



SAFEGUARDING POLICY

Aim

BSC (Education, Group and Young Learners Limited) aims:

- ✦ to ensure that all students regardless of age are protected from potential abuse while in our care
- ✦ to inform BSC team members of their responsibilities when working with children and adults at risk (England and Wales) or protected adults (Scotland)
- ✦ to educate our team in recognising signs of abuse
- ✦ to ensure a consistent process is followed if someone has a safeguarding concern.
- ✦ to educate our team and suppliers so that they protect themselves from allegations of abuse.
- ✦ to offer a variety of social activities suitable to the needs of younger students to provide contact information for further discussion

Purpose

BSC is committed to safeguarding and promoting the welfare of all our students including children and adults at risk and expects all members of the BSC team to share this commitment.

Scope

This policy includes key information around how we safeguard our students and applies to all employees, agency workers, contractors, volunteers, apprentices, and internships.

BSC recognises the duty of care we have to all our students regardless of age or language ability.

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INTRODUCTION

British Study Centres firmly believe in having detailed and rigorous control measures in place to safeguard children and adults at risk (England and Wales)/protected adults (Scotland). At BSC we are committed to safeguarding, and we expect everyone who works on our behalf to share this commitment.

This policy is aligned with the following statutory guidance:

- ✦ The Education Act (2002) Section 175
- ✦ The Children Act (1989 and amendments) and The Children Act 2004
- ✦ Sexual Offences Act 2003
- ✦ Aimsafer: A Framework for Safeguarding Children & Young People in Higher Education Institutions 2005
- ✦ Safeguarding Vulnerable Groups 2006
- ✦ Protection of Freedoms Act 2012
- ✦ National Minimum Standards for Private Fostering
- ✦ Counter-Terrorism and Security Act 2015
- ✦ Sexting in Colleges (UKCCIS) – August 2016
- ✦ Serious Crime Act 2015 (Commencement No 6) Regulations 2017
- ✦ Children and Social Work Act 2017
- ✦ Working Together to Safeguard Children (Revised 2018)
- ✦ Searching, Screening and Confiscation (January 2018)
- ✦ Sexual Violence and Sexual Harassment (May 2018)
- ✦ Information Sharing 2018
- ✦ Keeping Children Safe in Education (September 2023) ✦ Prevent Duty Guidance 2015.
- ✦ Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland.

BSC believes that all individuals inclusive of race, gender, religion, needs or beliefs should be treated with dignity and respect. BSC will strive to provide a safe and caring environment which promotes the welfare of all persons in its care while they are working, staying, studying, visiting or participating in BSC activities.

A caring environment is one in which and where:

- ✦ The health, safety and welfare of all individuals has been assessed and catered for
- ✦ The team are aware of the possibilities of abuse and able to recognise early warning signs
- ✦ The team take measures to prevent accessibility of abuse
- ✦ There is a sound and known reporting system for any concerns

- ✦ There are dedicated persons who are specially trained for handling safeguarding and welfare reports

This policy and procedures are based on the following principles:

- ✦ Ensure there is good practice of safer recruitment, whereby checking the suitability of all team members at BSC.
- ✦ All students whatever their age, culture, disability, gender, language, racial origin, socioeconomic status, religious belief and/or sexual identify have the right to safeguarding from abuse
- ✦ All concerns and allegations regarding the welfare and safeguarding of students will be taken seriously and responded to swiftly and appropriately
- ✦ Support students who have been abused, in accordance with the terms set out within this policy
- ✦ It is everyone's responsibility to report any welfare and safeguarding concerns about abuse to the responsible person(s), such as the Designated Safeguarding Lead (DSL – England and Wales), Designated Child Protection Officer (DCPO - Scotland), Designated Liaison Person (DLP– Ireland)
- ✦ To provide the DSL/DDSL and other team members with relevant training and support
- ✦ Ensure the presence of an appropriate adult to support, advice and assist if a student is being questioned or detained by the police

We have the duty to refer to the appropriate person any person who has:

- ✦ Harmed or poses a risk of harm to a child
- ✦ Satisfied the 'harm test' (i.e. no action or inaction occurred but the present risk could be significant) or
- ✦ Received a caution or conviction for a relevant offence

DEFINITIONS

Safeguarding

Safeguarding is the process by which we protect the health, wellbeing, human rights and welfare of children and adults at risk (England and Wales)/ protected adults (Scotland), enabling them to live free from harm.

Children

The Children Act 1989 states the legal definition of a child is "a person under the age of 18". (The Children Act 1989 and the Vetting and Barring Scheme 2009).

Adults at Risk

Section 115(4) of the Police Act 1997 states that a person can be considered to be vulnerable if they are "substantially dependent upon others in performing basic physical functions, or his ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result, he would be incapable of protecting himself from assault or other

physical abuse, or there is a potential danger that his will or moral well-being may be subverted or overpowered”.

BSC recognises that although our adult students are not considered as vulnerable adults within the terms of the Section 115(4) of the Police Act 1997 definition. As best practice to recognise all students’ vulnerabilities due to cultural differences, being in unfamiliar territories, language barriers and isolation from support networks, BSC risk assesses and complies with safer recruitment to ensure all students are safeguarded.

Designated Safeguarding Lead (DSL) – England & Wales

Designate Child Protection Officer (DCPO) - Scotland

Designated Liaison Person (DLP) - Ireland

Abuse

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

- ✦ Physical
- ✦ Sexual
- ✦ Psychological – repeatedly being made to feel unhappy, humiliated, afraid or devalued by others
- ✦ Financial or material – stealing or denying access to money or possessions
- ✦ Neglect
- ✦ Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender, disability or cultural background

Abuse may involve one or a combination of these factors. Please see Appendix C Recognising Abuse and secondary forms of abuse.

REPORTING PROCEDURE

Where under 18s are concerned there are statutory responsibilities for any organisation to follow regarding the safety of young people.

Each of the BSC centres has a Designated Safeguarding Lead (DSL)/Designate Child Protection Officer (DCPO) in Scotland/Designated Liaison Person (DLP) in Ireland to be the lead on any safeguarding issues.

All members of the BSC team must be alerted to recognising the signs of abuse and any concerns regarding the welfare and safeguarding of our students must be reported. Guidance is available throughout this policy and within the Local Safeguarding appendices.

Guidance with regards to a specific incident may be obtained from the DSL/DCPO/DLP or Deputy. The DSL/DCPO/DLP or their Deputy will follow the relevant procedures and action necessary to protect our students from harm.

A safeguarding incident report must be made to the DSL/DCPO/DLP or Deputy without delay who will maintain a written record of any such incidents.

In accordance with statutory requirements and this policy, where safeguarding and welfare issues are involved, it is not possible to offer confidentiality to any person regardless of age as any disclosures must be reported. However, it is imperative to inform the student of that disclosure to necessary people in order for appropriate action to be taken. If a report is made to a BSC team member, the individual will be informed that the information they disclose will be shared with the relevant person(s) and where possible, provide the name(s) and role of those who will be made aware.

Operating Procedures

All class registers will indicate any students who are under 18 so that teachers are able to inform the DSL/DCPO/DLP or their deputy immediately of any absences of any student under 18.

OUR RESPONSIBILITIES

At BSC, student protection is our number one priority. Our Board Members and Senior Leadership Team actively review our safeguarding measures and ensure that we follow the latest guidance from the relevant bodies.

Compliance & Safeguarding Manager

The Compliance & Safeguarding Manager is responsible for supporting the BSC in ensuring that we meet our duty of care to all students and team members by ensuring best practice is followed. The role provides consistency to the group across its procedures, policies and practice.

DSL/DCPO/DLP and Deputies

The DSL/DCPO/DLP has responsibility for the implementation of the College's Local Safeguarding Policy. The Designated Safeguarding Lead (DSL) will have Specialist Safeguarding for Safeguarding Lead training (formerly known as Level 3) The Designated Child Protection Officer (DCPO) in Scotland and Designated Liaison Person (DLP) in Ireland, will have the equivalent appropriate training.

The role of the DSL/DCPO/DLP and Deputies is to:

- ✦ Suitably plan and consider the risk for all events and activities provided by the business
- ✦ Act accordingly and professionally in response to a safeguarding concern or report
- ✦ Assess information promptly and sensitively, clarifying and obtaining more information about the matter as appropriate

- ✦ Consult with the Compliance & Safeguarding Manager to ensure incidents are handled in a consistent and fair manner
- ✦ Record all concerns in line with our data protection policy
- ✦ Take responsibility on a local level for safeguarding children entrusted to the care of BSC Education
- ✦ Provide support, advice and guidance to team members on an on-going basis and on any specified safeguarding issue as required including online safety
- ✦ Be aware of who to contact within and outside of the organisation
- ✦ Ensure there is a presence of an appropriate adult to support, advise and assist if a pupil is being questioned or detained by the police

Specifically, the role of the DSL/DCPO/DLP includes:

- Make formal referrals or liaise with statutory safeguarding agencies or the police when necessary
- Manage referrals to the Channel and Prevent programme where there is a radicalisation concern as required
- Handle concerns or allegations regarding BSC team members including informing HR immediately alongside submitting an incident report form. HR will be responsible for making a referral to the Disclosure and Barring Service as required if a person is dismissed or left due to risk or harm to a child.
- Ensure that child protection files are kept up to date and in the event of an under 18 moving College, to share those files within five days of that transfer in line with Annex C of KCSIE

People and Performance Team (HR)

- **Policy Development:** People team is responsible for to work on developing, implementing, and regularly updating safeguarding policies and procedures in accordance with legal requirements and best practices, alongside the Compliance and Safeguarding Manager.
- **Training and Awareness:** They ensure that all team members, particularly those who work directly with vulnerable individuals like students, receive appropriate training to recognize signs of abuse or neglect. People and Compliance team both play a vital role in fostering awareness and a culture of safeguarding throughout the organization.
- **Background Checks:** People team is responsible for overseeing the process of conducting comprehensive background checks on new starters and exiting team members and volunteers/contractors who will have contact with students or vulnerable individuals. This includes criminal record checks, reference checks, and verifying qualifications.
- **Recruitment and Onboarding:** People team need to ensure that recruitment practices adhere to safeguarding principles. They should also facilitate safeguarding orientation as part of the onboarding process.
- **Reporting and Investigation:** People team established a clear process for reporting safeguarding concerns and investigates cases promptly and impartially. Confidentiality and transparency in handling these issues are essential and People team responsibilities.

The specific duties of these roles are written in the individual's job description.

The named DSL/DCPO/DLPs at BSC are:

| College | Designated Safeguarding Lead/responsibilities | Safeguarding Deputy/Others |
|-------------|---|---|
| Brighton | Nigel Warwick | |
| Edinburgh | Sioban Ingram | Catriona Macdonald |
| Manchester | Brian Swash | Megan McInerney |
| York | Tim Ashurst | Tanya Djalili |
| London | Sofia Papadimitroupoulou | Adrian Cini Thin Wai |
| Board Level | Fatemeh Azizinesar | Global Director of People and Performance (HR) GDPP |
| Board Level | Alex Cann | Director of Operations and Academic Delivery |
| Operations | Charlotte Powlesland Coralie Purday | Compliance and Safeguarding Manager Operations Manager |

Contact details for the DSL/DCPO/DLP and Deputies are outlined in the relevant local appendices within this safeguarding policy.

In each centre there will be a member of the team nominated as a point of contact for all under 18s. This may be the DSL/DCPO/DLP, their Deputy or another member of the team who will be trained to an equivalent level. They are introduced during the welcome induction in the first week when the member of the team introduces themselves and their role (primarily as a nominated point of contact for any issues). The member of the team will also go through the curfew rules and check that the information provided is understood and they have no concerns to raise. They will meet with under 18-year-old students during their course to ensure that they have no concerns and that they are given the support they need.

The role of the deputy safeguarding lead is to conduct the role of the DSL/DCPO/DLP in their absence. For this reason, the DSL/DCPO/DLP and the deputy will not be authorised leave at the same time, unless when another person is trained to cover the role.

5.1 BSC TEAM

All the BSC team are required to take shared responsibility for the safeguarding and safety of any young people and adults at risk in College. The BSC team may be considered in a position of trust, those team members who teach, support, guide or in any way interact with students, young people and adults at risk when visiting the College and should be aware of the significance of this position. It is always incumbent on all the BSC team to be aware and understand this policy and to act accordingly.

It is the duty of the BSC team to only inform but not to investigate – this is the role of the Police and Social Services.

If the team, during their work at BSC, have a safeguarding issue brought to their notice, this must be treated as a priority over all other work.

All concerns and allegations of abuse regarding a BSC Team member, contractor, agency worker or visitor will need to be reported additionally and immediately to HR who will deal with any team member's investigation and then make the necessary referrals to the LADO and DBS/PVG.

5.2 Safer Recruitment

BSC has a rigorous recruitment process and policies that includes safeguarding measures to ensure that applicants and successful candidates have been suitably vetted for the role they have applied for.

Part three of the Keeping Children Safe in Education guidance by the Department for Education states:

‘It is vital that Colleges create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children.’ At BSC we actively adopt and promote policies and procedures which support these aims.

Line managers and People Team are responsible for recruitment will complete an ‘in-house’ recruitment training course. (For full details on our safer recruitment process, please refer to the BSC Recruitment and Selection Policy

5.3 Statutory Safer Recruitment Requirements for people working with children and adults at risk.

Under the Children’s Act 2004 all roles with children and young people must satisfy safer recruitment standards including appropriate checks on new BSC team members and volunteers.

BSC policies aim to follow relevant legislation and guidelines which includes:

- The Education Act (2002) Section 175
- The Children Act (1989 and amendments) including The Children Act 2004
- Sexual Offences Act 2003
- Serious Crime Act 2015 (Commencement No 6) Regulations 2017
- Working Together to Safeguard Children (Revised February 2017)
- Information Sharing 2018
- Keeping Children Safe in Education - Updated September 2022

For BSC Colleges using volunteers, they will be required to complete a risk assessment for each volunteer to decide whether they need an enhanced DBS check or not. Even if a criminal check is conducted, if the volunteer is not in a regulated activity, then BSC is not legally permitted to conduct a barred list check. We need to ensure that the pre-employment checks conducted on

behalf of each individual are relevant to the role they have accepted. People department will be responsible for completing all the necessary checks.

5.4 UPDATES ON CRIMINAL CHECKS

BSC wish to ensure the continued safety of our team and students, therefore we have adopted best practice in subscribing all permanent team members based in England to the DBS Update Service where possible. BSC will run the check on the Update Service annually for those team members. BSC team members who are on the Scottish PVG Scheme should ensure that their details are always updated and ensure that BSC is listed as their employer in order that BSC will be informed of any changes to criminal data. All team members recruited in Ireland will be required to have a valid Garda check. As these are specific to the College that requests the check, Garda checks from other employers cannot be used.

Upon joining the Company, all BSC team members must report any subsequent criminal convictions, cautions, reprimands, investigations and warnings to their line manager and the People Team via completing the disclosure form. Failure to provide accurate information on the form and upon BSC receiving information on the DBS certificate, this may result in suspension and a potential disciplinary action being taken.

Should any safeguarding concern be raised regarding an individual, BSC will make the discretionary decision whether to redo a criminal record check to ensure the welfare of the students, in the absence of updated service for a live check.

Failure to comply with any request to redo a criminal record check may lead to disciplinary action and dismissal.

5.5 BSC TEAM INDUCTION

As part of induction, the following will be undertaken:

- ✦ Making known to all BSC team members the policies and procedures in place that promote the safety and welfare of children and adults at risk
- ✦ All new team members will meet with the DSL/DCPO/DLP or Deputy on their first day (where possible) for a safeguarding induction (see checklist – Appendix E) during which the DSL/DCPO/DLP will confirm the difference between a concern (something that seems not to be right but is of no immediate danger to the under 18) and a serious issue (where the under 18 could be in danger of harm/abuse and an urgent response is required).

5.6 TRAINING

In accordance with good practice BSC will ensure that the DSL/DCPO/DLP, deputies and other team members likely to be in regular contact with under 18s and adults at risk receive appropriate training.

All BSC team members are expected to have Basic Awareness training (previously Level 1), usually the BSC Basic Safeguarding & Prevent Training. The DSL/DCPO/DLP and their deputies must have specialist training (formerly Level 3) or equivalent. Annual refresher training is required for all College team members.

BSC will also provide information in the form of posters to raise awareness to ensure that all the BSC team understands what to do if a student or visitor covered by this policy discloses abuse or any other safeguarding issue.

5.7 EXPECTATIONS OF THE BSC TEAM IN RELATION TO SAFEGUARDING

All BSC team members should understand that safeguarding students is paramount and takes priority over any other workload.

All BSC team members must always wear an identification badge on BSC premises so that they are clearly identifiable. This can be worn either using the BSC team members' lanyard or a clip-on badge.

All BSC team members must be familiar with BSC's Code of Practice for the BSC team attached as Appendix A.

All BSC team members must be familiar with BSC's Code of Behaviour for Young People and Adults attached as Appendix B.

All BSC team members must read and sign the relevant safeguarding policies and procedures regarding their roles and responsibilities.

All BSC team members must be familiar with the concept of "Position of Trust". It should be noted that whilst a young person in the UK can consent to sexual activity once they reach the age of 16, the Sexual Offences Act 2003 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under 18 where the adult is in a position of trust.

Additionally, to the DBS and/PVG checks (for Scotland), BSC require a criminal records check/certificate of good conduct for time spent abroad for any team member coming from abroad or UK nationals who have not been in the UK for the last 6 months in line with government guidelines.

All BSC team members are always expected to maintain a professional working relationship with students regardless of their age. Please refer to BSC Workplace Relationship Policy, available on YPDA and Team Handbook.

5.8 CONSENT FROM PARENTS OR GUARDIANS

All parents/guardians of a student under the age of 18 will be asked to provide written consent for their child to attend a BSC course. The written consent outlines several conditions and refers the parent/s/guardian to this policy for further information.

Any medical history is requested as part of the parental consent form and provides the authority for Certified Emergency personnel to deal with medical situations.

Where a booking for an under 18 does not include the arrival transfer, parents/guardians are asked to provide details on a No Transfer Form of how the student will be travelling independently from the port of entry to the College/homestay to form part of the risk assessment of the journey.

If the under 18 student wishes to stay in independent accommodation (not arranged by BSC), their parent/guardian will need to complete a separate consent form detailing information about the accommodation (address, type of accommodation, adults who will be responsible for the student throughout their stay). The College will then carry out an investigation to ensure the accommodation is suitable for the student, but they reserve the right to refuse this request. In that case, BSC will arrange accommodation for the student and their parent/guardian will have to commit to cover the cost.

If the under 18 student wishes to have an overnight stay during their time with BSC, they will need to ask the College permission in advance and before making any arrangements. Their parent/guardian will also need to submit a consent form for overnight stays containing the following information: where they are staying, how they are travelling there and back and who they are staying with. The College will then carry out an investigation to ensure the accommodation is suitable for the student. The College reserves the right to refuse permission for the overnight stay should they consider it not suitable.

We expect Under 18 students to follow all of BSC rules during their stay in the UK. Should the student not abide by the rules, the Colleges reserve the right to contact their parent/guardian and take any appropriate measures, including termination of their course and accommodation without a refund.

5.9 UNSUPERVISED TIME OF UNDER 18S OUTSIDE OF THE CLASSROOM

Under 18s on an adult course will have periods of unsupervised time for example: journeying between their homestay and College, shopping time, time after lessons before they need to be home for the evening meal, time between the evening meal and curfew, weekend day times etc. Parents/guardians will have been made aware of this as part of the parental consent (see 4.3).

5.10 ACCOMMODATION

A number of students are accommodated with homestay families. This is arranged by Host International who have their own specific safeguarding and safer recruitment policies which are applied to accommodation offered, this includes a designated child protection manager. Details of their policy can be found below:

Host international Safeguarding Policy Overview:

‘Hosts International recognises the importance of creating a safe culture where trust is built between staff and under 18’s and both are protected from any behaviour which runs contrary to this culture. We achieve this through adherence to the policies laid out in this document and a

genuine environment of care fostered by robust procedures and recruitment and training activities.'

<https://www.hosts-international.com/safeguarding-policy/>

Procedures relating to Accommodation.

- ✦ concerns raised by students should be actioned immediately and reported using the incident report form. Serious concerns will be immediately reported to the local authorities and/or the Local Authority Designated Officer (LADO) via the DSL or College Manager
- ✦ contact to be made with Host International safeguarding lead.
- ✦ ensure that there is a risk assessment available for the journey to and from College.
- ✦ ensure that students' parents or guardians provide written consent for activities outside of the agreed curfew. The College has the right to amend or refuse such requests in accordance with College policy and accreditation guidelines.
- ✦ all parents' contact numbers from the consent letter must be entered into the College database as soon as possible and ideally before the student arrives. If an under 18 does not arrive within 1 hour of their expected arrival time, the host is instructed to call the College emergency phone and a BSC team member will then contact the parent and if necessary, report them as a missing person to the police
- ✦ ensure that residential accommodation (including student houses) is not made available to under 18s.

5.2.1 SOCIAL PROGRAMME

The managerial responsibility for any programme or activity rests with, firstly, the College Manager and secondly the individual who is directing or organising the activity.

Those members of the team involved in social programmes are expected to:

- ✦ ensure that the activity is planned, organised and delivered in accordance with the Safeguarding Children and Adults at Risk Policy
- ✦ arrange the checking, training, induction and guidance for all other team members and volunteers involved in the social programme activity
- ✦ complete a health and safety risk assessment for each activity
- ✦ ensure there is appropriate levels of supervision and ratio of team members as outlined in the risk assessment
- ✦ ensure that there is a variety of social programme activities suitable for under 18s
- ✦ ensure that students are familiar with the 24-hour emergency telephone number and that they know to call this number at any time if a concern arises
- ✦ BSC team members, when they are responsible for a social programme activity, must ensure that under 18s adhere to curfews, do not drink alcohol and are protected from potential harm
- ✦ BSC team members leading a social event are not allowed to drink alcohol whilst responsible for the students
- ✦ BSC team members leading a social event should be aware of the procedures to follow if an incident arises e.g. U18 goes missing, medical emergency, etc.
- ✦ BSC team members leading a social event should be aware of emergency action procedures

5.2.2 EXTERNAL SUPPLIERS AND VISITORS TO THE COLLEGE

BSC will ensure that all suppliers (taxi drivers, excursion company employees) who are contracted for under 18 students have provided written confirmation that they will only use drivers who have been vetted in accordance with our Recruitment Policy.

Access to the College's premises will be controlled by each welcome hub at each site. All visitors to the College premises will be required to sign in on arrival, wear appropriate visitor lanyards and will follow the local safeguarding policy procedure for visitors.

5.2.3 ONLINE COURSES

BSC may at times in exceptional circumstances, deliver online courses to students. BSC are committed to ensuring the wellbeing and safety of all our students. We have zero tolerance to online bullying or abuse and have outlined guidance to ensure our students are in a safe learning environment while enrolled on our online courses. All BSC team members should treat online safety as a safeguarding matter and understand that online abuse can occur wholly online, or it can be used to facilitate abuse in real life. Any concerns relating to online safety from either a teacher, team member or student are bound by safeguarding practices and principles and are to be shared with the Colleges Designated Safeguarding Leads.

There is an ever-evolving breadth of safety concerns online however these can be categorised into four risk areas:

content: being exposed to illegal, inappropriate or harmful material **contact:**

being subjected to harmful online interactions with other users **conduct:**

online behaviour that increases the likelihood of, or causes harm

commerce: risks such as online gambling, inappropriate advertising, phishing or financial scams

To ensure the safety and security of a team members and student the following guidance is adopted:

Security options when scheduling a class or meeting for teachers and academic teams

- meetings and classrooms should require registration: This will show you the email addresses of all those who should be in the class
- it is best practice to generate a random meeting ID for your class, so it can't be shared multiple times. Create new meetings frequently and never share your own id because this will mean the meeting will be running all the time and anyone can enter it.
- password-protect the classroom: Create a password and share with your students so only those intended to join can access a virtual classroom.
- tick the box which allows only authenticated users to join: Checking this box means only members of the College who are signed into their Zoom account can access this particular class.

- disable join before host and enable the waiting room feature: This means that students cannot join the class before the teacher joins and students will see a pop-up that says, “The meeting is waiting for the host to join. “
- allow guest participants only this will mean everyone except someone from BSC will have to wait in the waiting room before joining the class.

Guidelines for hosting online classes and meetings:

- lock your online classrooms and do not allow late arrivals in after 15 minutes. Attendance rules apply online as they do in the real classroom.
- enable the waiting room, leave students in the waiting area until at least two students have arrived, then admit students.
- restrict the in-class chat so students cannot privately message other students. Teacher should control access to chat in the toolbar so students can chat to teacher and the teacher can enable it for a specific activity.
- switch the settings to make sure microphones and videos off when joining the meeting • teachers are to be in control of turning on the mute and video settings when required.
- save the video/chat content- record the class and chat content.
- be conscious of background environments and others in the room.
- make sure you are in a professional environment and use a virtual background if necessary.
- dress appropriately
- remove an unwanted participants or students who does not follow the student guidelines.

Student rules:

- Students to turn camera's on during class.
- engage in class and logging on is not enough to be marked as present, but you MUST participate. If you do not participate in class for 15 minutes, your teacher will private message you to make sure you are alright. A further 5 minutes will be given so a student can respond, if they do not respond they will get a warning that if they do not respond within 5 minutes they will be removed from class. Any student who has been expelled from class will be contacted by the Director or Assistant Director of Studies. Repeat offenders will receive a warning and BSC disciplinary procedure will be followed.
- dress appropriately for class
- take your class in a professional environment, at a desk or table and use a virtual background if necessary.
- check your email before class to have the material your teacher has emailed you ready
- keep your Microphone off. Your teacher will put it on when necessary and wait to be nominated to speak
- do not take a picture of any other student or your teacher while online without their permission, do not post online picture of others without their permission.
- Use an account that you have created in Gmail to participate in our online courses and regularly change your password
- There may be 16-year-olds in our adult classes and it is against the law to post and redistribute photos of anyone this age.
- be respectful and tolerant of fellow students

Additionally for all students that are under 18:

- ✦ parent/Guardian will be asked for their consent for the student to take part in these lessons via the parental consent form.
- ✦ lessons will be delivered securely via the BSC Adobe Connect platform.
- ✦ lessons may be recorded for compliance purposes.

5.2.4 FILTERING AND MONITORING

In line with KCSIE 2023, BSC IT Operations support implemented identical filtering and monitoring systems across all of its Colleges. The College uses a systematic approach to web filtering which seeks to protect students from harmful, inappropriate, non-compliant content, whilst promoting a safer and more secure online environment for all. The College also seeks to monitor the use of ICT resources and the Internet, so as to ensure the principles of appropriate use and safeguarding particularly in reference to Child Sexual Exploitation, prevention of radicalization and extremism and effectively all types of grooming on-line.

Students and team members are responsible for their internet browsing and must not research materials (unless as part of a legitimate study directed by a teacher) which may promote ideologies and practices contravening British Values, thereby undermining the safeguards undertaken by the UK Government to prevent extremism and radicalisation (reference: CONTEST (The UK Government Strategy for Countering the Terrorist Threat July 2011) and PREVENT Strategy (the aim of which is to stop individuals becoming allied to and active in terrorism). Such matters are therefore bound by safeguarding practices and are to be shared with College Designated Safeguarding Leads.

Notification

We have set up a notification system whereby reports of content filtering incidents are reported to an email account shared between the IT team (technical) and the Compliance and Safeguarding Manager (safeguarding) for monitoring.

Review

BSC will conduct monthly reviews of notifications made, providing an overall report to the senior leadership team of any notifications and reasons behind attempted access.

Reviews will take place annually between IT Operations support and the Compliance and Safeguarding Manager to ensure the robust nature of our systems and to evaluate changing needs of the Colleges. All reviews and evaluations will be shared with senior leadership teams.

5.2.5 WORKING WITH STUDENTS WITH SPECIAL EDUCATIONAL NEEDS (SEN) AND/OR DISABILITIES

Where possible BSC will identify any students with SEN and/or disabilities and ensure that there are appropriate support measures in place. This may be indicated at the time of booking or is most likely to be when the student presents to, or is referred to, the student experience team. There

must be an awareness that behaviour, mood and injury may relate to possible abuse and not necessarily be as a result of the specific SEN or disability that has been identified. It should also be noted that these students are of a higher risk of peer group isolation and may have additional challenges with communication.

Any BSC team member with concerns regarding a student whom they believe falls into this category must contact the DSL/DCPO/DLP who will consider what, if any, additional pastoral care should be put in place.

SEARCHING, SCREENING AND CONFISCATION

In January 2018 the Department for Education issued advice for headteachers, school staff and governing bodies in relation to Searching, Screening and Confiscation.

College team members can search a student for any item if the student agrees.

College Managers and any BSC team member authorised by the CM can search a student, without their consent, where they have reasonable grounds for suspecting that the student may have a prohibited item. Prohibited items include: knives or weapons; alcohol; illegal drugs; stolen items; or any item that the BSC team member reasonably suspects has been or is likely to be used to commit an offence, or to cause personal injury to, or damage to the property of, any person (including the student).

The BSC team member can seize any prohibited item found as a result of a search. They can also seize any item they consider harmful or detrimental to College discipline.

For full details please refer to <https://www.gov.uk/government/publications/searching-screeningand-confiscation>

ALLEGATIONS:

(See Whistleblowing Policy)

All BSC team members, including, volunteers, contractors and visitors have a role to play in ensuring there is a culture of transparency, trust and openness throughout all colleges. It is imperative that this sharing of information allows for the College's core values and expected behaviour standards are upheld day to day.

In terms of creating an open and transparent culture at BSC it may be that allegations at times may be falsely made. Concerns and allegations that are raised against team members (including volunteers, contractors and visitors) must be treated and investigated professionally and fairly and in keeping with KCSIE (September 2022) which looks at allegations of abuse made against teachers and other staff.

8.1 – Allegations that meet the harms test

There may at times be concerns/allegations regarding a BSC team member including (volunteers, contractors and visitors) it is important to note that allegations that meet the harm test could

include but not limited to; posing a risk of harm, possibly committed a criminal offence related to or against a child or behaved in any way that has harmed a child.

Allegations of abuse against BSC Team members should be reported to Global Director of People and Performance who will then work with Compliance and Safeguarding Manager team and Director of Operations on the matters raised. This should be done via the Incident report form. If there is a conflict of interest at this level the allegation must be made to the LADO. People Team will access the allegations and contact the local LADO as a result. LADO contact details can be found within Local BSC policies. These allegations will be dealt with via a common-sense approach, quickly and whilst maintaining consistency. The DSL is responsible for ensuring the welfare of the student to mitigate any further risk and referring cases where necessary. Initial responses to allegations will also be sensitively managed, supported and provide protection for the child and team member subject to the allegation, under BSC Data Protection Policy.

8.2 – Low level concerns

Low level concerns are those against BSC Team members including (volunteers, contractors and visitors) which do not meet the harm threshold, these are behaviours inconsistent with team members code of conduct or are not serious enough for the College to refer to the local authority. This does not however mean these concerns are not significant. Some examples of low-level concerns are but not limited to; having favourites or over familiarity with students, inappropriate, sexualised or offensive language or unprofessional conduct in and outside of work. It could be in the form of a 'nagging doubt' or a concern that is causing a sense of unease in behaviour that is inconsistent with BSC's code of conduct. These concerns must be reported via low-level concerns reporting and is done to minimise risks to students whilst maintaining professional boundaries.

Where a low-level concern relates to a volunteer, contractor or agency those concerns will be raised with their employer. This is to mitigate risk and any potential patterns of inappropriate behaviour can be identified.

8.3 – Allegations involving a BSC team member

Allegations involving a BSC team member, and a student should be reported to the Compliance and Safeguarding Manager and to the DSL/DCPO/DLP. If the allegations involve the DSL/DCPO/DLP, then the report should be made directly to the Compliance and Safeguarding Manager.

All allegations will be followed by an investigation which may lead to disciplinary action including gross misconduct. For full details on this process, see the BSC Disciplinary Policy. Consideration will be given as to whether the situation falls within the definition of abuse. If DSL/DCPO/DLP believes that the allegations constitute abuse, they will contact the Local Authority Designated Officer (LADO) immediately and follow their instructions.

ALLEGATIONS OF ABUSE OR INAPPROPRIATE BEHAVIOUR INVOLVING STUDENTS

Allegations between students should be reported to the DSL/DCPO/DLP.

Consideration will be given as to whether the situation falls within the definition of abuse. If the DSL/DCPO/DLP believes that the allegations constitute abuse, they will contact the Local Authority Designated Officer (LADO) immediately and follow their instructions. These allegations are always to be kept completely confidential by all BSC team members involved.

WHISTLEBLOWING POLICY

It is a legal requirement to disclose a concern and appropriate action is taken. Where there are concerns about the way that safeguarding is carried out in a College, the BSC team member should refer to the Whistleblowing Policy. A copy of this policy can be found on YODA and Team Handbook.

The NSPCC runs a whistleblowing helpline on behalf of the Home Office, the number is 0808 800 5000. The NSPCC also run a whistleblowing advice line to talk through your concerns, the number is 08000280285.

RECORDING INFORMATION

All personal data will be processed in accordance with the requirements of the Data Protection Act 2018 and UK General Data Protection Regulation 2018. Due to public interest in safeguarding children in our communities we will retain safeguarding data for a longer period than other types of data. Safeguarding data will be collected by the DSL/DCPO/DLP or deputy and recorded via a Safeguarding Log. This will be held on a Central Safeguarding Log by the Compliance and Safeguarding Manager. If appropriate the DSL/DCPO/DLP or deputy may pass the relevant information on to the police or other relevant government authority. The record of the data will include the nature or detail of the concern and whether any action was taken.

Records will be kept of all such incidents and their outcomes and held by the DSL/DCPO/DLP in accordance with the Data Protection Act 2018 and UKGDPR.

11.1 CONSENT REGARDING USE OF PHOTOGRAPHS AND VIDEOS

For any BSC activity involving young people, parents or guardians the participants will have been asked to give their permission to be photographed, videoed or other images taken of their children for the purposes of promoting social programme activities. Parents or guardians will be given the right to refuse to give permission for their children to be interviewed by press, broadcasters or other media before any such activity may take place. For further information see the BSC Data Protection Policy.

APPENDIX A: CODE OF CONDUCT - GOOD PRACTICE FOR THE BSC TEAM

The following guidelines are intended to be a common-sense approach that both reduce opportunities for the abuse of young people and adults at risk and help to protect BSC team members, students and volunteers from any false allegation.

YOU SHOULD

- ✦ treat all young people and adults at risk with respect and respect their right to personal privacy
- ✦ follow our guidance and policies in relation to data protection

- ✦ ensure that, whenever possible, there is more than one adult present during activities or that you are within sight or hearing of others
- ✦ exercise caution when discussing sensitive issues with children or adults at risk
- ✦ exercise caution in initiating any physical contact with a young person or adults at risk
- ✦ operate within the guidance offered by this Code
- ✦ challenge all unacceptable behaviour and report all allegations or suspicions of abuse
- ✦ be aware of the College's rules in relation to alcohol, drugs and smoking
- ✦ avoid becoming personally involved in a student's personal affairs
- ✦ be aware that their personal web profiles on social media can be viewed by anyone and therefore should be especially cautious about their public web profiles and privacy settings
- ✦ be an excellent role model to other BSC team members and students
- ✦ be aware of the effect your appearance has on students and the importance of presenting appropriately e.g. in class, on activities, in accommodation
- ✦ be aware of the College's policy on gifts
- ✦ remember that when dealing with a child protection issue, information must only be shared with the designated team, not with anyone else, including their own family. Confidentiality about both the victim and the accused must be maintained

YOU SHOULD NOT

- ✦ establish or seek to establish social contact with under 18s/students during the course
- ✦ give personal e-mail addresses or personal phone numbers to students under 18
- ✦ electronically or verbally communicate via e-mail, text, phone, social networking sites, blogs, web pages or messaging services with under 18s, except when necessary on a business device as part of role requirements such as using the emergency phone
- ✦ send sexual messages to under 18s in England and Wales in accordance with the enactment of the Serious Crime Act 2015 which came into force 3 April 2016
- ✦ post photos or videos of students under 13 on any website or social networking sites. Permission is required from any student over 13 for use by BSC for College purposes only
- ✦ spend excessive time alone with young people or adults at risk away from others
- ✦ take young people or adults at risk alone in a car journey, however short unless organised through the College. In this instance, the under 18 should sit in the back of the car as there is room to do so
- ✦ take young people or adults at risk to your home
- ✦ engage in physical or sexually provocative games including horseplay
- ✦ allow or engage in inappropriate touching of any form
- ✦ make over-familiar or sexually suggestive comments or approaches to a young person or adult at risk even as a 'joke'
- ✦ let allegations, over familiar or sexually suggestive comments or approaches made by a young person or adult at risk go unchallenged or unrecorded
- ✦ do things of a personal nature that young people or adults at risk can do for themselves.

UNDER 18'S SEEKING PERSONAL CONTACT WITH BSC TEAM MEMBERS

- ✦ if an under 18 seeks to establish personal contact, the BSC team member should be aware that such social contact could be misconstrued. BSC team members should inform their line manager if a student is seeking social contact with them OR If a student is seeking social

contact with a team member, the team member should direct the student to this policy to explain why the contact is unnecessary and against company policy

- ✦ BSC team members should be made aware that it is an offence to engage in sexual communication with a child. The offence covers both online and offline communication, including through social media, e-mail, and letters with adult groomers facing up to two year in prison and being automatically placed on the sex offenders register in England and Wales
- ✦ appropriate professional contact (on behalf of the business via a business device or work environment)
- ✦ BSC team members must maintain neutral, friendly relationships with students while avoiding exclusivity or overfamiliarity.
- ✦ BSC team members must resist any attempt by a student to develop an overfamiliar or exclusive social relationship.
- ✦ if a student confides sensitive personal information, BSC team members have a duty to listen and respond in a professional manner in accordance with organisational guidelines.
- ✦ BSC team members have a duty to report to the employer any actual or perceived inappropriate development of the relationship between student and a BSC team member, electronic or otherwise.

ELECTRONIC CONTACT INCLUDING SOCIAL NETWORKING SITES

- ✦ BSC team members must only use the College VLE (Virtual Learning Environment) for any electronic contact with a student before, during or after a course
- ✦ in any electronic contact with students, BSC team members must pay attention to use neutral, non-emotive language that will not be misconstrued
- ✦ BSC team members must not exchange any information with a student that they would not be happy to share with the child's parent or carer
- ✦ BSC team members must avoid the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings
- ✦ BSC team members must not initiate or agree to 'friendship' requests or similar with students that will result in the sharing of personal information, photos, status updates, etc. For example, if a BSC team member receives a Facebook friend request from a current student they should inform their line manager or the DSL/DCPO/DLP so that there is complete transparency and they should not accept the request
- ✦ BSC team members should be particularly cautious about their public web profiles and privacy settings

FAILURE TO COMPLY

- Non-compliance with the above policy will result in an investigation and potentially a disciplinary procedure. In the instance where it is deemed that the non-compliance falls under gross misconduct, BSC will follow the appropriate procedures as outlined in the BSC Disciplinary policy. Examples of gross misconduct which may render an employee liable to summary dismissal include, but are not limited to, the following:
 1. insulting, aggressive or abusive language and/or behaviour
 2. indecent or immoral behaviour

3. deliberately withholding information about other team members who break Company rules and procedures, regardless of their status
 4. discrimination, harassment, victimisation or other unlawful discrimination against other employees, students or suppliers
- ✦ BSC has a duty to remove an individual from regulated activity where there is risk of harm to children.
 - ✦ BSC has a 'duty to refer' to external authorities* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children. (*ISA, police, local child protection authorities).
 - ✦ For more information, please review BSC Disciplinary and Workplace Relationship Policies available on YODA and Team Handbook.

APPENDIX B: CODE OF BEHAVIOUR FOR CHILDREN & ADULTS AT RISK (ENGLAND AND WALES/PROTECTED ADULTS (SCOTLAND))

BSC (Education, Group and Young Learners) is a language college for the education of students, including children aged under 18. All people visiting BSC, either privately or with an organised group, are expected to respect BSC team members, students and its buildings and grounds.

BSC seeks to offer visitors a safe and caring environment. In return, you must:

- ✦ respect the rights and dignity of each other and of the BSC team and other helpers ✦
- respect the rules of BSC which include:
 - ✦ purchase, sale and consumption of alcohol, recreational/nontherapeutic drugs and substances for abuse is forbidden
 - ✦ smoking is banned in all buildings at BSC and is only allowed within outdoor areas specifically designed for this practice
 - ✦ all rules and safety/emergency procedures such as fire drills must be followed
 - ✦ participants in organised events are expected to attend all timetabled activities unless they have been granted specific leave of absence
 - ✦ inappropriate physical intimacy among participants is not permitted
 - ✦ serious incidents of misbehaviour such as fighting, racial/sexual abuse, damage to property, indecent language and failure to obey instructions will normally lead to expulsion from the activity and possibly from the BSC course, in accordance with our Terms and Conditions.

APPENDIX C: RECOGNISING ABUSE (PRIMARY AND SECONDARY)

Abusers can be anyone and anywhere. An abused person is someone, who has suffered physical injury, neglect, emotional or sexual abuse. In many cases, an abused person will suffer more than one type of harm, for example physical injury and emotional abuse. Importantly, abuse can result in the individual suffering significant harm and at worst, can lead to death. Definitions of abuse vary across time, culture and geography. We know more about abuse now but there are no reliable figures from previous generations to compare with today's figures. Abuse is NOT the abused person's fault. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Individuals may be abused in a family or in an institutional or

community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another under 18 or under 18s. Often the abuser is known to the individual, such as a member of the family, neighbour or family 'friend'. It is important to note that abuse can take place online or offline formats in many ways. All team members at BSC are aware that children and adults may not know how to tell someone they are being abused, exploited or neglected or feel ready to do so, they may not even regard or recognise that their individual experiences are harmful.

Abusers may be anyone:

- any age
- male or female (including sexual abuse)
- from any social class, culture or faith
- 'nice' people
- professionals such as teachers, religious leaders or social workers
- related to the under 18
- other under 18s
- those in a position of power or trust

There are four main categories of abuse:

- sexual abuse
- physical abuse
- emotional abuse
- neglect

PRIMARY ABUSE

1. SEXUAL ABUSE

Sexual activity with or directed toward a person under 18 by an adult who is in a position of trust with under 18-year olds is a criminal offence (Sexual Offences Act 2003)

Some arrive in a job with a pre-meditated desire to abuse children; others develop it while in the job. Therefore, safer recruitment alone is not enough to provide adequate safeguarding for children.

A sexual abuser typically goes on a journey:

- ✦ feeling emotionally connected to children and having few adult relationships/pastimes
- ✦ overcoming his/her own conscience by, for example, seeing child porn on the Internet means it is permissible and/or by interpreting children's behaviour as sexual and flirtatious when it is not
- ✦ grooming adults so they see the abuser as normal/respectable/responsible
- ✦ grooming children, especially those in need, firstly by testing their boundaries in minor ways so that should there be any complaint, it would be easy to explain away

- ✦ slowly developing a relationship with a child and gradually pushing the boundaries of sexual behaviour further

Sexual abuse involves forcing or enticing an under 18 to take part in sexual activities, not necessarily involving a high level of violence, whether or not the under 18 is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving under 18s in looking at, or in the production of, sexual images, watching sexual activities, encouraging under 18s to behave in sexually inappropriate ways, or grooming an under 18 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 under 18s.

Physical signs of sexual abuse include:

- repeated, inappropriate masturbation
- presence of sexually transmitted diseases
- young children with age inappropriate sexual knowledge, e.g. penetration, ejaculation, oral sex • explicit sexual drawings
- pain, soreness or itching in the genital or anal areas or mouth
- recurrent genital or urinary infections
- pregnancy

Behavioural signs of sexual abuse include:

- disclosure from a child (to another child or an adult)
- young children acting out sexual behaviours, e.g. simulating intercourse, grabbing genitalia etc.
- young children displaying sexually inappropriate knowledge or behaviour
- persistent bedwetting, nightmares and sleep problems
- anorexia, bulimia, self-harm or excessive 'comfort' eating
- fear of a specific person
- running away from home
- substance abuse
- child having unexplained gifts (including money)
- children having 'secrets' that an adult says they are not allowed to tell
- secrecy around internet use and webcams etc.

2. PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to an under 18. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in an under 18.

Physical abusers:

- ✦ (unless sadists) are not usually pre-meditated but reactive abusers
- ✦ typically lack self-restraint and do not have appropriate strategies for managing conflict and/or difficult children

Signs of physical abuse include:

Everyone can have accidents and may have bruises from time to time. The under 18 or his or her parents/guardians will usually tell you how the injuries occurred and what happened. However, if they do not tell you or do not give you an adequate explanation of what happened, you need to consider whether the injuries are a possible sign of physical abuse. Sometimes an under 18 can be physically abused without easily identifiable signs of injury, so it is important to act on concerns so professional assessments can be made.

Injuries not adequately explained include: fractures, bruises, burns, bite marks, slap marks and implement marks (e.g. belt mark).

Other signs of abuse include:

- grip marks - may indicate shaking
- slap marks - cheeks, buttocks, limbs (may leave a hand imprint)
- soft tissue marks
- long marks
- symmetrical bruising
- bruising in unusual places e.g. bruises on ears
- teeth/bite marks
- burns with outline, e.g. outline of an iron
- cigarette burns
- fractures or other injuries
- injuries which haven't been treated properly and there is delay in seeking medical attention

Behavioural signs of physical abuse include:

- U18 appears frightened of others e.g. parent(s) or carer(s)
- U18 doesn't want to go home or runs away
- U18 flinches when approached or when someone stretches a hand towards them
- U18 reluctant to get undressed e.g. for games or sport activity
- U18 very passive or aggressive
- frozen watchfulness – U18 sits very still watching what's going on (waiting for the next hit)
- appear overly 'happy' and 'eager to please'

3. EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of an under 18 that causes severe and persistent adverse effects on the individual's emotional development. It may involve conveying to them that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving the under 18 opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age developmentally inappropriate expectations being imposed on under 18s. These may include interactions that are beyond the individual's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing under 18s to frequently feel frightened or in danger or the exploitation or corruption of under 18s. Some level of emotional abuse is involved in all types of maltreatment of an under 18, though it may occur alone. Be aware that:

- ✦ all sexual abusers are emotional abusers
- ✦ other forms of emotional abuse include failing to provide support to children needing it and through constantly directing negative attention to a child
- ✦ bullying is the classic form of emotional abuse

Physical signs of emotional abuse include:

- physical, mental and emotional developmental delay/late developer with no obvious medical reason
- sudden onset of speech disorders, e.g. developing a stammer

Behavioural signs of emotional abuse include:

- acceptance of punishment which seems excessive
- over-reaction to mistakes
- continual self-deprecation
- excessive fear of new situations
- inappropriate emotional response to painful stimuli
- excessive behaviours, e.g. rocking, head banging, pulling hair out
- self-harm and/or eating disorders
- compulsive stealing/scavenging
- excessively sad, depressed, withdrawn
- low self-esteem
- very poor relationship with parent/carer

4. NEGLECT

The persistent failure to meet an under 18's basic physical and/or psychological needs, likely to result in the serious impairment of the under 18's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. From birth, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect an under 18 from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, an under 18's basic emotional needs.

Physical signs include:

- looking excessively thin or ill
- well below average weight and height, failure to thrive
- recent unexplained weight loss
- complains of hunger and lack of energy
- untreated conditions/injuries
- repeated accidents, especially burns
- inappropriately left at home alone
- repeatedly unwashed, smelly or dressed inappropriately for the weather

- inappropriate supervision/carers (e.g. an eight year-old looking after other children) • badly decayed teeth
- unhygienic and/or unsanitary living conditions

Behavioural signs include:

- poor level of concentration
- constantly hungry or 'stealing' food from others/bins
- not keeping doctor or hospital appointments
- frequently absenteeism or persistent lateness
- reluctance to go home from college
- delayed speech development

5. DOMESTIC ABUSE

Domestic abuse can incorporate a wide range of behaviour or single or patterned behaviour. Domestic abuse behaviour can include but are not limited to; physical, psychological, sexual, financial and emotional. Children may directly or indirectly experience domestic abuse in that they may hear or witness this abuse, finding someone injured or distressed or damage to their home environment. They may also suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of these have the potential to have a long lasting and damaging impact on their well-being, health and over all development which includes their abilities to learn. The college will liaise with police or other agencies when it comes to cases of domestic abuse to support the students in our care whilst at BSC.

MENTAL HEALTH

All BSC Team members should be aware that Mental Health problems can be an indicator that a child or adult at risk has suffered or is at risk of suffering, neglect, abuse or exploitation. BSC Team members and education team members are well placed to observe risk behaviours and identify any mental health or safeguarding concerns and implement any extra support including working with external agencies if required, however only trained professionals should attempt to make a diagnosis. If a BSC team member has a mental health concern that is also a safeguarding concern, then immediate action should be taken and reported to the DSL/DDSL as a minimum. More information can be found at; [Mental health and behaviour in Schools Guidance](#).

SECONDARY FORMS OF ABUSE

RADICALISM & FUNDAMENTALISM

Tolerance and diversity are promoted and explained to all students during their induction. Should individual students exhibit intolerance or prejudice against other students or BSC team members based on race, culture, gender, religion, socio-economic status, age, or sexuality, their behaviours will be addressed by the college disciplinary policy. As part of the Counter Terrorism and Security Act 2015, Colleges have a duty to prevent people being drawn into terrorism.

Early indicators may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures

- making remarks or comments about being at extremist events or rallies outside of college
- evidence of possessing illegal or extremist literature
- out of character changes in dress, behaviour and peer relationships
- Intolerance of difference, including faith, culture, gender, race or sexuality

Should a BSC team member suspect that any student or team member is the focus of attempts to radicalise them to a set of fundamentalist religious or political beliefs, the BSC team member should inform the SEM and/or DSL/DCPO/DLP immediately who will report the suspicions to the relevant authorities.

FEMALE GENITAL MUTILATION (FGM)

BSC believe that all students should be kept safe from harm. Female Genital Mutilation affects girls particularly from North African countries, including Egypt, Sudan, Somalia and Sierra Leone. Although BSC has few children from these backgrounds and consider girls in BSC colleges safe from FGM, BSC will continue to promote awareness on the issue to ensure that if someone is suspected of experiencing FGM the BSC team are able to recognise and raise concerns in the correct way.

Female Genital Mutilation is the name given to procedures which involve the partial or total removal of external genitalia or other injury to the female genital organ for non-medical reasons. FGM can be carried out on girls of any age and has no health benefits and can harm girls in a multitude of ways with long lasting-physical and psychological trauma. Many procedures are undertaken abroad, and team members should be aware of risk indications. Should a BSC team member suspect a student is at risk of FGM they should inform the DSL or SEM immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy). FGM is illegal in the UK and must be reported to the Police.

CHILD SEXUAL EXPLOITATION (CSE)

BSC believe that students should be kept safe from sexual exploitation. Child Sexual Exploitation (CSE) is defined as 'a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology'. CSE can apply to both boys and girls although indications may vary. It can also apply to 16- and 17-year olds who can legally consent but may not realise they are being exploited. This type of exploitation can be perpetrated by individuals, groups, children, girls and boys. It can also include family members. If this is the case, then siblings may also need additional support.

Indicators of CSE may include:

- acquisition of money, clothes, mobile phones etc without plausible explanation
- gang-association and/or isolation from peers/social networks
- exclusion or unexplained absences from college
- excessive receipt of texts/phone calls
- inappropriate sexualised behaviour for age
- evidence/suspicions of physical or sexual assault
- concerning use of internet or other social media

- increasing secretiveness

Potential vulnerabilities include:

- recent bereavement or loss
- social isolation or social difficulties
- physical or learning disability
- lack of safe/stable home environment (now or in the past)
- sexual identity

Should a team member suspect a student is at risk of CSE they should inform the DSL/DCPO/DLP immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy)

HONOUR BASED VIOLENCE (HBV)

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage and practices such as breast ironing. All forms of HBV are abuse, regardless of the motivation, and should be handled and escalated as such. If in doubt, BSC team members should speak to the DSL/DCPO/DLP.

HUMAN TRAFFICKING

Human Trafficking is exploitation. It involves the recruitment, transportation, transfer, harbouring or receipt of persons using methods such as; Threat, coercion, fraud, deception, abuse of position, payment or abduction for the purpose of exploitation.

Human Trafficking can take place in a victim's own country, during migration or within a foreign country.

BSC team members must be vigilant and know how to spot the possible warnings signs and report these concerns via their DSL/DCPO/DLP who will follow safeguarding procedures and inform the relevant authorities, if the victim is under 18 the Local Authorities 'are the primary service provider for safeguarding and responding to the needs of a child victim of modern slavery, regardless of their nationality or immigration status'. BSC DSL/DCPO/DLP should consult the guidance from Modern Slavery: Statutory guidance for England and Wales when referring an adult potential victim into the National Referral Mechanism.

Indicators include but are not limited to:

- Have false identity or travel documents
- Be unfamiliar with the local language
- Not know their home or work address
- Live in poor or substandard accommodations
- Come from a place known to be a source of human trafficking

SEXTING

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. However, in general 'sexting' can be considered when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession or distributing indecent images of a person under 18 to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

Should a team member become aware of a sexting issue, they should inform the DSL/DCPO/DLP or SEM immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy).

CHILD ON CHILD ABUSE

There are many forms of abuse that may occur between children or students and the following is not exhaustive.

Should a team member suspect a student is a victim of child-on-child abuse they should inform the DSL/DCPO/DLP or SEM immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy). BSC maintains the attitude that child-on-child behaviour could happen here even if it has no prior reports of such. BSC operates with the best interests of the child.

PHYSICAL ABUSE E.G BITING, HITTING, KICKING, HAIR PULLING

Physical abuse may include: hitting, kicking, pinching, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour (incl. accidentally) before considering the action or punishment to be undertaken.

SEXUALLY HARMFUL BEHAVIOUR/SEXUAL ABUSE (E.G. INAPPROPRIATE SEXUAL LANGUAGE, TOUCHING)

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, consensual/non-consensual sharing of images, inappropriate role play to sexually touching another or sexual assault/abuse. This abuse may also manifest itself online which can threaten, facilitate and encourage abuse.

The 'Sexual Violence and Sexual Harassment between Children in Colleges' was updated and republished May 2018. <https://www.gov.uk/government/publications/sexual-violence-and-sexualharassment-between-children-in-schools-and-colleges>

BULLYING

Bullying is unwanted, offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient that involves a real or perceived power imbalance. The behaviour may be repeated over time or a one-off incident. Both young people who are bullied and who bully others may have serious, lasting problems. Young people who bully use their power, such as physical strength, access to embarrassing information, or popularity to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.

The term prejudice-related bullying (harassment) refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Bullying includes actions such as making threats, harassing, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation and purposefully excluding someone from a group.

It is important that BSC team members remain vigilant and consistent and do not wait to see if the 'victim' will complain.

CYBER BULLYING

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone in a similar manner as outlined previously.

It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour. If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the college will have no choice but to involve the police to investigate these situations.

TEENAGE RELATIONSHIP ABUSE

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of

violent and coercive behaviour (in a heterosexual or same gender relationship) to gain power and maintain control over the partner.

APPENDIX D: SAFEGUARDING INDUCTION CHECKLIST

This is a suggested checklist for induction – it may be adapted to suit the specific local needs of a college

| | Induction |
|---|-----------|
| - know that safeguarding and promoting the welfare of children is everyone's responsibility | |
| | |
| - know that 'children' refers to everyone under the age of 18 | |
| - know who the local DSL/DCPO/DLP is and how to report any concerns to them and that all concerns should be made in writing using the safeguarding log - ensure there is an understanding of the difference between a concern (something that seems not to be right but is of no immediate danger) and a serious issue (where there is the possibility of danger of harm/abuse and an urgent response is required) | |
| - be aware of the contents of the college's safeguarding policy – Group and Local | |
| - be aware of the contents of the college's team member behaviour policy (Code of Conduct) that forms part of the policy especially in relation to social media, photos and sharing of personal information | |
| - all BSC team members should be aware that they must take part in safeguarding training and update training as required and as a minimum, annually | |
| - all BSC team members must know that they should never promise a child that they will not tell anyone about an allegation. | |
| - all BSC team members should understand the colleges duty to prevent radicalisation and understand the signs when considering the risk of radicalisation (Prevent) | |
| - all BSC team members should know that if a child is in immediate danger or at risk of harm to call the police | |

| | |
|--|--|
| - all BSC team members should understand the colleges whistleblowing policy | |
| - all BSC team members should be aware of what 'Position of Trust' means in the Sexual Offences Act 2003 | |
| - all BSC team members should read KSCIE (2023) Part 1 if in an ISI accredited College | |

EMERGENCY PROCEDURES – ALL CENTRES

WHAT TO DO IN A SAFEGUARDING EMERGENCY:

What is a safeguarding emergency? *

A safeguarding emergency is an unplanned situation that requires attention, guidance or assistance to protect a student under the age of 18 or an adult at risk. It is important to address the following:

1. stay with the student and log the details of the student involved; Name, Age, Nationality, Contact Details and Accommodation Details
2. identify if the student is here individually or as part of a group
3. identify the situation and make a note in the log of any further details provided

What next?

A plan of action

- Consult the Safeguarding case flowchart & information for help
- What is the seriousness of the situation? Emergency or Non-Emergency?
- What is the best course of action for the safety and welfare of the student?
- What needs to happen first?
- Who do you need to inform?
- Note all information, including the action taken, in the emergency log

Out-of-Hours Procedure:

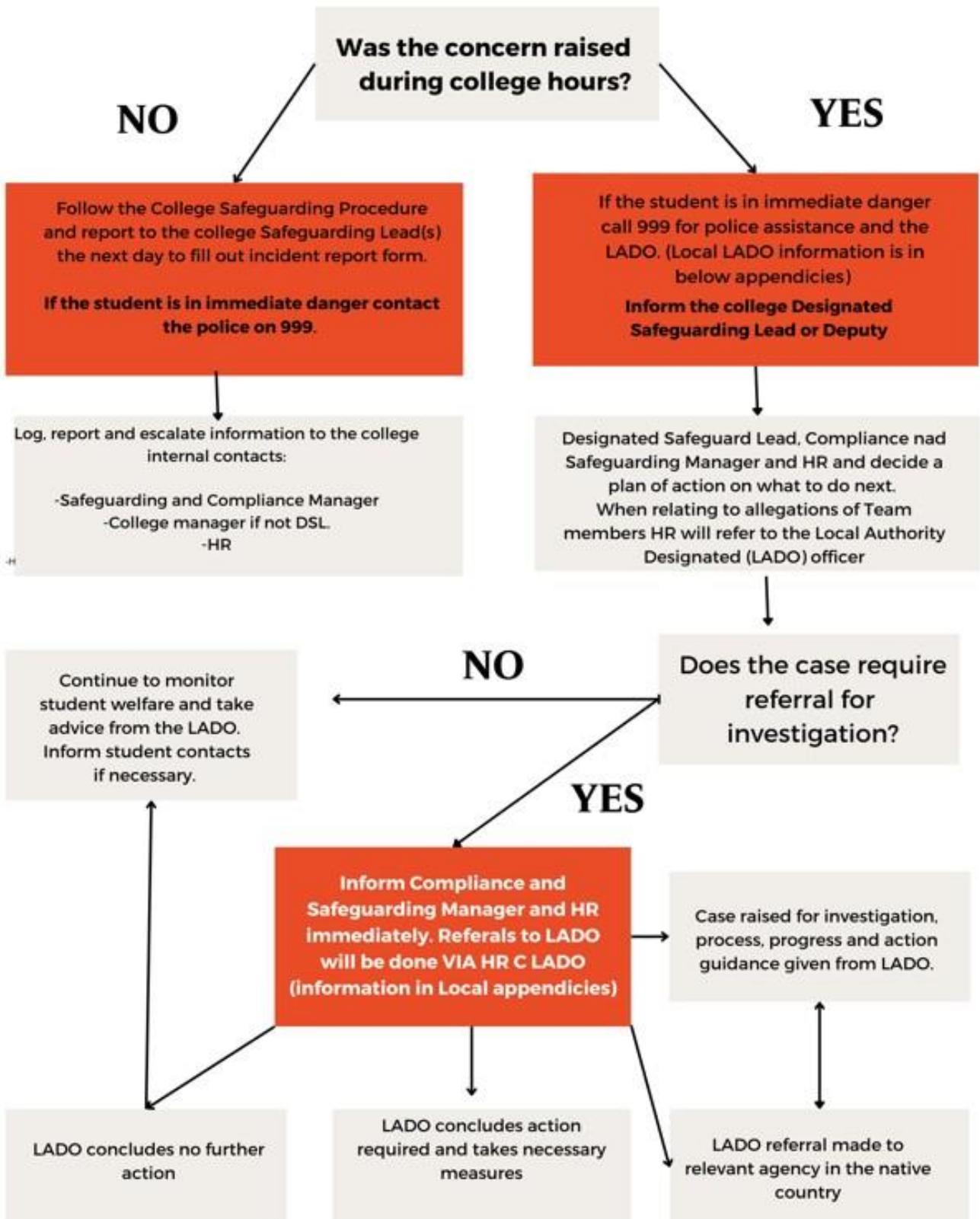
1. Identify if the issue is an emergency or if it can be addressed in college the following working day.

- make a log of non-emergency cases and report them to the Safeguarding Lead and Deputy
 - all emergency cases must be dealt with immediately and the information logged
- Incident report forms must be filled in for all safeguarding cases

2. In the case of an emergency *

- call 999 for emergency assistance of police and/or ambulance, if needed
- if you believe a crime has taken place report it to the police
- immediately remove the student from any endangering accommodation and rehouse the student with an emergency host family
- contact your local **LADO** (this is found in your local **IMPORTANT** contacts section) for advice and help with social services and police intervention
- inform the college Designated Safeguarding Lead (DSL) and complete necessary incident report forms

Safeguarding case raised for a child under the age of 18 years - All centres



With all safeguarding cases regarding abuse, harm and neglect, HR must be informed. When relating to a team member HR has a duty to refer to LADO/DBS and TRA and any other relevant agencies.

EXAMPLE PLANS OF ACTION

Non-emergency safeguarding case

Details:

A class mate of an under 18 year-old student has come to inform you that they are tearful and emotional and showing signs of what they believe to be homesickness but they cannot be sure as the student does not wish to talk about it and seems embarrassed.

Plan of Action:

- take student's details
- log details in the incident report form
- report information to DSL and DDSL

Emergency safeguarding case

Details:

A student has disclosed out of hours that they are uncomfortable in their accommodation as the host parent has been too friendly with them. They are upset and do not feel safe and they don't know what to do.

Plan of Action:

- take student's details
- take details of exactly what happened and why they feel this way
- if there is case for suspected or confirmed abuse call the police and social services
- remove student from host family and rehouse them with emergency host
- call your local LADO for advice: detail all information and actions on the safeguarding and welfare log
- DSL and DDSL to follow up on issue and ensure student and case are monitored

SAFEGUARDING GLOSSARY

WHAT IS THE LOCAL SAFEGUARDING CHILDREN PARTNERSHIP (LSCP)

The Local Safeguarding Children Partnership (LSCP) is the key statutory mechanism for agreeing how the relevant agencies in each local area will co-operate to safeguard and promote the welfare of children in that locality, and for ensuring the effectiveness of what they do. For more detailed information please refer to Working Together to Safeguard Children, July 2018.

The core functions are:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- enabling children to have optimum life chances in entering adulthood successfully, particularly in terms of being healthy and staying safe
- ensuring that lessons are learned by sharing best child protection and safeguarding practice generally, and from episodes including when a child dies, or suffers serious harm when maltreatment is considered to have been a contributory factor
- ensuring that work to protect children from harm is properly co-ordinated and effective is the primary function of the partnership

WHAT IS A LOCAL AUTHORITY DESIGNATED OFFICER (LADO)

The LADO role is outlined in 'Working Together' and is in place to ensure that allegations against people working with children are progressed in a timely and appropriate way. The role covers all settings where people work with children (e.g. football clubs, church groups and child minders) not just local authority employees.

The LADO should be made aware of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child or
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence
- enquiries and assessment by children's social care about whether a child needs protection or in need of services and
- consideration by an employer of disciplinary action in respect of the individual

As an employer you may be requested to attend a 'Strategy Discussion' to provide information and help

agree how the Children and Families Assessment Team and the Police will undertake their enquiries. As part

of this process the LADO will liaise with the employer to ensure that whoever is the subject of an allegation is

supported appropriately and to assist the employer in deciding whether individuals should receive a suspension from work during the enquiry.

WHAT IS PREVENT

Prevent is a Home Office programme whereby the police work with other organisations to protect vulnerable people from being exploited by extremists.

It is important to share any concerns you might have regarding radicalisation and extremism; this journey can take place quickly or over a long period of time.

Sharing your concerns is vital. Contact details are listed above for reporting and advice. If it is an emergency, please call 999.

Action for Children

<https://www.actionforchildren.org.uk>

A national charity that provides services for children, young people and families, as well as carrying out research on child abuse and neglect.

Barnardos

<http://www.barnardos.org.uk>

Every child has the right to grow up in a safe, secure and loving home. Vulnerable children need your help.

ChildLine

<http://www.childline.org.uk/Pages/Home.aspx>

Free confidential helpline for children and young people in the UK. You can call them on 0800 1111 to talk about any problem. They have counsellors who are always there to help you sort it out.

NSPCC

<https://www.nspcc.org.uk>

Runs a wide range of services across the UK for both children and adults, including national helplines and local projects. Help for children & young people is available via ChildLine - 0800 1111

LOCAL SAFEGUARDING POLICY BRIGHTON

SAFEGUARDING ISSUES SPECIFIC TO BSC Brighton
(Appendix to the Group Safeguarding Policy)

Designated Safeguarding Lead:

Nigel Warwick
Director of Studies

| Reviewed by: | Date: |
|-------------------------------------|----------------|
| Compliance and Safeguarding Manager | September 2022 |
| Compliance and Safeguarding Manager | September 2023 |

British Study Centres Brighton runs predominantly adult courses but does accommodate bookings for U18 learners (ages 16-17).

The college occupies the Vantage Point Building,
New England Rd, Brighton BN1 4GW,
it is a spacious building with a lovely green area on the ground floor

All team members are always required to wear their BSC lanyards, with their nametags when on college premises for easy identification

| Designated Safeguard Lead | Designated Deputies |
|----------------------------------|------------------------|
| Nigel Warwick College Manager | Adam Clarke Teacher |

For out of hours safeguarding issues, contact the emergency phone number: **01904 530 426** between the hours of 17.00 to 08.30 – Including weekends and Bank Holidays.

At BSC we implement the following strategies to safeguard our students:

- college rules are explained and made available to all students during induction on their first morning along with the college's emergency number. They are all given the emergency number as part of the admissions process pre-arrival.
- DSL and DDSL are introduced to all students during their first day
- during induction students are made aware of what they should/should not do in the city to stay safe

All U18s on an adult course or a Young Learners Group (YL) course:

- all U18s on any course are required to sign in and out each day
- one of deputy DSLs delivers induction for U18s on their first day
- teachers are required to report to the Student Experience or Academic teams if they have a missing U18 year student in their class (General English, Speaking & Listening, PM options) to prevent students from signing in and then leaving the building
- if an U18 arrives late to college they must be allowed into class or stay in a monitored area
- local risk assessment for U18s on an adult course or a Young Learner course is available • students are informed that they should discuss their after-college plans with their host family so host knows their whereabouts and what time they will be home
- set curfew time (22:00) is explained to students and host families, as are procedures if they are missed
- All U18s are informed if they want to travel during weekends college has to receive parents or guardian's permission prior to travel

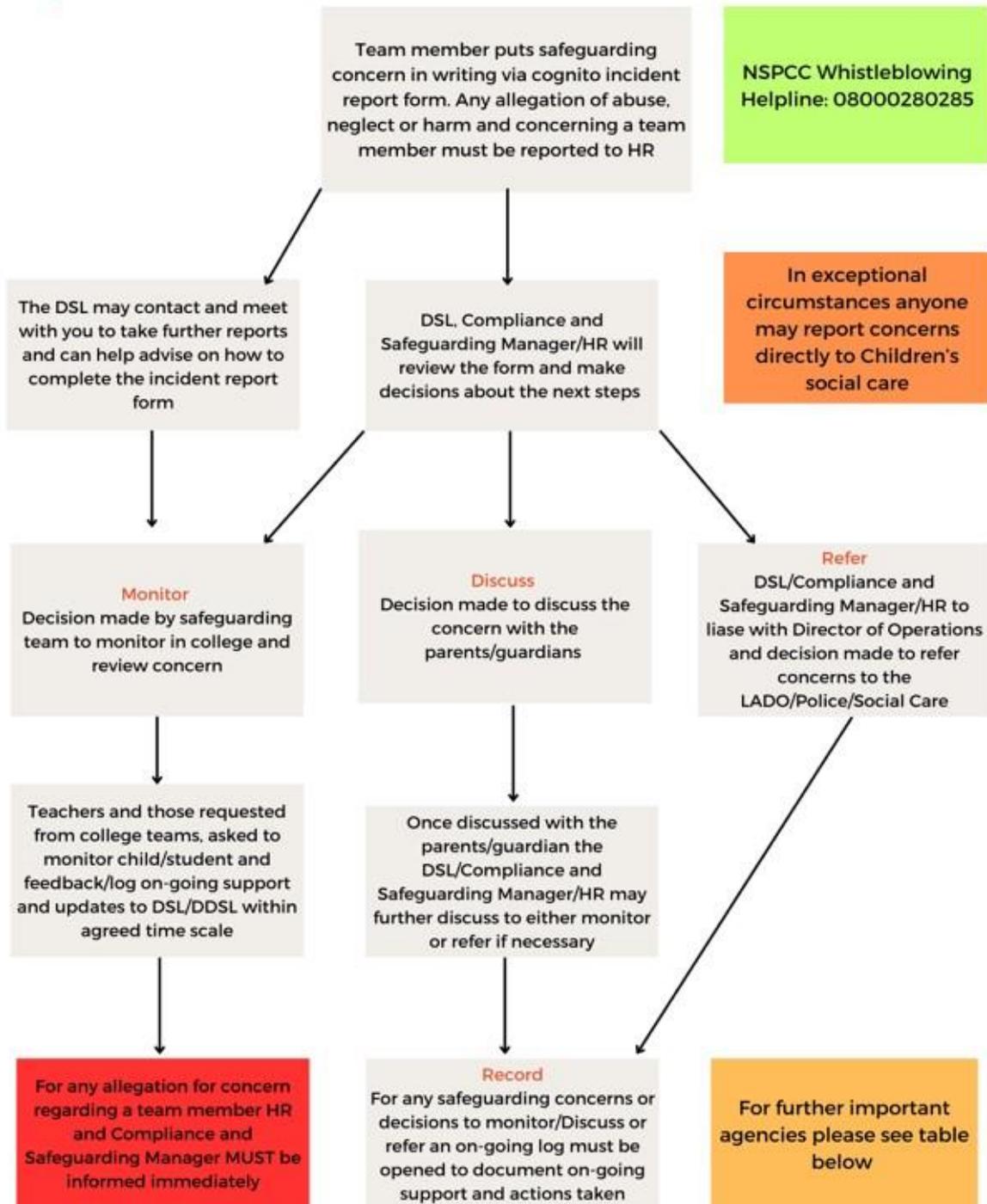
U18s on Young Learners Group (YL) course only:

- please see information for All U18s on adult courses or Young Learners Group (YL) course
- U16s on Young Learner courses are required to sign in and out each day
- U16s have different break times from adult students. There is a dedicated toilet for U16s in building
- Group Leader or designated guide must always be in building to monitor during breaks and lunch times. If GL or guide is not available, a team member is allocated during those times
- no YL can leave the building without a teacher/GL or pre-arranged with a parent/guardian

Visitors/Contractors to BSC Brighton:

- visitors/contractors gain access to college by ringing main entrance buzzer. Member of Student Experience team opens door. All visitors/contractors must report to reception
- at reception, all visitors/contractors must sign in and indicate reason for visit
- all visitors are provided with a lanyard that must be worn at all times
- once visit is over, all visitors/contractors must return to reception to sign out, return their lanyard and escorted to front door

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD OR ADULT AT RISK.



IMPORTANT CONTACTS - BRIGHTON

| Contact Details: | Name | Role | Email/Number |
|---|----------------------------------|----------------------|---|
| Brighton – Hove | LADO covered on an interim basis | LADO | LADOenquiries@brightonhove.gov.uk |
| Brighton and Hove Safeguarding Adults Board | Nahida Shaikh | PREVENT LEAD | Nahida.Shaikh@brightonhove.gov.uk 01273 290584 |
| Front Door for Families | Brighton & Hove | Support and guidance | https://www.brighton-hove.gov.uk/frontdoorforfamilies |
| UK modern slavery and exploitation | | Helpline | 08000 121 700 |

LOCAL SAFEGUARDING POLICY LONDON

SAFEGUARDING ISSUES SPECIFIC TO BSC London
(Appendix to the Group Safeguarding Policy)

Designated Safeguarding Lead:

Sofia Papadimitropoulou
College Manager

| Reviewed by: | Date: |
|-------------------------------------|----------------|
| Compliance and Safeguarding Manager | September 2022 |
| Compliance and Safeguarding Manager | September 2023 |

British Study Centres London Central runs predominantly adult courses but does accommodate bookings for U18 learners (ages 16-17).

The college occupies the North Building, Staples Inn Buildings, London WC1V 7PZ, it has glass windows throughout for transparency and is a light spacious building

All team members are required to wear BSC lanyards with their name shown when on college premises for easy identification

| Designated Safeguard Lead | Designated Deputies |
|--|---|
| Sofia Papadimitropoulou College Manager | Adrian Cini Lead Teacher |
| | Thin Wai Thazin Toe Student Experience Facilitator Lead |
| | Hannah Tucker-Bloom Academic Programmes Manager-Pathways Central Support DDSL |

For out of hours safeguarding issues, contact the emergency phone number: **01904 530 426** between the hours of 17.00 to 08.30 – Including weekends and Bank Holidays.

We implement the following strategies to safeguard our students:

- college rules are explained and made available to all students during induction on their first morning along with the college's emergency number. They are all given the emergency number as part of the admissions process pre-arrival.
- DSL and DDSL are introduced to all students during their first day
- during induction students are made aware of what they should/should not do in the city to stay safe
- students are advised to register their Oyster Card with Transport for London

All Under 18 students on an adult course or a Young Learners Group (YL) course:

- all U18s on any course are required to sign in and out each day
- one of deputy DSLs delivers induction for U18s on their first day
- teachers are required to report to the Student Experience or Academic teams if they have a missing U18 year student in their class (General English, Speaking & Listening, PM options) to prevent students from signing in and then leaving the building
- if an U18 arrives late to college they must be allowed into class or stay in a monitored area
- all U18s are advised to register their Oyster Card with Transport for London, which means if they lose the card, the money can be transferred to a new card
- separate policies are in place for students traveling during the weekends under 18 (16 and 17) on Adult course only
- local risk assessment for U18s on an adult course or a Young Learner course is available • students are informed that they should discuss their after-college plans with their host family so host knows their whereabouts and what time they will be home
- set curfew time (22:00) is explained to students and host families, as are procedures if they are missed

Visitors/Contractors to BSC London

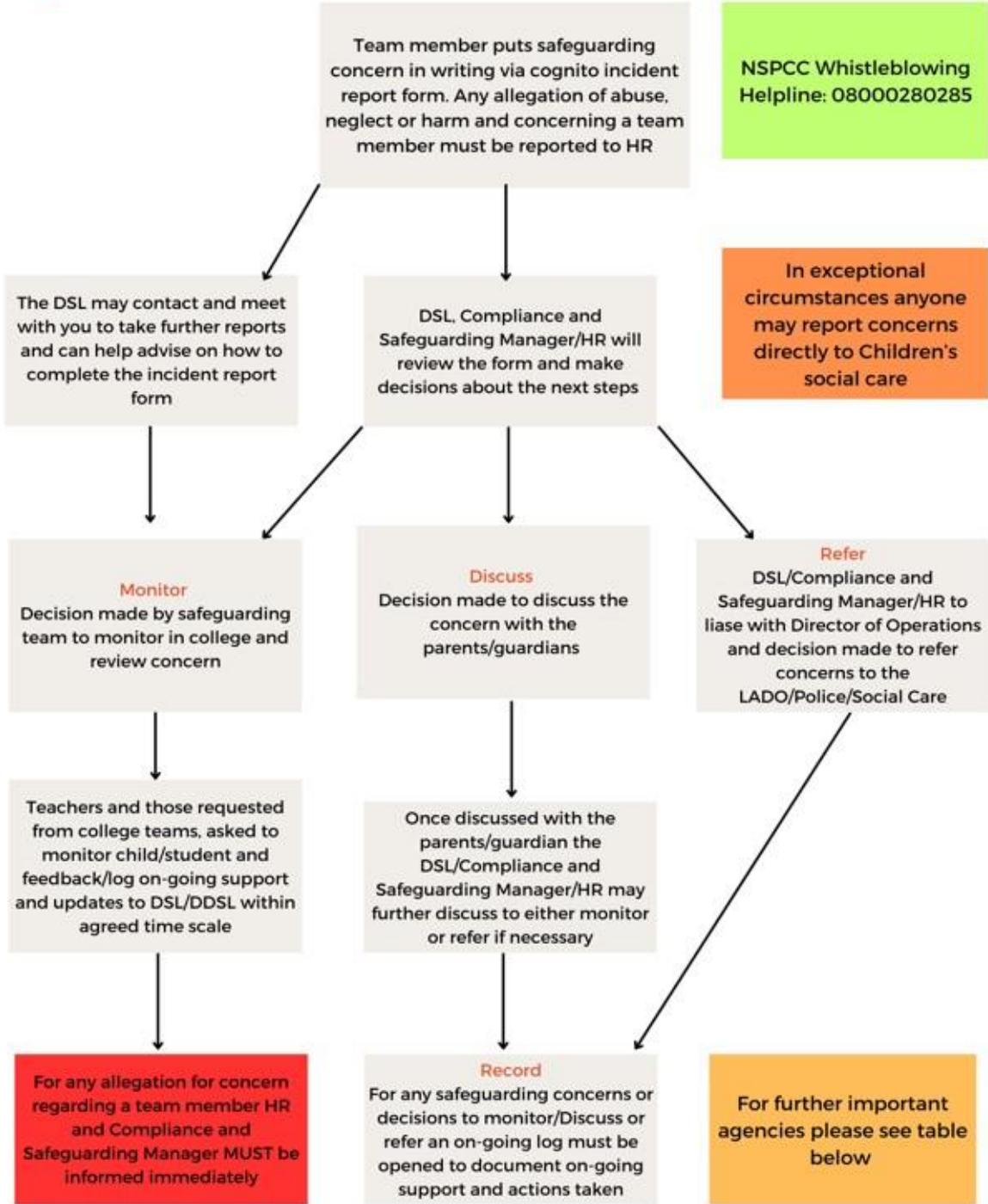
- access to BSC London premises is monitored during core hours of (9:00am and 17:00) by the welcome hub intercom system
- prior to this, the door is open for students to gain access however this welcome hub area is always overseen by a member of the student experience team
- visitors/contractors gain access to the college by ringing main entrance buzzer. They will be asked their name and purpose of visit
- at reception, all visitors/contractors must sign in and indicate reason for visit
- all visitors are provided with a lanyard that must be worn at all times

- once visit is over, all visitors/contractors must return to reception to sign out, return their lanyard and escorted to front door

U18s on Young Learners Group (YL) course only:

- please see information for All U18s on adult courses or Young Learners Group (YL) course
- U16s on Young Learner courses are required to sign in and out each day
- U16s have different break times from adult students. There is a dedicated toilet for U16s in building
- Group Leader or designated guide must always be in building to monitor during breaks and lunch times. If GL or guide is not available, member of the team is allocated during those times
- no YL can leave the building without a teacher/GL or pre-arranged with a parent/guardian

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD OR ADULT AT RISK.



| Contact Details: | Name | Role | Email/Number |
|--|-------------------|------------------------|--|
| Camden - London | | LADO | LADO@camden.gov.uk |
| Camden - London | Jacqueline Fearon | LADO OFFICER | Jacqueline.fearon@camden.gov.uk |
| Prevent – London | | PREVENT Advice line | 020 7601 2442 0800 011 3764 |
| Camden Safeguarding Children Partnership | | CSCP | https://cscp.org.uk/ |
| Multi-Agency Safeguarding Hub – Camden | | MASH CHILDREN | LBCMASHadmin@camden.gov.uk 0207 974 3317 0207 974 4444 |
| Multi-Agency Safeguarding Hub- Camden | | MASH ADULTS | adultsocialcare@camden.gov.uk 020 7974 4000 |
| UK modern slavery and exploitation | | Helpline | 08000 121 700 |

IMPORTANT CONTACTS

LOCAL SAFEGUARDING – MANCHESTER

SAFEGUARDING ISSUES SPECIFIC TO BSC Manchester
(Appendix to the Group Safeguarding Policy)

Designated Safeguarding Lead:

Brian Swash
College Manager

| Reviewed by: | Date: |
|-------------------------------------|----------------|
| Compliance and Safeguarding Manager | September 2022 |
| Compliance and Safeguarding Manager | September 2023 |

British Study Centres Manchester runs predominantly adult courses but does accommodate group bookings for U18 learners (ages 16-17).

The college address is 7 Chatham Street, M1 3AY, Manchester. This is a newly refurbished building with glass windows and doors throughout for transparency and is a light spacious building.

All team members are always required to wear BSC lanyards with their names when on college premises for easy identification.

| Designated Safeguard Lead | Designated Deputies |
|--------------------------------|--|
| Brian Swash College Manager | Megan McInerney Student Experience Facilitator Lead |
| | Rachel Kilner Lead Teacher |

For out of hours safeguarding issues, contact the emergency phone number: **01904 530 426** between the hours of 17.00 to 08.30 – Including weekends and Bank Holidays.

At BSC we implement the following strategies to safeguard our students:

- college rules are explained and made available to all students during induction on their first morning along with the college's emergency number. They are all given the emergency number as part of the admissions process pre-arrival.
- DSL and DDSL are introduced to all students during their first day
- during induction students are made aware of what they should/should not do in the city to stay safe

All U18s on an adult course or a Young Learners Group (YL) course:

- all U18s on any course are required to sign in and out each day
- one of deputy DSLs delivers induction for U18s on their first day
- teachers are required to report to the Student Experience or Academic teams if they have a missing U18 year student in their class (General English, Speaking & Listening, PM options) to prevent students from signing in and then leaving the building
- if an U18 arrives late to college they must be allowed into class or stay in a monitored area
- local risk assessment for U18s on an adult course or a Young Learner course is available • students are informed that they should discuss their after-college plans with their host family so host knows their whereabouts and what time they will be home
- set curfew time (22:00) is explained to students and host families, as are procedures if they are missed
- All U18s are informed if they want to travel weekends college has to receive parents or guardian's permission prior to travel

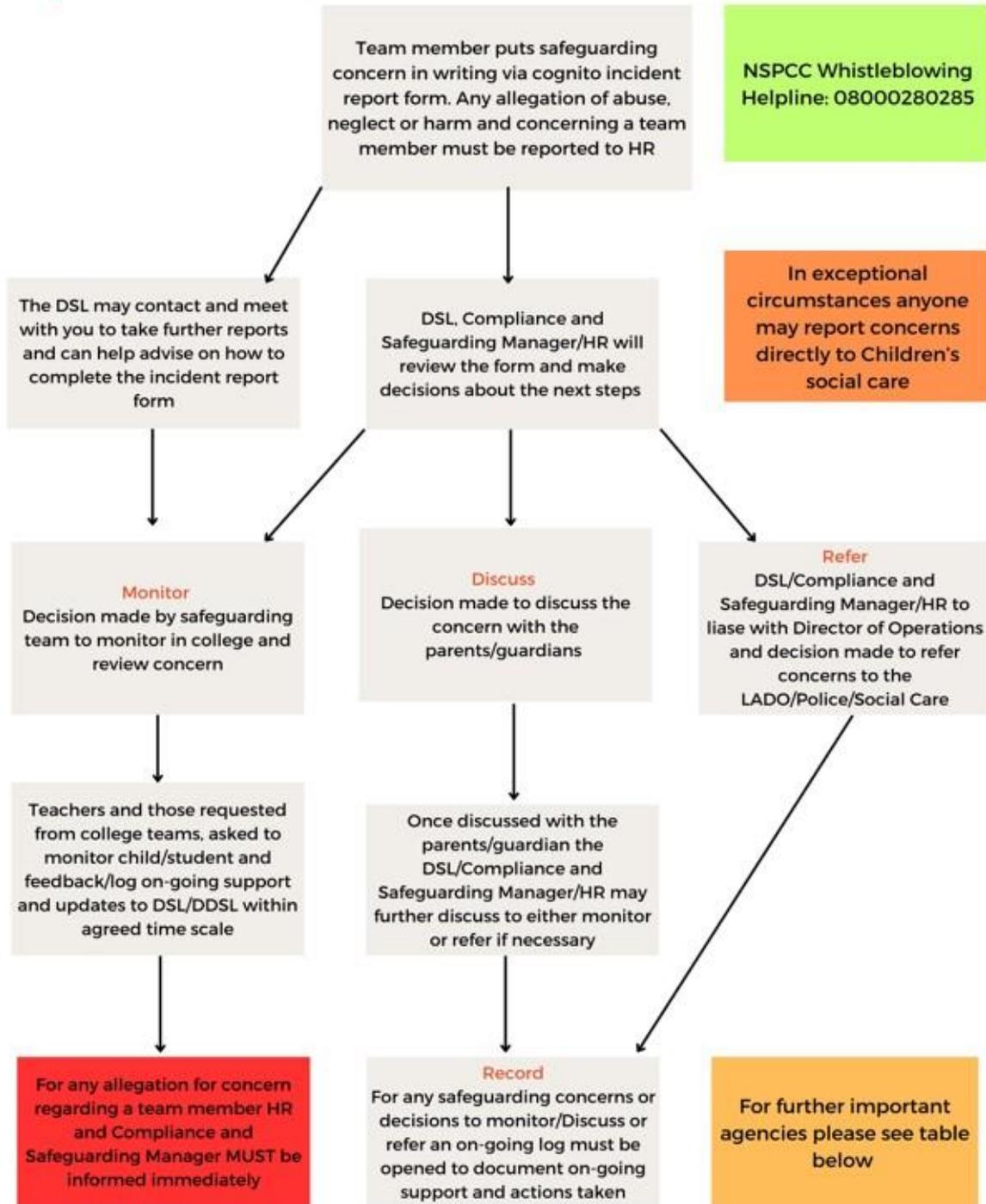
U18s on Young Learners Group (YL) course only:

- please see information for All U18s on adult courses or Young Learners Group (YL) course
- U16s on Young Learner courses are required to sign in and out each day
- U16s have different break times from adult students. There is a dedicated toilet for U16s in building
- Group Leader or designated guide must always be in building to monitor during breaks and lunch times. If GL or guide is not available, member of staff is allocated during those times
- no YL can leave the building without a teacher/GL or pre-arranged with a parent/guardian

Visitors/Contractors to BSC Manchester:

- visitors/contractors gain access to college by ringing main entrance buzzer. Member of Student Experience team opens door. All visitors/contractors must report to reception
- at reception, all visitors/contractors must sign in and indicate reason for visit
- all visitors are provided with a lanyard that must be worn at all times
- once visit is over, all visitors/contractors must return to reception to sign out, return their lanyard and escorted to front door

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD OR ADULT AT RISK.



IMPORTANT CONTACTS - MANCHESTER

| Name: | Role | Email/Number |
|---|---|--|
| Jackie Shaw | LADO | j.shaw2@manchester.gov.uk Tel: 0161 234 1214 |
| Majella O'Hagan | LADO | majella.O'hagen@manchester.gov.uk Tel: 0161 234 1214 |
| Gerard Sweeney | LADO PART TIME | Gerard.sweeney@manchester.gov.uk |
| For LADO referrals | LADO | Qualityassurance@manchester.gov.uk |
| PREVENT | Protecting vulnerable people from being exploited by extremists | Prevent Team: 0161 8566345. National police Prevent advice line 0800 011 3764 |
| Manchester City Council Social Services | Safeguarding | Tel: 0161 234 5001 email: mcsreply@manchester.gov.uk Web link: Social Services |
| UK modern slavery and exploitation | Helpline | Tel: 08000 121 700 |

Manchester Specific:

These resources are to support professionals managing allegations and relate to the role of the MCC Designated Officer (formerly known as the LADO).

If you have concerns about an adult working with children or young people, please report your concern using the MCC Designated Officer (LADO) **Referral Form below** (FEB 2020)

If you wish to have an informal conversation with the MCC Designated Officer before making a referral, please call **0161 234 1214**.

Completed referrals forms should be emailed to qualityassurance@manchester.gov.uk – it is essential that all sections of the referral form are completed.

Referral Form: <https://www.manchestersafeguardingpartnership.co.uk/wp-content/uploads/2020/02/BlankLADO-Referral-Form.pdf>

LOCAL SAFEGUARDING POLICY YORK

SAFEGUARDING ISSUES SPECIFIC TO BSC York
(Appendix to the Group Safeguarding Policy)

Designated Safeguarding Lead:

Tim Ashurst
College Manager
7 New Street, York, YO1 8RA, United Kingdom

| Reviewed by: | Date: |
|-------------------------------------|----------------|
| Compliance and Safeguarding Manager | September 2022 |
| Compliance and Safeguarding Manager | September 2023 |

British Study Centres York runs predominantly adult courses but does accommodate bookings for U18 learners (ages 16-17).

BSC have 3 buildings in York: building 5, building 7 (Student Hub is located) and building 9.

The BSC York college opens at 8.30 and closes at 17.00, Monday to Friday.

The college can only be entered from building 7, all students and team members are welcomed at reception before admission into the building. All team members, students and visitors are given a lanyard/ ID. The lanyards are also colour coded, so it is easy to identify team members, adults and visitors.

| Designated Safeguard Lead | Designated Deputies |
|-----------------------------|--|
| Tim Ashurst College Manager | Tanya Djalili Student Experience Lead Safeguarding and Welfare support |

All team members are required to wear their ID when on the college premises for easy identification. British Study Centres College has no shared access or social areas with other businesses

For out of hours safeguarding issues, contact the emergency phone number: **01904 530 426** between the hours of 17.00 to 08.30 – Including weekends and Bank Holidays.

We implement the following strategies to safeguard our students: -

York BSC College

- BSC York is in the heart of the city and the road outside the college's buildings is open to traffic between 7.30am to 10.00am and after 17.00pm; between these times, it is a pedestrianised area
- students are made aware of how to cross the road safely and the need to look a different way for on-coming cars as most students are from countries where they drive on the righthand side of the road

All under 18 students on an adult course (16-17years)

- college rules are explained and made available to all students during induction on their first morning along with the college's emergency number. They are all given the emergency number as part of the admissions process pre-arrival.
- DSL and DDSL are introduced to all students during their first day
- during induction students are made aware of what they should/should not do in the city to stay safe

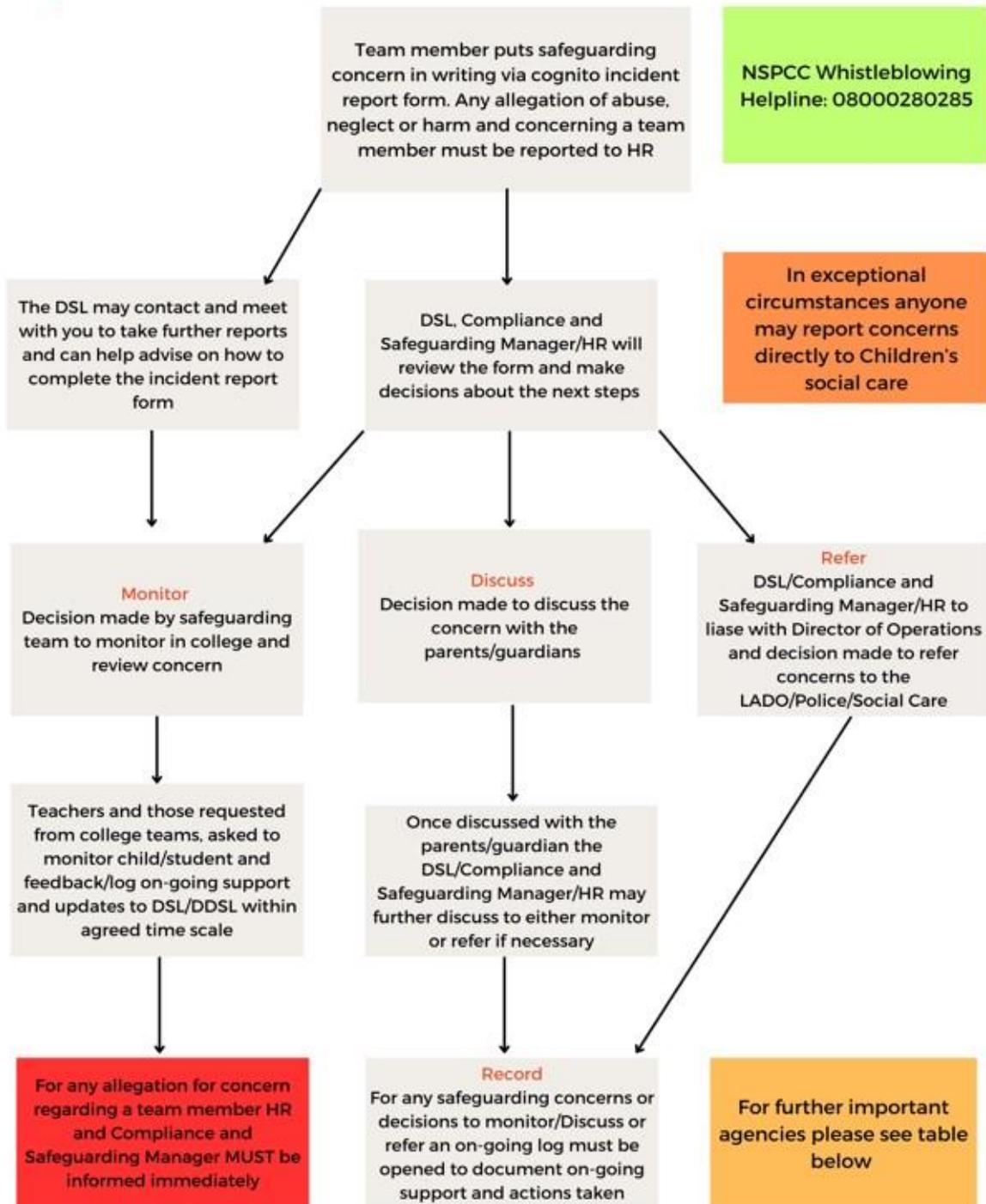
Under 18 (16-17 years) students on an adult course only

- U18's are shown a specific PowerPoint on first day which explains all rules applicable to them
- students aged 16 and 17 on adult courses are required to sign in/out each time they enter/leave the buildings using a QR code located in the Student Hub
- all U18s (16-17 years) on an adult course are highlighted to teachers on registers which have photos and class list in the teachers' room
- teachers are required to check with reception if they have any concerns over a missing U18 in their class. If U18 is deemed missing/absent reception will contact U18/host family to ascertain situation
- set curfew time (22:00) is explained to students and homestay families and process if they not adhered to
- should U18 wish to stay out later than curfew or go away at weekend, college needs e-mail confirmation from parent/guardian agreeing to this and full details provided to college and homestay
- all students are given student ID cards and are always required to carry them for easy identification. ID badges also have the college's emergency number.

Visitors/Contractors to BSC

- visitors/contractors must all report to reception
- at reception all visitors/contractors must sign in and indicate reason for visit
- all visitors are provided with a lanyard that must be worn at all times and wait in the Student Hub until an appropriate member of the team can escort them through the premises
- once visit is over, all visitors/contractors must return to reception to sign out, return their lanyard and escorted to front door.

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD OR ADULT AT RISK.



IMPORTANT CONTACTS - YORK

| Name | Role | Email/Number |
|---------------------------------------|----------|--|
| Leigh Moore | LADO | Leigh.moore@york.gov.uk 01904 551783 |
| Duty LADO | LADO | Lado@york.gov.uk |
| Jane Mowat | PREVENT | Jane Mowat 01904 555742 preventenquiries@york.gov.uk |
| PREVENT | PREVENT | prevent@northyorkshire.police.uk |
| UK modern slavery and exploitation | Helpline | 08000 121 700 |

LOCAL SAFEGUARDING POLICY EDINBURGH

SAFEGUARDING ISSUES SPECIFIC TO BSC Edinburgh
(Appendix to the Group Safeguarding Policy)

Designated Safeguarding Lead:

Sioban Ingram

College Manager

Address: 26 Palmerston Pl, Edinburgh EH12 5AL

| | |
|-------------------------------------|----------------|
| Reviewed by: | Date: |
| Compliance and Safeguarding Manager | September 2023 |

British Study Centres Edinburgh runs predominantly adult courses but does accommodate bookings for U18 learners (ages 16-17).

The BSC Edinburgh college opens at 8.30 and closes at 17.00, Monday to Friday.

All students and team members are welcomed at reception once they enter into the building. All team members, students and visitors are given a lanyard/ ID. The lanyards are also colour coded, so it is easy to identify team members, adults and visitors.

All team members are required to wear their ID when on the college premises for easy identification. BSC College has no shared access or social areas with other businesses

| Designated Safeguard Lead | Designated Deputy |
|----------------------------------|------------------------------------|
| Sioban Ingram College Manager | Catriona Macdonald Lead Teacher |

For out of hours safeguarding issues, contact the emergency phone number: **01904 530 426** between the hours of 17.00 to 08.30 – Including weekends and Bank Holidays.

We implement the following strategies to safeguard our students: -

BSC Edinburgh College

- BSC Edinburgh is located in the West End of the city. It is in a quiet area but just a 5-minute walk from the city centre. It is also close to Haymarket train station.

- Students are made aware of how to cross the road safely and the need to look a different way for on-coming cars as most students are from countries where they drive on the righthand side of the road

All under 18 students on an adult course (16-17years):

- college rules are explained and made available to all students during induction on their first morning along with the college's emergency number. They are all given the emergency number as part of the admissions process pre-arrival.
- DSL and DDSL are introduced to all students during their first day
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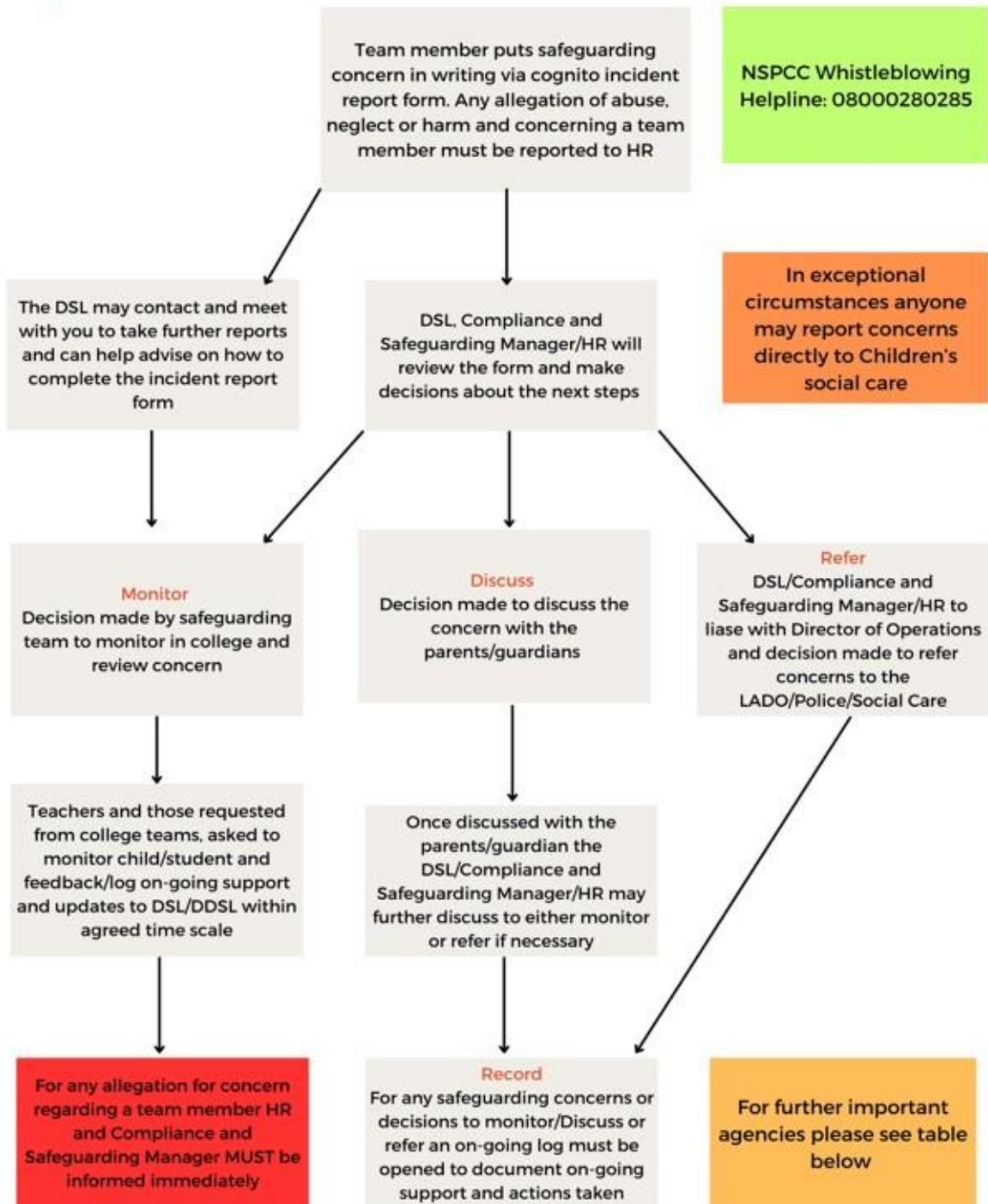
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FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD OR ADULT AT RISK.



HOW TO REPORT A CONCERN:

If you think a child is in immediate danger call the police on **999**.

If you are worried about a child but they are not in immediate danger, you should share your concerns.

- Follow BSC safeguarding child protection measures
- Contact the **NSPCC** for expert advice or talk through your concerns.
- Contact your local children's social work team
- Contact the local children's reporter

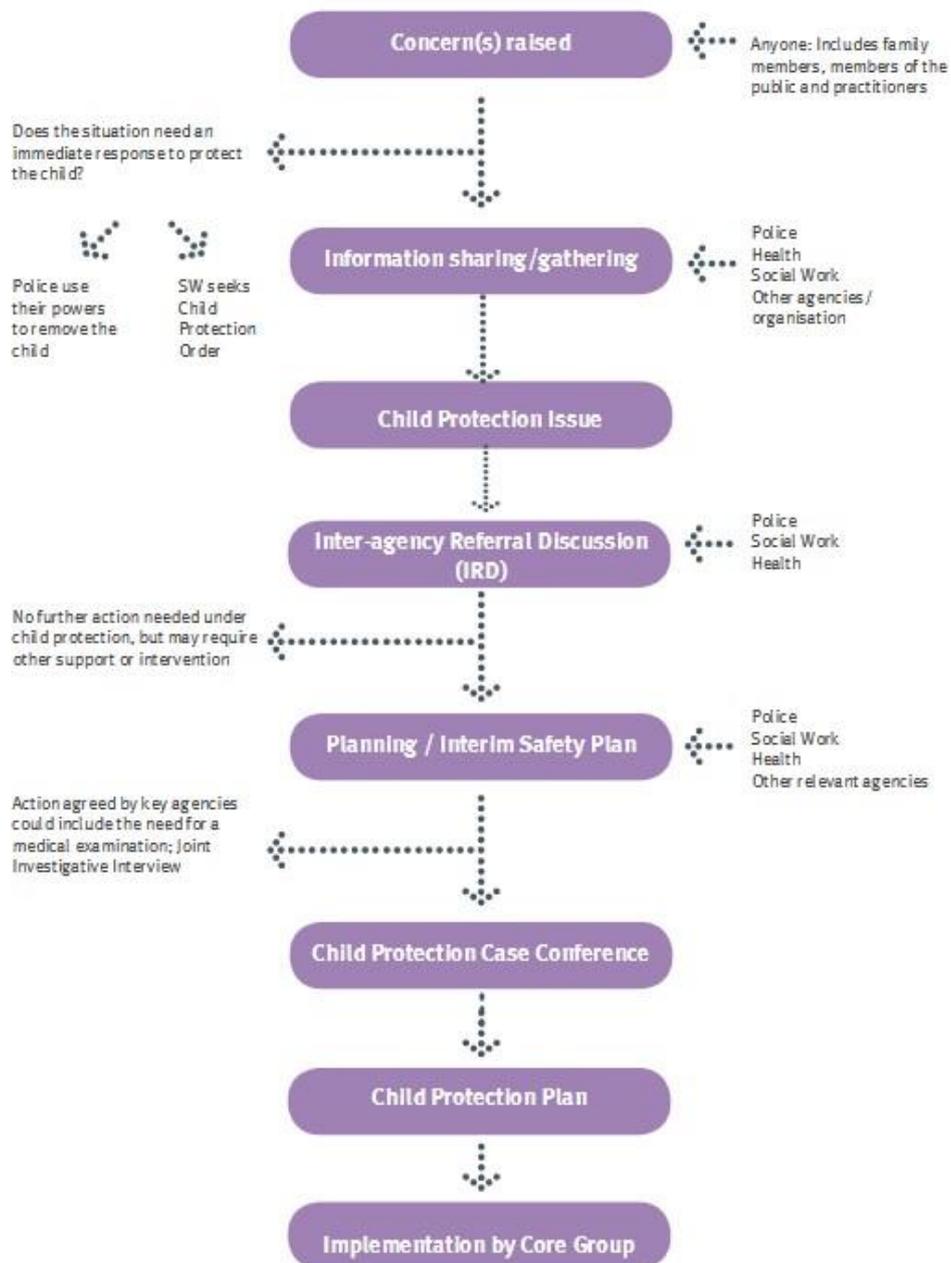
Local authorities, NHS Boards and Police Scotland are responsible together for the protection of children and adults at risk in Edinburgh

Services will risk assess the situation and take action to protect the child as appropriate either through statutory involvement or other support. This may include making a referral to the local authority.

Summary of Child Protection Referrals in Scotland

IMPORTANT CONTACTS EDINBURGH

| Name | Role | Email/Number |
|---|------------------------|--|
| NSPCC | HELPLINE AND ADVICE | 0808 800 5000 help@nspcc.org.uk . |
| Edinburgh Council | Social Care Direct | Adult Protection concern please contact Social Care Direct on 0131 200 2324 . If you think that a child needs immediate protection you must call Children and Families Social Work on 0131 200 2327 |
| Edinburgh Child Protection Committee | Child protection | Tel:0131 553 8378 |
| Police | Public protection Unit | 101 |
| Scottish Children's Reporter Administration | Helpline | Tel: 0300 200 1666 |
| UK modern slavery and exploitation | Helpline | Tel: 08000 121 700 |



Edinburgh and the Lothians Inter-agency Child Protection ProcedureS 3.8.15

(<https://www.edinburgh.gov.uk/downloads/file/23055/child-protection-procedures>)

Our Compliance and Safeguarding Manager has overall responsibility for this policy, please contact: Charlotte.Powlesland@bsc-education.com for further information about this policy if necessary.

Your local DSL (in England)/ DCPO (in Scotland)/ DLP (in Ireland) should be contacted for more information on the Local Safeguarding Policies

Policy State

The Company reserves the right to modify any part of this policy at its discretion and in accordance with any required legislative changes. We are committed to actively consulting our team members and any changes will be communicated and apply to both existing and new employees.