

WESTBOURNE ACADEMY
SAFEGUARDING POLICY

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1. Policy Statement

Safeguarding is looking after students properly and keeping them safe. Westbourne Academy has a Safeguarding Policy because:

- it helps to create a safe and positive environment for students, particularly those under 18 and any adults at risk
- it makes clear what Westbourne Academy must do to protect all students
- it is a statement of intent that demonstrates Westbourne Academy's commitment to keeping students safe from harm
- it provides a basis for protection of adults associated with Westbourne Academy, e.g. staff, homestay providers, group leaders and any others.

1.1 Context

Westbourne Academy is a year-round English language school in the Westbourne area of Bournemouth. It:

- is located in one 3-storey building on the corner of a road junction
- has been owned by New City College, a state sector FE college since 2016
- offers year-round classes to students aged 16+, some closed group classes and a Junior Programme course for students aged 14-17

The number of 16/17 students varies; it is often 5% in winter and can be 40% in summer. 16/17s are individual bookings usually sent by agents, or come in closed groups with a teacher/group leader.

Students aged 14-15 may only be booked onto the Junior Programme Course as part of a group who are joined by a Group Leader for the duration of their course. Students aged 14-15 may only attend a course for a maximum of 3 weeks.

1.2 Scope of policy

This policy applies to all Westbourne Academy students regardless of gender, race, religion, sexuality, disability, or any other factors. Certain sections of the policy apply only or predominantly to under 18s.

1.3 Adult responsibilities

All adults associated with Westbourne Academy, whatever their role, are expected:

- to share the school's commitment to safeguarding and protecting all students
- to follow this policy
- to report any concerns about students, however small, to the safeguarding team (see 1.4) if the adult considers the safety and well being of students is at risk

For adults working with **students under 18**, there is a legal ‘**duty of care**’ to look after students as a caring and responsible parent, protecting the students from that which is not in their best interests. Reporting concerns about abuse of an under 18 is part of the legal duty of care.

1.4 Structure, staffing and responsibilities

There is a team of staff who have all had specialist training to deliver effective safeguarding at Westbourne Academy.

<i>Name</i>	<i>Safeguarding role & school role</i>	<i>Email</i>
Mark Halls	Designated Lead Safeguarding Officer (DSL) , Principal	mark.halls@westbourneacademy.com
Vanessa Elphick	Deputy Designated Safeguarding Lead (Deputy DSL) , Head of Accommodation	accommodation@westbourneacademy.com
Mark Halls	Designated Safeguarding Officer (DSO) Director of Studies	mark.halls@westbourneacademy.com
Gary Garfield	Designated Safeguarding Officer (DSO) , Academic Administrator	academic@westbourneacademy.com
Erin Fry	Designated Safeguarding Officer (DSO) , Office Manager / Head of Admin	erin.fry@westbourneacademy.com

Phone contact for everyone: **01202 752 777** or out of hours, via the emergency phone **07974 348 453**

1.4.1 The DSL has overall responsibility for safeguarding at Westbourne Academy;

- for ensuring all reasonable steps have been taken to promote the safety and welfare of all students, particularly those under 18 and adults at risk
- to lead a quick response in the event of any serious safeguarding issue
- to contact the appropriate authority in the event of reports of abuse
- to ensure safeguarding documentation is kept current and communicated to all as required
- to ensure training of staff is effective and kept up to date

1.4.2 The DSL is supported by the Deputy DSL and four Designated Safeguarding Officers. The Deputy DSL is Vanessa Elphick.

If both DSL and Deputy DSL are absent, one of the other DSOs will deputise.

A member of the Safeguarding Team is available 24 hours per day and 7 days per week on the Emergency phone.

The DSOs each have a safeguarding focus on different areas of Westbourne Academy life paying particular attention to students aged under 18:

Vanessa Elphick – Accommodation and homestays

Gary Garfield & Eloise Warren – Academic programme

Erin Fry – Student welfare and general school matters

1.5 Meetings

The Safeguarding Team meet every week to discuss Safeguarding concerns or issues and decisions.

In the event of any serious safeguarding incident/issue or a change in requirements, the Safeguarding Team will hold a meeting.

1.6 Student awareness

Various elements of the safeguarding policy are communicated to students at different times:

- some elements in publicity
- on receipt of a completed booking form, the Parental Consent Form is sent to ensure students and parents have realistic expectations

- a parental consent form must be completed and returned before booking is processed onto our system
- a map of their journey to and from school is sent at the same time as the accommodation details prior to arrival
- a map also awaits U18s on their arrival at homestays. Homestay hosts go through key safeguarding information about the local area and travel to/from school
- on their first day at Westbourne Academy, students meet (a) member(s) of the Safeguarding Team who explain key elements of the Student Handbook and provide other detailed safeguarding information. Students also receive their safeguarding wristband with the emergency phone number on it which they are told must be worn at all times.

1.7 Legal and documentary framework

The following were used to help write this policy:

<u>Legislation</u>	The Children Act 1989. Duty to safeguard and promote the welfare of children Health & Safety at Work Act 1974. Safety in the workplace for employees and others
<u>Documents</u>	Keeping Children Safe in Education + Summary for Staff (Sep 2021) Working Together to Safeguard Children (July 2018) AccreditationUK Handbook 2019-22 and Care of Under 18s: Guidance for ELT Providers

1.8 Policy review and availability

This policy will be reviewed:

- at least annually between October - April
- if there are changes to relevant legislation
- if a serious safeguarding issue happens that leads to changes in policy or procedures

This policy is available

- in full form on the website
- to staff in the Policies Folder in the staff room
- in the Interactive Whiteboard Folder on the WA server
- in condensed form for homestays, group leaders and any other stakeholders

2. Code of Conduct

It is important to build trust and respect between students and the adults who work with them. Having clear boundaries of interaction helps to build that trust; everyone knows what is and isn't OK.

Westbourne Academy students come from many different countries and cultures, and may not know what behaviour is considered acceptable and usual in the UK for adults working with under 18s.

A strong Code of Conduct protects everyone, both under 18s and the adults working with them, from inappropriate behaviour or accusations of inappropriate behaviour. Transparency is important. Consider whether you would be happy for anyone to see how you were interacting with an under 18.

2.1 Position of Trust

Every adult engaged by Westbourne Academy is in a 'Position of Trust' for all Westbourne Academy students aged under 18.

The Sexual Offences Act 2003 states that anyone in a 'Position of Trust' is breaking the law to engage in any sort of sexual activity or grooming (preparation for sexual activity) with an under 18 they are working with or caring for.

2.2 Adults being a role model

All adults should help students behave in the best way by modelling great behaviour to them, for example;

- show respect to everyone, other adults and students

- be tolerant of others, especially those from other races, religions or who have different opinions; it is fine to disagree with somebody, but not to put them down or ridicule them
- be polite and show good manners in all situations and with everyone
- use good language; no swearing or rude words
- be patient with others, especially if they don't understand things quickly
- be interested in others and help them develop good social skills
- be clear with boundaries and respond calmly but firmly if they are broken

In addition, being a good role model also requires adults to follow the behaviours/guidelines that follow below.

2.3 Appropriate adult behaviour with under 18s

Adults should not practise, nor lay themselves open to accusations of, inappropriate behaviour. Here are some 'dos' and 'don'ts'.

2.3.1 Physical contact

- do not have physical contact of any sort, unless (a) situation requires it, e.g. giving first aid (b) it happens in a public space.
- if physical contact is necessary, talk through what is happening and ask permission to touch areas
- if under 18 initiates physical contact, e.g. a greeting or parting hug, don't reject them. Make the contact safer by turning it into, e.g. a brief sideways hug. The aim is not to stop normal human behaviour, but always be aware of how others might view what you are doing.

2.3.2 Closed space

- never be alone in a closed room with an under 18. If you need to talk to them 1:1 do it in a public or nearly public space
- if you need to enter a room to help an under 18, e.g. a sick one in homestay bedroom, do it with another adult present and the door open
- if giving 1:1 lessons for an under 18, the teacher and student will be seated opposite each other at a desk viable through the door window.

2.3.3 Privacy – particularly in homestays

- be clear about which rooms in the house are private (e.g. bedrooms, bathrooms) and which are public, (e.g. kitchen, living room)
- always knock and ask permission to open door of private room; best to knock once as warning, then knock again 5 seconds later to announce you are opening door in a further 5 seconds

2.3.4 Socialising with under 18s - staff

- as stated in staff contracts, no social contact with students (of any age) is permitted unless approved by the DSL
- no future contact between staff and under 18 students after the end of the course, unless via the official Westbourne Academy email addresses and in relation to educational questions
- under 18s should not try to contact staff online or via text; if staff receive messages from under 18s, report them immediately to the Safeguarding Team who will talk to the under 18 involved.

2.3.5 Socialising with under 18s - homestays

- keep contact with under 18s, e.g. by phone text or online, appropriate and on subject
- contacting students via social media is usual; check your privacy settings and make sure anything they can view is OK for under 18s
- do not give alcohol to under 18s if having a social event (party, BBQ) at home; that is against school rules (see 2.6)

2.4 Favourites and gifts

Adults must be fair and even with all students. Don't have favourites; if you do, the other students feel left-out and the adult could be accused of favouritism.

Any gifts which students bring to staff have to be reported to the DSL.

2.5 Appearance

All adults and students should dress appropriately for the situation and respect the sensitivities of others, for example;

- at all times; no clothes with slogans or images that could upset others; staff to always be well-groomed
- in class; students – no beach clothes, tight shorts or short tops. Staff: - smart wear, jeans are not permitted
- for activities; - appropriate footwear is required, e.g. trainers for most sports
- around the homestay, particularly getting up and going to bed and in hot weather, always cover up when students are at home, even if walking a short way down the hall.
- no inappropriate comments should be made on someone else's appearance.

2.6 Alcohol, drugs and smoking

- school rules for under 18s state they must not consume alcohol or take drugs whilst on the course; if staff or homestays are aware of under 18s doing either, they must tell the Safeguarding Team
- if any under 18 students talk about alcohol, drugs or cigarettes, adults should use the opportunity to talk to them about the dangers of addictive substances and taking them to excess, rather than joke about them

2.6.1 Alcohol, drugs and smoking - staff

- to use alcohol and cigarettes in moderation when in front of students, especially when students under 18 are present, (e.g. at school smoking area and any social events involving alcohol)
- to ensure that no under 18s are given alcohol by other students during social activities
- being under the influence of drugs or excessive alcohol will lead to disciplinary action

2.3.5 Alcohol, drugs and smoking - homestays

- under 18s are usually placed with non-smoking homestays; please smoke outside if you need to
- do not give alcohol to under 18s (see 2.3.4), it is against school rules

2.7 Transport

- staff should not take students (of any age) in their own vehicles, unless permitted by WA and should ask students to sit in the back seat.
- if homestays take under 18s in their car, the under 18 should sit in the back seat

2.8 Whistleblowing

Adults working with under 18s have a duty to tell the Safeguarding Team if they feel colleagues or other adults working with under 18s are not following the Code of Conduct. For staff, this is a legal obligation.

3. Child Protection

Child protection refers to the need to protect students under 18 from abuse. Westbourne Academy have procedures in place to do that and below details what response is required in the event of abuse happening.

3.1 Adult responsibilities

All adults associated with Westbourne Academy (staff, homestays, group leaders and any others) have a responsibility to ensure abuse does not happen to Westbourne Academy students, and to report any concerns they have.

Adults need to respond in the following situations:

- if they notice anything themselves
- if they are told anything by another person, adult or under 18
- if a person discloses about abuse happening to them (see 3.4)

3.2 Who to inform

Any concerns or accusations of abuse must be passed to the Safeguarding Team at Westbourne Academy (see section 1.4) who are available 24 hours per day, 7 days a week. (See also 3.5)

If the reporting adult feels the response from the Safeguarding Team is inadequate, that person can contact the relevant local authority direct.

Children's First Response Hub

<https://www.fid.bcpccouncil.gov.uk/kb5/poole/fis/service.page?id=nOfmlmxxaow>

Out of hours service on 01202 738 256

01202 123 334

childrensoohs@bcpcouncil.gov.uk

3.3 Abuse and recognising symptoms

Abuse is any action by another person that causes significant harm to a child but can also be associated with failing to prevent harm. A child in the UK is defined as anyone under the age of 18. Abuse can have lasting and serious effects on the victims. Abuse can happen in many different ways but there are 4 main types:

Name	Type of abuse	Symptoms
Physical abuse	Causing physical harm, e.g. hitting, throwing, burning or inducing illness	<ul style="list-style-type: none"> * physical marks; bruises, cuts, burns * injuries that cannot be easily explained * reluctance to be around certain others * suddenly covering up (e.g. long sleeves in summer) to hide marks * being very passive and withdrawn * being aggressive and lashing out
Emotional abuse	Making a person feel worthless, inadequate and insecure, e.g. through continual negative comments, putting them down, making fun of them or taking no notice of them.	<ul style="list-style-type: none"> * signs of having low self-esteem, e.g. * over-reacting to mistakes * being withdrawn, sad, not socialising * mood swings from passive to aggressive * eating disorders * self-harm
Sexual abuse	Engaging in any form of sexual activity with an under 18 ** (see below), from inappropriate touching outside clothing to full penetration. Making an under 18 watch sexual acts or produce sexual images. Preparing under 18s for sexual abuse (grooming) is also abuse; done in person or online	<ul style="list-style-type: none"> * showing sexual knowledge beyond years, either verbally or physically through gesture * genital pain or infections * reluctance to be around others * bedwetting, nightmares, poor sleeping * being withdrawn, secretive or isolated * eating disorders or substance abuse * having unexplained gifts
Neglect	Not properly taking care of an under 18, e.g. not providing enough food, clean clothing, proper medical care. Also failing to keep	<ul style="list-style-type: none"> * being hungry and/or tired * looking unhealthy * badly dressed in unwashed clothes

	under 18s safe from danger or not supervising them adequately.	<ul style="list-style-type: none"> * smelling bad and not having bathed * untreated medical conditions * frequently left alone for long periods
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A change in behaviour is usually a key symptom that something is not right in the life of an under 18.

** The legal age of consent for sexual intercourse in UK is 16. However, for any adult in a **position of trust**, looking after or working with under 18s, the **legal age of consent is 18** (see also 2.1)

3.4 Disclosure: an under 18 talks about being abused

If an under 18 starts to tell you about abuse, there are things you must and must not do.

You must:

- remain calm
- listen – give full attention
- ask only open questions: ‘What do you want to tell me?’
- tell them you have to pass on the information to others who can help them more than you can
- reassure the under 18 they have done the right thing to tell you
- quickly write down exactly what was said
- report to the safeguarding team

You must not:

- panic, show emotion or pass judgment
- start to interrogate or ask leading questions; that is not your job
- promise to keep any secrets
- interpret the under 18’s words; write exactly what they said (as well as you can remember); if they used their own language, state that
- involve anyone else during the conversation; the under 18 has chosen to talk to you.

In summary: receive (listen) - reassure - record - report

3.5 Confidentiality and what happens?

Any concerns or accusations of abuse **must remain confidential** after they have been reported to the Safeguarding Team. The identity of the under 18 and the person alleged to be harming them must not be discussed with anyone, even family members.

When a child protection concern or allegation is made, the DSL will quickly take appropriate action, typically

- making sure the under 18 is safe
- (if the situation requires immediate intervention, contact the Police (999))
- discuss the situation with other members of the safeguarding team
- Contact **Children Services Fire Response Hub**. Out of hours service on 01202 738 256. Office hours: 01202 123 334. Email: childrensfirstresponse@bcpcouncil.gov.uk
- proceed by following their advice

3.6 Difference between concern and serious issue

All safeguarding concerns and serious issues or allegations need to be reported to the Safeguarding Team. To clarify the difference between them

- concern: something seems not right or makes you feel uneasy; there is no immediate danger to the under 18.
- serious issue: the under 18 could be in danger of harm or abuse; a quick response is required.

3.7 Other types of abuse

There are other types of abuse to be aware of. Bullying is sometimes called the 5th form of abuse

<i>Name</i>	<i>Type of abuse</i>	<i>Symptoms</i>
Bullying	Any actions which are repeated and deliberately done to cause unhappiness to an individual or group, e.g. physical harm or threatening harm, verbal taunting, exclusion or discrimination. Online bullying is very hurtful as it can be anonymous and 24x7	<ul style="list-style-type: none"> * becoming unhappy or withdrawn * being apart from others - isolated * looking sad at reading an online message * reluctance to be with certain others
Child Sexual Exploitation	An adult manipulates and grooms an under 18 for sexual activity. Often selecting vulnerable under 18s, the adult gives time, affection, shows interest, gives gifts, money, alcohol, drugs etc. At some point the adult threatens to withdraw what they are giving unless the under 18 gives sexual favours in return	<ul style="list-style-type: none"> * having a much older boy/girlfriend * being absent from school * appearing with unexplained gifts * other signs of sexual abuse
FGM Female Genital Mutilation	A female's external genitals being cut or changed when there is no medical reason. Illegal if done in UK. Must be reported to safeguarding team and police	<ul style="list-style-type: none"> * withdrawn, anxious or depressed * asking for help without being explicit * difficulty walking, sitting or standing
HBV	Crimes committed to protect the honour of a family and/or community; may include FGM or forced marriage. Whatever the motivation, these are abuse according to UK law.	<ul style="list-style-type: none"> * persistent absence * becoming withdrawn, less sociable * decline in behaviour or performance * family member keeping close eye on student

3.8 Vulnerable students and early help

Some students may be more vulnerable due to:

- being in a different country and culture, or away from home for the first time
- being immature
- having special educational needs
- having physical limitations
- having mental health issues

Reporting any concern quickly, particularly about a vulnerable student, allows for early help or intervention and reduces the likelihood of small problems becoming large ones.

3.9 Dealing with people accused of abuse

As well as ensuring the safety of the under 18 suffering abuse or suspected abuse, the DSL must think about the person accused of abuse. If the accused is connected to Westbourne Academy, these procedures will apply, usually following a conversation with the Children's Services First Reponse Hub:

3.9.1 Accused is a staff member

- if the accused has acted or is acting in a way that endangers students or other staff, the Police will be called
- if the accused is subject to an allegation which the Children's Services First Reponse Hub advise should be dealt with internally, the DSL will refer to HR department prior to beginning the Westbourne Academy disciplinary process (see Policies Folder in staff room)
- the accused may be suspended during the disciplinary process

3.9.2 Accused is the DSL

- if members of the Safeguarding Team are informed of an accusation against the DSL, the Deputy DSL (or another member of the Safeguarding Team in their absence) will contact the Managing Director of Westbourne Academy, London 020 7510 7652
- the Children's Services First Reponse Hub will then be contacted for guidance
- if the matter is to be dealt with internally, the Managing Director will consult with HR department prior to beginning the Westbourne Academy disciplinary process

3.9.3 Accused is another under 18 student at Westbourne Academy

- the parents of the accused will be contacted quickly
- as the parents of the accused are not present, a member of the Safeguarding Team will be allocated to support the accused through whatever process is happening, which could include meeting the Police or other local authorities

3.9.4 Accused is another student (over 18)

- if the accused has acted or is acting in a way that endangers students or other staff, the Police will be called
- a member of the Safeguarding Team will be allocated to support the accused through whatever process is happening, which could include meeting the Police or other local authorities
- the DSL will refer to the WA Terms and Conditions of Enrolment
- the accused may be suspended during investigation
- the accused may be expelled dependant on the outcome of the investigation

3.10 Records

Safeguarding records must be kept as follows:

- the person reporting a concern or serious issue must begin the report providing their observations and using a Westbourne Academy safeguarding report form available from the DSL
- the Safeguarding Team then add to the form, recording their response and any follow up
- reporting can be done online or in hard copy
- all child protection information and records are confidential and kept securely and apart from other records. Child protection records and information must only be accessible to the Safeguarding Team.

3.11 Students aged 18 or over and abuse

Any students aged 18 or above suffering from, or suspected of suffering from, abuse also need to be reported to the Safeguarding Team who will inform the appropriate authorities.

4. Training

4.1 Responsibility for training

The overall responsibility for effective safeguarding training lies with the DSL.

- staff, homestays and group leaders receive Basic Awareness (level 1) training appropriate to their role
- safeguarding team members have Advanced Safeguarding (level 3) training so that all have DSL level understanding of safeguarding and any of the team can assume DSL child protection responsibilities if required

4.2 How and when training is delivered

4.2.1 Basic Awareness training

- introductory online training is done by all staff; a certificate is evidence of successful completion
- homestays are offered a free online training with a certificate on successful completion. They are also provided training annually by a member of the WA Safeguarding team. This is done on-site where possible. Should both of these fail, the Head of Accommodation (a member of the safeguarding team) will provide a 1:1 session with the homestay on their re-visit.

- in addition, there is face to face training as part of induction which refers to Westbourne Academy documents and procedures and ensures that staff, homestays and group leaders know the practical ways in which safeguarding is delivered and their responsibilities
- Basic Awareness training is refreshed for staff and homestays by members of the Safeguarding Team:
 - at least annually
 - when changes are made to the policy,
 - in response to a serious safeguarding issue
 - when staff or homestays raise safeguarding issues

4.2.2 Advanced (from now on called Specialist) Safeguarding for DSL

- training is delivered by an outside trainer, from the local authority or industry specific bodies
- refresher training happens every 2 years. The Safeguarding Team stay aware of changes via the monthly English UK bulletin and the regular Accreditation UK Newsletter.
- attending DSL Forum for Language School meetings which are held in conjunction with CP Council.

4.3 Ensuring understanding

- staff and homestays taking online introductory training have to answer questions to successfully complete the training
- face-to-face refresher training includes verbal check questions and, at least annually

4.4 Recording training

4.4.1 Training - evidence

- introductory online training and specialist DSL training have certificates as evidence
- induction training, including safeguarding, is recorded on an induction form; this applies to all staff, homestays and group leaders
- refresher training certificates (DSL refresher) as evidence
- a staff training spreadsheet is updated at each refresher session for those who attended

4.4.2 Safeguarding training overall record

Training is recorded showing dates, people attending, brief content and who delivered the training. This is done via staff and homestay files.

5. Safer Recruitment

As part of the commitment to ensuring a safe and positive environment for students at Westbourne Academy (see opening statement), recruitment procedures are followed so that only suitable people are appointed to work with our students. Particular procedures are in place because students may be under 18.

5.1 Scope of recruitment checks

Safer Recruitment procedures shown below predominantly apply to staff and homestays. Certain checks are also required of people not directly employed by Westbourne Academy, i.e. group leaders and sub-contractors (e.g. taxi drivers meeting under 18 students at airports) to ensure they are suitable.

5.2 Recruitment materials

Recruitment materials include information for candidates on:

- the expectation that they will share Westbourne Academy's safeguarding ethos and actively engage in keeping students under 18 safe
- the need for certain checks to ascertain their suitability to work with Westbourne Academy students (see 5.4)

5.3 Safeguarding addressed at different stages of recruitment

Safeguarding is addressed in the following ways at different stages of recruitment

- job description / information to homestays outlines safeguarding responsibilities for role
- advertising role includes wording specifying need for candidate to commit to safeguarding ethos, and list of checks that will be made on applicants

- Westbourne Academy application forms must be completed; including signing section on past criminal record and section stating contents of application form are true
- pre-interview documentation includes Condensed Version of Safeguarding Policy or sections of Safeguarding policy so that they can be discussed during interview
- interviews are carried out by at least one person who has had Safer Recruitment training
- interviews include questions on candidates' attitudes to working with students under 18
- at least 2 references are collected: references include question on candidates' suitability for the role, which includes working with under 18s
- pre-appointment checks are made before candidate begins work
- safeguarding training happens (see section 4)
- staff/homestays are monitored during a probationary period and safeguarding procedures are discussed in more detail

5.4 Checks to deter unsuitable candidates

Before submitting their application, candidates will be told that:

- proof of identity is required
- DBS checks are required for successful applicants (covering all adults resident in a homestay – see 5.5.2)
- if the candidate has lived/worked outside UK in the previous 5 years, overseas Police checks are required if the candidate has lived/worked in a country for 6 months or longer
- if applicant is non EU resident, proof of right to work is required
- all gaps in CVs/periods in their life must be accounted for
- references will be collected and will specifically ask about the candidates' suitability to work with under 18s
- Prohibited List checks will be done for staff who have worked in state or independent education

5.5 DBS and Overseas Police check - scope

5.5.1 Staff

- a new Enhanced DBS is required for applicants, unless they are members of the DBS Update Service
- DBS renewals will be done every 3 years for staff in continuous service and annually if staff have employment gaps of more than 3 months

5.5.2 Homestays

- a new Enhanced DBS is required for homestays taking students under 18, unless all resident adults (aged 18 or older) are members of the DBS Update service.
- the route for checking all resident adults is usually done by the main carer. The position/role of 'Host Family Member (child.edu) is selected on the DBS application form thus allowing the local Police to provide information on other adults resident in or closely associated with the address
- or every adult in the homestay can have individual DBS checks

5.5.3. Group Leaders

- provide a Police check from their country OR
- have a written guarantee provided by the agent or head teacher employing them that the group leader has a current clear Police check
- new Police checks or letters of confirmation are required annually for visiting group leaders

5.5.4 Sub-contractors (e.g. taxi companies and bus companies used for under 18s)

- confirmation from the senior manager of the company that all the employees / drivers used for work with Westbourne Academy have clear DBS checks
- renewal confirmation required every 3 years
- self-employed – see a recent (within 3 years) DBS check

5.6 Response if difficulties with pre-appointment checks

If certain checks have been impossible to collect, or not yet been returned, these procedures will apply.

5.6.1 DBS applied for, but not yet returned

- Homestay - cannot use a homestay for under 18s until the DBS is returned and seen by WA staff
- Staff
 - do separate Barred List check
 - do risk assessment for role, situation and level of contact with under 18s
 - members of Safeguarding Team make joint decision on whether to proceed

5.6.2 Overseas Police check not possible

- Homestay - cannot use a homestay for under 18s until Police check is returned and seen by WA staff
- Staff
 - use DBS list of overseas Police checks to verify circumstances of why check isn't possible
 - collect additional references from person in country where Police checks not possible; preferably from person who has seen candidate with under 18s
 - review candidate's application and ask further safeguarding questions
 - members of Safeguarding Team make joint decision on whether to proceed

5.6.3 Two references not available

- Staff and homestays – must collect and have evidence of at least 2 references. References should not normally be from family members, (this may be acceptable in certain situations)
- This applies to all staff employed since January 2014 and all homestays employed since January 2016
- Staff and homestays are not accepted to commence work until 2 references have been received

5.7 Applicants with a criminal record

Briefly:

- arrange meeting with applicant and at least 2 members of the Safeguarding Team to discuss applicant's criminal record
- consider the following during the meeting and when deciding whether to proceed with employing the applicant
 - nature of crime and how serious it was
 - when it occurred and if it was repeated
 - how the crime impacts on the role applied for
 - applicant's attitude to the crime and also to working with under 18s
- decision about employing candidate to be made by Safeguarding Team who met applicant
- without mentioning the nature of crime, the decision is to be recorded showing date, process and who came to decision

5.8 Record keeping

A database (single central record) is kept to track employment documentation and pre-appointment checks. There is one database for staff recruitment and one for homestay recruitment.

6. Implementing Safeguarding

Westbourne Academy has a commitment to keeping students safe from harm (see opening statement). There are many procedures used to deliver that commitment, particularly for students under 18 and vulnerable students.

6.1 Identifying students under 18

Westbourne Academy has various identifiers:

- staff = lanyard and staff badge
- visitors = visitor badges on red lanyards
- students aged 18 or above = no identifier
- students aged 16-17 = wristbands (blue) also containing WA emergency phone number
- students aged 14-15 = wristbands (yellow) also containing WA emergency phone number

Anyone (whatever age) seen not wearing one of the identifiers listed above should be challenged by staff and asked to accompany the staff member to reception to confirm their status.

Students to be informed of the system and why it matters to always wear the appropriate identifier.

6.2 Risk Assessments

Risk assessments identify hazards and then show ways to reduce the likelihood of harm happening from those hazards. They are legally required for:

- buildings
- activities and excursions organised by Westbourne Academy

They are also used for situations where Westbourne Academy has a legal duty of care responsibility for students aged under 18 whilst on a Westbourne Academy course, for example:

- arriving and departing UK and travelling to Westbourne Academy
- unsupervised time, e.g. when under 18 students are not attending organised lessons / activities
- travel away from the local area, particularly at weekends
- missing students; how to respond when under 18s are not present or in contact at the times expected
- joining excursions or social activities not organised by Westbourne Academy

6.2.1 Process for producing and using risk assessments

- all sports and social activities and visits include a risk assessment
- produced by individual with responsibilities in that area
- risk assessments produced by venues being visited are requested and records kept up to date by Westbourne Academy staff. Copies of these risk assessments are then used in line with Westbourne Academy's own risk assessment to suit their international students
- signed off by two members of Safeguarding Team and added to central files kept on WA server
- risk assessment and any changes to procedures communicated with staff (school building & activities)/ homestays (homestay building) / group leaders (activities)
- staff affected by risk assessment to read, sign and date; evidence kept centrally
- staff to pass on key information to students as shown on risk assessment
- risk assessment process is ongoing: changes identified by those using risk assessments to be recorded and acted upon by members of the Safeguarding Team

6.3 Supervision: - levels and ratios

Westbourne Academy recognises its overall 'duty of care' responsibility for the safety of students attending its courses, particularly those under 18. Westbourne Academy staff have:

- local knowledge and knowledge of UK laws
- understanding of the cultural norms of UK
- identified hazards and ways to reduce them via risk assessments (see 6.2)
- developed rules and guidelines for students based on the above points.

Westbourne Academy works with parents and group leaders to provide proper and safe levels of supervision, including times when students are unsupervised. Because of the legal 'duty of care' on Westbourne Academy to safeguard students under 18, and because of the points listed above, Westbourne Academy's rules and guidelines must be followed and take precedence over parental or group leader requests.

6.3.1 Unsupervised time – communication

Unsupervised time for students under 18 requires safety measures and limits. These have been identified based on risk assessments and included in various documents. Unsupervised time can happen in a range of situations.

Information on these is communicated at certain times to agents, parents and group leaders and signed consent given by the parent / student representative (sometimes it must be the parent) as follows:

<i>Unsupervised time</i>	<i>Where rules / guidelines to be found</i>	<i>When information is communicated to students / parents / agents / group leaders</i>	<i>How agreement / permission given</i>
Outside class - daily routine, (e.g. travel to/from homestay, curfew times, attending dinner at homestay or checking in, staying safe in local area)	* Website page: under 18 section / student welfare * Student Handbook (hard copy and on website)	Pre-booking Pre-arrival information On arrival at intake During course as required	Standard Parental Consent form (to general terms of whole course.)
Accommodation – must be homestay. Private home arrangements for u18s (see 6.6)	* Website page: accommodation / under 18 section	Pre-booking Pre-arrival information	
Travel from/to airport to homestay unaccompanied (see 6.9)	* Website – arrival information * Travel form	Pre-booking Pre-arrival information	Unaccompanied travel consent form
Travel outside local area, particularly overnight	* Website page: under 18 section / student welfare * Student Handbook	Pre-booking Pre-arrival information On arrival at intake During course as required	Travelling outside area + overnight away consent form: separate form for every occasion
WA organised excursions, including organised time away from staff (e.g. shopping time)	* Website page: under 18 section / social programme * Risk assessments for each activity	Pre-booking Pre-arrival information During course/ activity as required	Standard Parental Consent Form
Joining excursions not organised by Westbourne Academy	* Website page: under 18 section / social programme * Student Handbook	Pre-booking Pre-arrival information On arrival at intake During course as required	Separate consent form

6.3.2 Supervision ratios

- Excursions organised by Westbourne Academy have at least one accompanying staff member
- Accompanying staff will first have joined an excursion led by at least one experienced WA staff, to learn proper excursion procedures
- If under 18 students join the excursion, there are two WA staff members
- If a closed group with under 18s is on excursion, their group leader must accompany the group
- During excursion, under 18s will have some time away unsupervised by staff, following certain safety limits. However, there will always be two staff, so in the event of any incident, one can attend to the incident whilst the other looks after the remaining students.
- An experienced WA staff member will always accompany longer excursions involving overnight stays. These excursions have one male and one female member of staff accompanying them.

6.4 Missing students

The general principle is that Westbourne Academy must know the whereabouts of its students under 18 at all times. If an under 18 student is scheduled to be in class or at an activity, the school responds quickly if they are not there.

6.4.1 Student aged 14-17 missing class

- within 30 minutes of the start of school, a member of the Safeguarding Team will check classes and report any missing students to the Accommodation Officer(s) who have responsibility to follow up by
- (i) phoning the homestay and/or the student's mobile
- (ii) if there is no response within one hour a member of the Safeguarding Team will visit the student's homestay
- (iii) if there is still no contact from the student during the visit, the Police will be informed together with the student's parents at the earliest possible time.

6.4.2 Student aged 18 or above missing curfew

- There is no curfew for students aged 18 or above. If they do not return home overnight, the homestay phones the school in the morning / the school becomes aware at registration the next morning (see 6.4.1.)

6.4.3 Student aged under 18 missing curfew

- the homestay calls the student to ascertain their whereabouts. If the student is on their way and arrives home within 15 minutes, everything is fine.
- if the student responds but returns later than 15 minutes after curfew, the following morning the homestay reports it to the Head of Accommodation who will talk to the student about the importance of adhering to curfew times
- if the student does not reply to the initial call at curfew time, the homestay immediately calls the 24-hour emergency phone
- the emergency phone holder will then use every communication pathway available to try and contact the student
- should the emergency phone holder be unable to contact the student, the Police may be informed.

6.4.4 Student aged 18 or above missing start of activity for which they have registered

- the staff member responsible for taking the activity will contact the student using the student mobile number on each excursion. For an activity they will note down any absences and inform the office the next morning. If the staff member has any reason to believe that the student is in any danger then they will contact WA emergency number to report the absence. The homestay provider will then be contacted and if necessary the parents of the student.

6.4.5 Student aged under 18 missing start of activity for which they have registered

- under 18s are identified on the activity register, including their mobile number. Staff taking activity will phone under 18 to find out why they are not there
- if there is no reply from under 18, activity staff will inform the DSL or a DSO via the emergency number who will then contact the homestay provider to check if they know anything.

6.4.6 Student aged 18 or above not returning from free time during excursion

- students told to contact excursion emergency number if going to be late
- if not at meeting point at set time, give 5 minutes, then call student
- if no response or if student not able to get to meeting point in time, leave one staff at meeting point while other returns with students. Maximum delay of 15 minutes is allowed.

6.4.7 Student aged under 18 not returning from free time during excursion

- students told to contact excursion emergency number if going to be late
- if not at meeting point at set time, give 5 minutes, then call student – and ask other students in group who had gone off together for free time, where they last saw student
- if no response or if student not able to get to meeting point in time, leave one staff at meeting point while other returns with students
- person at meeting point waits 1 hour before leaving. (follow procedure included on '**Supervision and safeguarding under 18's on WA excursions**' which is contained within the Sports and Social Activities policy on risk assessment / safeguarding procedures.)

6.5 Welfare provision

As part of duty of care, students receive welfare support from staff and homestays in the following ways:

- staff and homestays are required to be vigilant and alert to any students who may be lonely, withdrawn, or generally behaving unusually
- staff and homestays are also required to listen carefully to students wishing to talk about any problem or with a question. If possible, the staff/homestay should assist the student and inform a female/male Safeguarding officer what has happened.
- if staff and homestays cannot help the student, they must quickly inform a safeguarding officer and tell the student they have done this and that a welfare officer will contact the student
- A safeguarding officer can be informed by phone, online, in person, via a note. They will record the information on a central student database and, where necessary, cross reference it to a homestay/staff member
- A safeguarding officer will talk to the student, recording the meeting and outcome of the meeting, particularly any follow up action or meeting required and the date/time that will occur
- A safeguarding officer would normally go back to the person reporting the query / problem, thanking them and providing any feedback as appropriate
- students requiring additional or ongoing support will be monitored, and as appropriate. A safeguarding officer informs staff and homestay of the situation (as appropriate) and asks for their ongoing monitoring / support of the student

6.5.1 Welfare provision for students under 18

Welfare for students under 18 follows the same system as for all students. In addition, under 18s have:

- curfew times of 10.30 pm Sun-Thur and 11.30 pm Fri & Sat (effective 02/01/2018) for students ages 16-17; under 18s are encouraged to get enough rest to cope with their education
- curfew times of 9.30pm (effective 01/01/2019) for students aged 14-15; under 18s are encouraged to get enough rest to cope with their education
- to get specific parental permission for certain things, e.g. joining an excursion not organised by WA, travelling outside the local area or staying away from their homestay overnight
- students under 16 are not permitted to stay away overnight
- a weekly meeting with a member of the safeguarding team where they are asked about their homestay, how they are getting on, if they have found friends, what they do when they leave school or in the evenings, if they are planning on going outside of Bournemouth on the weekend etc. A checklist of this meeting can be found on the back of the checking form.
- the meeting is held at a regular day and time each week; usually Thursdays during the first 30 minutes of the lesson (morning and afternoon)
- when there are larger numbers of under 18s, a member of the safeguarding team may ask group leaders to help lead meetings with their closed group students

6.6 Accommodation

Students under 18 can only stay in homestay accommodation:

- homestays hosting under 18 students are DBS checked, usually using Box 66, 'work happens in the home' route to ensure information is gathered about all adult residents and frequent visitors to the home. Or every adult in the homestay has a separate DBS check
- if a parent requests that their under 18 child stay with an immediate family member (parent, adult sibling, grandparent) whilst on a course at the school; the school will ask for full information about the responsible family member including exact relationship to student, photo ID, the address and contact details
- if a parent requests an under 18 to stay with non-immediate family or friends, because of overall duty of care responsibilities, the school reserves the right to refuse the request if, in their view, and after having met the adult(s) looking after the under 18 and visited the address:
 - (i) the under 18 will not be properly looked after
 - (ii) the location or nature of the home is unsuitable for under 18s
 - (iii) any other factor
- homestays will always be at home overnight when hosting under 18s. If the homestays need to be away overnight, the under 18 will be temporarily moved to another under 18 homestay, or a DBS checked adult known to Westbourne Academy and trusted by them will move into the homestay
- if students aged 16-17 staying in homestay accommodation wish to stay overnight away from their organised accommodation, parental permission and additional information must be given (where staying, who with, contact number) every time a request is made.

6.7 Medical and First Aid

6.7.1 Medical support for students

There are many ways in which Westbourne Academy ensures its students receive medical information and help:

- students provide medical information about themselves (e.g. allergies and conditions) before arrival on the enrolment form
- students are informed of how the NHS works on the website / as part of pre-arrival information and advised to take out medical insurance
- they are given information about accessing the NHS and other medical services in the local area, e.g. GPs, Health Centres, pharmacies, hospitals on arrival at the homestay and school
- if students require specialist medical support, information on a range of services is kept by Vanessa Elphick in reception
- if students need support at any stage of using medical services, they are helped by homestays or by Vanessa or another member of the safeguarding team

6.7.2 Medical support for students under 18

In addition to the information and support given to all students, the adults looking after the under 18s take additional care of their medical needs in the following ways:

- parents must provide full information on medication used by their child and advise if the student will self-medicate or if they require support to ensure medication is taken
- medication will usually be kept by the under 18, but the homestay or school will provide locked storage and refrigerated storage of any medicines that require it
- medication and dosages are required to be explained by the student's doctor and translated into English (so that the school can pass this information to a doctor or hospital if required). Any medication arriving without a translation will be checked to ensure it is legal in UK
- the parental consent form includes a section giving permission for emergency medical treatment following the advice of a registered medical practitioner
- in the event of a medical emergency the under 18s parent and/or agent will be contacted immediately; if they are not available and if necessary, the DSL will make decisions about treatment and follow the advice of registered medical practitioners
- if an under 18 student needs to visit a pharmacy or any medical service including hospital they will be offered support and to be accompanied by a homestay or member of staff (medical confidentiality exists in UK for anyone aged 16 or over)
If an under 18 is sick, the following will happen:
 - Vanessa Elphick will ascertain if there is a DBS checked adult from the homestay available to stay at home with the sick student. That person will be asked to check the student regularly.
 - if not, the following procedure will apply:
 - two members of the safeguarding team discuss the situation and severity of illness; if necessary calling 111 (NHS helpline) for guidance
 - based on the above information, staff will decide how frequently to check on the student and whether that will be done only by phone or in person (which also depends, potentially, on ability to gain entry to accommodation). Grid to record checking calls /visits to be made showing times of day to call and visit.
 - student will be informed when calls will be made and that the student must phone school at any time if feel bad
 - calls / visits to be recorded by a member of the Safeguarding team
- medical information and, where necessary, medication for under 18s will be carried by staff on excursions beyond the local area of the school
- under 18s on medication with permission to go outside the local area and/or stay away overnight. An accommodation officer will contact homestay asking them to ensure under 18 carries medication when going away

6.7.3 First Aid

- First Aiders are: Mark Halls, Paul Jacob, Vanessa Elphick, Erin Fry, Simona Restifo, and Justyna Kucharska.
- First Aid boxes are located: in Reception
- First Aid kits are taken on relevant higher risk activities.

6.8 Student behaviour and discipline

Students are expected to show respect and tolerance for everyone associated with the course; their peers, staff, homestays and any visitors.

- students are asked to sign the school rules during their induction. These are also available on the website
- a policy about abusive behaviour including bullying is displayed in all classrooms and is part of the Student Handbook
- the policy includes the procedure that is followed if students fail to follow the policy;
 - (i) there is a meeting with a member of the safeguarding team when the student's unacceptable behaviour is explained and, where appropriate, they are offered the opportunity to apologise to anyone who has been upset. The meeting is recorded.
 - (ii) if there is a another incident, the student must see the DSL / Principal who will explain the severity of a second transgression and warn them that a further incident will lead to dismissal. The meeting is recorded.
 - (iii) a further incident will mean the student is required to leave the school
- instances of severe abusive behaviour may lead directly to step (iii)

6.8.1 Under 18 behaviour and discipline

- at time of booking, parents sign the parental consent form that includes agreement to their under 18 following the school rules
- students are then asked to sign the school rules during their induction
- in addition to the procedures for all students (6.8), parents or agents will be informed at stage (i) as soon as an under 18 needs to have a meeting with staff regarding their behaviour
- in the event of an under 18 having to leave the school, staff will ensure they have a safe onward passage (to another location within UK or to an airport/station to exit the country)

6.9 Fire Safety

6.9.1 Fire safety at school

- the school building is signed with Fire Exit signs and there are fire doors and other safety equipment in place.
- fire drills are carried out once a term, i.e. 6 times a year
- Fire signage of what to do in the event of a fire are available around the school and in each classroom.
- The assembly point is in the Car Park at the front of the school
- the fire officer is Gary Garfield
- fire equipment is checked by external contractors every 6 months
- records are kept of all aspects of fire safety
- In the event of a fire, teachers lead their classes to the assembly point and designated office staff check their areas of responsibility in the building before evacuating themselves.

6.9.2 Fire safety in homestays

- homestays do a fire risk assessment which is updated annually and/or on re-visits. An Accommodation Officer records when the fire risk assessment has to be/is seen each year
- homestays are given information and support from an Accommodation Officer on completing fire risk assessments successfully
- part of the homestay's arrival welcome to students is to show the student the escape routes (main and, where possible, secondary) from the home in the event of fire, and explain how to exit the house, e.g. where keys are kept for locked doors
- no additional fire safety information is given to students under 18

6.10 Transfers from airports / stations (point of arrival) to Westbourne Academy

The Westbourne Academy website gives information on how students travel from the point of arrival in UK to Bournemouth; the school can arrange a taxi transfer or the student can plan their own train/bus journey. Information is available from the school's reception to help students plan their return journey.

6.10.1 Transfers for students under 18

Students under 18 are encouraged to take a taxi transfer on arrival and departure from the school, unless being accompanied by a close family member, or another person (e.g. family friend) identified to the school in advance.

6.11 Online safety

Key principles of online safety affect the whole school community, including staff, homestays and students. They include the following;

- legal aspects, particularly regarding access to certain sites, copyright infringement and not introducing viruses or hacking into other people's information
- health aspects, time spent online and dangers of addiction to e.g. gambling sites
- appropriate online behaviour, e.g. interactions with others respectful and polite and safe for everyone
- safeguarding under 18s online; which behaviours are appropriate and acceptable and which not

Westbourne Academy have a filtering system in place on all WIFI access. Particular words and phrases found on websites will cause the website to be inaccessible. Should anyone wish for a list of these, please contact us.

Posters regarding how to be safe online are available in classrooms and around the school. Students and staff are told to notify the office immediately if they are able to access a website with unacceptable content.

6.11.1 Online safety for students under 18

The key principles of online safety are extended for under 18s in recognition of:

- increased vulnerability of under 18s and therefore the need to safeguard them effectively
- increased legal aspects involved with under 18s online behaviour

6.12 Extremism and Prevent

Prevent is an important tool in safeguarding students of any age; extremism of any type is not acceptable in Westbourne Academy where everyone (staff, students, homestays, visitors) are expected to show respect and tolerance for all people associated with the school.

Westbourne Academy will address Prevent in the following ways:

- have a Prevent lead, the DSL, supported by other members of the safeguarding team
- engage with the local police Prevent officers
- explain core British values to students, via posters and, as appropriate, as part of curriculum
- develop students' critical thinking skills to help them question extreme views
- staff and stakeholders to exemplify core British values
- have clear referrals process and keep records

Training in Prevent will happen in the following ways:

- as part of Basic Awareness online safeguarding training available for staff, homestays and group leaders
- in addition, staff and stakeholders need to know:
 - (i) what Prevent is and how the organisation is meeting requirements
 - (ii) how to recognise vulnerable students
 - (iii) what to do if concerned
 - (iv) to exemplify core British values and use them to challenge extremist views
- students and group leaders need to know:
 - (i) terminology and core British values
 - (ii) importance of maintaining a supportive and tolerant society within the organisation
 - (iii) to report any concerns they have and who to report to.