselves:

-Homestays hosts cannot be used if DBS has not yet been received. We obtain permission to run enhanced DBS upon passing interview. This interview also tries to ascertain suitability for working with U18s.

- Two references (called 'recommendations' and can be done by non-family members) are checked prior to start with a question about suitability for work with under 18s.
- Other adults that regularly spend time in the house are subject to a basic DBS check.

II. when a homestay host has an existing DBS from elsewhere

This is checked on the update system. If the host is not on the update system, they are asked to join by renewing their DBS.

III. renewal for returning hosts

DBS is checked annually via the update system.

Activity leader

I. when a new DBS is required

We obtain permission to run enhanced DBS upon passing interview.

While awaiting DBS, we run a barred list check as a minimum, and do not allow unsupervised access to U18s.

Two references are checked prior to start with a question about suitability for work with under 18s.

II. when a leader has an existing DBS from elsewhere

This is checked on the update system. If the leader is not on the update system, they are asked to join.

III. renewal for returning employees

DBS is checked annually via the update system.

Transfer contractors

Transfers are completed through companies that have completed DBS checks on their drivers.

Responding to existing record

A decision is made according to Employment of Ex-Offenders policy by considering the nature, seriousness, relevance and time since the offence. The decision is made by more than one person and recorded.

STUDENT BEHAVIOUR AND DISCIPLINE

This code of conduct is conveyed through induction, teacher awareness, classroom notices and dedicated sections of the curriculum. This extends to awareness of safety online (i.e. awareness of privacy, harassment and identity theft)

In accommodation, students should:

- respect their fellow residents and be careful of everyone's health and safety
- respect the accommodation and avoid damaging the furnishings and facilities
- respect the privacy of the hosts and not give out their information or invite guests without their permission
- never be in possession of weapons or replica weapons
- not rearrange the furniture in their accommodation
- not drink or smoke if they are under the age of 18. Other smoking devices (such as e-cigarettes) are also not permitted.
- never cover smoke detectors

At all times, students should:

- arrive on time for lessons and activities
- not eat in classrooms
- only use phones in class as directed by the teachers
- try to maximise their learning by using English in class
- minimise abusive behaviour (see below)
- feel welcome to raise concerns with the safeguarding and welfare team

Abusive Behaviour

Abuse is defined as “the wilful, conscious desire to hurt, threaten, upset or frighten anyone.”

Abusive Behaviour may consist of the following, but is not limited to:

- Verbal abuse
- Harassment
- Bullying
- Actual or threatened violence
- Damage to personal property

The following actions also constitute abusive behaviour:

1. Deliberate unkindness or any action that causes hurt or upset will not be tolerated from any student, staff member or visitor.
2. It is a form of abusive behaviour to write notes, make phone calls or send electronic messages that are offensive, hurtful, annoying, or worrying.
3. Abusive behaviour can also include Cyberbullying; use of information technology to repeatedly harm or harass other people in a deliberate manner, e.g. sending, forwarding or

posting harmful material using a cell phone or the internet. Cyberbullying can also take place in the workplace or on company web sites, blogs, or product reviews.

4. Students, staff members and visitors have a right to privacy of property and personal information in school. It is dishonest and can be a form of abuse to go into another person's pocket or bag, read a private document or electronic message.

Procedure for dealing with breaches of the code of conduct

The appropriate and proportionate response to incidents is dependent on the circumstances, but the following steps are advised as necessary.

1. The misbehaviour is first brought to the attention of the student by an adult so that the student can correct it himself / herself.
2. A member of DSS reminds the student of the code of conduct (and the later steps of dealing with it) and asks the student to sign a customised and relevant code of conduct declaration.
3. A final warning is given.
4. As a last resort, in consultation with all parties, the course / accommodation services may be cancelled without refund.

The following steps may be taken when dealing with incidents of abusive behaviour:

1. If abusive behaviour is suspected or witnessed, a clear account of the incident must be reported to a member of DSS who must deal with it immediately.
2. The member of DSS/s will interview everyone who was involved and will further record the incident.
3. Parents, guardians and/or agents will be kept informed, where necessary.
4. Punitive measures will be used as appropriate and in consultation with all parties concerned. This may lead to permanent exclusion from the course and any other services (e.g. accommodation). No refund or alternative arrangements will be made.

Students, staff members or visitors who have been a victim of abusive behaviour will receive full support from Lions Bay Ltd. by:

- offering an immediate opportunity to discuss the experience with DSS
- offering continuous support and reassurance
- working on restoring self-esteem and confidence
- taking measures to ensure no further abusive behaviour occurs

The accused student, staff member or visitor will also receive full support from Lions Bay Ltd by:

- being given the opportunity to discuss the events
- discovering why s/he became involved

- establishing the wrongdoing and the need to change behaviour
- Advising and supporting him/her to seek professional help
- If s/he is a student, inform parents, guardians and/or agents to help change the attitude, where necessary
- If s/he is a staff member, informing their line manager to help change the attitude, where necessary. Should the offence be of a serious nature, disciplinary procedures will be followed.

ADDITIONAL CONSIDERATIONS

Fire Safety

Fire safety risk assessments make provision for U18s in terms of additional precautions, such as awaking younger students in residential accommodation. Homestay hosts are required to complete their own fire safety risk assessments.

Safety during transfers

Transfers are completed through companies that have completed DBS checks on their drivers.

Salisbury

Homestay hosts greet students on the first day and help to arrange their transport to school.

Special Educational Needs

Designated staff should be careful not to confuse Special Educational Needs with warning signs of abuse. To avoid this, they should be aware of which students have special needs through the enrolment process. These students may be especially vulnerable.

Private Fostering

No U18 is placed with a host family for more than 27 nights.

GDPR with regard to safeguarding

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Private data regarding staff and student identification is held securely within databases with restricted access and kept securely when in hard copy.

For safeguarding purposes, relevant staff may have access to student phone numbers for the purpose of maintaining contact. These are kept on school phones and deleted as soon as they are no longer required.

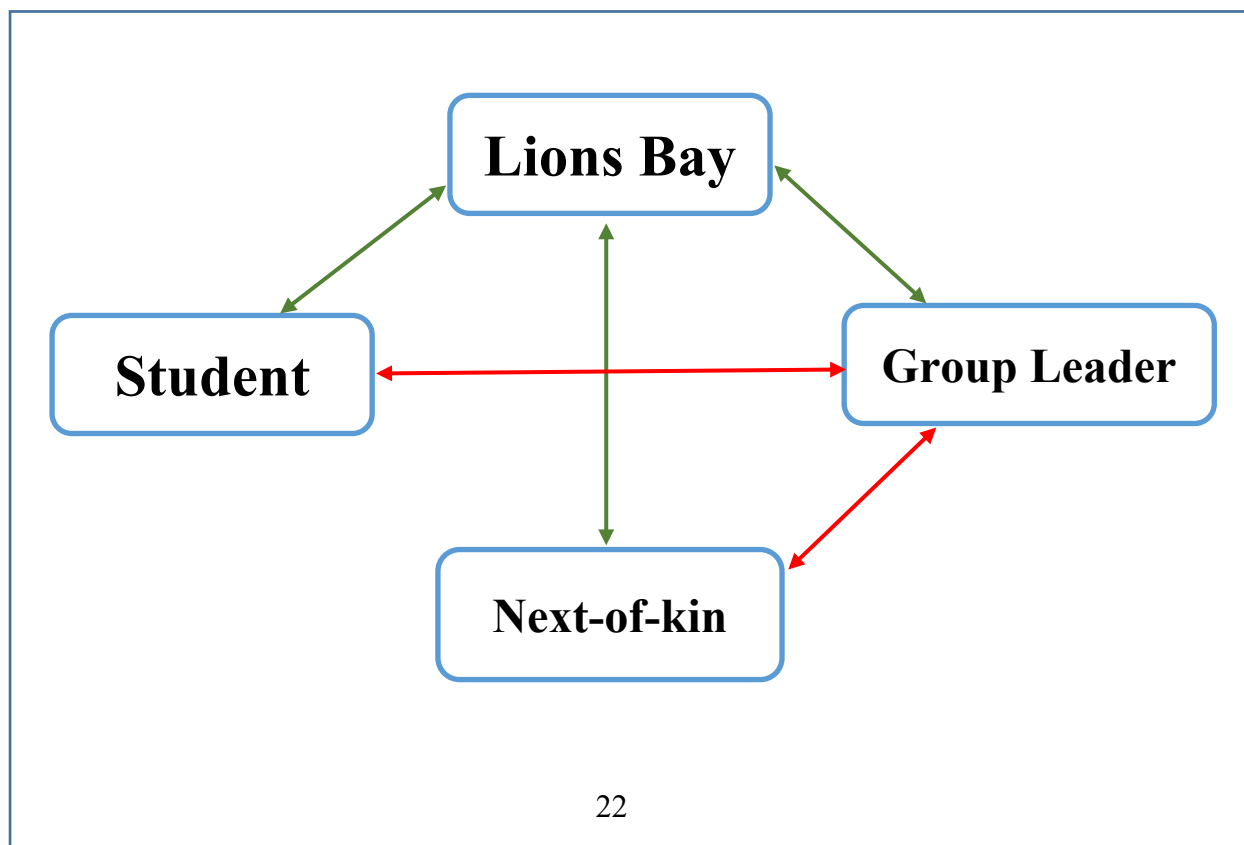
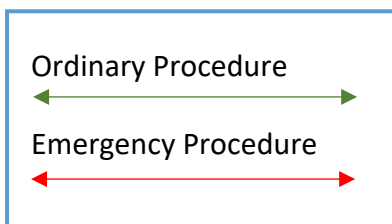
A paper folder is used to keep records of concerns and allegations and is kept securely in the Academic Management offices of Eastgate House and Salisbury for their respective reports.

Monitoring and review of our policy

This Safeguarding Policy will be kept under continuous review. We update it annually or as often as required. Any changes we may make to this Policy in the future will be posted on our website in this document.

LINES OF COMMUNICATION

Residential Stay



Homestay

