

7.3 Safeguarding (Child and Adult at Risk Protection Policy)

PRINCIPLES

- 7.3.1 We have a duty of care to safeguard all students under the age of 18 from harm. All children have a right, in line with legislation, to protection and this has been extended to include adults at risk.

While primarily intended to safeguard children and similarly at risk adults, this Child and Adults at Risk Protection Policy, is also meant to protect employees from any false allegations of improper conduct in this regard. It is recognised that Anglo-Continental has a duty to help employees and students understand their responsibilities, through guidance, support and training, to minimize risk and to avoid situations, where possible, where abuse or neglect might arise or be alleged.

For the purpose of this policy, the term child means any young person under the age of eighteen as defined by 'The Children Act 1989' and is also inclusive of those staff under this age. At risk adults, are people who because of a disability, including age or illness, or whose ability to communicate with others is severely impaired, are unable to take care of themselves, or unable to protect themselves, against significant harm or exploitation. At risk adults also include our international students as they are in unfamiliar surroundings, immersed in a foreign culture and away from family and friends, who would normally act as their support structure during times of worry or distress.

This policy has been formulated in accordance with provisions of:

The Children Act 1989
Human Rights Act 1989
Data Protection Act 1989
The Protection of Children Act 1999
The Education Act (2002) Section 175
The Sexual Offences Act 2003
The Children Act 2004
Working Together to Safeguard Children 2006
Safeguarding of the Vulnerable Adult Guidance 2006
Keeping Children Safe in Education September 2016 & September 2018

For the purpose of this policy, whenever the guidelines refer to a child or children, this will also apply to adults at risk. The key principles and aims of this policy are:

- to provide protection for the children who receive Anglo-Continental's services and to ensure that they are protected from potential abuse from staff, homestay families and fellow students. Their welfare is, and must always be, the most important consideration;
- an acknowledgment that children can be victims of physical, sexual and emotional abuse, as well as neglect and bullying;
- to inform staff of their responsibilities and provide them with guidance on procedures in the event that they suspect a child may be experiencing, or may be at risk of harm;

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- it is everyone's responsibility to report any concerns about abuse to the Designated Lead Safeguarding Officer (Julie Haine – Personnel and Student Administration Manager) 01202 41183 or jhaine@anglo-continental.com or out of hours on 07831 613193, her deputy Rina Loder – Student Support Counsellor) 01202 411834 or rloder@anglo-continental.com or Jonathan Jeffery – Safeguarding Liaison Officer on 01202 411886 / 411860 or jjeffery@anglo-continental.com;
- and the responsibility of the Social Services Department / MASH (Multi-Agency Safeguarding Hub) and the Police to conduct, where appropriate, a joint investigation;
- to practise our commitment to safe recruitment, selection and vetting of staff, homestay families and other suppliers;
- all children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, socio-economic status, religious beliefs or sexual identity;
- all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately, in order to avoid employees making themselves vulnerable to suspicion of any form of abuse;
- Anglo-Continental will foster a culture where safeguarding is taken seriously through staff training and commitment to safeguarding procedures;
- all employees are expected to comply fully with the procedures laid out in this policy.

OUR COMMITMENT

Homestay

- All members of the family and any regular visitors to the home must be declared and their details entered on the homestay database;
- to ensure that there is a bank of Enhanced DBS checked homestay families with a Barred List check for all students under the age of eighteen;
- to review homestays who host students under the age of eighteen every 12-18 months;
- to check homestay details on an annual basis to ensure that records are accurate;
- to ensure that all under eighteens and their homestay families conform to the school's agreed evening curfew and notify the school's emergency telephone number immediately if the student breaks the curfew;
- to ensure that all homestay families that host students under the age of eighteen, email the school on the designated email address (absence@anglo-continental.com) if their student fails to come home for dinner;
- to remove from the homestay database any families that are not suitable and any serious concerns will be immediately reported to the local authority;

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- to ensure that homestay families who host students under the age of 18, complete on an annual basis the Children's Act 1989 (Part 1X) form declaring any convictions or offences against children for all family members and regular visitors;
- new homestay families taking students under the age of 18 should receive mandatory safeguarding and Prevent training, either delivered by an appropriately trained member of the Anglo-Continental safeguarding team or via an approved on-line training platform;
- on an annual basis all homestay families are sent a link to the updated Homestay Handbooks (for adult students and for those under 18) which contain specific information relating to the care of under 18s and sections on Private Fostering, overcoming cultures differences, homesickness, Disclosure and Barring Service and advice on how to deal with any safeguarding/radicalisation issues;
- Homestay families should advise the school if they are leaving their student aged under 18 in the care of another adult and that adult should have a valid DBS check;
- All students under the age of 18 are not permitted to stay overnight in another student's accommodation or at accommodation not known to Anglo-Continental's staff. They are also not permitted to receive overnight guests at their own accommodation. (The above is only sanctioned if permission is obtained from the parents of the student and the school is satisfied that it is an appropriate and safe arrangement).

Administration

- to meet with students aged 16-17 on their first day of school to ensure that they are aware of the school's expectations of them in terms of their behaviour, attendance, returning home for their evening meals and the curfew times and that they are happy and safe in their new environment;
- to ensure that they meet with a member of the Student Support Team on their first day of school and are aware of how to contact them for future advice and support;
- students aged 16 and 17 enrolled on adult courses will be assigned a member of the Student Support team and will meet with them on a weekly basis for the duration of their course to ensure that any concerns are addressed;
- to ensure that all students are familiar with the twenty-four hour emergency telephone number and understand that they can call this number at any time;

Education / Registration

- to ensure that we operate an 'open door' policy for any teaching staff whose Enhanced DBS check has not been received on commencement of their employment. This entails the classroom door remaining open for the duration of their lessons and a senior member of the educational team, or an appropriate member of the administration staff, observing the teacher and the class at least once each lesson. Until the DBS check is received the teacher will also have to report to an Academic Head or another appointed senior member of the education team to ensure that any issues can be resolved in an appropriate manner. his procedure will remain in place until the DBS check has been received. As an additional

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measure, the Personnel Manager will also undertake at least one telephone reference which will take place, if possible, with the most relevant and recent referee and the results recorded;

- to ensure that all class registers are checked and absences of any students under eighteen recorded and followed up immediately by members of Student Services, and if appropriate, a member of the Student Support team to investigate further;
- all students under the age of 18 must be admitted to their classroom regardless of their time of arrival;

Social Programme

- to ensure that there is a variety of social events or activities suitable for students under the age of eighteen;
- to ensure that students' parents or guardians provide written consent for activities or excursions outside of the agreed programme;
- if a student aged 16 or 17 wishes to travel independently, written parental permission must be sought and every effort should be made to ensure the student's safety (e.g. confirmed hotel reservations and suitable travel companions). If there are any concerns, then this should be communicated to the parents/agent with a strong recommendation that the travel plans are amended;

Student Relationships

- whilst it is not our policy to prevent students from entering into romantic relationships, the school will monitor and intervene if it deems it appropriate, any relationship which appears to be unhealthy (e.g. large difference in age, perceived imbalance of power – peer pressure or pressure to be sexually active);
- in order to ensure appropriate interaction between older students and those aged under eighteen, we have added to the 'Information Guide' for students a section regarding acceptable and unacceptable social behaviour between adult students and those aged under 18. We have also added to the 'Homestay Handbook', a section on safeguarding issues applicable to our homestay families.

Suppliers

- to ensure that all suppliers (taxi and coach drivers, tour guides and outside contractors) have obtained current DBS checks or have signed disclaimer forms.

RESPONSIBILITIES

DBS (Disclosure and Barring Service) Checks

Anglo-Continental will ensure that all existing and new staff have a current Enhanced DBS check generated by the school and sign a copy of the Children's Act 1989 (Part 1X), which will be kept on file, declaring any convictions of offences against children. An Enhanced DBS check will state whether or not adverse information has been found with regard to the member of staff or homestay family member. This will include any cautions, reprimands and final warnings relevant to the post. If the check denotes a previous conviction which does not pose a direct threat to the safety of our students, then further information will be sought. Areas for

consideration will be the circumstances surrounding the conviction, the seriousness of the offence, when this took place and whether it was an isolated incident or part of a history. A decision will then be taken by the Personnel and Student Administration Manager as whether or not they are suitable staff or homestay providers.

The Role of Staff in a Caring Environment

All staff are required to take shared responsibility for the safeguarding and safety of any students at school and to foster a safe and caring environment for all. Staff who teach, support or interact with students in any way, are in a position of trust. It should be noted that whilst a young person can consent to sexual activity once they reach the age of sixteen, the Sexual Offences

(Amendment) Act 2000 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under eighteen where the adult is in a position of trust.

All staff are aware through this policy and training that there is the possibility of abuse and take all possible measure to prevent that possibility by reporting any concerns or incidents. All staff should be aware that in accordance with statutory requirements regarding safeguarding issues, it is not possible to offer confidentiality to a person under eighteen as any disclosure must be reported.

It is not appropriate for staff to exchange telephone numbers, interact on social media or meet outside of the school's social programme or timetabled activities with students who are under the age of eighteen. All staff should take reasonable and practical precautions to avoid any suspicions of abuse being brought against them.

- 7.3.2 To assist in upholding this policy the Anglo-Continental Educational Group has appointed a Designated Child Protection Person (DCPP), who is responsible for dealing with any concerns about the protection of children. This person is the Personnel and Student Administration Manager – Miss Julie Haine, contactable by telephone on (01202) 411813 or via email jhaine@anglo-continental.com. When the DCPP is not available, then the Student Support Officer – Mrs Rina Loder, contactable by telephone on (01202) 411834 or via email rloder@anglo-continental.com will deputise. If the DCPP or deputy is absent, then individuals should not delay in reporting their suspicions and should contact Mr Jonathan Jeffery – Safeguarding Liaison Officer on extension 286/260 or the Managing Director – Guido Schillig.

The role of the designated person is to:

- provide information and advice on child protection within the organisation;
- liaise with local social services and make a formal referral to a statutory child safeguarding agency or the police;
- keep relevant staff within the organisation informed about any concerns regarding a child's welfare;
- where appropriate, investigate any incident and if necessary proceed with disciplinary action against any member of staff;
- ensure that an accurate record is kept of any referral, any action taken and to ensure that all information obtained is kept safely and in confidence.

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- 7.3.3 It is a fact of life that some individuals will actively seek employment, or contact with children, in order to harm them. Remember that those who abuse children can be of any age (even other children known as peer on peer abuse), gender, ethnic background or class, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place. Abuse is any behaviour towards a person that deliberately or unknowingly causes harm, endangers life or violates a child's rights.

There are seven main forms of abuse:

- **Physical Abuse**
This involves deliberate physical harm to children. It includes, hitting, shaking, throwing, squeezing, suffocating, burning and biting, as well as giving children alcohol, inappropriate drugs or poisonous substances. Reasonable physical restraint to prevent a child from harming themselves, another person, or from causing damage to property is not deemed to be abuse.
- **Sexual Abuse**
This involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women also commit acts of sexual abuse, as can other children.
- **Neglect**
This involves the failure to meet the child's basic physical and/or psychological needs and is likely to result in the serious impairment of the child's health or development. It may involve a failure to provide food, warmth, clothing, attention and adequate supervision, failure to protect a child from emotional or physical harm or danger, or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child's basic emotional needs.
- **Emotional Abuse**
This involves the persistent emotional ill treatment of a child. This includes inappropriate use of criticism, threats, taunting and verbal or cyber-bullying, any actions that demean the child. It may involve conveying to the child that they are worthless or inadequate, or causing a child to feel frightened or in danger. It may also include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may involve seeing or hearing the ill treatment of another person.
- **Bullying**
This is deliberate, hurtful behaviour, where it can be difficult for those being bullied to defend themselves and is usually repeated over a period of time. Bullying can be hurtful in either a deliberate or unintentional way and causes others to feel powerless, worthless and

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coerces others into conforming against their wishes. The four main types of bullying behaviour are physical – hitting, kicking, taking or hiding belongings; verbal – name-calling, teasing, insulting, making threats, writing degrading or defamatory messages either on paper or on electronic media, or contributing to or supporting others who are carrying out these types of behaviour; emotional – spreading rumours about someone, excluding someone from a group, peer group pressure to conform and belittling those with disadvantages; e-bullying/cyber bullying – email, text messages or chat lines, social networking services, internet sites, chat rooms, blogs, which may also involve the misuse of images obtained with or without permission. If the bullying involves the use of taking or distributing indecent images of young people under the age of 18, then this is a criminal offence under the Sexual Offences Act 2003 and the school has no choice but to involve the police to investigate these situations. Bullying and harassment is not always open, direct and simple to identify. It can be covert and very subtle. Perpetrators may not always be aware that their action(s) have been perceived to be offensive.

- **Discriminatory**

Abuse motivated by discriminatory attitudes towards race, age, religion, gender, sexual orientation, disability or cultural background.

- **Peer on Peer Abuse**

This is where children or young people may be involved in any form of physical, sexual, emotional or financial abuse and coercive control, exercised within children's relationships (both intimate and non-intimate). See section 7.3.15 for more details.

- 7.3.4 If an employee has any concerns about the welfare of a child, or the conduct of a member of staff, they should immediately report the matter to the DCP who will decide what further action to take. It is the duty of staff to inform only and not to investigate – this is the role of the police and social services. If staff, in the course of their work at Anglo-Continental, have a child safeguarding issue brought to their attention, this must be treated as a priority over all other work. All concerns should be reported immediately in person, or if this is not possible then by telephone and confirmed in writing using the 'Child Protection – Record of Disclosure' form available from the DCP.

Staff may have their suspicion or concern raised in a number of ways, the most likely of which are:

- bruising or evidence of physical harm, which may be accompanied by unusual behaviour by a child;
- an injury where the explanation from the child appears contradictory;
- sexually explicit behaviour in games or activities;
- the conduct of a member of staff;
- a child describing an abusive act that has happened to them;
- another child or young person telling you of their concern regarding a friend or fellow student;
- serious distrust of adults;
- a child is withdrawn or becomes increasingly dirty or shabbily dressed.

Every effort should be made to maintain confidentiality. Suspicions **must not** be discussed with anyone else other than those nominated above.

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- 7.3.5 The DCPD has the responsibility to act on behalf of the organisation in dealing with allegations or suspicion of abuse or neglect. This will include collating details of the allegation or suspicion, conducting an investigation where appropriate or reporting the matter to the nominated authority.

Under no circumstances should members of staff carry out their own investigation into suspicions or allegations of abuse. The child in question should not be questioned closely as this may distort any investigation that may subsequently be carried out by the Police or Social Services.

- 7.3.6 Children who are being abused will only talk to people they trust and with whom they feel safe. It is useful to think in advance about how to respond to the child in this situation.

It is understandable that the child may want to see the member of staff alone and away from the others. Location is very important and although it is necessary to respect the child's need for privacy, staff should also be aware that they need to protect themselves against any potential allegations. Do not listen to the child's disclosure in a completely private place and try to ensure that other members of staff are present, or at least nearby.

The child may approach the member of staff at the end of a lesson or activity session, or may arrive deliberately early at a time when they think they will not be busy. However, a disclosure is not just a quick chat, it will take time and usually has further consequences. Therefore, arrangements should be made to speak to the child at an appropriate time.

Where the child discloses abuse or acts in a way where abuse is suspected, the person receiving the information should;

- react in a calm but concerned way and take what the child says seriously;
- tell the child that they are right to share what has happened and that they are not responsible for what has happened;
- do not interrupt the child when they are recalling significant events and only ask questions to clarify what the child is saying and not to interrogate;
- avoid using questions such as 'Is there anything else you would like to tell me?' or 'What did they do next?' (these could be construed as leading questions);
- reassure the child that they were right to tell and acknowledge their courage;
- reassure the child that the problem can be dealt with;
- do not give assurances of confidentiality which cannot be kept, but reassure the child that the information will only be passed to people that need to know;
- contact the DCPD immediately and make a full written record of what is said within twenty-hours of the disclosure, using the 'Child Protection – Record of Disclosure' form. The written record should include the child's own words and should not include the assumptions or opinions of others. The record should include where possible, a description of any visible physical injury, a description of the situation e.g., what the

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was wearing, where the disclosure took place, at what time, who else was present and what prompted the disclosure. This record must be signed and dated by the member of staff writing the document.

- if the concern arises during the evening or at the weekend, the DCPD should be contacted through the organisation's emergency telephone – 07831 613193.

7.3.7 If the need should arise to deal with an allegation or suspicion of abuse against a member of staff within the organisation, or person(s) connected with Anglo-Continental, this can be an extremely difficult issue to deal with. However, when a concern arises there are three processes that may need to take place. These are:

- contacting MASH (Multi-Agency Safeguarding Hub – 01202 735046) who will instigate a child protection investigation;
- contacting the local police who will instigate a criminal investigation;
- action by Anglo-Continental to discipline or remove the member of staff.

It is important that the above are properly coordinated and that events are managed correctly. For this reason Anglo-Continental will take no direct action against a member of staff, or person(s) connected with Anglo-Continental, without the advice and agreement of the appropriate agencies (e.g. the police, NSPCC or Social Services), except where such action is necessary to immediately protect a child.

If, following consideration and consultation, the concern is clearly about bad practice rather than abuse, then the DCPD will take the necessary action to advise, manage or instigate disciplinary action.

Irrespective of the outcome, Anglo-Continental may consider suspension and/or disciplinary action in accordance with its disciplinary procedure, if the concern is with regard to a member of staff. If a member of staff's behaviour contravenes this policy, it will be treated as gross misconduct.

Staff are entitled to the moral and practical support of senior colleagues if an unwarranted allegation of misconduct is made against a member of staff. As long as the member of staff's behaviour is in line with this policy, we cannot envisage any allegation of misconduct being justified. However, any allegation will be scrupulously investigated, with due regard for confidentiality. This should not be interpreted as indicating culpability. It is part of our duty to protect staff working with us from any unfounded allegations.

7.3.8 All members of staff are expected to demonstrate exemplary behaviour when working with children in order to prevent children from abuse and staff from false allegations. The following are considered good practice and are conducive towards a positive climate and culture:

- always put the welfare of the child first;
- treat all children equally, with respect and dignity;
- work in an open environment avoiding private or unobserved situations and encouraging open communication;

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- avoid spending time alone with children away from others, ensure that you are within sight or hearing of others and whenever possible there should be more than one adult present during activities;
- exercise caution when discussing sensitive issues or initiating any physical contact;
- staff should seek advice from a line manager if a child should try to establish contact and copy communications to their line manager;
- avoid becoming personally involved in a student's personal affairs;
- be an excellent role model – this includes not smoking or drinking alcohol in the company of children;
- whenever possible give enthusiastic and constructive feedback rather than negative criticism;
- it is not appropriate to initiate or agree to 'friendship' requests or similar with children that will result in the sharing of personal information, photos or status updates;
- be aware that personal web profiles on social media can be viewed by anyone and therefore staff should be especially cautious about their public web profiles and privacy settings.

The following can never be sanctioned:

- allow allegations to go unchallenged, unrecorded or not acted upon (this applies to any form of abuse or bullying);
- engage in any non-professional form of relationship, sexual or otherwise, with a young person in your care, even if this person is over the age of consent (this is an abuse of trust);
- engage in physically rough or sexually provocative games including horseplay;
- share a room alone or overnight with a child;
- allow or engage in any form of inappropriate touching;
- having an intimate relationship with a child;
- allow children to use inappropriate language unchallenged;
- allow verbally or physically aggressive behaviour to go unchallenged;
- make sexually suggestive comments to a child, even in fun;
- deliberately reduce a child to tears as a form of control;
- invite or allow children to visit you at home;
- take children alone in a car journey, however short;
- take photographs or videos unless consent has been obtained (this includes the use of camera phones);
- perform acts of a personal nature for children that they can do for themselves;
- establish or seek to establish social contact with children during or after the course;
- give to children personal email addresses or personal phone numbers;
- communicate via email, text, phone, social networking sites, blogs, web pages or messaging services.

The following must always be immediately reported to the DCPP:

- if you accidentally hurt a child;
- if a child seems distressed in any manner;
- if a child appears to be sexually aroused by your actions;
- if you are concerned that a child is becoming attracted to you;
- if you are concerned that a colleague is becoming attracted to a child;

- if a child misunderstands or misinterprets something you have done;

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- if you have had to use reasonable physical restraint to prevent a child harming themselves, or another, or from causing significant damage to property.

It is every member of staff's responsibility to take all reasonable steps to protect children from likely risks. Staff should also at all times, be alert to potential dangers, taking swift and appropriate action to ensure safety. Children are primed to explore or play games. Staff should do their best to anticipate adventurous behaviour and assess the risks involved. Children have less experience of danger than adults and can be unaware or heedless of dangers which others can clearly recognise.

To prevent young people coming to harm through their own rash actions staff should be aware of the following :

- judge carefully how to intervene in a situation which is not appropriate behaviour by a child;
- often the best course is to guide children into a safe course of action, rather than just telling them to stop what they are doing;
- if you have to dissuade children from taking a particular course of action – be clear and definite about telling them to stop;
- avoid being officious or challenging;
- if despite your efforts, a child persists in jeopardising their own or other people's safety – get help immediately from a senior member of staff;
- if a child is in serious danger and persuasion has failed to alter their actions, you should treat this as an emergency and contact the emergency services.

If restraint is absolutely necessary to prevent a child from taking a course of action, try non-physical approaches first, such as talking to them, by asking them not to move if they are injured, or by standing in their way. If you are then forced to use physical restraint, it should be the minimum necessary for their safety. If they are in imminent danger try holding them by their clothing. Whatever the circumstances, physical restraint must be appropriate and reasonable, otherwise, it may be regarded as assault.

- 7.3.9 Any information regarding child protection issues will be stored in a secure place and there will be limited access to this. Only the DCP, her deputy and the Managing Director may have access to this.

As an employer, we have a 'duty to refer' to external authorities (police, local child protection authorities) any suspicion or allegation of inappropriate contact by an individual where we perceive there is or may be a risk of harm to children. Concerns relating to child protection which have not been referred to an external body will be retained in a secure location for a period of one year.

In accordance with the 'Public Interest Disclosure Act 1998', Anglo-Continental will support and protect those staff who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions.

- 7.3.10 Non-compliance with the above policy will result in disciplinary procedures.

- 7.3.11 This policy and procedures will be regularly monitored and reviewed in accordance with changes in legislation and guidance on the safeguarding of children issued by the British Council or ISI, or following any issues or concerns that have been raised.

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7.3.12 Counselling is available to all members of staff who have been affected in any way by this Policy and further advice can be sought from the DCPD.

7.3.13 **Appendices to Safeguarding Policy**

Child Sexual Exploitation (CSE)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children may be tricked into believing that they are in a loving, consensual relationship. They might be invited to parties with older children or young adults and given drugs and alcohol. They may also be groomed on line. Some indicators of children being sexually exploited are: going missing for periods of time or returning to the homestay family late, regularly missing school, appearing with unexplained gifts, having older boy or girl friends, moods swings or changes in emotional wellbeing, drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 years of age is also an offence. It is an offence for a person to have a sexual relationship with a 16 or 17 year old if that person holds a position of trust or authority in relation to the young person.

Female Genital Mutilation is a form of child abuse and as such is dealt with under the school's Safeguarding policy. It is illegal in the UK and it is a grave violation of the human rights of girls and women. 'Female Genital Mutilation (FGM) comprises of all procedures involving partial or

total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons' – definition supplied by the World Health Organisation (1997). It is frequently a very traumatic and violent act for victim and causes severe pain. There may be immediate and/or long-term health consequences including mental health problems, difficulties in childbirth causing danger to the child and mother. FGM is a deeply embedded and social norm practised by families for a variety of complex reasons.

Countries where FGM is most commonly practiced include Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, and Eritrea. However, girls from non-African communities that are also at risk include those from Yemen, Oman, UAE, Saudi Arabia, India, Indonesia, Pakistan and Kurdish nationals.

Indications that FGM has taken place are a prolonged absence from school with noticeable behaviour change – especially after a return from holiday and spending long periods of time away from class during the day. Indications that a child is at risk of FGM are that the child comes from a community that is known to practice FGM; in conversation, a child may talk about the issue and express anxiety about a special ceremony or returning to their home country after their course has finished. A child who has undergone or who is at risk of FGM should be seen as a child protection issue and advice should be sought from the DCPD who will make a referral to Social Care and the Police.

Preventing Extremism and Radicalisation – we are committed to providing a secure environment for all of our students and staff and safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.

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Extremism is defined as the holding of extreme political or religious views. Radicalisation can involve the exploitation of vulnerable people, including children, to hold extreme views, including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

There are a number of behaviours which may indicate that a child is at risk of being radicalised or exposed to extreme views. These include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of materials or symbols associated with an extremist cause;
- attempts to recruit others to the group/cause;
- communications with others that suggests identification with a group, cause or ideology;
- using insulting to derogatory names for another group.

More critical risk factors could include:

- accessing violent extremist websites, especially those with a social networking element;
- possessing or accessing violent extremist literature;
- using extremist narratives and a global ideology to explain personal disadvantage;
- justifying the use of violence to solve societal issues;
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

If employees have any concerns regarding the above, then advice should be sought from the DCP who will act as the first point of contact within the school for case discussions relating to students who may be at risk. Relevant information will be collated in relation to vulnerable students into the 'Channel' process.

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Dorset Police Counter-Terrorism Unit through their 'prevent' team and it aims to safeguard individuals who might be vulnerable to be radicalised, so that they are not at risk of being drawn into terrorist-related activity. They also provide early intervention to protect and divert people away from the risks they face and reduce vulnerability. They can be contacted on 0800 789 321 or through emailing the Safeguarding Referral Unit on SRU@dorset.pnn.police.uk

Further details on preventing Extremism and Radicalisation can be found in our Prevent Policy.

7.3.14 **Social Media Policy**

The following policy provides direction for staff at Anglo-Continental when participating in online social media activities. Due to the wealth of new social media websites like Facebook, Twitter, YouTube, MySpace, there is now the potential to keep in touch with friends and colleagues and to share information on line. This translates into the need for a greater level of awareness, responsibility, and accountability for all users – please think carefully about the information you post.

Key Principle

Interacting with each other on-line is no different than interacting face-to-face and we require our staff to maintain the same principles of respect, dignity, concern for and protection of others and safety in all interactions. Activities which are inappropriate, unethical, illegal, or which cause undue discomfort for members of the school or wider community (including students, members of staff, or others associated with the school) should always be avoided in written communications, and cyberspace.

Online Interaction and Identity

Be aware of what you post online. Social media venues are very public. What you contribute leaves a permanent digital footprint for all to see. Do not post anything you would not want your friends, colleagues, or a future employer to see, as you cannot control posted data once it is on the web. Staff should also be aware of the following:

Do not post secret or confidential information online e.g. colleagues / students personal data as information that is not easily available to others should be kept confidential;

Do not complain or make disrespectful comments about other staff members, homestay families or students. If you have any concerns, talk to your line manager or the Personnel Manager. An informal chat is better than letting off steam online because this could result in disciplinary action been taken against you;

Staff may not use social media sites to publish, upload or post a link to any inappropriate racist, bullying, harassing or sexually explicit material. Cyber-bullying/harassment will not be tolerated. For example, sending an abusive message to a colleague from your mobile / home computer, outside of normal working hours. If someone has posted an offensive or inappropriate comment, do not join in, as your participation will not be viewed any more leniently.

Contact with Students

Employees should not have a student or former student under the age of 18 as a 'friend' to share information with. Neither should any employee interact with a student or former student under the age of 18 on social networking sites. Should a student, or former student, under the age of 18 attempt to join your area on a social networking site, then you must inform your line manager and the Personnel Manager.

Privacy

To make it difficult for others to access information about your private life, you should consider reviewing the privacy settings on your profile, so that only people you have accepted as friends can see your content. In addition, regularly review who is on your 'friends list' on your personal profile. Any member of staff who feels that that have been harassed or bullied, or are offended by material posted or uploaded by a colleague onto a social media website should inform the Personnel Manager.

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Where evidence of misuse is suggested, the School will undertake a more detailed investigation and this may result in sanctions being imposed - resulting in a verbal, written and final warnings and ultimately dismissal. If necessary, any information gathered during such an investigation may be handed to the police or other bodies including the Local Safeguarding Children Board.

7.3.15 Peer on Peer Abuse

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is where children or young people may be involved in any form of physical, sexual, emotional or financial abuse and coercive control, exercised within children's relationships (both intimate and non-intimate). Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Peer on peer abuse can take various forms such as:

- bullying and cyberbullying (For description see Section 7.3.3);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment; (refers to sexual offences under the Sexual Offences Act 2003 and includes rape, assault by penetration, sexual assault or unwanted conduct of a sexual nature that can occur online or offline and violates a person's dignity;
- sexting (known as youth produced sexual imagery and is when someone sends or receives a sexually explicit text, image or video. This includes sending nude or rude pictures/selfies);
- initiation type violence and rituals (also known as hazing this involves a ceremony or ritual which is used to induct newcomers into a group or organisation. It can take the form of mild rituals to severe and violent ceremonies in order to promote a bond between members or a shared rite of passage.

If staff have suspicions or concerns about any of the above which can manifest as a single incident, appear to be socially acceptable within a peer group, involve overt elements of victimisation/discrimination, an element of coercion or pre-planning or a power imbalance between two people then the Designated Safeguarding Lead Safeguarding Officer (Julie Haine) or in her absence Rina Loder or Jonathan Jeffery should be contacted immediately and informed.

This Safeguarding Policy was last reviewed on 27 February 2019. It will next be reviewed on 1 January 2020, or sooner, if deemed necessary.

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**7.4 Prevent Policy
(Preventing Extremism and Radicalisation Policy)**

7.4.1 Principles

Extremist organisations can develop and popularise ideas which create an environment conducive to violent extremism and terrorism. Anglo-Continental is committed to providing a secure environment for students, staff and homestay families. All staff and volunteers working at the school recognise that safeguarding is everyone's responsibility, irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not. Under the Counter Terrorism and Security Act 2015, the school has a statutory duty to have due regard for the need to prevent people from being drawn into terrorism. This policy is one element within our overall school arrangements to safeguard and promote the welfare of all children and vulnerable adults in line with our statutory duties set out in section 175 of the Education Act 2002, Prevent Strategy 2011 and the Counter-Terrorism and Security Act 2015 and it should be read in conjunction with the school's Safeguarding Policy.

7.4.2 Understanding Terminology and the Risk of Extremism

Radicalisation is the act or process of making a person more radical or favouring extreme or fundamental changes in political, economic or social conditions, institutions or habits of mind. Extremism is holding extreme political or religious views which may deny rights to any group or individual.

Staff, students, group leaders or members of our homestay families may already have, or over a period of time may develop, extremist views. This may be because of being influenced by a range of factors such as global events, peer pressure, media, family views, extremist materials (hardcopy or on-line), inspirational speakers, friends or relatives being harmed and social networks. People who are vulnerable are more likely to be influenced and their vulnerability could stem from a range of causes including loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime and bereavement.

7.4.3 Ethos and Practice

There is no place for extremist views of any kind at Anglo-Continental, whether from internal sources – students or staff, or external agencies or individuals. Our students see our school as a safe place, where controversial issues or events can be explored safely and we have a duty to ensure that this happens. We recognise that extremism and exposure to extremist materials and influences can lead to unwanted outcomes for our students and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our students and staff. Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice. We aim to ensure that our students thrive, feel valued and are not marginalised in any way.

Extremist influences or prejudiced views can emanate from a variety of sources and media, including via the internet. At times, students may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. Any such behaviour displayed by students or staff will always be challenged and where appropriate dealt with. Where misconduct is proven against a member of staff then the Employer Access Team – employer.access@education.gsi.gov.uk / Telephone 0207 593 5391, will be contacted so that consideration can be given as to whether a Prohibition Order is warranted.

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School staff will be alert to the following:

Disclosures by students of their exposure to extremist actions, views or materials;
Graffiti symbols, writing or art work promoting extremist messages or images;
Students accessing extremist material online, including through social networking sites;
Teachers or homestay families reporting changes in behaviour, friendship or requests for assistance;
Students or staff voicing opinions drawn from extremist ideologies and narratives;
Changes in behaviour e.g. becoming isolated;
Fall in standard of work, poor attendance, disengagement;
Use of extremist or 'hate' terms to exclude others or to incite violence;
Intolerance of difference, whether secular, sexual or religious;
Attempts to impose extremist views or practices on others;
Overt new religious practices;
Anti-Western or anti-British views;
Students, staff or homestay families voicing concerns.

If concerned, staff then need to follow the process of **NOTICE – CHECK – SHARE**.

Notice – notice examples of the above behaviours, **check** – speak to colleagues and **share** – either in-school or externally. In-school actions may include challenging views or supporting students through Student Support strategies. The Designated Lead Safeguarding Officer (Julie Haine – Personnel Manager), or in her absence, Rina Loder (Student Support Counsellor), will act as a source of advice for others, responsible for the Prevent Risk Assessment /Action plan and lead on engaging external partners. It may be necessary to refer concerns on the referral pathway. 'Channel' is a partnership approach to support individuals vulnerable to recruitment by violent extremists. Information and advice can be sort through the local coordinator 0800 789 321, or through emailing the Safeguarding Referral Unit on SRU@dorset.pnn.police.uk

7.4.4 Ways to Counteract Risks / Role of Staff

Staff at Anglo-Continental will promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. It should be noted that extremism can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as any religious extremism. We will encourage students to respect one another and to respect and tolerate difference, especially those who have a different faith. We must endeavour to keep our staff and students safe and promote life in modern, multi-cultural Bournemouth by actively promoting core British values through our culture and traditions.

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including education, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. As a school, we have a duty to provide a safe environment for staff and students to express their views, but also to appreciate the impact their views can have on others, to be responsible for their actions and to understand that the use of violence to further any cause is criminal. We confirm that our teaching approach is to protect our students from harm and to ensure that they are taught in a way that is consistent with the law and our values. All staff, students and homestay families, have a responsibility to immediately challenge any radical or extremist views, by referring to the international and multi-cultural environment of the school and the level of tolerance expected.

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Additional measures to be taken are:

- Staff being ready to react when world or local events cause upset and there is the likelihood of conflicting feelings being expressed among students;
- Have in place robust filters on IT equipment and clear rules on accessing extremist websites;
- Ensure that extremist speakers do not use the school's premises to distribute material or expound views;
- Staff and homestay families to be observant and vigilant in noticing any signs of radical or extremist behaviour;
- Student Support, all other staff members and homestay families to work together in order to support students identified as vulnerable and in danger of becoming involved in extremism or being radicalised.

7.4.5 Child Protection

Please refer to our Safeguarding Policy for the full procedural framework on our Child Protection duties. Staff will be alert to the fact that whilst extremism and radicalisation are broadly a safeguarding issue, there may be some instances where a student may be at direct risk of harm or neglect. For example; this could be due to a student displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with, or staff may become aware of information about a student's family, that may equally place a student at risk of harm. (These examples are for illustration and are not definitive or exhaustive). All adults working at the school are required to report instances where they believe a child or vulnerable adult, may be at risk of harm or neglect to the Designated Lead Safeguarding Officer (Julie Haine), who will make a referral to children's social care, the Dorset Prevent Team or MASH (Multi-Agency Safeguarding Hub). The Lead Child Protection Officer is the focus for staff and the local 'expert' regarding any concerns about an individual's safety or wellbeing and is the first point of contact for informing external agencies.

7.4.6 Training

Whole school in-service training with regard to Safeguarding / Child Protection and our Prevent policy will be organised for staff every year and will comply with the prevailing government /social services arrangements. The Designated Lead Safeguarding Officer will ensure that all adults working in the School receive appropriate levels of training, guidance and support in regard to safeguarding students from extremism and radicalisation. Appropriate information will also be forwarded to the homestay families via the Homestay Handbook and links to the Prevent policy on the Anglo-Continental website.

7.4.7 Recruitment and Staff Conduct

The arrangements for recruiting all staff to the school, will follow guidance for safer recruitment and best practice in education settings, including, but not limited to, ensuring that enhanced DBS checks are obtained, that references are always received and checked and that we complete and maintain a single central record of such vetting checks. We will apply safer recruitment methods, best practice principles and sound employment practice in general and in doing so, will deny opportunities for inappropriate recruitment or advancement.

7.4.8 Contact Details

It should be noted everyone should report any concern or incident to the Designated Lead Safeguarding Officer, no matter how small the initial concern is. All reported issues will be dealt with sensitively and carefully, and confidentiality is assured for the person reporting the incident.

TEACHERS' HANDBOOK

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Julie Haine – Personnel and Student Administration Manager, Designated Lead Safeguarding Officer – 01202 411813, jhaine@anglo-continental.com or via the school's emergency telephone 07831 613193, Rina Loder – Student Support Counsellor, Deputy Safeguarding Officer – 01202 411834, rloder@anglo-continental.com Jonathan Jeffery – Safeguarding Liaison Officer – 01202 411886/411860, jjeffery@anglo-continental.com Dorset Safe Schools and Community Team 01202 222844 Local coordinator for Channel - 0800 789 321, or through emailing the Safeguarding Referral Unit on SRU@dorset.pnn.police.uk Dorset Police on 101 or in an emergency 999 / Dorset Safeguarding Children's Board 01202 458102 / Emergency Duty Service (children's social care) 01202 657279