



Safeguarding Policy including 'PREVENT'

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Section 1: Churchill House Company Structure and Departmental Differences

This policy statement covers all company staff. However, the company includes two operational departments which work with minors and due to the distinct practical differences between the two departments there are separate documents outlining more detailed procedures for each:

For Churchill House School of English Language (CHSOEL) – The main school of English in Ramsgate - the most important additional document is the Churchill House (Ramsgate) Safeguarding Procedures document. All Ramsgate HO staff are included in the scope of the policy and this procedures document.

For Churchill House Summer Centres - Operates junior residential EFL summer schools at locations in rented venues around the UK - the key document is the Staff Handbook which includes residential specific instructions on safeguarding, health & safety and student supervision.

Section 2: Statement of Policy

Child Safeguarding is part of safeguarding and promoting welfare. All children regardless of their race, sex, beliefs and physical and mental abilities have the right to grow up unharmed, to have the opportunity to develop fully and have their basic expectations met.

Churchill House values the safety and well-being of the students in our care as our highest priority and requires all employees to play a full part in ensuring their safety, including maintaining staff/student ratios of 1 staff member to every 15 students at on-site activities (ages 11-15). Residential Centre ratios for younger students are stricter (see the Summer Centres Handbook).

Churchill House is an active member of the Young Learners English UK special interest group (YLEUK).

2.1 Definitions

2.1.1 For Churchill House Summer Centres

For practical reasons all students will be treated as minors.

2.1.2 For Churchill House School of English

The British Council and Child Safeguarding policies define juniors as those students under 18. There is no legal differentiation between 12 and 17 year olds.

At Churchill House School of English Language, whilst recognising this legal definition, we take a different approach to students aged 12–15 than with those aged 16–17. Experience has shown that a better result is obtained by applying different rules to, and less strict monitoring of, 16–17 year olds, than younger students, e.g. differing recommended times to return to their host families.

To enable us to operate this two tier system and for clarity we refer to students aged 12–15 as 'Juniors' in this document and students aged 16–17 as 'Young Adults'. Please remember that this is only an internal label – the correct external definition of juniors is all children under 18 years old.

Therefore please note that everything in the following document applies to 12-15 year olds but a more common-sense lighter regime is applied in the case of our Young Adult (16-17 year old) students (see our Care of 16 & 17 year olds in Main School Adult Courses Policy).

2.2 Scope

This policy applies to all divisions of Churchill House, including Churchill House School of English and Churchill House Summer Centres and covers all people employed by the company, including:

- All staff including temporary staff
- All host families
- Interns
- Contractors operating on behalf of the company

The policy is in place to protect all students studying with all divisions of Churchill House from:

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- Physical harm
- Emotional abuse
- Sexual abuse
- Neglect
- Harmful materials on the internet

2.3 Selection of Contractors

At the main school regular maintenance staff are DBS checked, occasional maintenance staff are brought in after school hours or are supervised.

External contractors (e.g. DJs, sport coaches) are chosen for their suitability for working with juniors and will not be allowed unsupervised access to juniors unless suitably checked/licensed, e.g. taxi drivers must have licences issued by their local authority.

2.4 Group Leaders

Churchill House terms & conditions of business require all groups to be accompanied by a Group Leader provided by the agent. The agent will be required to provide a statement that the Group Leader has had appropriate checks on their suitability to work with children. These statements will be recorded and saved. The Group Leader must also complete a declaration that they are not disqualified from working with children in the UK or abroad, under the terms of the Children's Act.

2.5 Residential Centres

All residential venues are educational establishments which carry out DBS checks on all staff. Maintenance contractors employed by the venue will have no unsupervised access to juniors

Section 3: Management Roles

The **Designated Safeguarding Co-ordinator (DSC)**, based at Head Office, has overall management responsibility for safeguarding policy and issues including:

- Liaising with management, staff and external agencies as necessary
- Acting as a consultant for staff to discuss/report concerns
- Maintaining a confidential recording system along with other designated responsible people (e.g. HoDS, Young Adult Welfare Officer (Main school))

For 16/17 year old students on adult courses in the main school the DSC is supported by the Young Adult Welfare Officer in the Teaching Department and the Social Club Manager.

For all-year-round group juniors, summer vacation groups and summer vacation individual juniors a Junior Liaison Officer (JLO) is appointed to check attendance, lateness and other problems, record these and report back to relevant Department Heads. In the case of small group or known Group Leaders a JLO may not be appointed.

In the residential centres the Centre Manager is the person in charge of safeguarding at each site and responsible for implementing and managing safeguarding and protection procedures at a local level. Any staff concerns at the summer centres about child safeguarding should be reported to the Centre Manager in the first instance. If the Centre Manager is unavailable or potentially involved in the concern, it should be referred directly to the Summer Centres Director at Head Office.

All **Heads of Department** and **Line Managers** are responsible for implementing child safeguarding policies within their team, and for fostering a positive attitude towards safeguarding, encouraging the reporting of concerns about students or other staff members.

Section 4: Safer Working Practices for Staff

4.1 Whistleblowing Policy

Churchill House encourages staff to involve management wherever they have a concern about a child's safety or adult's actions. If the staff member feels that they cannot discuss these concerns with their line manager or Centre Manager (Summer Centres) they should contact either the Designated Safeguarding Co-ordinator (DSC, main school) or the Summer Centres Director.

4.2 Concerns about Students

Staff can play a vital role in helping students in need. Concerns may come to the attention of staff in a variety of ways, e.g. through observation of behaviour or injuries or disclosure. The concern may not be related to Churchill House itself -it could be caused by the student's personal/family situation or bullying – but staff should still report the concern anyway.

Concerns could be raised by:

- Changes in student behaviour, or behaviour in certain circumstances
- Absenteeism (NB: it's important to record attendance/illness thoroughly)
- Withdrawal
- Shying away from others
- Physical signs of harm
- Students being flirtatious with adults, rather than other students, or seeking physical contact
- Seeing the student in suspicious situations, particularly those involving adults
- The student acting suspiciously with regard to notes or text messages. Often this means being noticeably secretive about their mobile phone/tablet
- Information heard/overheard, either from the student, their friends or their Group Leader. This includes FGM (Female Genital Mutilation) as it is illegal in the UK and there is a legal duty if an adult finds out /is told this has happened

Any member of staff who has a concern about a student, however insignificant this might appear to be, should discuss it with their line manager, Centre Manager, (Summer Centres) or the Designated Safeguarding Co-ordinator (DSC, Main School) as soon as possible. Remember that there might be several small clues that, together, point to abuse, which your information could be the key to. More serious concerns must be reported immediately to ensure that any appropriate action can be carried out as early as possible.

4.3 Responding to Student Disclosures

If a student makes a disclosure of abuse to a member of staff, they should:

- Listen to what is said; allow the student to make the disclosure at their own pace and in their own way
- Avoid interrupting except to clarify what is being said
- Keep your response short, simple and gentle - Avoid making comments or judgement about what they are telling you
- Only ask questions if you need to clarify something; don't ask leading questions or probe for information that is not volunteered
- Reassure the student that they have been heard and explain what will happen next
- Do not promise to keep any secrets
- Inform the DSC immediately or for residential centres the Summer Centres Director
- Record the conversation in writing on a Child Safeguarding Report form as soon as possible. Do not ask the child to make any written declarations
- Remember to note what is said and how it is said

NOTE: It is not the role of a staff member to investigate any concerns – they should report them to the appropriate person as quickly as possible.

TED – Asking Open Questions

When the child/young adult is telling you their story, give 'open instructions' (i.e. instructions that do not lead or direct) such as:

Tell me.....

Explain to me.....

Describe to me.....

This is called T.E.D.

Section 5: Managing Allegations

5.1 Recording

Incidents or behavioural changes that give cause for concern should be recorded on a Child Safeguarding Report form, copies of which are available from the DSC (Main School) or the Centre Manager (Residential Centres). It is important that records are factual and reflect the words used by the student. Opinion should not be given unless there is some evidence base which can be quoted. Records must be signed and dated with timings if appropriate. It is important to remember that any issues are confidential and other staff should only be informed on a 'need to know' basis.

Information to be recorded by the Centre Manager or DSC

- Name and date of birth
- The incident(s) with date(s) and time(s)
- A verbatim record of what student has said
- If recording bruising/injuries indicate position, colour, size and shape on body map (attached)
- Action taken could be further investigation and/or suspension, or a referral being made to LSCB

5.2 Storage of Records

All records should be passed to the DSC immediately (for Residential Centres this should be done via the Summer Centres Director at Head Office) – no local copies are to be made. The DSC will ensure that records relating to concerns for the welfare of students are kept securely. Information will be shared on a strictly 'need to know' basis.

5.3 Referrals to Social Services

It is the responsibility of the DSC to refer allegations or suspicions of abuse to the Designated Safeguarding Lead (DSL) within 24 hours (in writing or with written confirmation of telephoned referral). If a student is referred, the DSC must ensure that senior management and other relevant staff are informed.

5.4 Concerns Involving Members of Staff or Group Leaders

Any concerns that involve allegations against a member of staff should be referred immediately to the DSC (Main School) or Summer Centres Director (Residential Centres). They will inform senior management and the DSL to discuss and agree the action to be taken concerning the parties involved.

5.5 Staff Code of Conduct

All staff should take care not to place themselves in a vulnerable position in relation to child safeguarding. Interviews or work with individual students should be conducted in view of other adults. Excessive touching of students must be avoided. Physical intervention should only be used when a student is endangering themselves and/or others and must be recorded on an Incident Report form and, if possible countersigned by a witness.

5.6 Good Practice

The following are common sense examples of how to create a positive culture and climate. Good practice means:

- Treat all children equally, and with respect and dignity
- Conducting yourself in a manner that sets a good example to the participants
- Giving enthusiastic and constructive feedback rather than negative criticism
- Never using physical punishment
- Do not offer medicines or medical advice to juniors, if they are ill contact a first aider or ask a monitor to take them to the Designated Child Safeguarding Co-ordinator (Accommodation Manager)
- Observing the rules concerning social networking and electronic contact

5.7 Unacceptable Behaviour

- Endangering students through any action or inaction
- Engaging in rough, physical or sexually provocative games, including horseplay
- Engaging in any form of inappropriate touching
- Sexually suggestive comments to a child, even in fun
- Any form of Sexual Exploitation (a type of sexual abuse in which children are sexually exploited for money, power or status)
- Swearing or making offensive remarks within earshot of students
- In residential situations, entering children's bedrooms (unless it is essential e.g. because a child is ill)
- Using force as a form of discipline
- Taking a child to the bathroom/toilet without another responsible adult supervising
- Showing any favouritism to particular students or arranging work to spend time with a particular student/group of students
- Accepting children's inappropriate language/behaviour - This should always be challenged
- Reducing a child to tears as a form of control
- Do things of a personal nature for children or disabled adults that they can do for themselves (e.g. apply sunscreen)
- Invite or allow children to stay with you at your home
- Keeping photos of students or their contact details
- Making or responding to personal contact with students by telephone, SMS, messaging services, email or social media, either during or after a course (Young Adults on adult courses in the Main School may, for professional reasons, e.g. homework, communicate with teachers but only through their professional (and monitored) school e-mail addresses)

Residential Centres have further specific examples laid out in their Staff Handbooks e.g.

- Inviting children into their rooms
- Sharing a bedroom or bathroom with a child

Section 6: Staff Relationships with Students

Physical or emotional relationships between adults and students under 18 are completely unacceptable, and anyone that suspects that an adult is having or attempting to initiate such a

relationship should disclose this concern to the DSC immediately or in the case of a residential centre the Centre Manager.

All staff must be aware of the possibility that a colleague may be innocently compromised by a student attempting to initiate a relationship, which should also be reported to the DSC immediately (or for residential centres, the Centre Manager/Summer Centre Director) so that steps can be taken to protect them.

Any person in a position of trust engaged in sexual activity of any sort with students under the age of 18 years old is breaking the law (even though the legal age of consent is 16 years old.)

Staff Behaviour that may cause concern with regard to junior students and therefore should be reported:

- Creating an environment from which the adult can gain access to students e.g. changing shifts to coincide with a particular group of students, ingratiating themselves with their group leader
- Becoming particularly friendly with a particular group of students, as opposed to students in general
- Turning up to activities/lessons/meals in the company of the same student(s)
- Making or attempting physical contact
- Attempting to gain access to student records/photos
- Becoming aggressive/defensive when their relationship with students is discussed
- Unusual behaviour with mobile communication devices e.g. being particularly secretive, using their mobile phone frequently during activities.
- In Residential Centres being in an inappropriate residence building/corridor, particularly if not on pastoral care duty

Student behaviour which should be reported:

- Appearing nervous/agitated in the presence of a particular adult, or shying away from them
- Making or attempting physical contact
- Attempting regular contact with a particular member of staff
- Students being flirtatious with adults, rather than other students, or seeking physical contact
- Seeing the student in suspicious situations, particularly those involving adults
- The student acting suspiciously with regard to notes or text messages. Often this means being noticeable secretive about their mobile phone/tablet

Note: Any unexplained signs of physical harm should be disclosed immediately

Section 7: Physical contact with Children

Churchill House policy is to avoid any physical contact with children wherever possible, but we accept that the nature of our work will occasionally make physical touch unavoidable.

The circumstances where physical contact is appropriate can be summarised under the headings: 'Positive Touch', 'Negative Intervention' and First Aid. All staff must understand these concepts and their use in a school environment. However, staff should also remember that these concepts are subject to interpretation and should take these precautions to avoid misunderstandings:

1. Never touch a child in private; try to ensure that another member of staff or a GL is present
2. If you find yourself needing to touch a student in a small room (e.g. if you enter a bedroom to respond to a crying child), always leave the door propped open (not just unlocked)
3. The touch must be appropriate for the context and only as much as is absolutely necessary for the current need

7.1 Positive Touch

This can be to demonstrate skills (e.g. in sports coaching) or to reassure or convey approval/sympathy. **Always ask permission from the student first.** Touching or controlling the arm just above the elbow is

an appropriate initial focus for positive touch and personal safety. However, as the need for this type of touch is subjective it should be avoided wherever possible.

7.2 Negative Intervention

This is the use of reasonable force for self-defence, to restrain a child from hurting themselves or others, or to maintain discipline. It should always be used as a last resort – always try to talk to the student first. In the event of a breakout of aggression between students, call another member of staff to be present and if necessary assist with any intervention to limit risk of harm to both student and staff member.

Again, Negative Intervention will be judged subjectively - according to the situation, the force used and the role of the staff member. Avoid using it if possible.

7.3 First Aid

Giving first aid should be left to a qualified first aider wherever possible, but where emergency treatment is needed physical contact is always acceptable. If the treatment is more minor (e.g. dressing a cut/graze) physical contact is acceptable provided that it is done openly (preferably with another adult present) and that the contact is appropriate for the treatment needed. Ideally, however, the student should be asked if they are able to do the treatment themselves, if they are old enough e.g. they might be able to clean/dress a graze themselves.

Section 8: Taking Photographs of Students

Staff are not allowed to take photographs with their own equipment, distribute photographs/video taken, or keep/use photographs of students for personal use (it is strongly advised that this policy is followed with adult students as well). However, there are several circumstances where staff may have a legitimate business need for taking photographs of students, e.g. Marketing, Activities (such photographs should be taken using company equipment wherever possible and are the intellectual property of the company.) /Project Work/class leaving photos.

In which cases this policy must be followed.

- A staff member may take photos on behalf of a student, with the students permission and using the student's camera/phone, e.g. if they want a picture of themselves with their friends while on excursion.
- Photos should be taken in public with other adults or students present
- Students/staff must be dressed appropriately e.g. never in swimming costume/night wear
- Photos should not portray the students upset/distressed in any way, nor should they cause upset, distress or embarrassment

Staff Being Photographed with Students

1. Remember such photos may be viewed out of context e.g. on a student's Facebook page
2. For your own and your students' protection, use common sense in the site (public or an obvious classroom) and pose of any such photo

Residential Centres have further specific guidelines laid out in their Staff Handbook

Section 9: Electronic Contact between Staff and Students

Churchill House is a member of Young Learners English UK and therefore has agreed to be bound by the [YLEUK Social Contact with Juniors \(under 18\) Policy](#) (see separate document) on electronic contact between staff and students.

Teaching staff at the Main School are allotted professional e-mail accounts. These accounts can be monitored by the school management as necessary. It is strongly advised that all e-mail contact with adult students should be handled through these accounts, e-mail contact with 16 & 17 year olds in adult

classes must be handled through these accounts, e-mail contact with under 15s is forbidden. Any such contact would result in disciplinary investigation and action including dismissal.

The Summer Centres have further detailed procedures concerning electronic and social media contact laid out in their staff Handbook.

Section 10: Recruitment

All divisions of Churchill House will take steps to ensure that its staff recruitment process follows the guidelines for safer recruitment as laid down by the British Council and YLEUK with regard to advertising, interviewing, suitability checks and safeguarding training. Please see the separate detailed Recruitment Policy statements for Teaching and Non-Teaching staff (Main School) and Recruitment Policy for Summer Centres.

Section 11: 'PREVENT'

The School adheres to a 'Preventing Radicalisation and Extremism Policy' (see Company Manual). Please make the DOS or the Social Club Manager (lead person) aware of any concerns.

Rex Stickland (Management)

Sue Thompson (Designated Safeguarding Co-ordinator)

Reviewed annually

Last Update July 2018 by: Sue Thompson, (DSC)



CHURCHILL HOUSE

School of English Language

DIRECTOR: REX A.P. STICKLAND *Bsc Hons*

Appendix F: Body Map

Date:	Centre:
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Name of Child:	
Date of birth:	
Interviewer:	
Role:	
Witness:	
Role:	

