

Safeguarding Policy

Policy written by: André Murray
Policy reviewed by: André Murray (Designated Senior Person)
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This document sets out the policies and procedures which WE Bridge Academy implements to ensure the safety, security and wellbeing of all students who are under the age of 18. It covers all regulated activity both on and off the premises by staff, homestays, activity leaders and contactors. This policy is reviewed and updated annually by the Designated Senior Person, André Murray, and signed off by the Chief Operating Officer, Penny Mathews, and the Chief Executive Officer, David Henson. In addition, this policy is amended as required to incorporate:

- Changes in legislation
- Changes in guidelines
- Changes to academy procedures and practices
- Changed to circumstances in the academy.

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A. POLICY STATEMENT

A1. Context

WE Bridge Academy ('the academy') specialises in students who want to develop English language, academic and professional skills in a global market. Learners benefit from high standards of teaching and individually tailored programmes.

WE Bridge Academy is located in the centre of Cardiff and accepts students from 16 years of age. All courses provide an adult-learning environment and so the academy is careful to make it clear via its publicity, and prior contact with agents and parents, that students aged 16 or 17 will not receive a junior course level of supervision, and that they will be in classes with students aged 18+. The academy requires that students and their parents/guardians consider this carefully before any 16 or 17-year-old enrolls on the course.

The academy recognises its responsibility with respect to safeguarding the welfare of any child, vulnerable adult, and indeed all students that may be attending the academy, against abuse and believes that it is always unacceptable for any student to experience abuse of any kind.

The academy seeks to maintain a safe and supportive environment and ensure that all employees and homestay providers working with the academy accept and recognise these responsibilities. The academy also recognises that it has a responsibility to protect staff from unfounded allegations of abuse.

A2. Key terminology

Children and under 18s

The Children Act 1989 states the legal definition of a child as a person under the age of 18 and the Health and Safety at Work Regulations 1999 defines the term children / child to apply to persons between birth and 16 years. Individuals of 16 and 17 years are young persons; anyone over the age of 18 is an adult. In this policy, the terms 'under 18s', 'children' and 'child' are used interchangeably.

Safeguarding

This is the action that is taken to promote the welfare of children and protect them from harm. It means caring for children appropriately and protecting them from that which is not in their best interests; it includes health and safety, child protection and pastoral care.

Child protection

This is a part of safeguarding and promoting welfare and means protecting children from abuse. Child abuse can be defined as: 'Child maltreatment, sometimes referred to as child abuse and neglect, includes all forms of physical and emotional ill-treatment, sexual abuse, neglect, and exploitation that results in actual or potential harm to the child's health, development or dignity. Within this broad definition, five subtypes can be distinguished: physical abuse, sexual abuse, neglect and negligent treatment, emotional abuse and exploitation' (World Health Organization, who.int).

Duty of Care

This a legal responsibility that adults who work with children have a duty to look after them properly; children depend on adults for their safety and well-being.

Regulated activity

These are roles 'involving responsibility for or substantial access to under 18s' (Care of under 18s: Guidance for ELT Providers, British Council, 2016). This includes any position that has direct contact with children, or a position which manages staff who work with children. Regulated activities include teaching, leisure programme supervision, and homestay provision when they are carried out frequently (once a week or more), intensively (four times or more in a 30-day period) or overnight. Regulated activity also includes any activity of any kind carried out by an individual visiting a school frequently or intensively, or in connection with the school, and which gives the individual opportunity to have

unsupervised contact with children. Any person that is engaged in regulated activity must have an enhanced disclosure check.

A full description of what constitutes regulated activity can be found in:

‘Regulated activity in relation to children: scope’

Factual note by HM Government 2012

Early help

Early help means providing support as soon as a problem emerges at any point in a child's life. (Working together to safeguard children, July 2018).

Safer recruitment

This refers to recruitment procedures and practices which aims to prevent the appointment of people who are at risk to children.

Designated Senior Person (DSP) and Designated Safeguarding Staff (DSS)

The Designated Senior Person (DSP) is the person who takes overall responsibility for safeguarding and leading the team of all Designated Safeguarding Staff (DSS). The CEO has overall responsibility of these staff and safeguarding policies and procedures.

All the staff listed below have Advanced and Specialist Safeguarding training.

- Designated Senior Person (DSP): André Murray
- Designated Safeguarding Staff (DSS): Clara Martins, Richard Eastman, Kat Ekiert, Rachel Monk

Please refer to section A8. Roles and responsibilities for further details regarding the roles of the DSP and DSS.

Vulnerable adult

The definition of a vulnerable adult is a ‘person aged 18 years or over who may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself or herself, or unable to protect him or herself against significant harm or exploitation’ (1997 Consultation ‘Who Decides?’ issued by the Lord Chancellor’s Department).

A3. The academy's commitment to safeguarding

WE Bridge Academy is committed to the definition of safeguarding and promoting the welfare of children as defined in *Keeping Children safe in Education, 2020 (updated January 2021)*. WE Bridge Academy believes that safeguarding is the individual and collective responsibility of everyone working in the academy. Our policy recognises that the welfare and interests of children, and vulnerable adults, are the top priority in all circumstances and is committed to ensuring its safeguarding practices reflects Accreditation UK requirements, as well as all legal obligations.

The academy's aim is to prevent abusive behaviour in all forms and will not tolerate disrespectful behaviour towards students or staff members.

WE Bridge Academy is aware that some children, including disabled children and young people, or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

A4. Under 18s and principles of entitlement

WE Bridge Academy's safeguarding policy aims to ensure that, regardless of age, gender, race, ethnicity, religion or beliefs, sexual orientation, socio-economic background, all students have a positive and enjoyable experience in a safe and child-centered environment. All children have an entitlement to be protected.

Under 18s principles of entitlement

1. All children have rights. No one can take away a child's right to be safe.
2. All children have the right to say 'No' if any person tries to do something to them which they feel is wrong.
3. All children must feel they can tell an adult of any incident that frightens, confuses them or makes them unhappy.
4. All children must know that if they go to an adult for help, they will be believed and supported.
5. All children have the right to be treated with respect and to be safeguarded from harm.

A5. Adult responsibilities

All staff and any other adults involved with WE Bridge Academy are expected to accept and recognise their safeguarding responsibilities.

All adults must:

1. Understand, follow and implement this safeguarding policy and its procedures.
2. Safeguard the welfare of all under 18s and vulnerable adults at WE Bridge Academy.
3. Continually develop their awareness of any safeguarding issues through the sharing of good practice, and the completion of regular safeguarding training.
4. Follow child protection guidelines and accepted procedures.
5. Provide children with expected codes of behaviour and help children to understand what those are when necessary.
6. Report any concerns about any safeguarding and/or child protection issues with the relevant member of staff, and/or relevant outside organisations.
7. Ensure that all appropriate action is taken in the event of any safeguarding concerns or incidents, and appropriate support is provided to the individual(s) who discloses the concern.
8. Ensure that confidential, detailed and accurate records of all safeguarding concerned are maintained and securely stored.
9. Prevent the unemployment of any unsuitable individuals.
10. Ensure that continuous safeguarding arrangements and procedures are always in operation.
11. Always be vigilant to any safeguarding and child protection issues.

A6. Associated policies and documents

WE Bridge Academy has additional policies and documents that are associated with the safeguarding of children and should be read in conjunction with this policy. These policies and documents include:

- E-safety and acceptable use of ICT policy
- Preventing radicalisation and extremism (Prevent)
- Guidelines for homestay providers
- Guidelines for students in homestay
- Health and safety policy
- First aid policy
- Fire safety risk assessment
- Student handbook
- Student code of conduct
- Staff handbook
- WE Bridge Academy risk assessments (on premises and off site)
- Recruitment policy

A7. Policy review and availability

WE Bridge Academy is committed to reviewing its safeguarding policy and procedures at least every 12 months, or sooner if there are relevant changes to the law, and / or in the interests of best practice. The policy is written by the DSP, subject to approval by the CEO. However, all DSS are welcome to comment and to make suggestions for the policy at any time.

A full copy of this policy, and its updates, is given to every member of staff recruited at WE Bridge Academy. Each member of staff is asked to sign a declaration to confirm that they have received and read the policy and are aware of the academy's procedures that are in place to help them to understand and carry out their safeguarding roles and responsibilities.

A full copy of this policy is also available on the WE Bridge Academy's public website: www.we-bridge.co.uk

Group-specific safeguarding procedures are also available for the following: homestay providers, group leaders, under 18s, and visitors to WE Bridge Academy.

A8. Roles and responsibilities

All staff and students at WE Bridge Academy are required to take shared responsibility for the safeguarding and safety of any children and vulnerable adults. All staff and students must be aware of and abide by WE Bridge Academy's code of conducts. This includes all staff and students being aware of safeguarding issues and knowing how to raise concerns or issues with the relevant member of staff.

All WE Bridge Academy staff are in a position of trust, especially those staff who teach, support, and guide, or in any way interact with students, children and adults in need of safeguarding. All staff should always be aware of this and act accordingly.

The CEO has overall accountability and strategic responsibility for safeguarding vulnerable groups within WE Bridge Academy.

The Designated Senior Person (DSP) has operational responsibility for safeguarding vulnerable groups within WE Bridge Academy and carries out a leadership and coordination role. The DSP manages the Designated Safeguarding Staff.

The DSP's job roles and responsibilities include the following:

- referring cases of suspected abuse to the local authority children's social care as required;
- supporting staff who make referrals to local authority children's social care;
- referring cases to the Channel programme where there is a radicalisation concern as required;
- supporting staff who make referrals to the Channel programme;

- referring cases where a person is dismissed or left due to risk / harm to a child to the Disclosure and Barring Service (DBS) as required;
- referring cases where a crime may have been committed to the police as required;
- liaising with the CEO regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaising with the “case manager” and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- liaising with staff on matters of safety and safeguarding and deciding whether to make a referral by liaising with relevant agencies;
- acting as a source of support, advice and expertise for staff;
- carrying out staff training as required;
- ensuring each member of staff has access to and understands the academy’s child protection policy and procedures, especially new and part time staff;
- being alert to the specific needs of children in need, those with special educational needs and young carers;
- keeping detailed, accurate, secure written records of concerns and referrals;
- understanding and supporting the school or college with regards to the requirements of the Prevent duty and providing advice and support to staff on protecting children from the risk of radicalisation;
- obtaining access to resources and attending any relevant or refresher training courses;
- encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the academy may put in place to protect them.
- ensuring the academy’s child protection policies are known, understood and used appropriately;
- ensuring the academy’s child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensuring the child protection policy is available publicly and parents/guardians are aware that referrals about suspected abuse or neglect may be made and the role of the academy in this;
- linking with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

The Designated Safeguarding Staff (DSS) help to support the DSP in coordinating safeguarding practice for children within WE Bridge Academy. They also deputise in the absence of the DSP. However, the ultimate lead responsibility for child protection, as set out above, remains with the DSP; this lead responsibility should not be delegated.

The DSP or a member of DSS will always be available when the academy is open for staff to discuss concerns.

A member of the DSS will always be contactable via the academy’s 24-hour emergency phone number.

The DSP and DSS all have Advanced and Safeguarding training. In addition, the DSP and some of the DSS have Specialist Safeguarding Training.

A9. The involvement of under 18s in safeguarding policy review

WE Bridge Academy ensures that its safeguarding policy and procedures are made clear to all students at the time of induction.

The under 18s code of conduct is explained to all relevant students with the reasons why they must follow special rules and regulations.

Weekly forums are held with all under 18 students to discuss any concerns or issues, but also for staff to receive feedback from the students about the academy's safeguarding policies and procedures. All comments are recorded and reviewed by the DSP / DSS and action is taken when appropriate.

Furthermore, topics regarding safeguarding issues, such as internet safety and cyberbullying, are regularly introduced into lessons for all students to discuss and to provide feedback on.

A10. Policy references

The following documents and policies have been consulted in writing this policy:

- The Children Act, 1989
- The Children Act, 2004
- Working Together to Safeguard Children, 2018
- Accreditation UK Inspection criteria, requirements and additional guidance, 2019
- Accreditation UK Handbook, 2016-17
- Accreditation UK "Care of Under 18s: Guidance for ELT Providers, January 2016
- The Independent School Inspectorate's framework, 2018
- Protecting from Radicalisation: The Prevent Duty, 2015
- Keeping Children Safe in Education 2020 (updated January 2021)
- Safeguarding Policy Review Checklist (September 2017), Andrew Hall, Success in School.
- Sharing nudes and semi-nudes: how to respond to an incident, 2020
- Safeguarding for online lessons, English UK, 2020
- Criminal Exploitation of children and vulnerable adults: County Lines guidance, 2018

A11. Useful contacts

Cardiff and Vale Local Safeguarding Children Board

<https://www.cardiffandvalersb.co.uk/children/contact-childrens-board/>

029 2233 0880

029 2233 0883

NSPCC (National Society for the Prevention of Cruelty to Children) <https://www.nspcc.org.uk>

0808 800 5000

NSPCC whistleblowing helpline

This is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285; the line is available from 8:00 AM to 8:00 PM, Monday to Friday.

B. CODE OF CONDUCT

B1. Overview and principles

WE Bridge Academy's priority is to establish a safe and trusting environment for all our staff and students. This helps to ensure that all under 18s feel secure and happy, and reduces the risk of any actions by adult members of staff being misconstrued.

This code of conduct:

1. Assists staff working with under 18s to work safely and responsibly, and to monitor their own standards of practice.
2. Sets clear expectations of behaviour and codes of practice.
3. Makes clear that WE Bridge Academy does not tolerate unlawful or unsafe behaviour and will use disciplinary, or legal action, where appropriate.

B2. Position of trust

As a result of their knowledge, position and their authority invested in their role, all adults working in schools are in positions of trust in relation to under 18s.

This means that all adult staff members should:

1. Not use their position to gain access to information for their own or others' advantage.
2. Not use their position to imitate, bully, humiliate, threaten, coerce or undermine under 18s.
3. Not use their status and standing to form or promote relationships, which are of a sexual nature, or which may become so. Any person in a position of trust who engages in any sexual activity with a child is breaking the law, even if the child is above the legal age of consent of 16 (Sexual Offences Act 2003).

B3. Setting standards

We expect the best possible conduct from our staff when working with under 18s.

All staff must:

1. Always be excellent role models to under 18s.
2. Always consider how their actions will be interpreted by under 18s.
3. Be aware, approachable and understanding.
4. Always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others.
5. Report to the DSP or DSS anything that might have been done or said accidentally (by themselves or another member of staff) which may have been misconstrued by an under 18-year-old or may turn into an allegation (e.g. if the under 18 seems to become infatuated with a member of staff).
6. Raise all concerns or incidents to the DSP or DSS. This is a legal obligation. Any staff member who raises a concern, or makes an allegation, can do so without fear of being penalised and can be assured that any information will be treated as confidential.

B4. Adult interaction with under 18s

WE Bridge Academy staff members will abide by the following rules when interacting with under 18s.

All staff must ALWAYS:

1. Work in an open environment. Avoid private or out-of-sight locations and encourage open communication.
2. Speak clearly, without whispering so that students do not need to come close to hear.
3. Avoid spending time with individual students away from others.
4. Treat all students, regardless of race, disability, religion or belief, gender, or sexual orientation equally and with respect and dignity.
5. Ensure the student's welfare comes first.
6. Be aware of the impact of proxemics (know where and how to place your body and maintain safe and appropriate distances).
7. Maintain professional boundaries (e.g. using a specific mobile number or Academy email address for work purposes)

8. Present as an exemplary role model by not smoking or drinking alcohol, swearing, allowing suggestive conversations or jokes when in the company of a child.
9. Seek to be enthusiastic and constructive when giving feedback rather than making negative or critical remarks.
10. Record any injury that occurs and seek attention from a qualified First Aider.
11. Record any incident of concern involving a student's welfare.

All staff must NEVER:

1. Allow allegations made by a child to go unacknowledged, unrecorded or not acted upon (this applies to any form of abuse or bullying).
2. Lock doors, cover windows or use 'Do Not Disturb' signs.
3. Impose humiliating or power-based punishments on a student or reduce a child to tears.
4. Engage in rough, physical or sexually provocative games, including horseplay.
5. Allow or engage in any form of inappropriate touching.
6. Share a bedroom with a child.
7. Allow children to use inappropriate language unchallenged.
8. Make sexually suggestive comments to a child, even in fun.
9. Do things of a personal or intimate nature for children or disabled young people that they can do for themselves.
10. Invite or allow children to stay with you at your home unsupervised.
11. 'Friend' a child on their social media or yours.
12. Take photographs or videos of children unless written and signed consent has been obtained from the parent / guardian.
13. Seek physical contact.

B5. Appropriate appearance

Adults should dress in ways that are appropriate to their role and this may need to be different to how they dress when not at work.

Adult staff members who work with under 18s should ensure they are dressed appropriately for the tasks and the work they undertake. Those who dress in a manner could be considered as inappropriate could render themselves vulnerable to criticism or allegations.

This means that all staff members should:

1. Wear clothing that is appropriate to their role.
2. Wear clothing that is not likely to be viewed as offensive, revealing, or sexually provocative.
3. Wear clothing that does not distract, cause embarrassment or give rise to misunderstanding.
4. Wear clothing that is compliant with professional standards.

B6. Communication with under 18s (including the use of technology and social media)

Communication with under 18s both in the 'real' world and through web-based and telecommunication interactions should only take place within explicit professional boundaries. This communication is not only face-to-face, but includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chatrooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand-held devices.

This means that all staff should:

1. Not seek to communicate/make contact or respond to contact with pupils outside the purposes of their work.
2. Not give out their personal contact details to under 18s; for example, their personal e-mail address, home or mobile numbers, or details of any social media or digital identities. All communications must be through official channels such as company email accounts or company platforms such as Moodle.
3. Immediately inform the DSP/DSS if an under 18-year-old attempts to contact or correspond with them via their personal contact details, including via social media networks. The adult should not respond to the contact. The child should be firmly and politely informed that this is not acceptable (the DSP or DSS will tell the child).
4. Follow WE Bridge Academy's E-safety and acceptable use of ICT policy.

5. Ensure that their use of technologies and social media could not bring WE Bridge Academy into disrepute.

B7. Homestay providers

Homestay providers are given specific guidelines on how to deal with under 18s, covering issues such as curfews, alcohol, internet restrictions and so on.

The main household member must have an up-to-date enhanced DBS certificate which must be checked by the housing officer. Furthermore, each adult household member that lives in the homestay also must complete a self-declaration form. For full guidance, please refer to Rules and regulations for homestay providers with students under 18.

B8. Transporting under 18s

If a staff member is required to transport an under 18-year-old as part of their work then the need for this must be agreed by the DSP, and a risk assessment must be carried out to manage any known risks.

Staff should never offer to transport pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances, the matter should be immediately recorded and reported to the DSP and/or the CEO.

Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.

Staff must make sure that their behaviour and all arrangements for transporting the child ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven.

B9. Whistleblowing

WE Bridge Academy expects all its staff to express any concerns they may have with regards to the conduct of any individual. All staff must feel safe and supported in order to express their concerns and can do so without fear of victimisation or discrimination.

Confidentially - All concerns will be treated in confidence; however, there may be a need for the member of staff to give evidence e.g. if they have witnessed a crime or regarding disciplinary procedures if this is the outcome.

Anonymous allegations - Staff who raise concerns should be encouraged to identify themselves as part of their professional role and responsibility. However, anonymous allegations will be investigated as thoroughly as possible.

False allegations

If staff raise a concern in good faith which is not confirmed by an investigation, no action will be taken. However, if a concern is raised maliciously, disciplinary action may be taken.

How to raise a concern

- a) Report it to the DSP or CEO as soon as possible.
- b) The DSP or CEO will immediately ensure that the child involved in the concern is safe.
- c) A record of the concern must be made, including a record of anyone else who has witnessed the incident or allegation.
- d) The DSP or CEO will contact the local authorities immediately and no further decisions will be made without the consultation of the local authorities.
- e) If the concern is about the DSP or CEO, then a member of the DSS must be informed immediately instead.

Please refer to sections C6 and C7 of this policy for detailed guidelines on how to report a concern or allegation.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Staff can contact the helpline to speak by:

Phone: 0808 800 5000

Email: help@nspcc.org.uk

online form: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/report-abuse-online/>

C. CHILD PROTECTION

C1. Overview and principles

WE Bridge Academy meets its child protection responsibilities by ensuring a full copy of this policy, and its updates, is given to every member of staff recruited at WE Bridge Academy.

Each member of staff is asked to sign a declaration to confirm that they have received and read the policy (and any updates), and are aware of the academy's procedures that are in place to help them to understand and carry out their safeguarding roles and responsibilities. This includes regular face-to-face training and email updates.

All staff members are also given an electronic copy Keeping children safe in education, Part 1: Information for all school and college staff, 2020. An electronic copy is also kept on the Team Hub of the WE Bridge website.

C2. Nominated designated person

The Designated Senior Person (DSP), André Murray, or CEO, Dave Henson, must be informed of any child protection issues in the first instance. If the DSP or CEO is not available then a member of the Designated Safeguarding Staff (DSS) must be contacted (Clara Martins, Richard Eastman, Kat Ekiert & Rachel Monk). A member of the DSS is also always available via the academy's 24-hour emergency contact number: +44 (0)7958469916.

C3. Types of abuse and neglect

Abuse can appear in many forms. Staff also need to be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Abuse is a form of maltreatment of a child. Somebody can abuse a child by inflicting harm or by failing to act to prevent harm. Children can be abused by an adult or adults, or by another child or children. These abusers may or may not be known to them.

There are four broad categories of abuse: physical, emotional, sexual, and neglect.

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent / guards fabricates the symptoms of, or deliberately induces, illness in a child (Munchausen Syndrome by Proxy).

Signs to look for:

- Frequent and / or unexplained injuries
- Bruising (look for symmetry e.g. two black eyes, bruising on both shoulders) or bite marks
- Burns or scalds that have a clear edge (usually caused deliberately, not accidentally)
- Wearing clothes to cover injuries, even in hot weather

Emotional abuse

This is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

Signs to look for:

- Delayed physical or emotional development
- Extreme passivity or aggression
- Sudden speech disorders
- Overreaction mistakes or continual self-deprecation
- Neurotic behaviour (hair-twisting, self-harm)
- Signs of radicalisation (see the guidelines Preventing radicalisation and extremism (Prevent))

Sexual abuse

This involves forcing or enticing a child or young person 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, or 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 can also commit acts of sexual abuse, as can other children.

Signs to look for:

- Acting in inappropriate way with objects or peers
- Nightmares, sleeping problems
- Becoming withdrawn or clingy
- Personality changes, including feeling insecure
- Changes in eating habits
- Becoming secretive

Please also see Child sexual exploitation in section C5. Safeguarding issues.

Neglect

This is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs to look for:

- Badly dressed in clothes that need washing
- Poor appearance and personal hygiene; unwashed or unbrushed hair
- Lacks needed medical or dental care
- Often tired and / or hungry
- Unused to supervision or authority

C4. Safeguarding issues

All staff need to be aware of safeguarding issues, some of which are listed below. If a member of staff is made aware of any issue, either through disclosure by the victim, or another adult or child, then the staff must respond as per our reporting procedures.

Children missing from education

A child missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. Staff should monitor attendance and address when it is poor or irregular.

Child sexual exploitation

This is a form of sexual abuse where children are sexually exploited for money, power or status. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older boyfriends or girlfriends.
- Children who suffer from sexually transmitted infections or become pregnant.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late.
- Child who regularly miss school or education.

So-called 'honour-based' abuse (HBA)

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the Designated Senior Person

FGM mandatory reporting duty

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Staff have a statutory duty to report to the police where they discovered (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Failure to report such cases can result in disciplinary sanctions.

The duty does not apply in relation to at risk or suspected cases (i.e. where the member of staff does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff should follow local safeguarding procedures.

More information can be found here: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit can also give advice and information: 020 7008 0151 or <https://www.gov.uk/guidance/forced-marriage>

Other safeguarding issues can include:

- Bullying including cyberbullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence
- Gender-based violence
- Violence against women and girls
- Mental health
- Relationship abuse
- Sexting
- Trafficking
- Child Criminal Exploitation

For more information on any of these issues then please refer to the Keeping children safe in education, Part 1: Information for all school and college staff, 2020 (updated January 2021), or please ask the DSP or DSS.

C5. Peer-on-peer abuse

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender-based violence, sexual assaults and sexting.

It is likely when considering a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is against an older student and refers to their behaviour towards younger student;
- is of a serious nature, possibly including a criminal offence;
- indicates that other pupils may have been affected by this student;
- indicates that young people outside the school may be affected by this student.

Example of safeguarding issues against involving peer-on-peer abuse could include:

Physical abuse

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

Emotional abuse

- Blackmail or extortion
- Threats and intimidation

Sexual abuse

- Indecent exposure, indecent touching, or serious sexual assaults
- Forcing others to watch pornography or take part in sexting

Sexual exploitation

- Encouraging other children to attend inappropriate parties
- Photographing or videoing other children performing indecent acts

C6. How to respond during a disclosure from a child

It is important that all staff members know how to respond if a child decides to disclose to them that they are being abused.

DO

1. Allow the child to do the talking
2. Make sure that you talk to the child in a classroom with a large window and with the door open
3. Tell another member of staff that you are having a private meeting with the student
4. Listen quietly and encouragingly
5. Remain calm and supportive
6. Allow the child to finish
7. Explain that you may have to tell someone
8. Record the conversation (what was actually said) as soon as possible and give the report to the DSP

DO NOT

1. Panic
2. Examine the child
3. Promise to keep secrets
4. Ask leading questions
5. Interrupt
6. Express any opinions about what you have been told
7. Discuss the disclosure with anyone other than the relevant staff

C7. How to manage a concern or 'immediate danger or at risk of harm' to a child

All staff should be aware of the difference between 'immediate danger or at risk of harm' and a 'concern' and the process that follows.

1. If a child is in immediate danger or is at risk of harm, ensure that the child is safe (e.g. remove the child from the unsafe situation). A referral should be made to children's social care and/or the police immediately (anyone can make a referral). The DSP then should be informed.
2. If a staff member has a concern (as opposed to a child being in immediate danger), then tell the DSP as soon as possible.
3. Record all the details in writing by completing the Safeguarding Concern Form (available from the teachers' resource room or the DSP) which needs to be signed and dated. Staff members with safeguarding concerns can also report via the 'Safeguarding: report a concern' tab on the Team hub of the WE Bridge Academy website. Copies of this report will automatically be forwards to: André Murray (DSP) & Dave Henson (CEO).
4. The DSP will respond depending on the nature of the concern. The DSP will do one of the following:
 - a) monitor the situation on a regular basis until no further action can be recorded;
 - b) investigate further to gather more information;
 - c) discuss the matter with the CEO, group leader, parent or host, where appropriate prior to any action.

C8. How to manage an allegation against an adult

An allegation is information which indicates that an adult may have:

1. Behaved in a way that has/may have harmed a child.
2. Possibility committed a criminal offence against or related to a child
3. Behaved towards a child in such a way that indicates that they would pose a risk of harm if working closely or regularly with a child.

An allegation could be made directly to the DSP or via another.

Following an allegation, the steps to be taken are:

1. If a child is in immediate danger or is at risk of harm, ensure that the child is safe (e.g. remove the child from the unsafe situation). A referral should be made to children's social care and/or the police immediately (anyone can make a referral).
2. Inform the DSP. They will ensure that the child is safe and supported.
3. The CEO should then be informed immediately. (If the allegation is against the CEO, then another member of the senior management team will be informed. If the allegation is against the DSP, then CEO will take the responsibility for the situation).
4. If / when safe and appropriate, the child should be returned to their normal routine.
5. The child's parents will be contacted and informed that an allegation has been made.
6. The person making the allegation must complete the Safeguarding Concern Form (available from the teachers' workroom or from the DSP). Allegations can also be reported via the 'Safeguarding: report a concern' tab on the Team hub of the WE Bridge Academy website. Copies of this report will automatically be forwards to: André Murray (DSP) & Dave Henson (CEO).
7. The DSP and the CEO will then report the allegation to the Local Safeguarding Children's Board (LSCB). No decisions will be made without a referral to the LSCB.
8. Suspension of the accused will only be considered where children are at risk of serious harm or the concern is so serious it would result in instant dismissal. If the employee is suspended, the reason will be communicated to them within one day.
9. WE Bridge Academy will provide adequate support and the employee with a named contact if they are suspended.
10. The DSP and the CEO and the relevant local authorities will discuss and agree what actions are to be taken next. This may involve disciplinary action, dismissal and / or prosecution.
11. If the staff member is dismissed due to their unsuitability to work with under 18s (following an external investigation) the DSP or CEO will inform the Disclosure and Barring Service (DBS).
12. All details regarding the identity of the accused will remain confidential.
13. If an allegation is unsubstantiated, unfounded or malicious, WE Bridge Academy will support the member of staff. Any reports will be removed from their staff files. Disciplinary action will be taken against the perpetrators of the malicious allegation.

C9. How to manage an allegation against another child

Occasionally, allegations may be made against students by others in the academy which are of a safeguarding nature. Following an allegation, the steps to be taken are:

1. If a child is in immediate danger or is at risk of harm, ensure that the child is safe (e.g. remove the child from the unsafe situation).
2. Inform the DSP and/or the CEO.
3. The DSP will make sure that the child is safe and supported.
4. The DSP will contact the LSCB immediately to discuss the case.
5. The DSP will follow through the outcomes of the discussion and make a social services referral where appropriate.
6. The DSP will make a record of the allegation, the discussion and any outcome and keep a copy in the files of both students' files. A factual written record of the allegation will also be signed and dated, either by the person who made the allegation or the adult who heard the allegation from the child.
7. A DSS will be appointed to support the alleged victim and if/when safe and appropriate, the alleged victim will be returned to their normal routine.
8. The accused will also be appointed a DSS to help support them through what happens next.
9. If the allegation indicates a potential criminal offence has taken place, the police should be contacted and parents informed (of both the student being complained about and the alleged victim).
10. It may be appropriate to exclude the student being complained about for a period according to the academy's behaviour policy and procedures.
11. Where neither social services nor the police accept the complaint, a thorough investigation by the academy will take place using the academy's usual disciplinary procedures.
12. In situations where the academy considers a safeguarding risk is present, a risk assessment will be prepared along with a preventative, supervision plan.
13. This plan will be monitored and reviewed as appropriate.

C10. Record keeping

1. The DSP is responsible for maintaining all safeguarding records, including concerns and allegations, and training.
2. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

3. All records regarding concerns and allegations are kept locked away, and can only be accessed by the DSP, DSS and CEO.
4. The DSP ensures that recruitment records and the Single Central Registers are fully and accurately kept.
5. Copies of this safeguarding policy and all other relevant documents, including the concern and allegation forms, are kept in a folder in the teachers' workroom. Staff are always able to access these.
6. The DSP, DSS and CEO will meet annually to discuss the following:
 - a) The number of concerns and/or allegations made over the past year.
 - b) Staff training
 - c) Any major safeguarding issues
 - d) Feedback from staff and students
 - e) Any areas of weaknesses
 - f) Any new initiatives to be implemented over the next year.
7. An annual safeguarding report will be produced after this meeting and will be used to review the academy's safeguarding policy.

D. TRAINING AND AWARENESS

D1. Responsibility

1. The DSP is responsible for the training of all staff.
2. The CEO is responsible for ensuring that the training needs of the DSP and DSS are met.
3. All staff who have access to under 18s must receive Basic Awareness (Level 1) Safeguarding training. This training is either delivered online or in-house.
4. The DSP and DSS must all have Advanced Safeguarding training. The DSP and some DSS will also have Specialist Safeguarding training.

D2. Training requirements

Training for all staff must begin before that they have contact with under 18s; training of staff usually takes place at the staff induction.

Early training must include:

1. Raising awareness that everyone is involved in safeguarding; all staff members and adults connected with the academy have a duty of care to safeguard.
2. Ensuring that everyone knows who the DSP and DSS are and how they can be contacted.
3. Knowing the systems for reporting concerns and/or allegations.
4. Information on how to recognise signs of abuse, including child sexual exploitation, peer-on-peer abuse, and so called 'honour violence' that includes FGM.
5. Information on what happens if an allegation is made.
6. Receive a copy of the safeguarding policy and know where all the safeguarding documents are kept.
7. Know about the staff code of conduct regarding adult interaction with under 18s.
8. Awareness that all staff have a duty to look out for each other's behaviour and report anything inappropriate, and that they will be supported and treated in confidence if they do.
9. Prevent training.
10. Receive and read a copy of Keeping Children Safe in Education - Part 1, 2020 (updated January 2021).

All staff must receive safeguarding training at least annually.

The DSP and DSS must receive formal training every two years. In addition, their knowledge and skills should be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role.

D3. Training delivery

1. Basic Awareness (Level 1) Safeguarding training can be delivered in house by the DSP or online.
2. Online training needs to be supplemented with face-to-face training.
3. Staff will be updated regularly through monthly safeguarding e-bulletins.

D4. Visitor awareness

All visitors to WE Bridge Academy on arrival at reception are required to read the Guidelines for visitors, which informs visitors that there are under 18s in the academy and gives clear expectations regarding suitable behaviour. Visitors must sign to confirm that they have understood the rules and will abide by them during their time at the academy. Visitors are also required to wear a yellow 'visitor' lanyard so they can be easily identified.

D5. Homestay provider training

1. Homestay providers who wish to host under 18 students will be made aware of the academy's safeguarding policy at the application stage.
2. All homestay providers and household members will be required to read the academy's safeguarding policy, and to complete self-declaration forms to say that they have received the policy and accept the requirements.
3. Guidance will be given by the housing officer on safeguarding under 18 student guests from any adult visitors to the home, as well as on keeping any homestay host's children safe from when hosting older students.
4. The housing officer will ask appropriate questions at the inspection stage and further visits to ensure that homestay providers and their family members are compliant with regards their duty to safeguard.
5. Homestay providers will also be asked to read, understand and promise to abide by the homestay provider's rules and regulations for students under 18 (please see section F4. Welfare provision).
6. Homestay providers will be required to undergo Level 1 Safeguarding training which has been tailored to homestay providers. This training will be documented and recorded by the housing officer.

E. SAFER RECRUITMENT

E1. Overview

The academy pays due regard to its legal obligation in respect to the recruitment and selection of staff members and homestay providers and has recruitment procedures and practices which aim to deter, reject or identify people who might abuse children.

E2. Recruitment materials

Recruitment materials for all job roles (including homestay providers) contain reference to the academy's commitment to working with and safeguarding children. Recruitment materials will also inform applications that:

1. Reference requests will be followed up.
2. Reference requests will specifically ask whether there is any reason that the application should not be engage in situations where they have responsibility for, or substantial access, to persons under 18.
3. All gaps in an applicant's employment history must be explained satisfactorily.
4. Appropriate suitability checks will be required prior to confirmation of appointment.
5. Proof of identity and qualifications will be required.

This information will be provided as part of the application pack but will be provided to all applicants before they attend an interview.

E3. Recruitment stages

1. The academy will shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role.
2. Short-listed candidates will then be invited to attend in person a formal interview at which the application's skills and experience will be discussed in more detail.
3. All formal interviews will have a panel of at least two people chaired by the CEO and/or the director of studies, and/or members of the senior management team.
4. It is recommended that at least one person on the interview panel will have undertaken safer recruitment training.
5. The candidate will be asked questions that will explore their suitability to work with children. Examples of such questions are as follows:
 - a) What attracted you to teaching / this post / this school?
 - b) Give an example of how you dealt with bullying behaviour between students. What did you do? What made it successful? How could you have done it better?
 - c) What motivates you to work with young people?
 - d) How do you define an appropriate teacher-student relationship?
 - e) What would you do if were concerned about a colleagues' behaviour towards children?

E4. Pre-appointment checks

1. Any offer to a successful applicant will be conditional upon:

- a) receipt of at least two satisfactory references (the references will request for confirmation that the candidate is suitable to work with children);
- b) verification of identity and qualifications, including evidence of the right to work in the UK;
- c) an enhanced Disclosure and Barring Services (DBS) check, and if appropriate, a check of the Barred List, maintained by the DBS;
- d) a prohibition from teaching check, if applying for the role of a teacher;
- e) a completed self-declaration form of the candidate's suitability to confirm that they are safe to work with children.

E5. Applicants with a current DBS

1. If a potential member of staff or homestay provider has a current enhanced DBS for the 'child workforce' that is less than three years old, then WE Bridge Academy will not request a new DBS check, as long as there is no other reason for concern.
2. The DBS certificate will be checked online via the DBS update service by an appropriate member of staff and with the applicant's permission.
3. The applicant must provide the original document and this will be checked and recorded by an appropriate member of staff.

E6. Applicants awaiting a DBS check

1. If an employee is due to start work and the enhanced DBS check has not yet arrived, there should be exceptional and justifiable circumstances for employment to commence prior to receiving criminal clearance.
2. If a decision is made for the employee to commence work before the DBS check has arrived, it should only be made if is unavoidable. The key questions for consideration are:
 - a) What are the reasons for considering commencement of employment prior to receiving clearance?
 - b) What are the consequences to service delivery of waiting until clearance is received?
 - c) If the employee commenced in their role, what would be their normal level of access to children i.e. unsupervised or supervised access to children?
3. If a decision is made for the employee to commence work before the DBS check has arrived, the decision must be recorded and signed off by the relevant senior manager.

4. The new employee must have signed a self-declaration form and their access to under 18s should always be supervised. There should be a clear record of what alternative risk mitigation has been put in place to cover this period.
5. The employer must check that the candidate is not on the Barred List before they start work.
6. The employee should not start work prior to the submission of their completed application or paperwork to obtain criminal clearance.

E7. Applicants where a DBS check is not possible

1. If a prospective employee is an overseas national, then WE Bridge Academy will ask for a police certificate of good conduct from the county of the prospective employee's most recent residence.
2. If a record check is not possible for an overseas national, then WE Bridge Academy will document what action has been taken to obtain a check, and why this has not been possible. Special care will be taken with the overseas national's identity and qualification checks, and with exploring their employment history and obtaining references. A judgement will be made by senior management regarding suitability for the role and level of supervision. A written record of this judgment will be made.
3. If the new employee is a British national who has been living overseas, even for a long period of time, then an enhanced DBS check will still be asked in order to check their UK records.
4. All applicants will be asked to provide proof of their identity and their right to work in the UK.
5. References and employment history will also be asked for as per WE Bridge Academy's pre-appointment checks requirements.

E8. Policy on the recruitment of ex-offenders

1. WE Bridge Academy actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their aptitude, skills, qualifications and experience in relation to the requirements of the post.
2. It is a requirement that all registered bodies must treat DBS applicants who have a criminal record fairly and do not discriminate because of a conviction or other information revealed.
3. This policy on the recruitment of ex-offenders is made available to all disclosure applicants at the outset of the recruitment process.

4. As an organisation using the DBS to assess applicants' suitability for positions of trust, the academy aims to comply fully with the DBS code of practice and undertake to treat all applicants for positions fairly. The academy undertakes not to discriminate unfairly against anyone who is the subject of a disclosure based on conviction or other information revealed.

5. The academy is committed to the fair treatment of our staff, potential staff or users of our services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability, or offending background.

6. This policy will be made available to all DBS applicants at the outset of the recruitment process.

7. A DBS check is only requested when it is both proportionate and relevant to the position concerned. For those positions where a DBS check is required, the recruitment information will contain a statement that a DBS check will be requested in the event of the individual being offered the position.

8. Where a DBS check is to form part of the recruitment process, we encourage all applicants called for interview to provide details of any criminal record at an early stage in the application process. The academy guarantees that this information is only be seen by those who need to see it as part of the recruitment process.

9. We ensure that all those who are involved in the recruitment process will have suitable guidance to enable them to identify and assess the relevance of the offence in relation to the position applied for. We also ensure that they receive appropriate guidance on the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

10. At interview or in a later separate discussion, we ensure that an open and measured discussion takes place about any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position applied for could lead to withdrawal of an offer of employment.

11. We undertake to discuss any matter revealed in a DBS check with the person seeking the position before withdrawing a conditional offer of employment.

12. We make every subject of a DBS check aware of the existence of the DBS code of practice and make a copy available on request.

13. Having a criminal record will not necessarily bar you from working with the academy. This will depend on the offence and the relevance of the offence in relation to the position applied for. The factors considered will include:

- a) the seriousness and nature of the offence(s)
- b) nature of appointment
- c) age of offence(s)

d) frequency of offence(s)

e) any concealment of offences during the application process

14. Any decision regarding the suitability of the prospective employment will be discussed among relevant members of senior management and in conjunction with advice from the LSCB.

15. A clear written record of the decision will be made; this record will not contain details of the offences.

E9. Group leaders

1. Group leaders are not able to undergo a DBS check if they are an overseas national. Police certification of good conduct should be provided if available instead.

2. A formal agreement should also be place between the academy and the agent to ensure suitability checks have taken place on all adults accompanying under 18s.

3. In addition, all group leaders will be asked to complete a self-declaration form and will be made aware of the academy's safeguarding policy and procedures before they arrive.

4. WE Bridge Academy staff will also be aware of having to provide adequate supervision and vigilance of all group leaders during their time with the academy.

E10. Contractors

1. WE Bridge Academy will ensure that any contractor, or any employee of the contractor, who is to work at the academy, has been subject to the appropriate level of DBS check.

2. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information).

3. For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required.

4. Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity. The academy is responsible for determining the appropriate level of supervision depending on the circumstances.

5. If a contractor working at a school or college is self-employed, WE Bridge Academy will obtain the DBS check if necessary, as self-employed people are not able to make an application directly to the DBS on their own account.

6. WE Bridge Academy will always check the identity of contractors and their staff on arrival at the academy's premises.

7. All contractors will also be made aware of the academy's safeguarding policy and procedures before they arrive at the premises.

8. WE Bridge Academy staff will also be aware of having to provide adequate supervision and vigilance of all contractors while they are working for the academy.

E11. Volunteers and trainees

All volunteers and teacher trainees will not be left unsupervised when taking part in regulated activity at WE Bridge Academy.

E12. Homestay providers

1. The main care giver of the homestay provider must have an enhanced DBS check with barred list check before they can have any under 18 student accommodated with them.

2. References will also be requested with specific reference to safeguarding issues, and appropriate questions will be asked at the initial inspection by the housing officer that will explore their suitability to work with children and to check their understanding of safeguarding.

3. All other household members over the age of 18 must sign a self-declaration form to confirm that there is no reason why they cannot be in contact with under 18s.

4. All household members will be made aware of the academy's safeguarding policy and practice and will be asked to confirm that they have read and accepted them.

E13. Handling of DBS certificate information

1. As an organisation using the DBS checking service to help assess the suitability of applicants for positions of trust, the academy complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

2. It also complies fully with its obligations under the Data Protection Act 1998, GDPR and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

3. Certificate information is always kept in a secure, lockable filing cabinet with access strictly controlled and limited to those who are entitled to see it as part of their duties.

4. In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

5. Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

6. Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

7. Once the retention period has elapsed, the academy will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

8. We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

E14. Single Central Record

1. The academy keeps a Single Central Record (SCR) for all staff.

2. The information that is recorded in respect of staff members is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- a) an identity check
- b) a barred list check
- c) an enhanced DBS check/certificate

- d) a prohibition to teach check (if required)
- e) further checks on people who have lived or worked outside the UK
- f) a check of professional qualifications
- g) a check of references
- h) a check to establish the person's right to work in the UK

3. A copy of the documents used to verify the successful candidate's identity, right to work and required qualifications will be kept in each staff member's personnel file.

4. The homestay officer keeps a separate central record for all homestay providers that records that all required checks have been made, including DBS and barred list checks when required.

F. WELFARE AND IMPLEMENTING SAFEGUARDING

F1. Use of risk assessments

1. A risk assessment must be carried out prior to any planned or organised activity that:

- is being coordinated specifically for under 18s;
- will involve attendance/participation by under 18s.

2. The full extent of the assessment will depend on the nature of the activity. A generic assessment will suffice for most areas, but specific assessments should be carried out for entry into locations where there are known hazards.

3. Trips and activities away from the academy are likely to represent one of the most serious health and safety concerns for children and young people. All external trips and activities require careful examination before the visit goes ahead. It is the responsibility of one of the DSS to ensure that a risk assessment is conducted before the event. Students will be informed of any risks before the trip or activity begins.

4. A risk assessment is provided for journeys to and from the academy. Students are given a map, address of the academy and the academy's phone numbers (including the emergency phone number). Both the student and the homestay provider are informed on what precautions to take when travelling to and from the school. This information is included in the information pack given to homestay students.

5. The social event coordinator must ensure that all social activities are also appropriate for the age, interests and abilities for under 18s.

6. Before a child is allowed to attend an off-site social activity, the coordinator must ensure that the academy has parental/guardian permission for the child to attend such activities. The coordinator must complete a risk assessment form when planning an activity.
7. If there is an activity that is planned that in any way is unsuitable for students under 18 (such as certain films, places) then this must be clearly stated and no under 18s to be allowed to attend under any circumstances.
8. Homestay providers complete an initial risk assessment form which is reviewed with them at the time of their house inspection by the housing officer. It must be updated on subsequent inspections or earlier if there are any changes to the building.

F2. Supervision ratios

1. The academy ensures there is sufficient adult supervision for scheduled lessons and activities, both onsite and off-site. The academy will ensure that there is always sufficient supervision of students under 18 on Floor 2 and Floor 10. DSP will regularly check both floors throughout the day to ensure the students' welfare.
2. The 1998 DfEE publication Health and Safety of Pupils on Educational Visits advises the following supervision adult to student ratio: 1 adult for every 15 to 20 students who are aged 11 plus.
3. All trips with under 18s organised by WE Bridge Academy should observe this ratio as a minimum.
4. However, for each event, the social coordinator and risk assessors need to assess the risk and are expected to exceed this ratio if the safety and welfare of the students require it. For example, the ratios for swimming in the sea would be very different.
5. There should be enough supervisors to deal with an emergency.
6. In some circumstances group leaders may be included in this ratio, but this will be assessed according to the activity, location and circumstances, and will be recorded in relevant risk assessments.

F3. Missing students

Missing students from class

1. At induction, all students are told that they must attend 100% of the classes. If for any reason a student cannot attend a class due to an emergency or illness, then they are asked to contact the academy by phone or by email as soon as possible.
2. The under 18 attendance will be checked every day by a nominated member of the DSS.

3. If an under 18 student is absent from class without prior notification, the ACM or another nominated person will telephone and email the student. A message will be left on the student's voicemail to contact the academy as soon as possible.
4. If the student has not contacted the academy by 12pm for the morning session, and by 4pm for the afternoon session, then the ACM or other nominated person will contact the named legal guardian, emergency contact, homestay provider and/or the student's agent. A member of staff will visit the student home to check on their welfare.
5. If contact cannot be made with any of the above, and/or the student's whereabouts cannot be verified, then the police will be contacted either by the ACM, CEO or other nominated person.
6. The parents of the students will be kept updated by the ACM, CEO or other nominated person.
7. This procedure applies to students who are based in Cardiff. If a student is based in another country and attending classes remotely, academy staff will still attempt to make contact to check on the student's welfare. However, home visits and police reports are not deemed appropriate in this situation.

Missing students from homestay

1. Students under 18 have a strict curfew of 10:30pm to return to their homestay.
2. If a student does not arrive home by the curfew and has not informed the homestay provider that they will be late, the homestay provider is asked to call the student via their mobile.
3. If the student does not answer their mobile, the homestay provider will contact one of the academy's DSS via the academy's emergency contact number.
4. The DSS will contact the DSP, who will try to contact the student.
5. If the student cannot be contacted, then the DSP will contact the police.
6. The student's parents and/or agent will also be informed as soon as possible.

Missing students from activities and excursions

1. If a student under 18 is late, or goes missing, during an off-site activity/excursion, then the social activity coordinator and/or group leader will try to contact the student via telephone.
2. If the student cannot be contacted after three attempts then the police will be informed.
3. The student's parents and/or agent will also be informed as soon as possible.

F4. Welfare provision

Booking stage

1. Parents/guardians are requested to complete a consent form that covers arrival details, medical details, accommodation details (if not in homestay), emergency contact details and arrival details.
2. Parents/guardians are made aware that the academy does not accept responsibility for the supervision of 16 to 17-year-olds outside of scheduled class times and students will not be supervised when travelling between their accommodation and WE Bridge Academy.
3. Under 18 students cannot enrol at WE Bridge Academy unless the parental/guardian consent form has been completed and signed.
4. Parents/guardians are asked to provide WE Bridge Academy with a contact number that they can always be contacted on.
5. WE Bridge Academy will provide the parent/guardian with the details of the academy's 24-hour emergency contact number.

Student induction

During their induction, students will be informed of the following:

- a) the under 18 students' code of conduct and why safeguarding is important
- b) the policy on wearing student ID and lanyards
- c) the housing officer's contact details
- d) how to contact the DSP and DSS
- e) when to sign in at reception
- f) the 24-hour emergency contact number
- g) weekly under 18 meetings
- h) how to find their way around Cardiff; how to travel safely between their accommodation and the academy
- i) how to register with the police (if required)
- j) how to register with a GP

Studying at the academy

1. All students, staff and visitors are required to wear a lanyard which is colour-coded according to their role. Under 18 students are required to wear a red lanyard which ensures that they can be easily

identified while on the premises. All teachers and staff members must ensure that students always wear their lanyards .

2. Under 18 students are highlighted on class registers so all teachers are aware of who is under 18 in their class.

3. Teachers will consider the ages of the students when planning lessons topics and choosing materials to teach to under 18s.

4. A list of all under 18s in the academy are emailed weekly to all management staff.

5. Under 18s are expected to attend weekly meetings with the a DSS to discuss any issues or concerns. All meetings are recorded with follow-up points to be actioned.

6. A code of conduct for under 18 students is displayed in each classroom and the student lounge.

7. All under 18s will be identified to teachers on the class register and fire sheets.

The prayer room and toilet facilities

1. Under 18s are not allowed in the prayer room under any circumstances. Students are informed of this rule at induction.

2. Random checks are made of the prayer room at least twice a day by the ACM or nominated person to ensure that no under 18s are in the prayer room.

3. Toilet facilities are checked regularly by members of staff during break and lunchtimes to ensure that any under 18s are safe.

Accommodation

1. All under 18 students are advised to stay in homestay accommodation provided by WE Bridge Academy.

2. However, under 18 students can make alternative accommodation arrangement such as staying with a family member or an adult designated by the parent / guardian over 18 or living alone in private accommodation if written permission is obtained from the parent/guardian before the student arrives. In these cases, the academy will put into place additional measures to ensure that the under 18's welfare can be monitored.

3. If an under 18 student wants to stay overnight, or spend the weekend, at any other location than their usual accommodation, then the academy must have written permission from the parent/guardian

in advance, and must have details of where the student will be staying and who they will be staying with.

Homestay provider rules and regulations

1. The main care giver of the homestay provider must have an enhanced DBS check before they can have any under 18 student accommodated with them.
2. References will also be requested for homestay providers with specific reference to safeguarding issues, and appropriate questions will be asked at the initial inspection by the housing officer that will explore their suitability to work with children and to check their understanding of safeguarding issues.
3. All other household members over the age of 18 must sign a self-declaration form to confirm that there is no reason why they should not be in contact with under 18 students.
4. All household members will be made aware of the academy's safeguarding policy and practices and will be asked to confirm that they have read and accepted them.
5. Homestay providers need to carry out a fire risk assessment at their household and complete a fire risk assessment form.
6. Homestay providers must have an up-to-date gas safety certificate. This will be checked by the housing officer.
7. WE Bridge Academy must be informed immediately by the homestay provider of any changes concerning the people living in the household (new tenants, new partner, visitors that sleep over, a police conviction etc.).
8. Students under the age of 18 will not be housed with students of 18 years or older.
9. No more than one student will be accommodated in the same bedroom unless specifically requested written permission has been given by the parent/guardian and/or the agent.
10. Homestay providers will ensure that there is an adult available to greet students on arrival.
11. A responsible adult will always be present overnight and normally present when students under 18 are at home.
12. Under 18s should not be left unsupervised except for short periods.
13. Homestay providers are responsible for providing a laundry service and meals on a half-board basis to students aged 16 and 17 unless other agreements have been made by parents/ guardians.
14. Students under 18 have a strict curfew of 10:30pm to return to their homestay. If a student does not arrive home by the curfew and has not informed the homestay provider that they will be late, the homestay provider is asked to call the student via their mobile. If the student does not answer their

mobile, the homestay provider must contact one of the academy's Designated Safeguarding Staff (DSS) via the academy's emergency contact number (079603 922333).

15. Students who are under 18 are not allowed to be involved in any activities that are not suitable to their age and might be harmful. Students who are under the age of 18 are not allowed by law to drink/buy alcohol, buy tobacco, or use drugs. Homestay providers are responsible for ensuring that under 18 students adhere to these regulations.

16. Homestay providers are asked to work together with WE Bridge Academy to ensure that all under 18 students are safe when they travel between their home and the academy by providing students with up-to-date travel information. Homestay providers are encouraged to accompany students to the academy on their first day.

17. All homestay providers must take all steps to ensure the privacy of any under 18 student when they use the bathroom or when they are in their bedroom.

18. Contact between adults (including adult visitors) and under 18 students should not be extended beyond the kitchen, sitting room, garden, or any other open and non-private space(s) when at home.

19. All adults (including visitors) need to be always appropriately dressed when in the common areas of the house (e.g. sitting room, kitchen, garden).

20. All homestay providers are asked to monitor under 18 students' use of the internet and digital technology in the home, and to report any concerns immediately to the academy's DSP/DSS.

21. All homestay providers must be aware of WE Bridge Academy's Prevent policy and procedures, and to report any concerns to the academy's DSP / DSS.

22. All homestay providers must be aware of, understand and abide by WE Bridge Academy's safeguarding policy, including the academy's child protection policy. Any incidents of child abuse at the homestay will be immediately addressed by the academy's safeguarding team and will be reported to the police.

23. All homestay providers have a legal obligation to report any concern or allegation to a relevant member of the academy's Designated Safeguarding Staff (DSS).

24. If a homestay provider is hosting students aged over 18 and has children in the household, then it is highly recommended that they follow the same guidelines with regards to privacy, dress code and adult/under 18 interaction.

25. All homestay providers must declare what, if any, CCTV they have inside and outside of their accommodation. Students staying in homestay accommodation will be made aware of the location of any CCTV in their accommodation. Under no circumstances may a homestay host place CCTV equipment in areas where the student would reasonably expect privacy, such as bedrooms and bathrooms.

F5. First aid and medical

1. WE Bridge Academy has three trained first aiders: André Murray, Clara Martins and Richard Eastman
2. Two fully equipped first aid kits can be found in the teacher's room on floor 10. One kit is to be taken on all off-site activities. There is an additional first aid kit at reception on floor 2.
3. Students are advised at induction on how to register with a GP. Assistance will be provided to students who need it to register with a GP.
4. Parents/guardians must complete a medical consent form before the student arrives in the UK.
5. If students fall ill at their home, then the student or homestay provider is required to phone and tell a DSS.

Pre-existing medical conditions

When applying for a place at WE Bridge Academy, all applicants will be asked to complete a medical disclosure form giving details of any pre-existing medical conditions. Any disclosures must be brought to the attention of the DSP, the ACM, and Student Welfare Officer.

The condition(s) must be discussed, and decisions must be made regarding the safety and welfare of such a student whilst they may possibly be with us.

Points to consider are:

- Will the student be staying on their own and is this viable bearing in mind their condition?
- Is the homestay provider (if any) prepared and able to care for the individual concerned?
- Does the student understand how to take their medicine and request some more if needed?
- The student will in all probability be coming from abroad; is coming to Cardiff to study in their best interests with their medical condition?

It is therefore recommended that all relevant risk assessments (studying at academy, travel to and from the academy, homestay, social activity) be carried out for such students and if they do come to study, all relevant parties (ACM, DSP, DSS, homestay provider) are all made aware of the student's condition.

F6. Under 18s behaviour and discipline (code of conduct)

All under 18 students are asked to read and sign to accept that they understand the under 18s code of conduct. These are additional and specific rules in addition to the general student code of conduct. These rules are included in the student handbook and are displayed on notice boards in every classroom, the notice boards in the corridor and the notice board in the student lounge.

Posters are also displayed in each classroom to clearly display who students need to go to if they feel unhappy or unsafe.

If a disciplinary issue arises, then the usual academy disciplinary procedures for students will be followed. However, special care and sensitivity will be taken to ensure that there are no underlying safeguarding issues or causes of concern.

F7. Fire safety

Fire safety information is displayed in all the classrooms and throughout the academy, and all students under 18 are walked through the fire drill during their induction. Escape routes are clearly visible, and students are informed of the fire drill process and shown where the fire drill meeting area is.

Regular fire drills are carried out and with the help of the DSS to make sure that all under 18 students know what to do. Teachers are also responsible for accompanying all under 18 students during a fire drill and a role call is completed at the meeting area. Fire drills are carried out at least twice a year.

All homestay providers are required to complete a fire risk assessment and have a current gas safety certificate. These documents are checked by the housing officer.

F8. Airport transfers

Before travelling to the UK, students and their parents are contacted by a member of the administration team at WE Bridge Academy to be informed that it is preferred that an airport transfer by WE Bridge Academy is arranged (all our taxis are DBS checked). However, parents / guardians can give their written permission for alternative arrangements if required. WE Bridge Academy will provide appropriate guidance and support if necessary.

Students and parents will also be advised to visit the following website to ensure that they meet the UKBA requirements for travelling to the UK if under 18 (with or without an adult):

<https://www.gov.uk/study-visit-visa/documents-you-must-provide>

F9. E-safety

All student are given advice regarding the use of the internet, and are asked to sign that they understand the e-safety code of conduct during their induction. More information about the rules and

regulations can be found in the academy's E-safety and Acceptable Use of Information and Communications Technology (ICT) Policy.

Homestay providers are asked to monitor under 18s use of the internet and digital technology at home and to report any concerns to the DSP / DSS at WE Bridge Academy.

F10. Prevent

WE Bridge Academy recognises its responsibilities under the Counter Terrorism and Security Act 2015 to prevent people of all ages, including under 18s, being radicalised or drawn into terrorism. Prevent is about safeguarding people and communities from the threat of terrorism. Prevent is one of the four elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The school promotes a multicultural environment where respect for, and tolerance of, other people's beliefs is required at all times. For more information about the academy's policy and procedures, please refer to the academy's Prevent policies and procedures.

F11. Provision for those more vulnerable, including vulnerable adults

The definition of a vulnerable adult is a 'person aged 18 years or over who may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself or herself, or unable to protect him or herself against significant harm or exploitation' (1997 Consultation 'Who Decides?' issued by the Lord Chancellor's Department).

WE Bridge Academy is aware that disabled children or adults may be especially vulnerable to abuse, including because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

Although the academy is constantly on the lookout for vulnerable adults among the students, the academy rarely receives students who fall into this 'official' category; however, at WE Bridge Academy, all students are considered to be potentially vulnerable adults as they are all away from home and in a foreign country. The academy particularly looks out for those who have learning difficulties, special needs or physical disabilities. Others may be vulnerable for a whole range of reasons, and particularly if they have a very low level of English, if they are lacking confidence, if they find it difficult to integrate and make friends, or if they come from a troubled background at home.

Sometimes issues are flagged up by our agents before the students arrive. However, often it is a teacher who identifies these issues once a student is here. The teacher should report this immediately to the Director of Studies who informs the rest of the safeguarding team, and is then dealt with following the academy's safeguarding practices.

F12. Early help

Staff members have a paramount role to play in the early help process. Teachers and other members of staff are encouraged to keep an eye on the underage students in order to identify early any potential signs of abuse, discomfort or worry. If such signs are identified teachers and other members of staff need to report immediately to the DSP or a member of the DSS.

All staff members should be alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is showing signs of engaging in anti-social; or criminal behaviour;
- is in a family circumstance presenting challenges for the child such as substance misuse, adult mental health problems or domestic violence and abuse;
- is showing early signs of abuse or neglect.

F13. Private fostering

Although though WE Bridge Academy currently does not accept students under the age of 16, WE Bridge Academy is aware that the local social or children's services must be informed at least six weeks in advance about all private fostering situations, i.e. when a child or young person under 16 years old (or 18 if they have a disability) will be looked after for 28 days or more by someone who is not a close relative, guardian or person with parental responsibility.

G. SAFEGUARDING DURING ONLINE LEARNING

In the event of students engaging in online learning, the same high standards of safeguarding will apply. Safeguarding procedures will be specifically adapted for online learning in the following ways.

1. Each under 18 student's attendance at online classes will be monitored and recorded. If a student misses an online class, the same contact procedure will apply as for students who miss live classes. This is outlined in section F3 - Missing students
2. A member of the safeguarding team will hold a safeguarding meeting by phone with each student who is under 18, following the procedure outlined in Section F4 - Welfare provision. Any concerns arising out of these meetings will be addressed according to the procedures outlined in Section C - Child Protection.

3. All staff involved in interacting with students online will have the same recruitment process and suitability checks as staff interacting with students in person, as laid out in Section E - Safer Recruitment.
4. A minimum of one lesson containing students under the age of 18 will be observed per week. A record of observations will be kept in the 'Online lesson observation' log. These observations will be in addition to and separate from any lesson observations carried out by the academic management team for the purposes of quality assurance.
5. All communication between staff and students will be via official WE Bridge Academy channels only such as Moodle and company email accounts.
6. Emails between staff and students will be electronically monitored for a list of keywords associated with online abuse and grooming. Any emails containing these words will be quarantined and checked by Pisis, WE Bridge Academy's IT support supplier. The safeguarding team will be informed of any emails that are deemed suspicious.
7. All online lesson will be scheduled by the school. Teachers are not allowed to schedule extra lessons without prior approval by the ACM. Student and guardians will be sent copies of the timetable. If extra classes / tutorials are needed these will also be scheduled by the school.
8. Teachers will follow the code of conduct outlined in Section B - Code of Conduct. In addition, all teachers will:
 - maintain the same professional demeanor, appearance and behaviour as in live lessons.
 - ensure that anything the students can see in the background is appropriate. Ideally, this will be a blank wall / whiteboard.
 - monitor students aged under 18 for signs of abuse / neglect.
 - inform the safeguarding team of any concerns that they might have regarding students.
9. Any concerns / disclosures regarding under 18s will be addressed according to the procedures outlined in Section C - Child Protection.
10. The majority of our students come from a cultural background in which sharing one's image on online can lead to shaming, embarrassment and in extreme cases, online harassment. WE Bridge Academy is very cognisant of the risk that our under 18 students might have images / video of their face captured without knowledge or consent if they show their faces on video during an online lessons. This could be done through 3rd party recording software. These images / videos could be shared online through, for example, social media. This would leave the students vulnerable to the negative and emotionally damaging consequences outlined above. In order to protect all students, especially those aged under 18, from these potential risks, students will not be required to turn on their video camera during online lessons.