

SAFEGUARDING FOR UNDER 18s

1. Introduction

Bayswater College/Eurocentres offers courses and programmes to young learners from all over the world. These courses and programmes are designed to be both educational and fun and to offer students a secure environment during their stay in the UK.

Under 18 Provision overview

Bayswater College/Eurocentres operates the following courses and programmes:

- Year round EFL courses to 16 and 17-year olds enrolled on adult courses in Bayswater
- Year-round closed junior groups at our schools in London and Liverpool
- Winter School & Summer School in Liverpool and London, where junior students study in international or closed groups
- Summer Schools at University of Hertfordshire, Oxford Brookes, Arts University Bournemouth, University of Roehampton, University of Westminster, University of Greenwich and University of Brighton, where junior students study in international or closed groups

Any additional provision offered in the future will be the subject of this document and of the policies and procedures contained herein.

Bayswater College/Eurocentres responsibilities

As a result of accepting students under the age of 18, Bayswater College/Eurocentres must:

- Have child protection policies in place
- Operate safe recruitment procedures and carry out appropriate checks on staff and volunteers (see the Bayswater College/Eurocentres Staff Recruitment Policy)
- Have procedures dealing with allegations of abuse against staff and volunteers
- Designate senior members of staff to take lead responsibility on child protection issues
- Ensure that all staff that work with children receive training in child protection issues and that such training is updated at no less than three yearly intervals
- Carry out annual reviews of our policies and procedures

Under 18 entitlement

Bayswater College/Eurocentres has a legal duty of care to all of our students, especially those who are under 18 years of age. In England the law states that people who work with children have to keep them safe. This safeguarding legislation is set out in The Children Act (1989) and (2004). It also features in the United Nations Convention on the Rights of the Child (to which the UK is a signatory) which sets out the rights of children to be free from abuse. The Government also provides guidance in their document Working Together to Safeguard Children 2013.

As such, all of our Under 18 students have an entitlement to be protected, and our safeguarding policy and procedures apply to all of our Under 18 students, irrespective of race or gender. Please refer to our Equality & Diversity Policy which is available on our website.

Bayswater College/Eurocentres is guided in its safeguarding procedures by:

- Best practice and our commitment to excellence in the care of under 18s
- Legal responsibilities under UK law in the care of under 18s
- Requirements of the Accreditation UK scheme

Bayswater College/Eurocentres has overall responsibility for the implementation, review and monitoring of safeguarding policies and procedures. In addition, every member of Bayswater College/Eurocentres staff is responsible for ensuring that the safety and well-being of students is a daily event. Safeguarding should be considered constantly in relation to issues such as: student welfare, health, hygiene and safety.

Child protection is a very specific area of Safeguarding and will be handled by a small number of people when such a situation arises. Child protection situations are less common.

Associated Policies and Procedures

Many of our other policies and procedures contain sections that are relevant to our safeguarding procedures.

In particular, the following policies contain sections that are relevant to our safeguarding procedures:

- Behaviour & Discipline Policy
- Equality & Diversity Policy
- Staff Recruitment Policy
- PREVENT Policy
- E Safety for Juniors Policy
- Staff Handbook
- Risk Assessments

Versions and Availability

A simplified version of this policy is available at the reception of the college and given to all visitors. Simplified versions are also including in student and group leader welcome packs and on the website.

2. Terminology

Child Protection: means protecting children from harm and abuse. Bayswater College/Eurocentres uses the definition of abuse commonly used by the World Health Organisation:

‘Child abuse’ or ‘maltreatment’ constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.’

Abuse is also defined by inflicting harm or by failing to act to prevent harm (Working together, 2013).

Duty of Care: is a legal responsibility that adults who work with children as professionals or volunteers have a duty to look after them properly; and be aware that children depend on adults for their safety and well-being.

Regulated Activity: the term most commonly used to describe roles where suitability and criminal record checks are required by law, which includes all roles involving responsibility for or substantial access to under 18s. Regulated activities most applicable to ELT providers are teaching; leisure programme supervision; general care or supervision (e.g. by a group leader, homestay host or residential staff). All roles with Bayswater College/Eurocentres are classified as regulated activity as they give the individual the opportunity to have unsupervised contact with children.

Safeguarding: means caring for children appropriately and ensuring they grow into happy and healthy young adults as well as preventing anything which is not in their best interests; it includes

health and safety, child protection and pastoral care.

Safer Recruitment: recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children; this is an essential part of safeguarding. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to children in order to harm them.

Suitability Checks: checks made to identify any known reasons a person would be considered unsuitable to work with under 18s, such as a criminal record check.

Under 18s: this policy refers to 'under 18s' rather than 'juniors' or 'children' to make it clear that these requirements apply to all students who have not yet reached their 18th birthday, irrespective of the age of maturity in their home country.

3. Policy Statement

The purpose of the policy is as follows:

- To provide protection for under 18s who enroll on Bayswater College/Eurocentres's courses and programmes;
- To provide staff with guidance on procedures they should adopt if they suspect a child or young person may be experiencing, or be at risk of harm.

Bayswater College/Eurocentres is committed to a practice which protects Under 18s from harm and helps them to be the best young person they can be. Bayswater College/Eurocentres believes that all children have potential and that every child matters, anywhere in the world. Bayswater College/Eurocentres affirms the position that all children have the right to be protected from all forms of abuse as set out in article 19, UNCRC, 1989.

We recognise that:

- the welfare of under 18s is paramount;
- all under 18s, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse;
- Bayswater College/Eurocentres has a duty to protect all students from extremism and radicalisation.
- working in partnership with under 18s, young people, their parents, homestay providers, agencies, leaders and teachers is essential in promoting young people's welfare;
- all Under 18s have the right:
 - To a voice and have the right to be listened to and be believed.
 - To say no and this will be taken seriously.
 - To be supported to be the person they would like to be.
 - To be treated with respect and shall have their rights protected irrespective of their age, gender, ethnic background, religion or sexual orientation.
 - To be protected from political and religious extremism
 - To have their suspicions and allegations investigated and taken seriously.

We seek to safeguard under 18s by:

- valuing them, listening to and respecting them
- adopting child protection guidelines through procedures and a code of conduct for all adults
- recruiting staff and homestay providers safely, ensuring all necessary checks are made
- sharing information about child protection and good practice with under 18s, their parents and all adults sharing information about concerns with relevant agencies and involving parents and under 18s appropriately
- providing effective management for all adults through recruitment policies, supervision,

support and training.

- Developing and implementing procedures for an appropriate and measured response to welfare and safeguarding concerns
- Developing and implementing procedures for safer recruitment
- Raising awareness of safeguarding issues and best practice amongst our staff, managers and students
- Carrying out annual Risk Assessments with regards to radicalisation and extremism.

All adults working with children are interviewed and vetted to ensure they are committed to the safety and well-being of the children they come into contact with. All staff sign to say they agree and will uphold all aspects of this policy and continue to its development.

Responsibilities for the implementation of this policy are as follows:

- U18s: Responsible for having a basic awareness of safety and how to be safe, looking out for each other and raising any concerns with adults if necessary.
- Staff: Responsible for understanding the policy and pro-actively engaging with its requirements. Bayswater College/Eurocentres staff have a duty to safeguard under 18s from all forms of mistreatment. The duty to safeguard under 18s includes the duty to report concerns about an under 18 to the Designated Safeguarding Person (DSP).
- Designated persons: At each Bayswater College/Eurocentres site there is a Designated Safeguarding Person (DSP), whose role it is to oversee the standards and practices across the group. In addition, the DSP is responsible for the implementation of the policies and procedures. Their contact details are made known to all staff and students and are also available on the website. For these details please see section 5 of this document (Child Protection).
- Designated Safeguarding Lead (DSL): the Designated Safeguarding Lead has overall responsibility for Safeguarding policy and practice across all Bayswater centres. The DSL is responsible for liaising with the Local Authority Safeguarding Children Board, MASH Team and Local Authority Designated Officer for any referrals or concerns.

This Policy applies to all Bayswater College/Eurocentres staff including directly employed staff, homestay hosts, accommodation and transport providers, volunteers, interns and anyone working on behalf of Bayswater College/Eurocentres.

All staff are expected to read and abide by the policy and procedures set out in this document.

This Safeguarding Policy is sent to all staff before they commence employment and is intended to be used as a reference for staff and managers and any other stakeholder.

Staff are able to access this document on the company shared drive.

This policy will be reviewed by the Designated Safeguarding Lead in December each year as a minimum and updated in line with any changes to legislation, incidents or new knowledge with feedback from DSPs, staff and students.

4. Bayswater College/Eurocentres Staff Code of Conduct regarding Under 18s

4.1 Overview

This Code of Conduct is contained within the Bayswater College/Eurocentres Staff Handbook and is discussed with all new members of staff as part of the staff induction process at the commencement of their employment.

Bayswater College/Eurocentres recognises the importance of creating a safe culture where trust is built between staff and under 18s and both are protected from any behaviour which runs contrary to this culture. We achieve this through adherence to the policy laid out in this document and a

genuine environment of care fostered by robust procedures and recruitment and training activities.

This Code of Conduct aims to ensure that adults exercise their responsibility to ensure their behaviour is not misunderstood or misinterpreted thereby placing themselves and particularly children in compromising or potentially abusive situations.

This Code aims to help all staff understand behaviour that is, and is not, acceptable and goes hand in hand with thorough induction procedures and robust management supervision. Staff should talk to the Designated Safeguarding Lead if any aspect of the Code of Conduct or the Safeguarding Policy is unclear. This Code also aids Under 18 students in their understanding of what they should expect of members of Bayswater College/Eurocentres staff.

4.2 Setting standards

The key elements of our code of conduct are set out below:

- interaction;
- appearance;
- intoxicants;
- IT;
- social networks;
- accommodation; and
- transport.

We expect all adults working on behalf of Bayswater College/Eurocentres to be an excellent role model for all students in their care and to cultivate a respectful, safe and secure environment for staff and students.

4.3 Interaction

- Maintain professional physical and relationship boundaries, and act in a way appropriate to your Duty of Care
- Do not make suggestive or inappropriate remarks to or about any adult or U18
 - Inappropriate remarks include innuendo, swearing and discussing their or your own intimate relationships.
- Other than in exceptional circumstances do not communicate directly with U18s via email or text messages and only then with prior consent from the child's parent or guardian.
- Do not engage in behaviour that may be construed as 'grooming' an U18 for example giving money, presents or favours or talking or behaving in an inappropriate or unprofessional manner.
- Intimate or sexual relationships between staff and students under the age of 18 are an abuse of trust which constitutes a criminal offence.
- Avoid putting yourself in a situation where you are on your own with an under 18 as far as possible. Situations where there is only one staff member present with a child should be avoided. On the occasions when a confidential interview or one to one meeting is necessary, these should be conducted in a room where the exit is clearly visible and, where possible, the door to the room is left open and that another member of staff is aware of the situation.
- Conduct all interactions in a calm manner and avoid shouting at U18s wherever this is possible unless there is a Health & Safety risk.
- Ensure any physical contact is within clear boundaries to avoid any allegations of inappropriate touching. Unnecessary physical contact with young people/children should be avoided, for example, gestures such as regularly putting a hand on the shoulder or arm. Whilst these gestures may be well intentioned, such acts could be misinterpreted.
- If you are required to be in a one-to-one setting with an U18, consider how this can be managed effectively i.e. Leaving a door open, using a room that has a window in the door,

Review Date: 25 January 2021

Date of Next Review: 25 January

positioning yourself within sight of the door and considering if the one-to-one setting is really necessary.

- Do not socialise with U18 students outside of school organised events.
- In situations where it is necessary for staff to restrain a young person/child in order to prevent self-injury, injury to others or damage to property, only the minimum force necessary must be used and any action taken must be only to restrain. Any incidents where restraint was felt to be required should be recorded on an incident report and investigated by the Designated Safeguarding Lead.
- Staff required to administer first aid (normally a trained first aider) should ensure, wherever possible, that another member of staff is present if they are in any doubt as to whether necessary physical contact could be misconstrued.

4.4 Appropriate appearance

Adults might not be aware of the effect their appearance has on students and how hard it is for some students to respect them/their role if they do not present appropriately. For this reason, the Code of Conduct includes this section regarding the appearance of adults.

Adults should present an appearance which:

- promotes a positive and professional image
- is appropriate to their role is not likely to be viewed as offensive, revealing or sexually provocative
- does not distract, cause embarrassment or give rise to misunderstanding
- is absent of any political or otherwise contentious slogans
- is not considered to be discriminatory
-

4.5 Alcohol, drugs and smoking

- Ensure under 18s are aware of UK law in relation to smoking, consuming alcohol and drugs including prescription drugs
- Do not consume, or allow U18s to consume any alcohol, drugs, cigarettes or intoxicating substances on school premises
- Do not provide alcohol, drugs, cigarettes or intoxicating substances to U18s
- Do not work under the influence of any intoxicants or drugs

4.6 IT and social networks

- Do not share your personal social media details with any under 18s
- Do not take any images or videos of under 18s on your personal recording equipment

4.7 Accommodation

Where staff are working and living on campus (e.g. Chalfont St. Giles), staff should:

- Abide by the accommodation rules and guidelines at that site
- Not enter private areas without first gaining the student's permission, or in the case of needing to search property, without informing them first and doing so in their presence with a second member of staff present.

4.8 Transport

- Staff should avoid transporting under 18s in their own vehicle.
- If it is absolutely necessary, in the event of an emergency under 18s should only sit in the back seat of the car
- The journey should be recorded including time of start and end of journey, start and end location as well as any stops along the way and reason for journey
- For coach travel, supervision ratios should be maintained on the vehicle as per child supervision policy

- On public transport including London Underground staff should avoid, where possible, travelling during rush hour as this increases the risk of under 18s being left behind
- Before getting on the train all students should be aware of the station they will alight at and the number of stops
- If busy, staff should split the group into more manageable numbers per adult and line up at different doors ensuring everyone is aware of the destination station.

4.9 Individual Privacy

While it is accepted that staff may, exceptionally, need to enter student rooms in emergencies, or to enforce disciplinary rules, in all circumstances, staff should respect students' right to privacy and staff should never normally enter a room uninvited. Staff and managers should ask to enter a room if necessary and no staff member should enter any bedroom alone when occupied by a student.

It is important that staff knock loudly on the door and identify themselves and state that they will be entering the room. An example may be "Hello Annalisa, it's Joanne here, please can you open the door?" Preferably staff should do this in pairs, as this is likely to be less intimidating to the child.

With the exception of during a genuine fire evacuation, staff should never try and enter a room without first identifying themselves and without having stated their name and asked for permission to enter at least two times. Staff should be aware that students may be disorientated during the night and may need a few moments to collect themselves before being ready to reply in English.

When it is necessary for staff to enter a student's bedroom, it is important that this is done appropriately, and the bedroom door should always remain open and the staff members should leave if asked to do so. This is to ensure that students are comfortable but also to protect the staff member from mistaken or malicious false accusation of impropriety. Any breach of the above guidelines should be reported to the DSP without delay.

4.10 Adults not Employed by Bayswater College/Eurocentres

All students will regularly come into contact with adults who are not employed by Bayswater College/Eurocentres such as taxi and coach drivers, campus management, employees and visitors.

We have made arrangements to ensure that third party contractors are equally as rigorous with their own recruitment and management as we are. Care should be taken to minimise any contact between our students who are under 18s and any external adults. Students should be warned, in an age appropriate way, of the danger strangers present.

Bayswater College/Eurocentres may also host Group Leaders who are employed by agencies abroad. Bayswater College/Eurocentres requires that all agents obtain a police certificate of good conduct for the Groups and requires a signed document to prove that the agent has conducted a Group Leader background check. This documentation is held at Bayswater College/Eurocentres's head office in London.

5 Child Protection

5.1 Overview

We meet our child protection responsibilities by:

- Creating policies and procedures to comply with all regulatory requirements and guidelines
- Reviewing these policies and procedures annually
- Training all staff to an appropriate level of awareness and procedural competence with periodic review
- Making all policies and procedures available to all stakeholders

5.2 Nominated/designated persons

Each Bayswater College/Eurocentres site has at least one Child Protection Officer (DSP) who is

responsible for ensuring a safe environment for our staff and students. The DSP has a minimum of level 2 safeguarding training.

In the unlikely event that the DSP or DSL is unavailable, the school emergency phone is in use 24 hours a day and is DSP trained will be contacted.

All allegations and concerns are reported by the DSP to the local child safeguarding authority. In all cases, these bodies will advise on next steps and procedures.

5.3 Responding to concerns

Scenarios which may cause an adult to have safeguarding concerns about an U18 may include:

- An U18 tells an adult they are worried about another U18
- An U18 tells an adult of an issue that concerns themselves
- Anyone from outside the Bayswater College/Eurocentres reports a potential issue
- An adult witnesses' behaviours of another adult which cause concern
- An adult sees in an U18 non-verbal indications of safeguarding concerns

Serious issues where it is felt the safety of the child is in immediate jeopardy will be dealt with immediately regardless of time or day.

Concerns raised where it is felt that the safety of the child is not under immediate threat will be dealt with on the same day if raised during working hours or the following day is outside of working hours.

5.4 Recognising symptoms of abuse

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. There are four primary types of child abuse:

- physical abuse;
- sexual abuse;
- emotional abuse; and
- neglect.

Child abuse commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race or ability.

Abusers can be adults (male or female) or other young people and are usually known to and trusted by the child and family but not always.

An individual may abuse or neglect a child directly or may be responsible for abuse because they fail to prevent another person harming that child. There is no textbook list of signs and signals but the below gives some indicators:

Physical:

- Cuts
- Bruises
- Burns
- Restraint or grip markings
- Black eyes
- Unusual pattern of injury; repeated trips to the emergency room
- Social isolation or withdrawal
- Vague medical complaints such as chronic headaches, fatigue or stomach pain
- Pelvic pain; vaginal or urinary tract infections

- Fearfulness

Sexual:

- Changes in behaviour – a child may start being aggressive, withdrawn, clingy, have difficulties sleeping or start wetting the bed.
- Avoiding the abuser – the child may dislike or seem afraid of a particular person and try to avoid spending time alone with them.
- Sexually inappropriate behaviour – children who have been abused may behave in sexually inappropriate ways or use sexually explicit language.
- Physical problems – the child may develop health problems, including soreness in the genital and anal areas or sexually transmitted infections, or they may become pregnant.
- Problems at school – an abused child may have difficulty concentrating and learning, and their grades may start to drop.
- Giving clues – children may also drop hints and clues that the abuse is happening without revealing it outright.

Emotional:

- be overly-affectionate towards strangers or people they haven't known for very long
- lack confidence or become wary or anxious
- not appear to have a close relationship with their parent, e.g. when being taken to or collected from nursery etc.
- be aggressive or nasty towards other children and animals.
- use language, act in a way or know about things that you wouldn't expect them to know for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends.

Neglect:

- be smelly or dirty
- have unwashed clothes
- have inadequate clothing, e.g. not having a winter coat
- seem hungry or turn up to school without having breakfast or any lunch money
- untreated injuries, medical and dental issues
- repeated accidental injuries caused by lack of supervision
- recurring illnesses or infections
- not been given appropriate medicines
- missed medical appointments such as vaccinations
- poor muscle tone or prominent joints
- skin sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- anaemia
- tiredness
- faltering weight or growth and not reaching developmental milestones (known as failure to thrive)

- poor language, communication or social skills.

Being alert to abuse means:

- Thinking about what you are seeing and asking if it is acceptable practice
- Taking seriously what you are told
- Responding to the stresses behind requests for help or other presenting problems
- Being alert to signals or non-verbal communication or challenging behaviour, and aware that this could indicate unacceptable practice is being deliberately hidden or denied.

Secondary Forms of Abuse:

Bayswater recognises that outside of the four primary forms of abuse there are further secondary forms of abuse. These are listed below along with definitions for staff awareness.

- Child Sexual Exploitation
 - Children sexually exploited for money, power of status
- Female Genital Mutilation (FGM)
 - the partial or total removal of external female genitalia for non-medical reasons
- Bullying & Cyber Bullying
 - usually repeated over a long period of time and can hurt a child both physically and emotionally.
- Child Trafficking
 - children are recruited, moved or transported and then exploited, forced to work or sold.
- Grooming
 - Children and young people can be groomed online or in the real world, by a stranger or by someone they know - a family member, friend or professional.
- Harmful Sexual Behaviour
 - Children and young people who develop harmful sexual behaviour harm themselves and others.

5.5 Reporting concerns to the DSPs

Whenever an adult has a safeguarding concern regarding an U18, the adult should:

- Follow the Child Protection Guidelines outlined below
- Report immediately to the DSP/DSL
- Explain your concerns and the reasons behind them
- The DSP will advise you on the next step.

5.6 Child Protection Guidelines: Responding to a child or young adult telling you about abuse

When someone talks to you about alleged abuse, remember you are not investigating the situation, just listening. If a child discloses abuse, remember that this may be the beginning of a legal process, as well as of a process of recovery for the child. Legal action against a perpetrator can be seriously damaged by any suggestion that the child's words have been influenced in any way by the person they told.

The following guidance should be followed as far as possible:

- Do not promise to keep the information a secret. Rather you must inform the child that you will have to share this with the person responsible for their safety;
- Rather than directly questioning the child, just listen and be supportive;
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish;

- Using the Safeguarding Recording Form (available in shared drive policy folder) to write an account of the conversation immediately afterwards, as close to verbatim as possible. Make a note of what they actually said, using his or her own words and phrases;
- Describe the circumstance in which the disclosure came about;
- Where physical harm is being reported use a body map to indicate the location of cuts, bruises and abrasions, noting the colour of any bruising.
- Hand your record to the DSP or DSL, who will contact the Local Children's Safeguarding Board/Local Area Designated Officer where appropriate.
- Do not share the disclosure with any member of staff except the DSP/DSL

5.7 Keeping Records

All serious concerns communicated to the DSP will be responded to on the same day.

All information regarding allegations of abuse or safeguarding concerns is recorded in writing by the DSP. A reference is made and dated in the student's record on the database.

Access to the safeguarding file is only available to the DSL and any official outside agency as appropriate. The safeguarding file will be stored in a password protected file or in a locked cupboard if physical copies are kept.

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS Disclosures reveal information from the police about an allegation that did not result in a criminal conviction. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

The DSP will take advice from the Local Authority Designated Officer, police and local authority social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What if any information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if and when it should arise.

If a staff member is accused the DSP will then work with the LADO/Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child. The staff member will be suspended or dismissed if appropriate.

If a child is accused, the LADO or LSCB/Appropriate Social Work Department will be informed, and their advice taken to ensure the safety of both the accuser and accusee. Suspension/expulsion will be carried out where appropriate.

If a DSP is accused, the DSL will then work with the LADO/Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child. The staff member will be suspended or dismissed if appropriate.

If the DSL is accused, a DSP will then work with the LADO/Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child. The staff member will be suspended or dismissed if appropriate

5.8 Training delivery

The DSL has overall responsibility for ensuring all Bayswater College/Eurocentres staff members have appropriate training and that this is updated annually.

- All Bayswater College/Eurocentres staff must complete a minimum of level 1 online safeguarding training, attend a training session run by the DSP and be fully aware of the Bayswater College/Eurocentres Safeguarding Policy.
- Staff with access to U18s must also be in possession of a recent DBS check
- DSPs are expected to complete the level 2 safeguarding training.
- DSL is required to have completed the level 3 safeguarding training

This training is emphasised/refreshed in staff meetings and during staff appraisals.

Any signs of radical or extremist are to be reported to the Centre Manager and / or on-site DSP, who will report it to the Police if required. For full information regarding Bayswater policy for radicalisation and extremism please see the Bayswater College/Eurocentres PREVENT policy.

5.9 Welfare of Under 18s

We provide general care for our U18s as follows:

- A DSP on each premises, reporting directly to the DSL for Safeguarding concerns
- Risk Assessments completed for all aspects of our students' time at Bayswater College/Eurocentres and summer locations
- Under18s monitored by suitable adults at all times according to supervision ratios – see section 5.11
- 24-hour emergency phone number given to all students, parents and agents
- Safeguarding policy read and understood by all staff
- Safeguarding level 1 completed by all staff
- Constant safeguarding review and training updates
- Safeguarding as an item on the agenda in every meeting to do with U18s
- Inductions and training for all staff including welfare scenarios
- Safe recruitment procedures

5.10 Risk Assessments

Risk assessments are completed for the following:

- All premises: The initial assessment is made by a full inspection of any buildings to be used. This is updated for any changes to the building or its use, and staff are informed of its contents. All appropriate details are passed on to students during their induction.
- All accommodation provision:
 - o Homestay: Hosts complete an initial risk assessment form which is reviewed with them at the time of their house inspection. It must be updated on subsequent inspections or earlier if there are any changes to the building.
 - o Student residences: The initial assessment is made by a full inspection of any buildings to be used. This is updated for any changes to the building or its use, and staff are informed of its contents. All appropriate details are passed on to students during their induction.
 - o Excursions and off-site activities: The initial assessment is made through a site visit in advance. Specific risks are then updated and signed off on the day.

5.11 Supervision ratios for U18s

The minimum supervision ratio for U18 students on Young Learner programmes is as follows:

- In residential accommodation:
 - o at least 1:20 for students aged 12–17

- at least 1:15 for students aged 10-12
- During social activities and excursions away from the Bayswater College/Eurocentres sites:
 - At least 1:10 for students aged 8-11
 - At least 1:15 for students aged 11-17

In some circumstances Group Leaders may be included in this ratio, but this will be assessed according to the activity, location and circumstances, and will be recorded in relevant risk assessments.

Bayswater College/Eurocentres does not offer course for children aged under 8 years.

If any U18s attend an adult programme, additional supervision needs are addressed in risk assessments. Curfew times are given to staff, students and accommodation providers and enforced throughout the student's stay.

5.12 Missing students

Where students go missing during transfers, on excursions or activities, after curfew times, staff should immediately contact the Bayswater College/Eurocentres Emergency Number and await further instructions.

- All students attending adult courses aged 16 or 17 years are required to sign in and out at reception daily
- If a student aged 16 or 17 years enrolled on our adult courses is not present 15 minutes after the commencement of class and have not informed the college of their absence the college will call them
- If the student does not answer the emergency UK contact will be called
- If the emergency UK contact does not answer the second emergency contact will be called
- If after the above steps there is no information on the location and safety of the student Bayswater College/Eurocentres will contact the police and report missing person

5.13 Fire Safety

In all centres, the supervisors for the U18 students are responsible for ensuring the safety of those in their care following the appropriate fire regulations and procedures.

Bayswater College/Eurocentres staff receive Fire Marshall training, those who have received this training should be followed in the event of evacuation.

5.14 First Aid and Medical

Bayswater College/Eurocentres requires to be fully informed of any medical condition/disability of a prospective student in order to be able to provide appropriate care for the student. In the case of such information not being provided Bayswater College/Eurocentres may have to refuse acceptance of the student and request that the student is returned home at his/her own expense.

If notified of medical conditions or disability Bayswater will request completion of the Bayswater College/Eurocentres Needs Assessment. The information in this form will help inform staff of any additional provision or support required.

Bayswater College/Eurocentres staff and host families cannot be responsible for administering or safeguarding medicines. Students who are prescribed medication are asked to bring a letter from the doctor or prescriber with the name of the medicine, the dosage and frequency of taking it and the name of the condition for which it has been prescribed, clearly described in English. This is in case the student needs medical attention whilst in our care. In any event that a student is taking regular medication, the student must be responsible for the care and administration of her/his own medication.

Bayswater College/Eurocentres requires written confirmation from the student or parent/legal guardian to that effect prior to accepting the student.

Bayswater College/Eurocentres retains the right to make decisions regarding the appropriateness of students participating in certain activities if there is a medical condition and possible risks attached.

In the event of illness, U18s are accompanied to the local Doctor's surgery or the hospital. If there is a Group Leader with the student, they accompany them, with a member of staff on call in case of translation difficulties. If the student is unaccompanied, the Bayswater College/Eurocentres member of staff ensures appropriate supervision, acting in liaison with the attending medical professionals.

A Complete First Aid Kit is available in the office in each centre, and basic first aid kits are taken on all off-site activities.

A minimum of one first aid trained member of staff will be on site while the college/summer camp is in operation.

5.15 U18 Behaviour and discipline

Bayswater College/Eurocentres insists on appropriate behaviours in all its activities. Students are all sent a code of conduct in advance of travel. On arrival the code of conduct forms part of the induction.

In dealing with inappropriate behaviour, Bayswater College/Eurocentres staff follow the code of conduct at all times and apply any sanctions consistently and proportionately.

5.16 Airport transfers

U18 students are required to send details of who to contact in an emergency and, where possible, a contact number for the student themselves in advance of travel. We also require full details of the planned journey including flight information. Students are given the 24-hour emergency number prior to travel.

For students arranging their own airport transfer (only 16+): Bayswater College/Eurocentres requires signed confirmation from a parent/ guardian outlining the journey including taxi bookings/train tickets. All accommodation providers are required to contact the Bayswater College/Eurocentres emergency number if students are more than 3 hours later than expected.

Details of the transfer booked and procedures on the day are sent in advance to all students. This includes advice on what to do if they cannot find the meet and greet person, and specific information as to how they should identify their contact person. The Bayswater College/Eurocentres representative always carries a sign with the Bayswater College/Eurocentres logo and the full name of the student/group to be met.

5.17 Accommodation

Bayswater offers homestay and residence accommodation options to students. Below are the age and meal plan requirements for children looking to study with Bayswater:

16-17 year olds enrolling in year round adult courses

- Half board homestay accommodation
- Privately organised accommodation

14-17 year old children signing up individually to the junior summer programme in London:

- Homestay full board accommodation
- Privately organised accommodation

12-17 year olds travelling with a group during the year or summer:

- Homestay full board accommodation
- Residence full board accommodation
- Privately organised accommodation

10-11 year olds travelling with a group during the year or summer:

- Residence full board accommodation
- Privately organised accommodation

Bayswater College/Eurocentres works with agencies recognised by the British Council for meeting the requirements of placing under 18s in homestay accommodation exclusively. For under 18s staying in the UK for longer than 27 nights Bayswater recognises the need to register them as Private Foster Care Placements and works with the accommodation agency to provide documents and information as necessary as well as organising Local Authority Visits as necessary.

6. Bayswater College/Eurocentres's commitment to safer recruitment

This section is also included in Bayswater College/Eurocentres's Staff Recruitment Policy.

Every adult who is recruited by the school (including homestay hosts, Group Leaders and outside agencies) should undergo a process of suitability checking for work with U18s as appropriate to their role and status through documentation check and the interview and selection process. We are aware that it is a criminal offence to employ staff who are the subject of a DfE prohibition order. Any adult disqualified from working with children, or who is living with a disqualified person, will not be employed by Bayswater College/Eurocentres.

6.1 Recruitment materials

All Job Descriptions must contain a statement that members of staff need to actively engage in looking after U18s safely, that they must follow the safeguarding policy and procedures, and provide appropriate suitability documents.

6.2 Recruitment process

In all recruitment interviews for roles with substantial access to U18s there should be questions exploring the applicant's awareness of safeguarding. For example: 'Safeguarding is key to everything we do. What do you understand by this term, and can you give examples of how your role can contribute?'

Interviews are always conducted either in person or by live video link and a minimum of two members of staff conduct the interview.

References are always followed up for new staff members. Every reference request should contain a specific question asking if there are any concerns about this person working with U18s. Suitability checks for working with U18s are always sought.

6.3 Vetting

All applicants should be informed that:

- References will be followed up
- All gaps in CVs must be explained satisfactorily
- Proof of identity and (where applicable) qualifications will be required
- Appropriate suitability checks will be required prior to confirmation of appointment.
- Successful completion of level 1 Basic Awareness of Safeguarding and PREVENT training are required before commencement of employment.

For any potential members of staff who have not lived in the UK for the past 2 years, an equivalent

check to the DBS is required from their main country of residence in this time period such as Police Certificate of Good Conduct or Criminal Records Check.

6.4 Applicants awaiting suitability checks

Where a DBS check has not been completed by the start date of a new employee, commencement of employment can take place only with restrictions. The decision will be made by the DSL, with the agreement of the DSP and rationale must be completed by both parties. This judgment will be based on an assessment of the risk compared to the consequences of the decision. If the employee does commence work, they must have signed a self-declaration and their access to U18s must be supervised at all times.

6.5 Applicants with a criminal record

In the event that a disclosure shows that a potential employee or member of staff has a criminal record, the situation will be judged by the DSL who, in consultation with the DSP will take into account the seriousness and nature of the offence, the nature of appointment, the age of the offence and the frequency of the offence. The disclosure will be discussed with the prospective employee and any decisions made must be documented.

Appendix I – Bayswater College/Eurocentres Safeguarding Structure

Designated Safeguarding Lead:

Jamie Tyler, Business Development Director

Designated Safeguarding Persons:

James Herbertson, Director (London School)

Sarah Byrne, Principal (Liverpool School)

Michael Duncan, Academic Manager (Bayswater Summer/London School)

Nicola Richards, Academic Manager (Liverpool School)

Centre Managers (Seasonal staff, Bayswater Summer)

Training Requirements:

Designated Safeguarding Lead:

English UK Basic Awareness Course for Language School Managers

English UK Advanced Safeguarding for designated staff in ELT

Specialist Safeguarding for designated lead in ELT

Deputy Safeguarding Leads:

English UK Basic Awareness Course for Language School Managers

Advanced Safeguarding for designated staff in ELT (Internal)

All other staff:

English UK Basic Awareness Course for Language School Managers

Contact Details for DSL/DSPs

Role	Name	Location	Phone	Email
Business Development Director / DSL	Jamie Tyler	Head Office	07493429061	jamie@basywater.ac
Director / DSP	James Herbertson	Head Office/ London School	07946534814	James@bayswater.ac
Principal / DSP	Sarah Byrne	Liverpool School	07956337980	sarah@bayswater.ac
Academic Manager	Nicola Richards	Liverpool School		nicola@bayswater.ac
Academic Manager	Michael Duncan	Head Office/ London School	07716019833	mike@bayswater.ac

Appendix II – Local Authority Contacts

The LSBC for Westminster Borough is combined with Hammersmith & Fulham and Kensington & Chelsea Boroughs.

The DSL will confer with the LSBC for any incidents or reports that require specialist knowledge.

LSCB Contacts:

Telephone: 07739315388

Reporting Abuse contacts:

acesstochildrenssevices@westminster.gov.uk

02076414000

LADO

02076414000

Out of hours: 02076416000

Leonie Bingham

Child Protection Adviser

Telephone: 020 7641 4199

Email: lbingham@westminster.gov.uk

John Griffin

Child Protection Adviser

Telephone: 020 7641 1615

Email: jgriffin@westminster.gov.uk

Prabha Vashee

Child Protection Adviser

Telephone: 020 7641 4003

Email: pvashee@westminster.gov.uk

For LADO consultations and referrals please contact the duty Child Protection Adviser on:

Telephone: 020 7641 7668

Email: LADO@westminster.gov.uk

If you cannot reach a duty CP Adviser you can reach:

Kembra Healy

Safer Organisation Manager and Local Authority Designated Officer (LADO)

Telephone: 07823 532 538

Email: kembra.healy@rbkc.gov.uk

Tri-Borough MASH Team Manager, Catherine Hoy at choy@westminster.gov.uk

Appendix 2 c'td Local Contacts Liverpool

Liverpool LSCP Team:
5th Floor Cunard Building
Liverpool
L3 1JR
Tel: 0151 233 0493

Main LSCP contact: Jacqui Taylor - LSCP Safeguarding Coordinator.
Jacquelyn.taylor@liverpool.gov.uk

Liverpool LADO is Careline 0151 233 3700 (24/7)
<https://liverpool.gov.uk/contact-us/careline-for-children/>

Other contacts at LSCP team:
Jane Woodward - LSCP Education Engagement Officer.
Jane.Woodward@liverpool.gov.uk
Lucy Hunter - LSCP Engagement Officer. Lucy.Hunter@liverpool.gov.uk

Appendix III – Documentation required

Bayswater recognizes that additional documentation and information is required for under 18s travelling and studying on our programmes.

Below is a list of information required from agents/parents/guardians of under 18 students and the timescale.

Parental Consent to Travel to UK

- All under 18 year old students
- Required before confirming enrolment
- Contained within Junior Application form and Group Booking Form
- Additional parental consent form for 16-17 year olds applying for adult courses
- Checked with students/parents on arrival in college to ensure information is correct

Emergency Contact information

- Require 2x emergency contacts, preferably one within UK where possible
- Required as part of enrolment
- Group students automatically have group leader and agent assigned unless specifically request parent to be notified

Independent travel consent – students can travel to/from school unsupervised

- Required for individual students attending Junior Summer courses in London or Liverpool
- 14 to 17 year olds are eligible for this
- Under 14s must always be supervised traveling to/from school
- Required before arrival for those booking accommodation with Bayswater
- Required on first morning of class for those staying with UK Guardian

Date of review: 25 January 2021
Next review date: 25 January 2022