



**GREENWICH**

Young Learners

# Safeguarding Policy 2022

# SAFEGUARDING POLICY

Date Established: 29/12/2020

Date of next revision: 12/2022 or sooner if required

Most recent Revision: 01/12/2021

This policy will be reviewed in full by the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead on an annual basis, or more frequently if there are changes in policy or circumstance. It is due for review in December 2021.

## Associated Policies

Safeguarding is at the heart of everything we do and the following separate policies all form part of this Safeguarding policy:

First Aid Policy

Recruitment Policy - including Safer Recruitment

Prevent Duty Policy

The Employees Handbook

All specific Staff Handbooks including the Teachers, DoS and Centre Manager Handbooks.

The DoS Daily Guide

Abusive Behaviour Policy

## Our Centres

This policy applies to our summer camps running in 2021 in:

**To be completed once we decide on centres**

Students in each centre are accommodated as follows:

**To be completed once sites are known but text will be similar to below.**

*Our students are accommodated in the residence on the same site as the university building. We have our own designated area/floors separate from any other school using the same accommodation. Rooms are single, ensuite and are split into 8 room flats with a kitchen/social space for each flat. There are approximately 2 flats of 8 rooms on each floor. Each floor is designated a single sex floor. During times where the centre is extremely busy, students may be accommodated on a mixed floor. However, they will all stay in separate sections. Our staff are also accommodated in the same building.*

### Policy Statement & Aims

This policy applies to Greenwich International Education's camps. Greenwich International Education has a duty of care to safeguard all children enrolled on our programmes and we ensure the safety and protection of those children through strict adherence to our Safeguarding Policy.

The Safeguarding Policy recognises that the mental and physical welfare and interests of children are paramount in all circumstances. As part of our Safeguarding Policy, Greenwich International Education will:

- Promote and prioritise the mental and physical safety and wellbeing of children.
- Follow safer recruitment procedures carefully, ensuring the suitability of all staff to work with students under the age of 18.
- Ensure everyone is aware of their roles and responsibilities in respect to safeguarding and is provided with the resources and suitable learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children.
- Ensure appropriate action is taken in the event of incidents/concerns of abuse and that support is provided to the individual/s who raise or disclose the concern.
- Ensure that confidential, detailed and accurate records of safeguarding concerns are maintained and securely stored.
- By ensuring students have a clear channel and means of communication in times of need.
- Ensure robust safeguarding arrangements and procedures are in operation.

This policy applies to all adults working at Greenwich International Education. To be read by all adults working with or alongside children in our care. This policy relates to all students in our care regardless of gender, age, ethnicity, nationality, religion or disability.

### Documents/legal framework

This policy is informed by the following legislation and training:

- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children, DfE (July 2018 updated December 2020)
- Keeping Children Safe in Education, DfE (September 2020 - updated January 2021)
- Tri-Borough Local Safeguarding Children Board Procedure
- Information Sharing (July 2018)
- Keeping Children Safe Code of Practice OOSS (Out of School Settings) (October 2020)
- Disqualification under the childcare act 2006 (DfE July 2018)
- Serious Crime Act, DfE March 2015
- Counter Terrorism and Security Act, DfE February 2015

- “Sharing nudes and semi-nudes: how to respond to an incident” UK Council for Internet Safety.
- English UK Safeguarding training (Levels 1, Designated staff (formerly known as level 2) and Designated Lead (formerly known as Level 3)

#### Non-statutory guidance:

Please find some useful links regarding Safeguarding issues as an addition to the legal framework.

1. What to do if you're worried a child is being abused  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
2. Safeguarding practitioners' information sharing advice  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419628/Information\\_sharing\\_advice\\_safeguarding\\_practitioners.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf)

[Regulated Activity in relation to Children: Scope](#)

[English UK Advanced Safeguarding for Designated Staff Training 2021](#)

[English UK Specialist Safeguarding for Designated Lead Training 2021](#)

[English UK Guide to Assist ELT Organisations Writing and Updating a Safeguarding Policy \(updated October 2018\)](#)

#### Terminology

The following terminology is used throughout this policy and other school policies. It is important that all staff are familiar with the terms used and where a term refers to a named person, they know who that person is and how they can be contacted.

Staff - used to describe all Greenwich International Education employees, group leaders and other individuals involved in delivery of courses for children in our care.

Child/young person - any student or visitor under the age of 18. They are deemed to be a minor by law. All under 18s have the right to safeguarding from abuse, regardless of their age, gender, disability, racial origin, religious beliefs, sexual orientation, language, social-economic status or appearance.

Designated Safeguarding Lead - A named member of staff, trained to Specialist Safeguarding for the Designated Lead (formerly known as Level 3), who has overall responsibility to ensure Greenwich International Education meets the aims of this policy.

For 2021 the Designated Safeguarding Lead for Greenwich International Education is Andy Cossey.

Deputy Designated Safeguarding Lead - A named member of staff trained to Specialist Safeguarding for the Designated Lead, who is able to support the DSL and cover in his/her absence. For 2021 the Deputy Designated Safeguarding Lead for Greenwich International Education is Alex Brown.

Local Safeguarding Children's Partnership (LSCP) - key statutory mechanism for agreeing how the relevant agencies in each area will co-operate to safeguard and promote the welfare of children in that locality and for ensuring the effectiveness of what they do.

Local Authority Designated Officer (LADO) - The officer or team of officers involved in the management and oversight of allegations against people who work with children.

Duty of Care - Greenwich International Education's obligation to look after the well-being of all our students and help them to achieve their potential.

Child Protection - Part of the Safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer individual harm. This includes child protection procedures which detail how to respond to concerns against a child.

### Roles and responsibilities

The Designated Safeguarding Lead (DSL) for child protection is Andy Cossey. Andy Cossey is the senior designated person with overall responsibility for Safeguarding across all the programmes offered by Greenwich International Education, who is available 24/7 and he can be contacted on +44(0)7957515164 and [andy.cossey@greenwich-international-education.com](mailto:andy.cossey@greenwich-international-education.com). Andy has taken the following training in Safeguarding - Level 1 Basic awareness, Advanced Safeguarding for Designated Staff (formerly known as level 2) and Specialist Safeguarding for Designated Lead (formerly known as level 3) and has also undertaken The Prevent Duty training. Andrew is available all year-round. Each summer camp also has its own DSP for dealing with daily issues on site.

The role of the DSL is to:

- Monitor and update the Safeguarding policy and other related documentation.
- Support and advise the staff and all Designated Safeguarding Persons (DSP) in day-to-day implementation of the policies.
- Ensure induction training conveys all on-site safeguarding responsibilities.
- Receive information from any staff, children, leaders or parents who have any safeguarding concerns and record it.

- Make a formal referral to a statutory child safeguarding agency or to the police.
- Record all information in writing in accordance to the Data Protection Act.
- Support and inform the DSL for each centre.

The deputy designated lead person for summer camps is Alex Brown.

Alex will assume any safeguarding responsibilities in the absence of Andy. Alex can be contacted at alex.brown@greenwich-international-education.com and on 07730 015594. Alex has taken the following training in Safeguarding - Level 1 Basic awareness, Advanced Safeguarding for Designated Staff (formerly known as level 2) and Specialist Safeguarding for Designated Lead (formerly known as level 3) and has also undertaken The Prevent Duty training. Alex is available year-round.

#### Designated Safeguarding Person

Each centre has a Designated Safeguarding Person who is made known to the students and staff in each centre at induction and in notices in the accommodation and classrooms of the school. The DSP ensures all daily safeguarding responsibilities are carried out and that the Safeguarding Policy is being adhered to. The DSP must report any safeguarding concerns on to the DSL without delay.

#### All Staff

All staff undertake Basic Awareness online training in Safeguarding and Prevent Duty online training. An induction before each centre opens involves further training in these areas and covers all site-specific information.

#### Group Leaders

All group leaders accompanying students to our centres from overseas are encouraged to undertake Basic Awareness Safeguarding before travelling to the UK. They receive a face to face induction on site covering our Safeguarding Policy delivered by the DSL or DDSL and our expectations of them to follow procedures outlined and to ensure student safety is their number one priority.

#### Involvement of Students

All students receive information in their induction, in their handbook and on displays in classrooms easy to understand information on who to speak to if they feel threatened, bullied or uncomfortable in any way at any time during their stay with us. This information is reinforced by staff in the centre.

### Code of Conduct for Employees Working with Young People

#### Overview

Greenwich International Education is fully committed to safeguarding the welfare of all children and young people. This Code of Conduct and the associated procedures are in

place to make sure all students, staff and any other person associated to our centres, are always in a safe environment. All staff are contractually obliged to read and adhere to the Staff Code of Conduct. Following the Code of Conduct is vital as a means of minimising the risk to any member of staff of being vulnerable to false or malicious allegations of misconduct or abuse towards children with whom they are working. Everyone must be aware that not strictly adhering to the code of conduct risks ruining their reputation, even if their actions were intended innocently.

We strive to provide a safe and supportive learning environment for every young student staying with us because we believe that all children no matter what their age, gender, nationality, race, religion, etc. have the right to be protected from any kind of abuse and harm.

We have a responsibility to identify any child who may be suffering or is likely to suffer any abuse (including risk of exposure to extremism and radicalisation) and we also acknowledge our duty to act appropriately to any allegations, reports or suspicions of abuse by reporting any concern to the DSL (Andy Cossey) and he onto the LADO where deemed required.

The purpose of this Code of Conduct is to:

- Safeguard all under 18s
- ensure all children are safe from harm and to prevent them from suffering harm by creating an atmosphere of trust and support
- promote children's health and development
- support staff members and our students in promoting the welfare of our students

All our staff are sent our Code of Conduct before contracts are signed. Each member of staff must sign a copy of the code indicating that they have read and understand it and agree to adhere to it. Staff inductions include a focus on this as well.

### Position of Trust

All staff in our centres are in a 'Position of Trust'. The Sexual Offences Act 2003 makes it clear that any person in a Position of Trust who engages in any form of sexual activity with students under the age of 18 is breaking the law even though the legal age of consent is 16.

Greenwich International Education strictly prohibits:

- any sexual, intimate, dating or other romantic relationship between any Greenwich International Education staff member and any student.
- Any form of communication with a child which could be interpreted as sexual, suggestive or provocative, verbal comments, letters, notes, email, phone calls, texts, social media.
- Greenwich International Education staff discussing their own sexual relationships with or in the presence of children.

- Befriend any student or have any kind of relationship with a student that is above and beyond a friendly, professional relationship.
- Meet any student outside of the work premises.
- Connecting with students in any way on any form of social media beyond posting on any of the school's official accounts.
- Allow any student to consume alcohol or tobacco products.

### Being a Role Model

All staff should lead by example and set standards, always following these guidelines:

- Help students understand.
- Maintain professional relationships with children and avoid exclusivity.
- Treat all children equally and with respect and dignity regardless of their age, gender, colour, race or religion and maturity.
- Always listen to what a child says.
- Encourage and praise every child.
- Do not make ambiguous or ambivalent comments to children that can give rise to misunderstanding – be clear and value each child.
- Respect every child's privacy.
- Dress appropriately. Do not wear clothing that could be viewed as offensive, revealing or sexually provocative. Clothing should be absent of any political or otherwise contentious slogans. Please refer to your staff Handbook for full details.
- Show care: which can mean 'tough love'.

### Physical Contact

In general, physical contact with students must be avoided. There are some rare examples when physical contact is permissible, these would usually fall into one of the three following categories:

1. Action to prevent harm or injury to a child or to others. If it is necessary, the use of minimum force and contact to prevent harm or injury is acceptable and defensible. Any such incidents must be reported to the Centre Manager, DSP and DSL and recorded.
2. Comforting a child in distress. Alternative means of providing comfort, such as counselling, should always be preferred to physical comfort. However, on rare occasions and not as a matter of course, an arm around the shoulder of a student who is very distressed is acceptable. Employees should consider how others might perceive this action and ensure that it does not develop into unnecessary contact or contact which could be misinterpreted. It is unacceptable to physically comfort the same child on repeated occasions: alternative means of dealing with the problem should be used. Again, any incidents should be reported to the Centre Manager, DSP and DSL and recorded.



3. First Aid. The existence of any life threatening, or serious condition will determine the suitability and necessity of physical contact. In the absence of such justification employees who administer first aid should ensure that, wherever possible, another adult is present if there is any possibility of the physical contact being misconstrued.

Staff should, in all aspects of their conduct, recognise the possibility of misinterpretation. Individual personal judgements will be needed from time to time about the level of physical contact with individuals. Staff should consider the student's age and understanding, personality, cultural and social background.

### Dealing with 'unruly' behaviour

Under no circumstances is physical contact for the purpose of reprimanding a student acceptable and may be unlawful, except in rare situations outlined in the above section physical contact.

In addition to the specific advice given in your job specific handbook use the following guidelines to deal with challenging behaviour consistently:

- Be aware of what unacceptable behaviour is. Ask your line manager or the DSP/DSL if you are not sure.
- Remember children are also given a code of conduct and rules to follow in class or when attending activities.
- Explain to children why certain behaviour is unacceptable so they are fully aware of why what they are doing is wrong, and are then hopefully less likely to repeat it.
- Punish the behaviour, not the person, and never call a child 'bad'.
- Record and report any instances and any follow up action taken.

### Anti-Bullying

Greenwich International Education is committed to providing a friendly and safe environment for all our students and bullying of any kind is completely unacceptable. If bullying does occur all students should know they can tell us and that all incidents will be dealt with immediately and effectively. All staff must be aware of what constitutes bullying and what actions are necessary. Students, parents and everyone involved with the students should be assured that bullying will not be tolerated.

Bullying can come in many forms, below are some of the most common but staff must be aware that there are many more types of bullying and this is not an exhaustive list:

- Emotional - being unfriendly, excluding and tormenting.
- Verbal - name calling, sarcasm, spreading rumours, teasing.
- Physical - pushing, hitting or any other use of violence.
- Racist - racial insults, gestures etc
- Sexual - unwanted physical contact or sexual comments.

- Homophobic - focusing on the issue of homosexuality

If you suspect bullying:

- Report it to your line manager or DSP/DSL.
- Incidents of bullying will be recorded in writing and kept securely.
- In serious cases parents will be informed and asked to discuss the issue.
- If necessary and appropriate, the police will be consulted.
- Attempts will be made to help the bully/bullies change their behaviour.

### Private Meetings

Avoid private meetings or being alone with children as this provides opportunities for misinterpretation. Where such a meeting is unavoidable or for example a student remains in class after the lesson and asks to speak to a teacher alone make sure the door is left open and other staff know where you are. Under no circumstances should meetings be arranged with children off the centre premises.

### Comments and Discussions with Children

Staff must never make comments or engage in any conversation with students that could be understood to have sexual overtones. Similarly, staff must never encourage debate or discussion between groups of students as having sexual overtones or be about unsuitable subjects that are not part of the teaching programme and syllabus.

The use of sarcastic, insulting, insensitive or derogatory language is strictly prohibited. All staff should use simple, understandable English at all times and not use language that could be understood as foul, blasphemous or offensive.

### Dress Code

All staff are always expected to dress appropriately. It is vital that all Residential members of staff remember this when in the accommodation and ensure they never leave their room without being appropriately covered. Further information is in your job specific Handbook. Staff should also ensure students are dressed appropriately with no slogans or wording on items of clothing that could be considered offensive to others.

### Alcohol, drugs and smoking

The use of alcohol, drugs, tobacco products and e-cigarettes/vapes is prohibited on all school sites and in accommodation buildings (except for designated smoking areas - for tobacco smoking and e-cigarettes/vapes), as well as off-site if on duty or in sight of any students. Staff must also never promote the use of drugs or the pleasures of alcohol or smoking. Staff will not possess, use or be under the influence of any drugs (including legal highs) while in our employment. Staff will not consume alcohol, nor will they be under the influence of alcohol while on duty. It is also unacceptable to come to work suffering from a hangover. The breaking of these rules will lead to disciplinary actions. Full details can be found in the Employee's Handbook.

### IT and Social Networks

Staff are prohibited from having any type of electronic contact with students before, during or after a course. This includes email, text, WhatsApp, iMessage, WeChat, social messaging sites or apps such, but not exclusive to Facebook, Instagram or Snapchat or any type of video messaging including Skype/Zoom. Staff must never give any personal contact information to children. To try and improve our students' awareness of the potential risks online a lesson on Online Safety is included in our suggested Daily Syllabus. We have a separate Online Safety risk assessment for our online classes that should be referred to. We have a responsibility to keep our students safe online.

### Favouritism and Gifts

Staff must not accept gifts of a high value from students at any time. Further information on this is in the Employees Handbook under Anti-Corruption and Gifts. Small gifts from students with an estimated value of no more than £20, such as a small souvenir from their country, are acceptable when a student, teacher or other staff member leaves. Staff should never give gifts to any student. This is to ensure there are no accusations of favouritism.

### Off Campus Activities/Excursions

Staff must be particularly careful when off site with students as the atmosphere can be relaxed, which may lead to misinterpretation by children. All stated standards of professionalism and being a role model off-site are the same as when on site.

### Teaching and Social Programme Material

The use of books, videos, online clips and films must be given careful consideration before use. Ensure there is no inappropriate language or sexual behaviour and consider religious and cultural sensitivities.

### Reporting Incidents and Whistleblowing

Staff should report to the DSP or DSL any concerns they have following an incident where they feel that their actions may have been misinterpreted, or where a student or third party has. Where a staff member is worried that a fellow member of staff is engaging in or has engaged in any inappropriate or illegal activity they are required to report it to their line manager (or any line manager). Further information on Whistleblowing can be found in the Employees Handbook. Greenwich International Education encourages all staff to report concerns which will be taken seriously, investigated and appropriate action will be taken in response. Greenwich International Education offers assurance that members of staff are protected from reprisals or victimisation from whistleblowing action undertaken in good faith.

### Photography

Greenwich International Education requests written consent to take and use images of children on enrolment. This consent must be checked at the start of the course and prior to

taking any pictures and/or video images. Any still or moving images taken are the property of Greenwich International Education and must not be used for anything other than official; Greenwich International Education purposes. Staff should avoid having their picture taken with individual students as this can be misinterpreted. Children should be encouraged to be careful when taking and using images.

### Data Protection and GDPR

Full information on how we collect, and store personal information can be found in our GDPR Policy and Greenwich International Education adheres to the Data Protection Act 2018. However, the Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

### Child Protection.

#### *Understanding the Difference between Safeguarding and Child Protection*

It is important that all staff understand what is meant by Safeguarding and Child Protection in order to be able to understand why the Code of Conduct and associated procedures are in place. Safeguarding and child protection are commonly thought of to be the same thing. However, Safeguarding is in fact a much wider concept than child protection.

#### *A General Guide to Safeguarding*

Safeguarding was brought into practice and guidance with the Children Act 2004. Safeguarding and promoting the mental and physical welfare of children is defined as:

- protecting children from maltreatment.
- preventing impairment of children's mental or physical health or development.
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- undertaking that role in order to enable those children to have optimum life chances and enter adulthood successfully.

Safeguarding covers a range of actions and activities taken by a number of different people and agencies. Safeguarding is usually defined by three types of activity:

- 1) Specific action to identify and protect children at risk of suffering significant harm.
- 2) Activities directly designed to identify and support children who are vulnerable to poor outcomes and life circumstances.
- 3) Ways to improve the general mental and physical health and wellbeing of all children.

Child protection is a part of safeguarding and promoting mental and physical welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Effective child protection is essential as part of wider work to safeguard and promote the mental and physical welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the mental and physical welfare of children so that the need for action to protect children from harm is reduced.

Safeguarding and child protection sit alongside each other. It is important to remember that Greenwich International Education is not an investigating agency. Any allegation or suspicion of abuse or significant harm will normally be carried out by social services or the police.

### Definition and types of Abuse

Abuse is any behaviour towards a person that deliberately or unknowingly causes harm, endangers life or violates their rights.

There are four types of abuse:

1. Physical (hitting, shaking, squeezing, kicking, punching, etc.)
2. Sexual (thorough inappropriate physical, sexual contact)
3. Emotional (repeatedly being made to feel unhappy, humiliated, and afraid or devalued by other)
4. Neglect (persistent lack of appropriate care of children, including but not limited to safety, nourishments, education, etc.)

### Identifying Child Abuse

It can be difficult to identify child abuse as it has various forms. Below are some typical indicators to look for:

- Sexual abuse - acting in a sexually inappropriate way with others, having too much knowledge/interest about sex for their age, becoming withdrawn, becoming secretive, changes in eating habits, unexplained gifts.
- Emotional Abuse - overreaction to mistakes, or continual self-deprivation, neurotic behaviour including rocking, hair-twisting, self-harm.
- Physical abuse - unexplained bruising, burns etc., bruises in places that are not typical for children (e.g. back, neck), wearing clothing that covers injuries even in very hot weather.
- Neglect - often hungry, may beg for or steal food, badly or shabbily dressed, poor appearance and personal hygiene.

### Knowing and recognising secondary forms of abuse

In addition to the types of abuse mentioned above staff should be aware of the following forms of abuse:

Peer on peer abuse (PoP) - happens between children of a similar age or stage of development. It can be any form of mental, physical, sexual, emotional and financial abuse and coercive control. It includes bullying, cyber bullying, sexual violence, harassment and sexting. It should be recognised that this behaviour is harmful to both the perpetrator (who is a child) and the victim. Signs of this might include changes in behaviour, constant checking of their phone, physical injuries and disengagement from school activities.

Teenage Relationship Abuse (TRA) - violence and abuse can occur in relationships between children and young people of any age. Relationship abuse can take a number of forms including: physical, sexual, financial, emotional or social. Signs of this can include a child isolating themselves from everyone except their partner, physical injuries, a fear of being left alone.

Child Sexual Exploitation - exploitation happens when under 18's receives 'something' (attention, gifts, money etc.) initially perhaps without giving anything in return but at some point, sexual activity is needed in return for the 'something' being given. Signs might be students missing classes, talking about an older boyfriend/girlfriend, misusing alcohol or drugs.

Female Genital Mutilation (FGM) - comprises all procedures involving partial or complete removal of the external female genitalia or other injury to the female genital organs for cultural or non-therapeutic reasons. FGM is child abuse in the UK. It is typically done to young girls from African countries. Signs may include a child not wanting/being asked to eat for a few days (before an operation) or anxiety about an upcoming family 'celebration' or 'ceremony'. Suspicions of this would be reported to the police immediately as this is a legal requirement.

Cyber-bullying - bullying that takes place online on devices such as phones, tablets and computers. It can occur via texts but is most common on social media such as Facebook, Instagram and Twitter. It can involve sharing personal or private information about an individual causing shame and embarrassment. Signs can include appearing withdrawn, appearing nervous when receiving a call or message.

Honour Based Abuse (HBA) - coercion or violence against a person in belief that family or tribal honour requires action, which can include extreme violence. Signs can include family members paying particular attention to them.

### Identifying Vulnerable Students

All children are vulnerable to abuse, but some may be more at risk if they:

- Have a special education need (SEN).

- Have a disability.
- Are the only person from one country and have no one else to speak in their mother tongue with.

### Procedure to follow if abuse is suspected

1. If you notice any physical or behavioural signs, tell the DSL or your centres DSP.
2. If you suspect an adult is a threat to a child in some way tell the DSL or the DSP and continue to monitor the situation (see Whistleblowing Policy).
3. If a child/young person makes any comment that gives cause for concern react calmly and act accordingly as outlined below (see Guidance on handling a disclosure from a child).
4. Make a note of what was said and who was present. Contact the DSL immediately or your DSP if the DSL is not immediately available. The DSL or the Deputy DSL will take appropriate action which may involve external agencies and contacting parents/guardians.
5. Remember to always record what you have seen, what has been said etc.

### Guidance on handling a disclosure from a child

What should you do if a child comes to you and tells you that they are being abused? It's normal to feel overwhelmed and confused in this situation. Child abuse is a difficult subject that can be hard to accept and even harder to talk about. Children who are abused are often threatened by the perpetrators to keep the abuse secret. Thus, telling an adult takes a great amount of courage. Children have to deal with a lot of issues, including the fear that no one will believe them. So, care must be taken to remain calm and to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

#### Receive:

- Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.
- Accept what is being said without judgement.
- Take it seriously.

#### Reassure:

- Reassure the child, but only so far as is honest and reliable. Do not make promises that you cannot be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously.

- Do not promise confidentiality - never agree to keep secrets. You have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React:

- Listen quietly, carefully and patiently. Do not assume anything - never speculate or jump to conclusions.
- Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so do not do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but do not ask leading questions e.g. 'is it your uncle who has done that?'
- Do ask open questions like "Is there anything else that you want to tell me?"
- Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English.
- Do not ask the child to repeat what they have told you to another member of staff.
- Explain what you have to do next and whom you have to talk to.
- Refer directly to the named child protection officer (DSP) or Designated Safeguarding Lead.
- Do not discuss the case with anyone outside the child protection team.

Record:

- Make some very brief notes at the time and write them up in detail as soon as possible. There is a Safeguarding Recording Form that your DSP will give you.
- Do not destroy your original notes in case they are required by Court.
- Record the date, time, place, words used by the child and how the child appeared to you - be specific. Record the actual words used; including any swear words or slang.
- Record statements and observable things, not your interpretations or assumptions - keep it factual.

The priority is to ensure the child is safe and not in any way at risk. Greenwich International Education will ensure immediate action is taken to safeguard the child.



### Allegations of abuse made against students

The same procedures as above (handling disclosure from a child) apply when it comes to the allegations of abuse made against students and the case will be reported by the DSL to the LADO within 24 hours of evidence being collected.

Greenwich International Education will ask for advice from the LADO on how to deal with any allegations and will then act to ensure the safety and welfare of all involved, including the student(s) accused of abuse. Greenwich International Education will inform parents/guardians that a report will be made to the LADO and do so before submitting the report. Following allegations of abuse, it may be necessary for the student(s) to be interviewed by the police. If this is required then, following the advice from the LADO, Greenwich International Education will inform the parents/guardians and ensure the student(s) has support during the interview by an appropriate adult.

### Reporting and Recording Procedures

All members of staff who are engaged in regular activity with U18s must be alert to any sign of abuse and to report it to the DSL or/and the DDSL.

Every staff member responsible for the care of children up to the age of 18 has inscribed in their job description a responsibility to monitor the welfare or behaviour of our students.

It is the duty of staff to inform but not to investigate because this is the role of the LADO or the police. If there is a safeguarding issue, this must be treated as a priority over all other work.

An oral report and completed Safeguarding Recording Form should be provided to the DSL, who will keep a confidential record.

Any records will be kept in a lockable cabinet in the camp's office or in a password protected electronic file which can only be accessed by the DSL and/or Deputy DSL. Access to those files by others is at his discretion and in compliance with the law.

### What happens to an adult accused of abuse?

If there is an adult accused of inappropriate behaviour/abuse, the DSL or the DDSL will be informed and then the DSL or the DDSL will make an official referral to the LADO. The accused member of staff will immediately be removed from duties involving any contact with children and will be suspended from duty as a precautionary measure, pending investigation by the LADO. Suspension for 24 hours with no explanation can be given.

It is NOT for staff to decide whether a suspicion or an allegation is true. Greenwich International Education staff including the DSL and/or DDSL will gather information but will not investigate. They will listen and report as accurately as possible to the LADO via the

Local Safeguarding Children's Partnership (LSCP). If a LADO cannot be immediately contacted, then the police will be called as they will be able to immediately respond.

### LADO in each Greenwich International Education Centre

Below is the contact information for the LADO in each centre's area. This is accurate as of January 2021. Contact details can be found on the local LSCP website. The LADO will investigate whether any individual has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offense against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

To be completed once centres are confirmed	
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### Safer Recruitment

Greenwich International Education is committed to safer recruitment. Full details can be found in our Safer Recruitment Policy where information regarding our job advertisements, job descriptions, interviews, job offers, DBS, proof of identity and induction programme can be found.

### Safeguarding Training

The DSL (Andy Cossey) and other staff with safeguarding responsibilities receive regular training to keep up to date with new regulations and safeguarding procedures. The Safeguarding Policy is updated as an outcome.

As outlined in the section on roles and responsibilities all members of staff are to complete an online course by Accreditation UK in Safeguarding prior to employment to raise awareness of their responsibilities as adults dealing with minors. All members of staff will also receive additional site-specific training face to face during induction. All group leaders accompanying students to the UK are encouraged to take the online Accreditation UK

training and information on it is included in contracts/agreements with parties sending students to the UK. Overseas leaders also receive face-to-face training in an induction on site following their arrival.

### Health & Safety

Children are provided, by a variety of means including the Student's Handbook, verbal instruction and a quiz on the key information contained in their Handbook and a quiz on UK Culture during their first class, easy-to-understand information regarding UK laws, personal safety, road safety and fire safety, as well as being given instructions on what to do should they get lost. Regular fire alarm checks and fire drills/walk throughs take place within our centres. As part of the Centre Orientation students are shown where fire exits are located. Children are issued with a lanyard on arrival with which phone numbers to call in an emergency or requiring any help at all.

### Risk Assessments

Risk assessments are carried out for all on-site and off-site activities to identify and eliminate risks where possible. Staff and leaders are required to read these risk assessments and will be informed about any additional changes to them. All risk assessments are 'live' documents subject to change based upon the experiences of staff carrying out the activities they detail.

As part of training all staff are made familiar with the Greenwich International Education Emergency Event procedure. In addition, all staff, students and group leaders are encouraged to download the CitizenAid app on their phones as this provides live, relevant updates in the event of an emergency situation occurring.

### Behaviour and Discipline

All children will have their behaviour monitored and controlled in order to minimise any danger they could present to themselves or to others, including online safety. Online safety can also be reinforced if there is any specific fear through using the online safety lesson in the suggested daily syllabus. Greenwich International Education does not accept any form of abusive behaviour towards our students from other students or from adults in our centres.

### Duty of Care to Students

All staff always have a duty of care to students. Even when staff are not directly supervising students, such as when they are in the care of their Leaders. Greenwich International Education staff must remain vigilant during these times so that any behaviour that might lead to harm can be stopped and reported. Greenwich International Education staff are also trained to assist students at all times, not simply when on active supervision duty. All staff need to be responsible, help students understand and be alert for situations that might not always be straightforward.

### Accommodation

Residential staff and students share the same accommodation, although they will be accommodated in separate sections with separate toilet and bathroom facilities. Under no circumstances should a member of staff use toilets or bathrooms assigned to students or vice versa.

Unless specifically by the written request of the parent/guardian of the children concerned under no circumstances will a child be placed in the same room as an adult. Children sharing a room will be of the same gender.

### Transport

Greenwich International Education provides airport transfers from the airport to each centre. Students are met at the arrivals areas of the airport and taken to their coach by a member of Greenwich International Education staff. Coaches are also used for excursions. All coaches have seat belts and meet the requirements for transporting children. The coach companies provide written confirmation that all their drivers have an enhanced DBS check and have received our Code of Conduct for Drivers.

### Supervision Ratios

Lessons have a maximum of 17 students. One responsible adult is assigned to each class. On activities and excursions the supervision ratio is 1:20. Students under 12 years old have a supervision ratio of 1:12. In residential accommodations Greenwich International Education will ensure that the ratio of residential adults to students will be at least 1:20 for students aged 12-17 and 1:15 for students under 12, to include Greenwich International Education staff and accompanying group leaders.

### Student Absences

Most students at Greenwich International Education come as part of an organised group while in the UK, all students are expected to attend 100% of the programme, including all lessons, activities and excursions. Registers are taken several times a day and any absences immediately followed up and checked on. Students who are sick and unable to take part in a lesson, activity or excursion will be monitored.

### Prevent Duty

Greenwich International Education recognises its duty to protect our students from extreme ideology or radicalisation. Full details can be found in our Prevent Duty Policy. All Greenwich International Education staff undertake online Prevent Duty training and further training in induction emphasises our school vision and 'core British values' – although we try to emphasise that these are universal values. Greenwich International Education actively promotes these values through our school vision, syllabus (our lessons include a focus on

British Life and Culture including core values), staff and teaching tolerance, respect and acceptance of all cultures, faiths and lifestyles.