

Safeguarding and Child Protection Policy 2019

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A: POLICY STATEMENT

A1. CONTEXT

Under UK law any person under the age of 18 is considered a child, regardless of the age of majority in their own country, and as such Frances King School of English has a duty of care to ensure the safety and wellbeing of all our students below that age.

This Safeguarding Policy covers all students under the age of 18 on any course at Frances King, in any location. It outlines the school's responsibilities, the measures we take to prevent harm and the actions to be taken in the event of an incident or allegation occurring.

This policy applies to all buildings used by Frances King in London, and should be displayed in all administration offices and staff rooms.

If any errors or shortcomings in this policy are identified, they should be reported immediately to a member of the Designated Safeguarding Team in person and by email: safeguarding@francesking.com

Types of Courses

Students under the age of 18 may study on the following courses at Frances King:

Adult Courses: Students aged 16 and above are accepted on adult courses throughout the year. Students aged 16 and 17 are therefore studying alongside adults who might be considerably older. Under-16s are not accepted on adult courses. Any under-16s who come as part of a group of students travelling together with group leaders will not be allowed to join the adult classes and will only be accepted on the below classes or in private, closed classes, exclusively with under-18s.

Family Programme: Children aged 6 to 16 are taught on seasonal courses. Some summer classes and those in the spring, autumn and winter programmes take place in buildings shared with adult learners.

London Teenager Programme: A programme that operates for 6 weeks each summer offering classes, activities and accommodation for both residential and day students aged 12 to 17. These take place on a university campus. Although all Frances King courses taking place on this campus will be for 12- to 17-year-olds only, there may be adults studying or staying elsewhere on campus.

Private Classes: Students from the ages of 5 to 17 can also be accepted for private classes in one-to-one, one-to-two or one-to-three classes by special arrangement at any time of the year. However, for students aged 5 or 6 we require a parent/guardian to stay on the premises during the lesson.

Locations

Locations used by Frances King for teaching in London are:

Frances King School of English (Referred to as **77GR** in this document)

77 Gloucester Road, SW7 4SS

This is our main building. It is used throughout the year, mostly for Adult Courses, but the winter, Easter and autumn Family Programme classes also take place in this building.

Quest Professional (Referred to as **5GG** in this document)

5 Grosvenor Gardens, SW1W 0BD

Occasionally used by Frances King as an annexe building during the year, but mostly used for the Family Programme in summer, with both Juniors (ages 6-16) and Parents classes being held there. For the first two weeks of the summer programme there are students from Quest Professional onsite, who are young adults, but for the rest of the course it is used exclusively by Frances King.

Whitelands College (Referred to as **LTP-W** in this document)

Roehampton University
Holybourne Avenue
London SW15 4JD

Used for 6 weeks in summer for our residential programme for teenagers (London Teenager Programme, LTP in this document).

Queen's Gate School (Referred to as **126QG** in this document)

126 Queen's Gate, SW7 5LJ

Used for 8 weeks in summer as an annexe for the main school. Only Adult Courses take place here.

Types Of Accommodation Offered

Frances King offers the following types of accommodation.

Homestay Accommodation: Living with a family of one or more adults in their home, where there may be other underage children as well. Under-18s and families of at least one parent/guardian + child can stay in homestay accommodation. We do not allow unaccompanied under-16s to stay in homestays. All homestays are inspected by Frances King, and are re-inspected at least once every 2 years.

Student Residences: We do not allow under-18s to stay in Student Residences. Exceptions can be made for groups who are travelling with their own Group Leaders; each booking will be considered on a case-by-case basis, after a risk assessment has been carried out by Frances King, which will include at least 2 members of the Designated Safeguarding Team.

In some residences we allow a parent and child to stay together in a twin studio with a private bathroom and kitchen. This is only possible in some residences, and different residences may have a minimum age for the child. We consider the child to be in the parent's care throughout their stay in the residence, and the parent has full responsibility for the child.

Campus Residences: The LTP accommodates students in a campus residence, with Frances King staff living in.

Self-catering studios and apartments: We do not allow unaccompanied under-18s to stay in self-catering facilities. Families can stay there, providing at least one of the adults is the parent or legal guardian of at least one of the children, and we have clear written permission from the parent/guardian of any other children for this adult to act in loco parentis for their child.

All accommodations offered are inspected by our own staff. For Codes of Conduct relating to accommodation, see Section B8.

A2. CONTEXT: MULTI-CENTRE ORGANISATION

Frances King London operates out of one centre for most of the year (77GR). However, every summer and occasionally when at very high capacity during the rest of the year we open extra centres. These extra centres will adhere to the rules and procedures laid out in this document.

However, each Centre Manager will review this Policy with respect to their centre, and may make changes for that particular centre if the building/course/age of students requires this. For example, in this Policy we treat 5GG as a centre for children plus their parents, but if the centre needs to be used for other adults, then a review will probably show that different rules and procedures are needed.

These changes will be laid out as an addendum, presented to the Safeguarding Committee for approval before the centre is opened and then given to all staff working in that centre.

It is the Centre Manager's responsibility to ensure that the Safeguarding Policy in use in their building is appropriate for the building's specific use.

A3. TERMINOLOGY

Some key phrases it is necessary to understand when reading this Policy:

- **Child**
A child is anyone who is under the age of 18, regardless of the age of majority in their own country.
In this document we refer to **under-18s** (U18s) for anyone below the age of 18, **under-16s** (U16) for those under 16 (but not including 16- and 17-year-olds). We also use the term **minors** for U18s, and **juniors** for U16s.
16- & 17-year-olds may have different rules or requirements to U16s, but are legally still children.
- **(Child) Abuse**
Child abuse is any maltreatment of a child. Abuse may be adult to child, or child to child. For explanations of types of abuse, see Section C4
- **Safeguarding**
Safeguarding means “looking after”: providing supervision and care. This Safeguarding Policy includes preventative methods to try to ensure that children do not get into dangerous or abusive situations, and to make sure that they have the care and support that they need during their time with us at Frances King.
- **Child protection**
This specifically refers to protecting children from abuse.
- **(Designated) Safeguarding Team** (See Section A9 for more details)
 - **Designated Safeguarding Lead (DSL)**
This is the person in the school who leads safeguarding policy and training, and will be the primary liaison with the police and local authorities in the event of an incident. They also serve as a point of contact for all staff.
 - **Designated Safeguarding Officer (DSO)**
Members of the Safeguarding Team are all Designated Safeguarding Officers. They help the Safeguarding Lead design and implement policy and training.
- **Duty of care**
This term means “a legal responsibility to ensure the safety and wellbeing of other people”
- **Government Organisations:**
 - **Local Authority Designated Officer (LADO)**
The local area (London borough) representative who is responsible for managing all child protection allegations made against adults who work in their area.
 - **Multiple Agency Safeguarding Hub (MASH)**
Some local authorities have combined their resources to work in a hub, to be better able to share information to protect children within their combined area.
 - **London Safeguarding Children Board (LCSB)**
An organisation made up of different agencies (such as Children's Services, the Police, health services etc) who work together to protect children in danger or at risk in London.
- **Prevent**
The term “Prevent” refers to the government initiative to protect people from extremism and radicalisation.
- **DBS Check**
An official check into a person's criminal history in the UK, which we carry out to make sure that unsuitable people don't work with children.

- **Regulated activity**
Work activity that involves unsupervised contact with children or vulnerable adults.
- **SEND**
This stands for Special Educational Needs or Disabilities.
- **Vulnerable Adults**
Some adults need more support and care than other adults. For example, adults with SEND conditions. In English Language schools adults who don't know the city, have no friends here and are not speaking their own language could be considered vulnerable adults due to their isolation. Generally we consider the less time someone has been here and the weaker their English, the more likely they are to be vulnerable. Although we do not specifically look at Safeguarding of Vulnerable Adults in this Policy, we do believe that our students may need extra care or looking after if they are more vulnerable. Many of the same approaches that we use for safeguarding children can also be applied to safeguarding more vulnerable adults.

Training Levels:

Throughout this Policy we refer to the different levels of safeguarding training as Level 1, Level 2 and Level 3. We use these shorter terms for simplicity and clarity. They correspond to the following training levels:

- Level 1: Basic safeguarding awareness training
- Level 2: Advanced safeguarding for Designated Staff
- Level 3: Specialist safeguarding for Designated Lead

A4. STATEMENT

Frances King recognises that it has special duties of care towards students under the age of 18, and is committed to protecting them from harm. We aim to promote a culture of vigilance and support; always acting in the best interests of the child, with safeguarding as a top priority in every area of the company's operation.

Frances King understands the importance of having safeguarding awareness and being alert to possible concerns raised in the school, and so trains all personnel who come into regular contact with students under the age of 18.

A5. U18S STATEMENT

This Policy applies to everyone under the age of 18, regardless of their race, gender or nationality. They all are entitled to the same protection and support we offer everyone.

A6. ADULT'S RESPONSIBILITIES

All adults working at or with Frances King who have any contact with U18s have a legal duty of care and a responsibility to safeguard them by:

- Following this Policy and the procedures laid out in it
- Sharing the school's commitment to safeguarding
- Undertaking training (see Section D)
- Reporting any safeguarding concerns, even small ones, or allegations of abuse
- Knowing who to contact within the school and outside the organisation

A7. STRUCTURE, ROLES AND RESPONSIBILITIES

Safeguarding is laid out and implemented by two bodies within Frances King: the Safeguarding Committee and the Safeguarding Team.

Safeguarding Committee

The Safeguarding Committee is responsible for overseeing the safeguarding policies and procedures for the Company, including the Safeguarding Policy. The Committee is made up of the Team Leaders for the four main Frances King Teams:

- Academic: Represented by Head of Programmes – Maricel Samson
- Student Services: Represented by Head of Administration – Kelly Harding
- Sales: Represented by Head of Sales – Laurine Tastet
- Marketing & Partnerships: Represented by a Director – Garth Youngusband

All four members of the Safeguarding Committee should have Level 3 training.

Safeguarding Team

Also referred to in some documentation as the *Welfare Team*. Since our students are more familiar with the term *Welfare* than with *Safeguarding*, we will often use this term to be more easily understood by students whose first language is not English. All members of the Safeguarding Team also assume Welfare responsibilities, as we believe all Welfare concerns involve vulnerable adults, which is an element of Safeguarding.

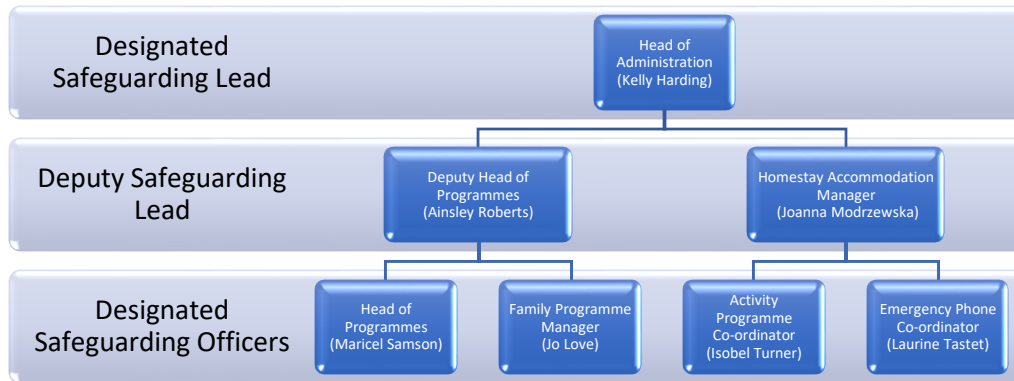
The Safeguarding Team is responsible for the day-to-day implementation of the Policy. Members are expected to support all staff with regards to any questions or concerns they have about safeguarding, attend Safeguarding Team meetings, and contribute to fostering the culture of vigilance and support for safeguarding that we aim to extend throughout the whole company.

Safeguarding Team members may also be asked to contribute to regular reviews of the Safeguarding Policy, as detailed in Section A13.

For 2019 the Safeguarding Team is made up of the following people:

- Head of Administration – Kelly Harding
- Head of Programmes – Maricel Samson
- Deputy Head of Programmes – Ainsley Roberts
- Centre Manager for LTP – Gavin Hards
- Head of Family Programme – Jo Love
- Homestay Accommodation Manager – Joanna Modrzewska
- Activity Programme Co-ordinator – Isobel Turner
- Emergency Phone Co-ordinator (Head of Sales) – Laurine Tastet

See Section C2 for details of the roles taken, as per the organogram below.



Job Descriptions

Membership of the SC and ST are tied to the roles listed above. Anyone assuming these roles will take on these duties and responsibilities, as defined in their Role Profile.

A8 DESIGNATED TEAM WAY OF WORKING

The Safeguarding Committee normally has two rounds of meetings:

Policy Review: Between February and the end of April the Committee meet to review the Policy and the state of Safeguarding in the school in general.

Post Summer Review: In conjunction with the Safeguarding Team, the Committee meets after the summer (our busiest time of year and time when we have the most U18s) in order to discuss any issues and changes in policy or procedure identified during the summer months. If any changes are urgent or applicable to our year-round courses, then these changes will be explored and implemented in this round of meetings. If the changes are specific to summer-only situations (eg on the LTP or specific to buildings only used in the summer) then the changes will be brought in as part of the next Policy Review.

Each “round” consists of at least one face-to-face meeting, but may require more meetings. All meetings should be minuted and these minutes stored in FrancesKing:\CLIENT SERVICES\Safeguarding\Safeguarding Committee\Minutes.

Further discussion may take place in meetings or by email. Any decisions made by email in which the whole of the SG and SC are not included, should be communicated to all members by emailing safeguarding@francesking.com, which includes all members of SC and ST.

The Safeguarding Team will usually be invited to contribute to the Policy Review round, especially if any changes are being brought in as a consequence of the Post Summer Review, which they will have already been involved in.

In the event of any Safeguarding incidents, the ST will meet at their earliest convenience to analyse how the Policy and procedures worked, and whether they helped or failed. These findings will, if negative, trigger an immediate Policy Review.

In the event of a change in legislation or criteria laid out by our accreditation bodies, then the ST will meet in order to assess the need for an early Policy Review. See Section A13.

Safeguarding duties are included in the Role Profiles for these positions at Frances King.

A9. LOCAL AUTHORITY CONTACTS

Our centres fall into three different Local Authorities:

- 77GR / 126QG: Kensington & Chelsea
- 5GG: Westminster
- LTP-W: Wandsworth

See Appendix 1 for contact details for each of these boroughs.

Homestay accommodation and student residences may be various local authorities. For this reason we have a field in Gnosis (our student management system) for “LADO” for each accommodation – to identify which local authority needs to be contacted in the event of an incident or allegation.

We keep a document with contact details for all boroughs used in homestay and residential accommodation in the shared London Safeguarding folder, which can be found in: FrancesKing:\CLIENT SERVICES\Safeguarding\LONDON. This document is reviewed once a year by a member of the Safeguarding Team. In the same folder we also keep a shortcut for the London Safeguarding Children’s Board list of contacts for all boroughs. A link to this webpage can also be found in Appendix 1.

A10. DOCUMENTS/LEGAL FRAMEWORK

This Policy is based on information and guidance provided by:

- English UK and Accreditation UK (including the British Council)
- The Independent Schools Inspectorate
- The Department for Education

We have also used the following documents, laws or policies to help us prepare this document:

- Sexual Offences Act 2003
- Keeping Children Safe in Education (KCSIE) 2018
- General Data Protection Regulation 2018
- Data Protection Act 2018
- Working Together to Safeguard Children 2018
- Information Sharing 2018
- What to Do if You’re Worried a Child is Being Abused 2015
- The Children Act 1989
- Local Government Act 2000
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Counter-Terrorism & Security Act 2015
- Children & Social Work Act 2017

A11. ASSOCIATED POLICIES

Other Frances King policies that share common ground with this Policy are listed below. A summary of the cross-over information is included in this Policy; the relevant sections are listed by each Policy.

The full policies can be found in the HR Info folder on the FrancesKing shared drive on our network, or printed versions can be found in the Student Services office at 77GR.

- First Aid Policy – See Section F4 and F8

- Prevent Policy – See Section F13
- Safer Recruitment Policy – See Section E
- Employment of Ex-Offenders Policy – See Section E8

A12. U18S INVOLVEMENT

We welcome feedback from U18s in the regular reviews of this Policy. This feedback is usually collected informally through discussions with U18s in our regular catch-up sessions. We have invited U18 students to focus groups in the past when creating our Policy and procedures. In the event of bringing in major changes to the Policy we would aim to discuss our ideas with U18 students to get their suggestions/feedback.

We expect our U18 students to understand that we take their safety very seriously, and to know that they can talk to any member of the Welfare / Safeguarding Team if they have any concerns. They are expected to know that they must abide by our rules, including curfew, attendance and punctuality, as well as good behaviour in general.

A13. POLICY REVIEW

This policy is reviewed annually by the Safeguarding Committee: Garth Younghusband, Kelly Harding, Maricel Samson and Laurine Tastet. Input and feedback is normally requested from all members of the Designated Safeguarding Team and any staff who have worked as Centre Managers or Academic Managers in the last 12 months but are not on the Safeguarding Team. All other staff are invited to contribute. Any findings or suggestions from the Post Summer Review (see Section A8) not already implemented will also be taken onboard.

The policy will also be reviewed in any of the following situations:

- Errors or weaknesses in the Policy are identified or reported to the DST
- Change in legislation
- Change in requirements from accreditation bodies, such as the British Council
- Change in locations used by the school
- Change in age restrictions of any of the courses laid out in Section A1
- After any major incident

The updated Policy will usually be signed off by Garth Younghusband on behalf of the Board.

When changes are brought in, we will make these changes clear to all stakeholders, and where necessary or appropriate, offer training. A summary of all changes is emailed to staff, displayed on staff noticeboards and included in internal newsletters.

A14 POLICY AVAILABILITY AND FORMATS

This policy is available in full form in the following locations and formats:

- On the school's website, in viewable or downloadable PDF format
- In the school's shared drive, in the HR INFO folder in PDF format
- In Student Services offices, staffrooms and admin offices in printed paper format

Simplified versions of the relevant information from this Policy are given to:

- New staff – in *Employee Handbook*, *Teachers' Handbook*, *Code of Conduct for Staff around Students Under the Age of 18* and *Basic Safeguarding Guide*.

- Homestay accommodation hosts – in the *Homestay Guidelines*
- Group Leaders – in the *Guidance for Group Leaders* document
- Students – in the *Student Handbook*, in the *Student Handbook for Students Aged 16&17*, and for those staying in homestays, in the *Homestay Information for Students*
- Parents of U18s in the main school: *Advice about Students Aged 16 & 17 at Frances King Adult Schools*
- Parents of U18s on the Family Programme: *London Family Programme Welcome Information*
- Parents of LTP students – in the *LTP Manual for Parents & Students*

A simplified version of this Policy can be found in the *Basic Safeguarding Guide*, which is designed for people with less safeguarding training who may not need to know everything in so much detail. For example: interns, students doing work experience at the school or ETOs who want reassurance about the level of safeguarding at Frances King. The *Basic Safeguarding Guide* is on our website.

Very basic safeguarding information is also on the back of all visitor badges, student ID badges and on IDs for temporary staff.

B: CODES OF CONDUCT

In order to ensure that the important information from this Policy is understood the people who most need to know it, we use simplified and condensed codes of conduct aimed at specific people to convey the information they most need.

B1. OVERVIEW & PRINCIPLES

The overall aim of our codes of conduct is, as stated above, to ensure that the right people get the most important information. This helps create a safer school culture. It protects both adults and under 18s from unknowingly behaving in a way that could be misconstrued or violate aspects of this Policy.

B2. POSITION OF TRUST

Any person working with or volunteering with children under the age of 18 is considered to be in a Position of Trust. All Frances King employees fall into the category.

The Sexual Offences Act 2003 states that any person in a Position of Trust engaged in sexual activity of any sort (even kissing or caressing) with students under the age of 18 is breaking the law and subject to prosecution. This is regardless of the age of consent in the UK or the student's own country.

B3. SETTING STANDARDS

At Frances King we believe it is important to set standards for both staff and students, in order to lay down a framework from which all our Safeguarding can develop.

Adults Working With Under-18s

We expect all adults working with under-18s to serve as excellent role models. They are expected to be very familiar with and abide by this Policy, support the school in the implementation of this Policy, and to be vigilant of any minors under their care.

Under-18s

Tolerance and respect for adults and other under-18s is expected at all times.

Some students may feel unhappy about the extra vigilance that adult staff show towards under-18s and may want to be given more freedom, so we need students to understand that this comes from a duty of care, which is intrinsic to the core values at Frances King.

B4 ADULT – U18 INTERACTION

The following guidelines are designed to protect both staff and any under-18s in our care. A slightly simplified version should be kept in every class register.

- At no times should there be any physical contact of kind between teachers or staff and U18 students. This includes during games/activities, routine crossing of roads or if the student is distressed. The only exceptions are that staff may touch or restrain a child:
 - to prevent them from harming themselves
 - to prevent them from harming another person
 - to prevent them from damaging property that is not their own
 - to protect them from harm (such as when they are crossing a road dangerously)
- Staff must not give out personal email addresses or phone numbers to any students under 18, and must not communicate with them by email, phone, SMS, messaging services or social media.
- Staff must avoid being on their own with any U18 in a room with the door closed. If there is a need to speak to an underage student alone this must be done with the door open in view of others. For 1-to-1 lessons the teacher must keep the door open.
- Staff must dress appropriately, including wearing any ID lanyards or badges as required.
- Staff should avoid comforting a distressed student alone and always try to get another member of staff to assist. While comforting a distressed student staff must remember not to touch them, which goes against one's natural instincts.
- Staff must maintain a professional relationship with students at all times and must not court popularity. They must avoid being over-friendly, showing favouritism or spending excessive amounts of time with any one student compared to others.
- Staff must report any inadvertent / accidental inappropriate conduct by either party as soon as possible. Staff should not put themselves in a compromising position by keeping silent about something because they don't want to look bad. Not reporting something innocent may look far worse.
- Teachers should always use appropriate language and material in class. They should not swear in front of students or teach swear words. They should make sure they are aware of content of songs / video clips before playing them to a class. They should always consider the age of their students before deciding if a topic is appropriate for class.
- Any concerns staff may have about the wellbeing or safety of a students must be reported straightaway to the DSL for that building, a member of the Safeguarding Team or to Garth Younghusband (Director). If any staff member believes that a child is in immediate danger, they should report it to the Child Protection Advisor for the local authority, which is displayed on the Safeguarding Team poster in offices and staffrooms.
- Any intimate or sexual relationship between a member of staff and a student under the age of 18 is an abuse of trust which constitutes a criminal offence. As well as immediate disciplinary proceedings upon evidence or allegations or such a relationship, the school will report this crime to the Police.

B5. APPROPRIATE APPEARANCE

Frances King expects employees to dress conventionally and appropriately. Our students and customers have very high expectations of us in many areas, and one of the most important is the appearance of the people who work in our schools. All staff are at the forefront of the school's contact with our customers and we require that the appearance of all our employees is professional and to a high standard at all times.

At Frances King casual clothing may be worn, but it must be clean and smart. For men this means, for example, that a shirt rather than a t-shirt should be worn in class / in offices.

Dress Code For Adults Working With U18s

An extra degree of moderation is required when working with under-18s and applies to staff in the classroom, in administrative roles, on activities, and whenever onsite – even if the staff member is off duty.

Below is a list of things that are considered unacceptable:

- Facial piercings
- Not shaving (unless you have a beard)
- See-through clothing
- Scruffy trainers
- If toes are exposed, they should be presentable
- Shorts, unless leading a sports activity
- Tattoos on hands, face or neck, or any tattoos that could be deemed offensive
- Bare midriff
- Faded jeans
- Dirty / creased / ripped clothing
- Exposed cleavage
- Dirty / untidy hair
- Visible underwear

Appropriate Dress For U18s

Some U18s will be used to dressing in a way that is considered sexualised in the UK, and may need to be told that this is not suitable for schoolwear, especially if they are in a class with adults. This will be a very difficult and sensitive situation. A member of staff of the same gender as the student should lead this conversation, in a private area, but there should be a second member of staff present, also of the same gender. Both staff members must be DBS checked.

On the residential teenager programme there is a dress code for students, which is sent to students and their parents in advance. These rules apply while on campus or on trips/activities, and apply to all students:

- No bare chests
- No bikinis
- No visible underwear
- No see-through clothing
- No hotpants / very short shorts
- No strapless tops
- No vests open at the sides
- No very low cut tops
- No clothes with offensive language or logos

Appropriate Dress For Residential Staff

Staff are expected to obey the dress code even when off duty. The exception being when they are inside their own rooms.

Staff also need to consider their appearance when walking to/from showers in residences, if they are not en-suite. Staff must be covered appropriately at all times. They should either be dressed or in a full bathrobe. Wearing only a towel in communal areas, even if it just to cross the corridor to their room, is not acceptable.

Residential staff should also consider their sleepwear – as if a fire alarm goes off in the middle of the night they will need to leave the room immediately to assist in the evacuation of students, and will need to be suitably covered for appropriacy as well as the outside temperature.

Appropriate Dress For Homestay Hosts

As with Residential Staff, we advise homestay hosts to consider their appearance in communal areas around the home – in particular when walking to/from bathrooms. We ask hosts not to dress inappropriately around U18s, and point out that they may need to think about what they wear to breakfast, as many people in the UK are used to going down to breakfast partially dressed or in their nightware.

As these are the hosts' own homes, we do not have this advice on dress as a requirement in the Homestay Guidelines; however, it is made clear to hosts at recruitment and in follow-up visits that any U18 who tells us that they feel uncomfortable with the way the hosts behave, then the student is moved immediately for Safeguarding purposes, and as such no notice period is paid to the family.

B6. ALCOHOL, DRUGS AND SMOKING

Laws and behaviour regarding alcohol, drugs and tobacco may be different in the students' countries or communities. Staff need to bear this in mind, and to make sure students are aware of the situation in the UK.

Staff

Staff are ambassadors for Frances King and should act as role models for our students.

No illegal drugs are permitted on any premises that Frances King is using at any time. Staff found to be in possession of any illegal drugs will immediately be suspended, pending a Gross Misconduct hearing.

With the exception of meals at restaurants, no member of staff should drink alcohol while around U18s. A second exception is for staff parties not held at a restaurant where there are interns who are under 18 – in this situation staff members may drink, but must ensure that the U18 interns do not.

Any staff member who has consumed alcohol and is in the presence of an U18 student must be sober enough to carry out any duties in their charge – a good guide is to remain within the legal limits for driving. If a manager believes a member of staff to be intoxicated while in the charge of U18s they will face disciplinary proceedings, as well as being removed from their immediate charge. If a manager asks a staff member who is on duty to take a breathalyser test, we expect all staff members to comply.

Any residential staff on night duty is prohibited from drinking alcohol while on duty or up to 4 hours beforehand.

If members of staff discuss alcohol or drugs with U18s, we advise them to take an educational approach and guide them to better understanding of the dangers involved. We do not recommend using alcohol or drug abuse as a topic for humour or entertainment. Staff should avoid telling U18s stories of drunken revelries, and instead should favour cautionary tales and lessons learned.

Under-18s

The information supplied to 16- & 17-year-olds in their first week includes information about the legal restrictions on buying tobacco and alcohol in the UK, and students are questioned on their understanding of these laws in their 1st week meeting with a member of the Safeguarding Team.

This information also informs the students about the law regarding possession, buying and taking of illegal drugs, and the legal consequences of being caught.

For the LTP, the Manual for Parents and Students states that smoking or drinking alcohol is not permitted on campus. It explains that the legal age for buying alcohol and tobacco is 18 in the UK, and anyone found with alcohol on campus or smoking in the residence will be removed from the programme and sent home.

B7. IT & SOCIAL NETWORKS

Messaging

Staff cannot use personal accounts or devices to message under 18 students using any digital system, such as SMS, WhatsApp, Line, iMessage, any form of social media direct messages (DMs), in-game messaging etc.

If a staff member receives a digital message from an U18 they should inform their manager or a member of the Safeguarding Team that they have received a communication from an U18, show them the content and not reply from their personal number/log in. They may reply from a work phone/account and explain that the student must not contact them on the other number/log in. They should also ask the student to delete the number/user name from their records. Likewise, after sending a record of the communication to the Safeguarding Team to enter on the Incident Log, the staff member should delete the message and the student's contact information.

Social Networks

Staff members should not send or accept any friends requests for U18s on social networks.

If they discover that a student is following them on an open social network, such as Instagram or Twitter, the staff member should block the student, and if possible explain to them in person that the school does not allow U18s to have any online interaction with staff on social media. They should not send them a direct message to convey this information – as explained above. The school's social media manager can send a DM to the student from the school's account explaining this if it is not possible to speak to them in person.

Emails

Staff must only email U18s from company email accounts, and must never give out their personal email address to U18s.

Any staff member contacting an U18 using their personal email may face disciplinary proceedings.

Mobile Phone Numbers

Staff must not give their personal mobile phone numbers to U18 students. Neither must they accept or request an U18s phone number to store in their personal phone.

When leading an event it is always preferable to use a school mobile, but if this is not an option, they should make sure any U18 has the 3 important numbers (Emergency Phone, Student Services and Activity Programme Co-ordinator) and the student should use these numbers if needing to contact the leader. The leader can only keep U18's numbers as part of the student register for events, must not store the number in their personal phone, and must correctly destroy the register after the event has ended, as per GDPR requirements.

Safe User Agreement

U18s will be asked to sign a Safe User Agreement in their first week to ensure they are aware of e-safety concerns. See Section F12 for more information.

Online Safety

U18 students should be made aware of the dangers of sharing any personal information on online systems and social networks. Staff will try to educate students about these dangers through meetings, the Safe User Agreement and in the Handbook for Students Under 18.

B8. ACCOMMODATION

In the more informal setting of accommodation, we ask staff and partners to be extra cautious with appropriacy, especially regarding bedrooms and bathrooms.

Bedrooms

Always knock and ask permission to enter, then wait for permission before entering an U18's bedroom. If a student doesn't answer, then knock again, louder and say you need to come in the room and that you are going to knock again in 10 seconds and will then come in the room. This method is effective if the student is pretending to not be there when avoiding school or if you need to enter the room without permission because you are concerned the student is incapacitated and you need to get to them to help them. Please be aware that if you have real cause to believe the child is in immediate danger you should enter without waiting – such as if you hear noises and believe the child is in a life-threatening situation (serious injury, heart attack, suicide etc)

Bathrooms

As explained in Section B5, we ask all adults to make sure they are covered up when going from bathroom to their own room. This should be either clothing on both halves of the body or a full dressing gown. Wearing just a towel, even if full length, is not considered suitable.

Adults should also be careful about entering bathrooms if there is a chance an U18 is in there. If in doubt, knock first. If you hear running water, do not enter.

All bathrooms must have a lock. Any faulty or missing locks must be replaced immediately. For residences this must be reported to maintenance staff and the bathroom should be made out of bounds – a poster can be put on the door to explain this, and staff should tell students in the floor meeting that evening.

If residential staff, a homestay host or group leader enters a bathroom and an U18 is in there, they should apologise and leave immediately. At the first appropriate opportunity they should talk to the student, preferably with someone else present to explain that it was a mistake and to ensure that the student is not upset or scared by the experience. They should also inform an appropriate member of staff (Centre Manager, Homestay Manager, DSL or any member of the Safeguarding Team) and explain the accident, so it is a matter of record and to avoid it appearing to be something more sinister that it was.

B9. TRANSPORT

Taxis and Coaches

Coaches and airport transfers arranged by the school will only be book through licenced companies, from whom we have had confirmation that all drivers will have a full DBS check.

For the London Teenager Programme, residential students may arrive in the UK unaccompanied. For these students we require them to book an airport transfer. For under-16s we also require a member of staff to meet them at the airport/train station and travel in the car with them back to the residence. For 16- and 17-year-olds we allow them to travel without a member of Frances King staff, but they must still use our transfer service. We always try to group together transfers, so that the students travel with other students when possible, both for extra security and for them to have the chance to meet other students as quickly as possible so they have a “friend” when they arrive at the residence.

All staff members who accompany students on airport transfers are all DBS checked, and we again book cars through a licenced company that confirms drivers will be DBS checked. We use a pre-booked service, but if there is a problem on the day, staff are required to take a licenced London Taxi cab, and not a mini cab or ride share (such as Uber)

Under-18s arriving unaccompanied to join our adult programmes are also required to use our transfer service, but as with the LTP, we do not require them to have a member of staff accompany them to their homestay accommodation. See Section F11 for more details and exceptions to these rules regarding airport transfers.

Staff Using Their Own Vehicles

Frances King staff are not allowed to transport students in their own vehicles.

Hospital Transfers

A member of staff will accompany any U18 student in an ambulance, unless the parent or guardian is with them. That staff member must be DBS checked.

For non-life-threatening situations it can be easier to get to hospital in a taxi. In these situations a DBS-checked member of staff will again travel with the U18, and will only use a licenced taxi service.

B10. FAVOURITISM & GIFTS

Staff should maintain a professional relationship with students at all times and not court popularity. They should avoid being over friendly, showing favouritism or spending excessive amounts of time with any one student in comparison to others.

Although this may be completely innocent, or even done as an attempt to be supportive to a shy or lonely student, this could be misconstrued by the student or an observer.

It is quite common to receive small gifts from students, and many bring the gift from their own country in preparation to present the gift to their teacher. This is a cultural norm in many countries, and refusing a gift can cause offence or embarrassment to the student. However, all gifts should be of nominal value (less than £50) in order to prevent any accusation of bribery. Any gift of a value exceeding £50 must be declared to a Director, if it cannot be refused.

Likewise, gifts should be one-offs, usually at the end of the course or for a celebration such as a religious holiday or a birthday. Repeated gifts could be interpreted as a sign for concern, either an attempt by the student to ingratiate themselves into the staff member's life or as a bribe. In order to protect themselves, members of staff who receive multiple gifts from the same student should report this to their line manager and a member of the Safeguarding Team. They should try to refuse multiple gifts, if it is possible to do so without causing offence.

If an adult member of staff ever receives an inappropriate gift from an underage student, such as alcohol or something of a sexual nature, this must immediately be reported to a member of the Safeguarding Team. Apart from protecting themselves from possible accusations further down the line, behaviour such as this could be an indication of abuse (see Section C4).

B11. WHISTLEBLOWING

Staff have a legal obligation to report any concerns they have about a colleague's inappropriate behaviour, and will in no way be penalised for doing so. Their report will remain confidential. Any such concerns should be made to a member of the Safeguarding Team. If staff members feel uncomfortable about reporting these claims to another member of staff, they can call the NSPCC Whistleblowing Helpline on 0800 028 0285.

If a staff member reports an allegation in good faith which is not confirmed by subsequent investigation, they will not face any form of action. If it is believed that the staff member did not report the allegation in good faith but instead it was for malicious or vexatious reasons, a separate investigation will be carried out into the reason for the allegation (rather than into the allegation itself) and if found to be malicious then the staff member will face disciplinary action for this.

Students should also know that we will listen to all concerns they have about any adult behaving inappropriately with students under the age of 18, whether this is about themselves or another student. Students will not get into any trouble with us for reporting any concerns they have. If a student thinks something is wrong, they should tell a member of the Safeguarding Team. We can arrange for the student to speak to someone in private, and if necessary we will try to find someone to help translate.

C: CHILD PROTECTION

C1. OVERVIEW AND STRUCTURE

As with Safeguarding, all adults have a legal obligation to protect children from harm. When abuse happens or is suspected, all adults have a legal duty to help protect the child from further harm. This can be difficult for people who do not fully understand the process, so at Frances King the Safeguarding Team are on hand to assist in the process and take over when necessary, liaising with the Police and/or LADO, as required.

C2. NOMINATED/DESIGNATED PERSON

Each centre has a named DSL, with at least 1 deputy. Other members of the Safeguarding Team make up the DSOs for all centres. See Appendix 2 for their contact information. The DSL will usually work with the authorities when there is a concern or allegation of abuse.

Centre	Role	Internal Role	Person
77GR	DSL	Head of Administration	Kelly Harding
	Deputy DSL	Deputy Head of Programmes	Ainsley Roberts
	Deputy DSL	Homestay Accommodation Manager	Joanna Modrzewska
5GG	DSL	Head of Family Programme	Jo Love
	Deputy DSL	Academic Manager	Appointed Annually
LTP-W	DSL	Centre Manager	Gavin Hards
	Deputy DSL	Activities Manager	Appointed Annually

C3. SITUATIONS WHEN ADULTS NEED TO RESPOND

Any adult has a duty of care and responsibility to respond to concerns about a child's wellbeing, whether the adult has identified these concerns themselves or if another person has told them something about the wellbeing of an under-18.

All staff members can seek advice from members of the Safeguarding Team, or they may contact the external authorities directly if they want to avoid delay. All allegations must be reported to the appropriate authorities.

If an U18 discloses information to an adult which causes a safeguarding concern, there is a specific procedure that must be followed: this is detailed in Section C5.

C4. IDENTIFYING MAIN FORMS OF ABUSE, RECOGNISING SYMPTOMS

The 4 main areas of abuse are:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Physical Abuse

Physical abuse is deliberately causing physical harm to a child. This might involve punching, kicking, biting, burning, scalding, shaking, throwing or beating with objects such as belts, whips, or sticks. It also includes poisoning, giving a child alcohol or illegal drugs, drowning or suffocation.

Possible signs of physical abuse include:

- Any injuries (such as bruises, bites, burns and fractures) not consistent with the explanation given for them
- The child is always "on alert" – as if they are expecting something bad to happen

- Injuries that have a shape pattern – such as marks in the shape of a hand, belt or shoeprint
- Injuries to the body in places which are not normally exposed to falls or rough games – such as on the back, torso, thighs
- The child flinches or tries to avoid people touching them in any way
- Injuries which have not received medical attention
- The child gives inconsistent accounts for the cause of injuries
- Reluctance to change for, or participate in, games or swimming
- Frozen watchfulness (ie staring at walls or off into space)

Sexual Abuse

Sexual abuse involves forcing or encouraging a child to take part in sexual activities, whether or not the child is aware of what is happening. This may involve physical contact including penetrative sex, oral sex, masturbation, kissing, rubbing, or touching outside of clothing, or it may involve non-contact activities such as involving children in watching sexual activities, producing or looking at sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Abusers can be men, women or other children.

Possible signs of sexual abuse include:

- Any allegations made by a child concerning sexual abuse – it should never be assumed that this is attention seeking
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age
- Sexual activity shown through words, play or drawing
- Repeated urinary infections or unexplained stomach pains
- The child is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- Eating disorders such as anorexia or bulimia

Emotional Abuse

Emotional abuse is where repeated threats, criticism or ridicule causes a severe negative effect on a child's emotional development. It includes telling a child that they are worthless, unloved or inadequate. Emotional abuse may include inappropriate expectations being imposed on a child, over-protection or preventing the child from taking part in normal social interaction. Bullying (including cyber-bullying) are a form of emotional abuse.

Possible signs of emotional abuse include:

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not mixing well with other children
- Sleep or speech disorders
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity
- Running away, stealing and lying

Bullying may be considered a form of emotional abuse. See Section C7 for more information on bullying and peer-to-peer abuse.

Neglect

Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment) or medical care.

Possible signs of neglect include:

- Poor hygiene: unwashed body, clothes, hair.
- Shabby appearance: clothing that is old, doesn't fit, uncombed hair, lice
- Insufficient clothing: few items of clothing or inappropriate clothes for the weather
- Frequent diarrhoea
- Untreated illnesses, infected cuts
- Frequently hungry

C5. A CHILD TELLING AN ADULT (DISCLOSURE)

When a child discloses an allegation of abuse, it is important to follow the correct steps in order to protect the child and ensure accurate reporting of the details. Not following these steps could jeopardise any future criminal proceedings, so it is important to know what to do.

The most important thing to remember is that the adult's duty is never to investigate the allegation or to decide if it is true or not. The adult's responsibility is to listen to the child and collect the information to pass on to the people who will investigate.

The four key steps in receiving a disclosure are: Receive, Reassure, Record, Report.

Receive

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

Accept what is being said without judgement.

Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions.

Take it seriously.

Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask any leading questions.

Do ask open questions like "Is there anything else that you want to tell me?". It is also a good idea to ask "When did this happen?" in order to ascertain if the abuse is current, and the child is in immediate danger or if they are safe at the moment.

Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose first language is not English.

Reassure

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

Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.

Tell the child that you will need to tell some people, but only those whose job it is to protect children.

Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

Do not ask the child to repeat what they have told you to another member of staff.

Explain what you have to do next and whom you have to talk to.

Record

Make some very brief notes at the time and write them up in detail as soon as possible. If the conversation was in a different language, write the notes up in that language and then write a translation. Keep both versions.

Do not destroy your original notes in case they are required by court.

Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used, including any swear words or slang.

Record statements and observable things, not your interpretations or assumptions – keep it factual.

Report

Report the disclosure immediately. Contact your DSL. If you cannot find the DSL, try to find a deputy or a DSO.

If you are not sure what to do or if what the child has told you is actually a cause for concern, just pass it on to any member of the Safeguarding Team. Remember it is not your role to determine if the child is telling the truth or not. If you have a concern, report the concern.

If the child withdraws what they have said (eg after you say you are going to tell someone else so they can help) you must still report it – even if they child is now adamant that they were making it up.

If the child is in immediate danger, do not delay trying to find someone appropriate to speak to, contact the CPA for the local authority (see Appendix 1 for contact details), or for situations where there is serious risk of harm contact the police.

C6. CONFIDENTIALITY

Any adult who becomes aware of child protection information must only share it with the Safeguarding Team or the appropriate authorities, not with anyone else – including their own family.

Confidentiality about both the victim and the alleged abuser must be maintained.

C7. KNOWING AND RECOGNISING SECONDARY FORMS OF ABUSE

Apart from the four main forms of abuse, it is important to recognise some of the common secondary forms:

- **Child Sexual Exploitations (CSE)**

This is a form of sexual abuse, where a child is forced by an adult to take part in sexual activity in return for something the child needs. This can start with the adult showing interest and giving time or friendly affection when the progresses to gifts, money, drugs or alcohol. This creates a power over the child, and the abuser then withholds their “gifts” until the child engages in some form of sexual activity. In extreme cases this is done by a gang who involve the child in multiple sexual activities, or even prostitution.

- **Female Genital Mutilation (FGM)**, also referred to as female circumcision or “cutting” is where a girl’s external genitals are cut or mutilated. It is illegal in the UK and must be reported to the Police as well as the Safeguarding Team – even if it is performed outside the UK.

Signs of FGM:

- The child is absent from their course for a long time, followed by unusual behaviour when they return.
- The child has difficulty walking, standing up or sitting.
- The child is anxious, withdrawn or depressed.
- The child asks for help, without saying exactly what for.

- Peer-on-Peer abuse (ie child to child abuse)

With peer-on-peer abuse staff must be aware that the abuser is underage as well, and as such must be handled with care. They may have learned this behaviour by being a victim themselves.

The most common types of peer-on-peer abuse are:

- Bullying
- Cyber-bullying
- Sexual Violence & Harassment

Most (but not all) sexual violence or harassment will be male-to-female. This may be something low-level, such as upskirting, touching breasts, pinching bottoms etc, but they must be made to understand that absolutely no sexual violence is to be tolerated. Ideas such as “It’s just a bit of teenage fun” or “Boys will be boys” are not accepted.

- At Frances King we tackle Peer-on-Peer abuse by fostering an attitude of zero-tolerance: staff are expected to stop and sanction all cases. There are anti-bullying posters in all classrooms and an Abusive Behaviour Policy in place.

C8. DIFFERENCE BETWEEN CONCERN AND SERIOUS ISSUE

Staff are expected to understand the difference between a concern and a serious issue.

- A *concern* is a situation where something seems not to be right, but there is no immediate danger to the child.
- A *serious issue* is one where a child might be in danger of harm or abuse and fast or urgent action is required.

With a concern, staff members can be more cautious in their approach to the situation and take a bit of time to get things right. With a serious issue we would expect staff to react fast to ensure the child is out of danger as quickly as possible, even if they are not 100% certain that their assessment of the situation is correct. If they believe the child is in current danger, then they must act.

C9. IDENTIFYING VULNERABLE STUDENTS

Students with special educational needs and disabilities (SEND) are statistically more vulnerable to grooming and abuse. Our staff therefore have a responsibility to pay close attention to all SEND students and look out for signs of abuse.

However, with SEND students, staff should also be careful not to confuse signs of abuse with symptoms of a SEND condition. For example, students with Asperger's may isolate themselves or avoid eye contact, which may seem like suspicious behaviour for people who are looking out for abuse symptoms, but are in fact just typical behaviours for people with this SEND condition.

Frances King adult students are in an unfamiliar country, usually away from family and support, and having to operate in a language not native to them, for this reason they may be more vulnerable to abuse than most adults. Our staff are therefore expected to look out for signs of abuse or concern in our adult students too.

C10. KEEPING RECORDS

Any Safeguarding concerns, incidents or allegations must be reported in the Incident Log, a confidential document kept in FrancesKing:\CLIENT SERVICES\Welfare\CONFIDENTIAL\London, accessible to the Safeguarding Team. The option of "Safeguarding" must be selected for incident type. The log can be used to store the details of the case, the action plan and any follow-up information, as well as companion documents, such as notes, photographic evidence or official documents.

When recording a Safeguarding concern or allegation, staff should use the Safeguarding Recording Form (see Appendix 4), available in Word format in FrancesKing:\CLIENT SERVICES\Safeguarding or as a paper document in all Student Services offices. This document should be completed by whomever raises the concern or receives the allegation. The information is then transferred to the log by a member of the Safeguarding Team. A copy of the original form is then attached to the log entry, along with any other accompanying documents.

All staff can store records of their forms, notes, photographic evidence etc in FrancesKing:\CLIENT SERVICES\Welfare\INCIDENTS, which a member of the Safeguarding Team should then immediately move to a confidential folder: FrancesKing:\CLIENT SERVICES\Welfare\CONFIDENTIAL\London\Incident reports - companion documents.

Both the Confidential folder and the Incident Log can only be accessed by members of the Safeguarding Team. Records are kept indefinitely, in order to be used if necessary in future cases of historic abuse.

C11. IF AN ADULT IS ACCUSED

The steps taken if an adult is accused or suspected of abuse will be different to those of a concern for a student's safety/wellbeing. Below are the routes we would take for an *allegation* (if someone tells you directly that something happened to them or that they witnessed something happening to someone else) and for a *concern* (a person is worried or suspects that there is abuse but has not actually witnessed abuse):

Allegation Of Abuse From A Student

The allegation of abuse from a student will begin with a disclosure (see Section C5). Although this will not always happen in exactly the same way, staff should always try to follow these steps when receiving the disclosure:

1. A child approaches you and says they want to talk about something, possibly saying it is private.
2. As soon as you realises it is a disclosure, you need to make sure you are ready to the take down the information, on paper or by recording the conversation. You should try to move the

conversation to somewhere more private if necessary, but this should not be alone behind a closed door. If necessary and appropriate, you should ask another member of staff to be present.

3. The most important first step is to assess if the child is in current danger – if the abuse could happen when they leave the school. For this reason it is ok to ask the leading question: When did this happen? If the allegation is against another person, the location of that person must be determined (ie if they are not in the same country as the student right now, there is no immediate risk). Your first priority is to decide if they are at immediate risk of harm. If so, you will escalate proceedings much faster and the child should be kept away from the person they are alleging has abused them.
4. Follow the 4 Rs when listening to the student: Receive (listen to what they say), Reassure (tell them it must be difficult for them to tell you, but that they have done the right thing, don't promise to keep it secret, tell them you are only going to tell some people who are going to help), React (act on what they have said: inform the right people, tell the child what you are going to do next), Record (write everything down as verbatim as possible, without including opinions, include any observations you made). Although what you they tell you may be very difficult to hear, it is important that you do not show any repulsion – a reaction such as this may make the child stop telling you.
5. Tell the child it is not their fault. You may need to repeat this. Victims of abuse have usually had it instilled in them that they are to blame.
6. Do not make the child tell anyone else at this stage. You are going to convey the information you have received on their behalf.
7. As soon as possible, inform the DSL, or if they are not available find another member of the Safeguarding Team. For matters of immediate concern, you can report the issue directly to the local Child Protection Advisor.
8. At your earliest convenience, complete a Safeguarding Recording Form, using the notes you have taken.
9. Take a copy of all your notes – those taken on the spot, the ones you wrote up more neatly, the Safeguarding Recording Form and anything else you have. Keep the originals safe in a sealed envelope as they may be asked for in any future legal proceedings. Give the copies/scans/files to the DSL or DSO to attach to the Incident Log.

We would expect steps 1 – 9 to be completed in less than 12 hours. The exception would be for step 9, if you do not have access to the technology needed for making copies.

For most staff, this will be the last step, unless you are required to give a statement to the authorities.

The next steps will be:

10. The DSL or another member of the Safeguarding Team if they are not available, will report the allegation to the LSCB within 24 hours. For issues of immediate concern, they will usually go directly to the local CPA. The LSCB may investigate the allegation themselves or may ask the DSL to investigate internally.
11. If the accused adult is a member of staff, they may be suspended and prohibited from entering school property, contacting any students or discussing the case with any member of staff other than their line manager or those on the Safeguarding Team, pending the outcome of the LSCB investigation.
12. For confidentiality, the school will not disclose to other members of staff or students the details of the staff member's suspension. The school will follow the advice of the LSCB with regards to what can/can't be said and to whom.
13. Even if the school does not investigate the allegation directly, the DSL will look into the alleged adult's behaviour with regards to our Codes of Conduct and this Policy. If they are found to have behaved in a way that violates school Policy, even if allegations against them

are not upheld by the LSCB, then the staff member will still face disciplinary proceedings for violating Policy.

Any staff member involved in a child's declaration of abuse will probably be quite upset, whether from hearing about the abuse or possibly because they have had to report a friend or colleague. It is important that staff members can talk to someone about their feelings, but confidentiality is also an issue. They should discuss their situation with the DSL, who may recommend someone on the Safeguarding Team they can talk to for support or may recommend an external body who they can talk to in confidence. No staff member should discuss the case with other staff members not already privy to the information (ie if two people took the disclosure, then they can talk about it together).

Allegation Of Abuse Reported By Another Person

When we receive an allegation of abuse from a person who has witnessed abuse or seen/heard evidence of abuse, then we usually ask them to go through their concerns with the DSL, or other Safeguarding Team member if the DSL is not available.

If the person reporting the allegation is also a member of staff, then the DSL will reassure that they are right to bring any allegations to them and remind them that they are protected by the Whistleblowing Clause in their contract.

The DSL will ask them to complete a Safeguarding Recording Form and will then enter the information on the Incident Log and contact the LSCB.

If the DSL believes the allegation to warrant further investigation, they will then work with the LSCB to look into the allegation. It would be unusual that the DSL did not report the allegation to the LSCB, but there may be circumstances that the DSL is aware of that the person reporting their concerns does not know.

As with the steps for receiving an allegation of abuse from a student, any staff member involved needs to respect the confidentiality of all concerned.

Concern Of Abuse

If someone is concerned that a child is being abused or has been abused in the past, then they should bring their concerns to a DSO. If the staff member cannot see a DSO in person, they can report their concerns via phone or email, but in person is preferred.

As with any allegation of abuse, if this concern comes from a member of staff, the DSO will reassure them that they are right to bring their concerns to their attention and remind them that they are protected by the Whistleblowing Clause in their contract.

The DSO will ask the person to complete a Safeguarding Recording Form, and to give them copies of any pictures/notes/documents they have to support their concern. This will be transferred to the Incident Log and reported to the DSL.

The DSL may seek advice from the LSCB. The parties involved will be spoken to. This will be handled sensitively and diplomatically. When talking to the child the DSL will usually ask the child's teacher to sit in on the conversation – unless the teacher is the alleged abuser.

Safeguarding Concern

You may have a Safeguarding concern that does not concern abuse, but rather the wellbeing of an U18. For example, if they are drinking, behaving strangely, isolated, homesick or misbehaving in class.

It is important to remember that the Safeguarding Team is concerned with a student's wellbeing and not just protecting them from abuse. You should report all your concerns to a member of the Safeguarding Team.

Your concern will be recorded on the Incident Log and further action may be taken.

C12. IF THE DSL / SENIOR MANAGER IS ACCUSED

If any member of staff receives an accusation against the DSL, then they should refer the matter to a deputy DSL, who understands that it is their duty to react and follow through with the accusation as if it were any other adult.

If a senior manager or director is accused, the member of staff receiving this accusation is obliged to report it as usual, bypassing any person who they feel cannot remain objective.

Frances King fully acknowledges that we expect our staff to proceed with all accusations regardless of which staff member is accused, and the person processing the accusation will do so knowing that they are protected both by this Policy and by the whistleblowing clause in their contract.

If the member of staff is uncomfortable reporting a DSL or senior member of staff internally, despite our assurances, then they are of course able to report their concerns directly to the LSCB.

C13. IF A CHILD IS ACCUSED

When a child is accused of inappropriate behaviour or abuse, then the Safeguarding Team will need to bear in mind that the accused is a child and entitled to the protections this brings, both legal and emotional. The procedure for dealing with an accusation against a child is the same as for an adult but with one important difference: one member of the Safeguarding Team will be appointed by the DSL to act as advocate for the accused, to ensure they are protected where necessary.

A child accused of peer-to-peer abuse is often a victim of abuse themselves, and will have learnt this behaviour. This is one of the reasons we have a zero-tolerance approach to even "minor" cases of child-on-child abuse (such as pinning bra straps, pinching bottoms, mild bullying), as we believe it is important to educate the child and eliminate any bad behaviour before it escalates to more serious abuse.

D: TRAINING

D1. RESPONSIBILITY

At Frances King, department heads are responsible for ensuring that their team members have the correct level of safeguarding training. The overall responsibility lies with the DSL, however we acknowledge that the DSL must be able to rely on department heads to check the level of training required for new or returning staff and to arrange training for them in accordance with Policy and any additional instructions from the DSL.

D2. DIFFERENT LEVELS OF TRAINING

All adults working within Frances King are required to have a minimum of Level 1 safeguarding training. This includes any interns.

DSOs must have Level 2 as a minimum.

DSLs, Deputy DSLs and Safeguarding Committee members must have Level 3 training.

D3. HOW DELIVERED AND HOW OFTEN?

For staff and student interns, Level 1 training is delivered through online training. We currently use the online training course offered by Accreditation UK. This training must then be followed up by a Level 3 trained member of staff in a face-to-face session, either individually or as part of a group CPD session.

Level 1 training should be refreshed once a year. This can be done by retaking the online course, or by in-house training from a Level 3 qualified member of the Safeguarding Team and an online quiz to test their knowledge. In the event of a serious incident, all relevant staff will be asked to undertake refresher training.

For Homestay hosts who will be hosting U18s, the Homestay Manager, who is Level 3 trained, goes through safeguarding basics in their first inspection and again in follow-up visits. They are also all encouraged to take the online Level 1 training course. There is also information in the Homestay Guidelines for host families.

In the event of any changes to legislation, all staff will be asked to retake Level 1 training and all relevant homestays will be contacted about the changes.

The DSLs may, at their discretion, ask staff members to do a refresher course earlier than is usually required without there having been an incident or change in legislation, if they feel that someone's safeguarding knowledge is below expected levels.

Level 2 training is usually done via face-to-face training, with English UK. However, some learners have expressed a preference for online learning, in which case this can be offered too, through High Speed Training. This should be refreshed every 2 years.

Level 3 training is always done via face-to-face training sessions with English UK. This should be renewed every 2 years.

Any major changes to legislation will require Level 2 and Level 3 staff to undertake fresh training as soon as possible.

D4. CONTENT

Level 1: Must know the basic principles of safeguarding and identifying types of abuse and their possible symptoms. Should also be clear on the codes of conduct for Frances King and their role within our Safeguarding Policy. At FK we consider the minimum to be:

- Understanding Duty of Care and an adult's responsibility in safeguarding
- Knowing that the age of majority is 18 for safeguarding purposes
- Understanding the main types of abuse and recognising signs
- Knowing who to report an issue to within FK
- What to do in the event of a disclosure from a child

Level 2: Must be very clear on Level 1, and also know to respond to situations. They should know how to report an incident to appropriate bodies outside the school.

Level 3: Must know all of Level 1 & 2 very clearly, and also know how local authorities work and have good awareness of ELT-related safeguarding specifically.

D5. ENSURING UNDERSTANDING

After Level 1 training, staff are required to have a face-to-face follow-up session with a Level 3 trained member of staff. This may be done individually, in small groups or as a CPD session.

After in-house refresher training, staff must complete an online quiz to check their understanding. If the refresher course is taken online, they will also have to complete the quiz, and may be required to attend a face-to-face session as well.

D6. RECORDING TRAINING

Safeguarding information is recorded in three places:

- In the Central Register, maintained by the Finance/HR department, together with copies of certificates by any issuing bodies.
- Team Leaders keep a record of their own team's safeguarding documents, together with all their training and CPD.
- The DSL keeps a list of safeguarding training carried out by staff, which includes in-house sessions and quiz scores.
-

E: SAFER RECRUITMENT

E1. OVERVIEW

Frances King is committed to following safer recruitment procedures whenever possible, at all stages of the recruitment process. These are laid out in our Safer Recruitment Policy.

E2. RECRUITMENT MATERIALS

We strive to ensure that all prospective staff, homestays and group leaders we work with are fully aware from an early stage of our commitment to Safeguarding, and that we expect them to share our ethos and actively engage in ensuring the safety of our U18s.

We have an application form which is in line with Safer Recruitment guidelines.

We use template references, which include questions about a person's suitability to work with children.

E3. ADDRESSING SAFEGUARDING IN RECRUITMENT STAGES

For any roles where the staff member will definitely be working directly with U18s (LTP staff, Family Programme staff), this is made clear from the start of the recruitment process. For example, when contacting someone for interview the email will clearly state that it is working with Juniors.

In interviews, staff interviewing for roles on the LTP or FP will be asked about their experiences working with children, in order to gauge their attitude to juniors.

For roles in Student Services applicants will be asked about their experience safeguarding, as many Student Services roles include a safeguarding responsibility.

For all teaching roles, even those where the teachers will never have U18s in their class, applicants are told that they will be DBS checked for safeguarding purposes.

All job offers are subject to satisfactory references and DBS.

E4. INFORMING APPLICANTS ABOUT SAFEGUARDING

It should be made clear to all applicants in advance that we carry out Enhanced DBS checks, and check proof of identity and their right to work in the UK. We also should inform candidates that we require two references, which will be followed up and the references will include a question about suitability to work with U18s.

When possible, this information should be included in the job adverts, but it will also be told to candidates at interview stage, and before a DBS application is submitted we should make sure candidates know that they are applying for an Enhanced DBS and not a basic one.

Before interview, candidates could be advised to read our Safeguarding Policy on our website, so that they are clear on the application process and requirements.

If any prospective applicants express any concern regarding the need for a DBS check, the recruiter should explain the company's commitment to Safeguarding of U18s and our requirement for all staff with unsupervised access to U18s to be DBS checked. Furthermore, they should also be given a copy of our Policy on the Recruitment of Ex-Offenders, where we promise not to discriminate unfairly against anyone based on the criminal record check.

E5. DBS APPLICATIONS AND RENEWALS

Any staff members who will be working in a role that gives them unsupervised access to U18s is required to have a recent criminal record check. This includes group leaders from an ETO or university.

UK Residents

Any staff we take on who will be working unsupervised with U18s is required to have an enhanced DBS check. They will have to supply their addresses for the past 5 years for this check to be carried out. Frances King covers the cost of a DBS check and will submit the application through our umbrella body. The full reports is sent to the staff member; Frances King only receives a notification of whether there were any findings or not in the check.

UK Citizens Residing Overseas

UK Citizens who have been residing overseas will have to get a police check from any country they have been living in within the past 3 years. If this a country that does not offer police checks, then a further reference or Letter of Good Conduct is required. (See Section E9.)

Non-UK Citizens

Non-UK citizens are subject to the same conditions of employment as UK citizens, so will need a DBS if resident in the UK or a police check to cover foreign residencies.

Returning Staff

Staff members returning to work for us after a period of less than 3 months do not require any additional checks.

If a member of staff returns to work for us after an absence of more than 3 months, then we do not require a new DBS check, but we will need a reference from the most recent employer, if different from the reference given when initially recruited.

If they have resided in the UK for any period of time between their previous role at FK and their new role, then a Children's Barred List (also known as List 99) check will need to be carried out.

Accepting DBS Certificates From Other Roles

We are able to accept a DBS certificate obtained for another employer, provided:

- We must check the applicant's identity matches the details on the certificate
- We must see the original certificate
- The certificate is the right level and type for the role (Enhanced DBS with barred lists)
- If they are signed up to the Update Service, then we can check their status online and accept the certificate if the update shows "no change".
- If not signed up to the Update Service, then we can accept a certificate for a similar role dated within the last 3 months. The candidate will still need to be checked against the Children's Barred List

However, it is the preference of the school to always carry out our own DBS check. Most line managers are reluctant to accept a DBS certificate from elsewhere and will choose to run a fresh DBS check.

Renewing Checks

Unless the employee signed up to the Update Service, then a new DBS should be carried out every 3 years.

If the person did sign up to the Update Service, then an update should be run once a year by a member of the HR Team.

Homestay hosts with multiple adults on the same DBS (see Section E6) are not eligible for the Update Service.

Storing Criminal Records Checks

For Line managers need to see the original certificate for a DBS or criminal record check. However, they must not keep a copy. They should instead send an email to HR@francesking.com confirming they have seen the original certificate, and include the date of the check and the certificate number.

E6. RECRUITMENT OF HOMESTAYS

When recruiting new homestays who will be hosting U18s, we require them to complete a DBS application, which will include all adults in who live in the house.

DBS Checks are renewed every three years, or earlier if another adult moves into the home. Our homestay manager regularly checks on the make-up of the household in order to ascertain whether our homestay profiles are correct and whether a family's DBS needs to be rerun to include any extra adults.

For people with existing DBS checks from other suppliers, we will only accept these under the same conditions as described in Section E5. However, we prefer to run our own DBS before actually placing any U18s with the host.

We do not place an U18 with a new host until they have hosted an O18 and had satisfactory feedback.

We require two references for each new host, using a template which asks the referee to confirm that they know the host personally and can vouch for them being of good character. They are also asked

to confirm that they do not know any reason why the prospective hosts should work with students, including U18s.

During the interview stage our inspector goes through basic Safeguarding awareness and Prevent training with prospective hosts and invites them to do the online training as well.

E7. APPLICANTS AWAITING DBS

If a person's DBS has not come through by the time they employment is due to start, then they can only be employed if they can be supervised at all times and never left alone with an U18.

This will need to be considered on a case-by-case basis as we will have to risk assess whether an applicant can be sufficiently supervised to ensure safety of U18s. For example, a teacher who was working on our Residential Teenager Programme would not be suitable. However, a member of the Sales Team who works in an office with other team members around them and does not normally have any contact with U18s might be suitable.

Homestay hosts can never be used if a DBS has not yet been received, as it would be impossible to supervise them.

Anyone who we employ while awaiting their DBS check will have to have a separate check against the Children's Barred List (formerly known as List 99) as a minimum.

E8. APPLICANTS WITH A CRIMINAL RECORD

If an applicant's disclosure includes a criminal record, then two members of staff will work together to carry out a risk assessment, looking at:

- The nature and seriousness of the offence
- How long ago it happened
- Was it an isolated event or part of a pattern?
- Whether it is a spent conviction
- The type of post applied for, and how much contact they will have with U18s

Although spent convictions (those which can be ignored after a certain amount of time) do not usually show up on a DBS check, they do show up on an Enhanced DBS check, which is what Frances King uses, as such a person applying for a job may think past convictions won't show up. For this reason it is important that it is made clear to applicants, either in the original advert, or when the contact us for more information, or when asked to complete the DBS application form, that we will be carrying out an Enhanced DBS check.

The findings of this risk assessment will be recorded. The applicant may request a copy of this if they are rejected. The risk assessment, together with all their application documents will be deleted three months after their application is rejected. A copy of the risk assessment is kept in the person's HR file if they are employed.

Frances King reserves the right to withdraw any offer of employment or to terminate a contract if the findings of a criminal records check reveal anything that the risk assessment shows to not be suitable for employment in our school.

We never knowingly employ anyone who is on the Children's Barred List.

E9. APPLICANTS WHERE CRIMINAL CHECK IS NOT POSSIBLE

If an applicant states that they cannot get a criminal records check from their country or a country they have been living in then there are two important steps to follow:

- 1) Check the government website <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants> to see whether a criminal records check is possible in that country, or what the process is. The applicant may just be misinformed or unfamiliar with the process.

If there is an official alternative – such as a Certificate of Good Conduct, then that can be used instead of a criminal record check.

- 2) If a check genuinely isn't possible, then on top of the two usual references, you must obtain references from someone in that country, preferably from a person who saw the candidate working with U18s, and at least one of these references must be followed up with a verbal check.

If a group leader is from a country without criminal records checks, then the same steps must be followed, but the reference should be referred to as a *Letter of Good Conduct*.

E10. SINGLE CENTRAL RECORD

Details of staff employed at Frances King are recorded on a Central Register, kept and maintained by the HR Team, which includes:

- Name
- Start date
- ID evidence
- Right to work in UK
- Job Title
- Teaching qualifications
- Safeguarding qualifications and dates
- DBS check: including date and certificate number
- Police check if DBS is not available
- Barred list check
- Prohibited list check (if applicable)
- Confirmation of references

E11. PROHIBITED LIST CHECK

If a prospective or returning teacher has worked in the state sector in the UK or EEA, then we check them against the Prohibited List before their employment starts.

However, as this is only an extra precautionary check, if we have not received the results before they start, we allow them to start (provided they have passed their DBS check). It would be made clear to them that if we subsequently find that they are on the Prohibited List then they will immediately be asked to leave the premises and their employment will be terminated.

E12. CHILDCARE ACT DISCLOSURE

As we accept children under the age of 8, we ask staff, including homestay hosts who accept children under 8, to sign a disclosure form regarding situations involving looking after children which would not appear on a DBS check but would be areas of concern for us. The questions we ask are:

- Have you ever been convicted of any offence against a child?
- Have you ever had a child removed from your care by the order of any court?
- Have you ever had registration for childminding under the Children Act 1989 refused or cancelled?
- Have you ever had a prohibition imposed on you at any time?
- Have you ever been disqualified for acting as a foster?

They are then asked to confirm with a declaration: *I declare that there is no reason why I should not be considered a person suitable to work with or look after children.*

In the event of someone answering “yes”, the Safeguarding Committee will review the case and risk assess whether it would be suitable to employ the person. If not, any job offer made would be withdrawn.

E13. DISQUALIFICATION BY ASSOCIATION

For homestay hosts who accept children under 8, we also require that they confirm the same information from E13 for other adults in their household.

In the event of someone answer “yes” for a family member, we would follow the same procedure as described in E13.

F: WELFARE / IMPLEMENTING SAFEGUARDING

F1. USE OF RISK ASSESSMENTS

We employ risk assessments for any situation where we want to check that the safety and wellbeing of our students or staff are not going to be compromised.

We use risk assessments for choosing or approving accommodation, activities and buildings as routine.

For any situation where things are not already clearly defined with regards to Safeguarding, or if students want to choose options that are not the norm, we would assess the situation, considering all the possible dangers, look at what we do that would reduce these dangers and what else we could or should do to improve this. For example, when a family want their child to stay with a non-family member in London, this will be risk assessed and a decision will be made based on those results.

When using other buildings or accommodation, we may consult their risk assessments, but we would still conduct our own in-house risk assessment.

Risk assessments should be regularly reviewed, and this should be shown on the document. Any risk assessment not reviewed within the last 15 months must be redone before that event/accommodation etc can be done or used.

In the event of an incident, then risk assessments for any relevant factors (event, accommodation, building, situation etc) will be reviewed by members of the Safeguarding Team and/or Safeguarding Committee.

F2. SUPERVISION

Ratios

Whenever underage students are taken offsite, whether for an excursion or class trip, they must be supervised. Supervision ratios are determined by age.

ACTIVITY PROGRAMME EVENTS ON ADULT COURSES

For all Activity Programme events on our year-round adult courses (which may include 16-17 year olds) the staff to student ratio should not exceed 1:15

The Activity Programme Co-ordinator monitors the number of students signed up for events and books extra leaders when necessary. In the event of a number of unexpected students turning up for an event so the ratio exceed this, he would immediately attempt to find more leaders, delaying the start of the event if necessary.

ACTIVITY PROGRAMME EVENTS FOR 16-17 YEAR OLDS:

In summer we run one activity a week just for 16-17 year olds so they can get to know people of their own age and have events suitable for their age in particular. For these events we keep the ratio down to 1:10

FAMILY PROGRAMME CLASS TRIPS:

Teachers accompany their own students, and extra assistants are used to adjust ratios to meet the NSPCC guidelines:

- 6-8 year olds: 1:6
- 9-12 year olds: 1:8
- 13-16 year olds: 1:10
- Parents/guardians of 6 & 7 year olds are invited to accompany them on any class trips.

The students are required to wear hi-viz vests with Frances King printed on the back, and wear Tyvek wristband with an emergency contact number. Students are told before trips that if they get separated they are to remain where they are and if possible ask someone in uniform for help. If anyone offers to help them they should show them their wristband and ask them to call the number, and not go anywhere with anyone not from Frances King. These wristbands are difficult to remove without cutting them, so will not come off by accident. In the event of an accident where the student has become separated from the group, they would also be a form of identification that the emergency services could follow up on.

FAMILY PROGRAMME ACTIVITY PROGRAMME EVENTS:

All juniors must be accompanied by a parent/local guardian who is only responsible for their own children. If a parent wants to send their child with another parent, we require both adults to sign form acknowledging this, and for the non-parent/guardian to accept responsibility for this child. We do not encourage this, and always try to get the child's actual parent/guardian to join the event.

As there are always adults on these trips, the ratio is always extremely low.

LONDON TEENAGER PROGRAMME:

There are daily activities, many of which will be off-campus. For these we have activity leaders, all trained in first-aid. The ratio is 1:12.

Family Programme onsite Supervision

For onsite supervision, teachers on the Family Programme are not allowed to leave classes unattended. If they need to leave the room, then they contact another member of the team (assistants, centre manager, academic manager) to stay in their class while they step out.

For breaktimes the teachers remain in the breakroom with the students. If there are Over 18s studying onsite, we stagger the breaks so they don't coincide. At busy times we will have assistants or other staff members in the breakroom to assist.

When using a building shared with Over 18s, any children under 14 must be accompanied to the toilets during lesson times. Teachers and assistants monitor the children at breaktime, accompanying them to toilets if necessary and appropriate. 77GR, U18s are not allowed to use the communal toilets on the ground floor and are only allowed to use the individual cubicle toilets elsewhere in the building. This is shown with a sign on the doors and should be explained to U18 students on their first day.

Safety During Unsupervised Time

Frances King recognises that U18 students will be unsupervised at some point during their stay with us. We aim to reduce the risks for unsupervised time as much as possible through risk assessments and having policy/procedures in place for as many scenarios as we can. When new scenarios are identified, members of the Safeguarding Team request (and later approve) a risk assessment in order to determine whether action needs to be taken. Below are some of the policies/procedures we currently have in place to cover unsupervised time:

JOURNEY BETWEEN HOMESTAY AND SCHOOL:

The journey is risk assessed as part of the overall assessment for any accommodation. Students are advised of the best route and warned of any potential dangers. 16-17 year olds are allowed to travel to school unsupervised. 14-15 year olds on the Family Programme may travel unaccompanied if we have written consent from a parent/guardian. Under 14s are never allowed to travel alone.

FREE TIME DURING EXCURSIONS:

16 and 17 year olds on adult courses may be given free time during Activity Programme events or class excursions, but this must be controlled by the teacher / leader. A meeting point must be clearly arranged, and they should be given a safety briefing and told where to go/not go. The teacher/leader must have their number, and if using a company mobile, the U18 should take the teacher/leader's number as well. If not, the teacher/leader should check that the U18 has the "important numbers" saved to their phone. They should not be given more than 2 hours free time during the excursion.

Under-16s on class trips must never be left unsupervised. Older children (14+) may be allowed to move around a particular area of a museum freely, but must not leave the area and must be given specific times/places to meet up again. That meeting time must never exceed 1 hour.

Under-16s on Activity Programme events are always supervised by their parents/guardians.

For the **London Teenager Programme**, while on excursions students are given free time within specific areas and boundaries. They must stay in a minimum of pairs but are advised to stay in small

groups. A leader will agree a meeting point with the students and remain there during the allotted time and students will be expected to check in with the leader every 30 mins.

TIME BETWEEN LESSONS AND DINNER TIME:

Unaccompanied 16-17 year olds have to stay in homestays, except in exceptional circumstances which will be assessed on a case-by-case basis. They are required to have half-board as a minimum, meaning that they have to return to the homestay for dinner. For the time between the end of their lessons and dinner time they are unsupervised. On their first day they are given an Under-18 Pack, with some extra information just for them. This includes a document "What to do with your afternoons" where we list various ideas for how to spend their afternoons, in ways we have assessed as reasonably safe.

RESIDENTIAL STUDENTS:

Teenagers on our residential programme have some free time in the late afternoons each day. Under 16s are not allowed to leave the campus during this time. 16 & 17 year olds can leave campus with permission from the senior member of staff on duty (if their parents given written consent) but must sign out/in and are given guidelines and rules of where to go during this time.

CURFEWS:

All U18s in homestays are given a curfew: 22.00 on weeknights and 23.00 on Friday and Saturday. These are to be enforced by the homestay hosts. If the student breaks curfew, then the hosts are asked to let us know so that a member of the Safeguarding Team can speak to the student about this. Students' families may choose to enforce an earlier curfew, but we do not accept requests from families to extend curfews.

Residential students on the LTP must be on their floors by 22.00, in their own rooms at 22.30 and have their lights out by 23.00. Floors are checked by on duty floor officers.

WEEKENDS:

Unaccompanied U18s are not directly supervised by Frances King during the weekend and on public holidays. We require our homestay hosts to be vigilant and supportive for this time, and to intervene if they feel it is necessary. We also ask them to report to us any behaviour they feel could be dangerous to the child's wellbeing.

Parental consent forms for unaccompanied minors make it clear to what degree their child will be supervised while studying with us.

F3. WELFARE PROVISION

A member of the Safeguarding Team meets all 16- & 17-year-olds in their first week, to check they are ok, talk to them about how they are settling in, and to check their knowledge of the rules they must follow. All students are asked:

- What age do you have to be to buy alcohol or tobacco in the UK?
- What time do you have to be back at your accommodation every night?
- What is your host's/guardian's phone number?
- What number should you telephone in an emergency if you need the police or an ambulance?

We also use this time to reassure the U18 that they can come to the Student Services office at any time for support, and to explain how we will be checking their attendance every day and will be in contact with them if they are absent or late. We check their phone is working OK, and that they have the 3 important numbers saved (FK emergency number, student services, activity programme co-ordinator). We offer them a UK sim card if they don't have one, and at times have also supplied them with a handset to use during their stay.

For female students we also advise them during this meeting that if they are ever in need of sanitary products during their time with us, they can come to Student Services where we keep an emergency supply.

In July, our busiest time for unaccompanied U18s on adult courses, we hold special activity programme events just for 16- & 17-year-olds, so that they can get to know each other.

We also hold regular catch-up meetings with all 16-17 year olds so that they can get to know other members of staff, voice any issues they have and meet other U18s in the school. When we have multiple U18s we host these as group sessions and try to throw in some learning activities to break the ice and give the session a clearer purpose. When there is only one or two of them in the school, then the sessions are usually just a quick informal catch-up with a member of the Safeguarding Team.

When there are only one or two students under the age of 18 in the school, we will normally judge on a case-by-case basis how often these meetings are held, depending on how independent the student is: their level of English, how mature they are, how well they know London and whether they are staying with family in London all contribute to how independent we judge the student to be.

F4. DEALING WITH WELFARE CONCERNS

This section covers how we deal with welfare concerns for unaccompanied U18s on our adult courses.

For accompanied U18s on the Family Programme, primary welfare care will be given by the family member responsible for the child. However, we will always support any child with welfare concerns regardless of whether they are unaccompanied or not.

Absence Or Lateness

Homestay hosts are expected to let Student Services know if an U18 student in their care is sick and/or going to miss school. When this happens we will liaise with the homestay host regarding the student's health.

At 09:15 (14:00 for afternoon students), an assistant or member of the Student Services team checks that every U18 on an adult course is in class. We have a register which lists all U18s and which room they are in for this specific purpose.

If any student is absent, they will be contacted by a member of Student Services to try to locate them. First we will send a Whatsapp, as this service allows us to see if a message has been received/read. If the student does not have Whatsapp, then we use a text message.

If the student replies that they are on their way or late, we request an ETA so we can check again that they have arrived.

If the student replies that they are not coming to school because they are ill, we will ask them what is wrong, and a member of the Welfare Team will advise them if necessary. We will also contact the Homestay Host to confirm that they know the student is sick (and check the student is telling the truth). We then remind the host family that they are supposed to let us know when a student is going to miss school.

If there is any cause to doubt the veracity of the student's message or whether it was the student who sent it, then we will also call the student to speak to them. If we are concerned that it is not the student we will ask questions from the personal information we have on record (DOB, parent's name etc). If we believe it is not the student on the phone we will immediately contact the police, homestay and the student's emergency contact.

If we do not receive a reply to the first text message within 15 minutes we then call them to find out where they are. If they do not answer then we continue to call them and from 09:45 (14:30 for afternoon students) we also call their homestay host until we get through to one or the other. If we have not been able to speak to either the student or the host by 10:15 (15:00 for afternoon students) we then attempt to contact the student's emergency contact as well until we are able to speak to someone and ascertain the whereabouts and wellbeing of the child.

Repeated Absenteeism

If an U18 is often absent, the Student Services team will have contacted them every day to find out why. When they are concerned about the level of absenteeism, we will arrange to meet the student to discuss their absenteeism and try to find out the cause. If appropriate we will ask their teachers for any input about how they are coping in class. We would aim to encourage the child to attend more, and remind them that if they have less than 80% attendance they won't get their end of course certificate. The homestay manager will discuss their behaviour with the homestay family.

If the absenteeism continues without improvement, then we will contact the child's parent/guardian or ETO. In the event of absenteeism continuing beyond two meetings with the Welfare Team, the school will issue official warnings, which may result in their exclusion from the school. The parents/guardians will be informed of all official warnings and the consequences of their continued absenteeism.

People to be informed: homestay hosts, parents/guardians

Sickness

If students are ill during their stay with one of our homestay hosts, we liaise with the student and the host to see how they are and to offer any support we can. If necessary we will also liaise with the student's parents/guardians and ETO.

If an U18 is ill while staying with a family member, we would expect the family member to assume the responsibilities of a parent when it comes to caring for a sick child; however, we would still liaise with both the student and family member to see they need any assistance or advice on healthcare in the UK.

If the student is taken ill while at school, then a member of staff with first-aid training – preferably a member of the Welfare Team – will assist the student, as per the First Aid Policy. For accompanied minors on the Family Programme we will contact the family member and ask them to collect the student early. For U18s on the adult programme we will contact the homestay or family member they are staying with. If appropriate, a DBS-checked member of staff will accompany the U18 home.

See Section F8 for more detailed information about Medical and First Aid aspects of Safeguarding.

People to be informed: student services officers, teachers, homestay hosts, parents/guardians, ETO

Homesickness / Isolation

Our most frequent area of concern for an unaccompanied U18 is that they will suffer culture shock, homesickness or won't make any friends. We try to pick up on this in our catch-up sessions with them, and will talk to their teachers and homestay families to see if this is the case.

In these situations the Safeguarding Team will usually try to find ways to support the student in fitting in and making more friends, encouraging them to join the Activity Programme, trying to pair them up with other U18s or getting their teachers to pair them with the friendliest people in class during activities.

People to be informed: class teachers, student services officers, homestay hosts, parents/guardians if the problem is severe and not improving.

Frequent Lateness

Lateness will be picked up on by our daily checks, which are carried out at 9.15 for morning classes and by 2.00pm for afternoon classes. For persistent offenders, a member of the Safeguarding Team will meet with the student to discuss the issue and go over why it is a problem. The homestay manager will check with the host family if the student is sleeping well, staying out late, getting up ok in the mornings etc. If the problem persists after 2 warnings, then we will involve their parent/guardian or ETO.

People to be informed: homestay hosts, parents/guardians (after 2 warnings)

Drinking Etc

If we suspect that an U18 has been drinking, going out a lot, taking drugs or otherwise behaving in a reckless way, two members of the Safeguarding Team, usually one from Student Services and one from the Academic team, will meet with the student, having first talked to their teachers and host family for feedback on how it is affecting them in class and at home. We will warn them of the dangers of their behaviour, contact their family and give them an official warning that if their behaviour doesn't improve they will be excluded from the school. In the event of drugs or other illegal activity being involved, we will contact the student's family as soon as we become aware of the issue.

People to be informed: teachers, student services, homestay hosts, parents/guardians

F5. MISSING STUDENTS

U18s On Adult Courses

As explained in Section F4, we have a weekly register of U18s in our adult classes. Each morning a member of staff goes to each classroom to check if each U18 student is there by 09.15 (14.00 for afternoon classes). If the student is not present this is reported to Student Services as soon as the check is complete. Student Services then attempts to contact the student by phone to see if they are ok. If we have not been able to establish contact with the student by 09.45 (14.30 for afternoon students) we contact the homestay host (if the student is in Frances King accommodation) or the parent/guardian (if the student is staying with their family). If we are unable to get a response from these people, we then attempt to contact the emergency contact for the student.

U18s On Family Programme Courses

All teachers report any missing students via text message to the Centre Manager (or in their absence the Academic Manager) at 09.15. The Centre Manager then attempts to contact the student's London emergency contact to establish where they are. If they cannot be found, then the home country emergency contact is called.

If the student is aged 14-16 and has permission to come to school on their own, then our concern is higher, as they may have got lost or something may have happened to them on their way to the

school alone. For those under 14 (or over 14 but without permission to travel alone) then they are much more likely to be with their London guardian so are at lower risk level.

For students absent from afternoon activities as part of the Family Junior Day School programme, the leaders must first establish whether the student was absent in the morning class (in which case it will have been dealt with or investigated already). If the student was present in the morning but absent in the afternoon, then the leader must inform the Centre Manager immediately, who will attempt to locate the student through normal methods.

London Teenager Programme

FOR RESIDENTIAL STUDENTS:

Students woken up by a night duty leader at 07:30 with the leader waiting for verbal response that student is awake. If the student does not respond, the leader continues to knock until they get a response. In the event of no response after 5 minutes, then the leader will contact the senior member of staff on duty and ask them to phone the student. In our experience, this has always turned out to be a student who is a particularly heavy sleeper or one who has headphones on. In both the phone ringing/vibrating of a phone can get through to them. However, if the student does not answer, then the person calling them will immediately find a member of the security team to open the door. Meanwhile, the leader will continue with the check for the rest of the floor, while the senior member of staff will head to the student's room to be present when the security guard opens the room.

All students are required to attend breakfast in the residence. If a student is feeling unwell they are asked to come to the canteen and speak to a member of staff so that a record can be made of sickness and teacher informed. If a student does not attend breakfast, then a member of staff must go to their room to check on them.

Any student who remains in their room due to illness or personal problem is checked on every hour by a member of staff.

FOR DAY STUDENTS:

Day students are required to sign in and out in to Reception every day.

If a day student does not attend their guardian in London is contacted.

ALL STUDENTS:

Students' presence is checked several times a day, through class registers and activity/trip registers. Any missing students are immediately reported to senior staff on duty and a search is made for them. If they cannot be found their emergency contacts will be called.

F6. EMERGENCY CONTACT DETAILS

As per KCSiE 18, we require two emergency contacts for students under the age of 18.

One should be the person responsible for them in their London accommodation, and the other should be a contact in their home country, or if appropriate a second family member in the UK.

For residential students on the LTP, there may not be an emergency contact in the UK, as the student is here alone. If so, we take two emergency contacts in their home country.

This information is kept on the student's record in Gnosis and on safely stored print-outs for quick reference.

F7. ACCOMMODATION

All under-18s are required to stay either in a homestay accommodation arranged by Frances King, with a DBS-checked family, or with a family member, who the child's parent/legal guardian has delegated as responsible guardian in the UK.

Apart from our own host families, we *usually* do not allow under-18s to stay with non-family members as their guardians, except as part of an organised group, where the Group Leader has been vetted and has accepted guardianship from the parents. In such circumstances we only allow them to stay in accommodation that Frances King has inspected and approved. If the ETO has arranged their own accommodation, then this must be part of a course-only booking with Frances King, where we do not accept any responsibility for the students outside of class time.

Exceptionally, we may agree to a parent/legal guardian's request to allow a student to stay with a close family friend in the UK who is not a family member. Bookings such as these will be considered on a case-by-case basis and only approved subject to a risk assessment carried out by a member of the Safeguarding Team. The parent/legal guardian will have to sign a Parental Consent form arranging for this person to act as local guardian for the child, and the local guardian will have to sign a counterpart of the same form, acknowledging and accepting their responsibility. See Section F14 for more details about Parental Consent forms.

U18s are not allowed to stay out overnight or go away for the weekend without explicit written permission from their parent/guardian for each trip. On such occasions we require details of the trip in advance (where are they staying, with whom and contact information) and Frances King may refuse to allow the student to go on a weekend trip if we feel it is not safe.

F8. FIRST AID & MEDICAL

Medical Consent

For any U18s we require parental consent to administer first aid. We obtain this through the parental consent form. For U18s on the Family Programme we specify this again on the personal details form, which the Centre Manager keeps a copy of on file in order to check.

For unaccompanied U18s, we require written consent from the parent/legal guardian for Frances King to authorise emergency medical treatment.

In the pre-arrival parental consent form, and for juniors on the Family programme again on their personal details form, we request details of all medication any U18s have to take.

Frances King has a high proportion of staff trained in first aid. All first aiders are also DBS checked.

First aiders are encouraged to always have a second member of staff with them when they assist an U18 in need of medical assistance. If this is not possible, or if trying to find a second member of staff would delay treatment, then the medical safety of the child must be put first, and the first aider will treat the child without a second person present.

As part of their initial meeting with a member of the Welfare Team, U18 students are told to come to Student Services if they have any medical concerns. We also check that they know the number to call for emergency services.

MEDICATION

With the exception of U18 residential students, staff cannot give medication to any students.

For residential students on the London Teenager Programme we ask written consent to confirm if students can be given aspirin / paracetamol / ibuprofen in the medical information and consent section of the parental consent forms.

For under-18s, we ask parental consent to give over-the-counter medication, as students may not be allowed to buy the medication themselves, or may need assistance/advice when buying. However, staff should not *supply* any medication to under-18s who are not residential students.

Staff are legally allowed to assist students in the administration of certain life-saving medications, such as Epi-pens. These exceptions are explained in detail in the First Aid Policy.

F9. U18 BEHAVIOUR & DISCIPLINE

We have a School Charter in every classroom, showing how we expect our students to behave.

Staff are expected to set good examples and to both show and encourage good behaviour.

When U18 students in particular misbehave staff are expected to confront them on their poor behaviour and to take time to explain why it is a problem and how they should behave better. This should be done in response to any incident, but will also be done in regular tutorials and catch-up meetings.

For minor breaches that warrant more serious action, we employ an official warnings system (1 verbal, 1 final written warning and then exclusion on the third infraction).

On the residential teenager programme the withdrawal of treats and privileges is also used to discourage bad behaviour. Students may lose the right to leave campus (16 & 17 year olds), may not be allowed on particular trips or may have a classroom detention while other students have free time on campus.

F10. FIRE SAFETY

Standard Evacuation Drills (Ages 16-17, 18+)

Fire evacuation drills are held a minimum of twice a year in the 77GR building, more usually this will be 4 times a year. The results of the drill are recorded in the fire safety log. In the event of a poor evacuation the H&S officer will go through fire safety procedures with staff, which teachers will then report back to students, pitching language appropriately for age / level. If necessary, teachers are encouraged to escort their students through the evacuation route and assembly process. A second drill will be held within 4 weeks of a poor drill to ensure that matters have improved. It is the responsibility of the H&S officer to arrange the second drill. If the H&S officer decides to make changes to the existing Fire Safety Plan, this information must be passed on to the Safeguarding Committee, in case these changes requires an update in this policy.

All students are given an overview of the evacuation routes and assembly point during the induction. This information is also displayed on Fire Action signs in every classroom. Teachers have a copy of the fire action instructions in their registers.

Residential Courses (Ages 12-17)

On residential courses, students will all be told in their welcome meeting about the Fire Action plan, including location of escape routes and assembly points. These instructions will be repeated at floor meetings. In co-ordination with the building management, a fire evacuation drill is held at least once during the course, to be held during study hours, so as to ensure day students are trained as well as residential students. The Centre Manager may decide to hold a second drill if results are concerning, and may also choose to run a drill during non-study hours. If the building management are not willing to run a drill (due to other residents' objections), then the Centre Manager will conduct a "silent drill", when staff are given a signal by text message to evacuate the building, and normal steps are followed, without the sound of a fire alarm.

Family Programme (Ages 6-16)

During the summer Family Programme course, held at 5GG, there will be at least 1 fire evacuation drill. The results of this drill will be reported to the H&S officer for 5GG, and shared with the H&S Officer for the main school, 77GR, in order to assess whether changes need to be made to the evacuation plan for the Family Programme. Any changes the H&S Officers make must be fed back to the Safeguarding Committee, in order to update this policy.

When the Family Programme is held in the main school at 77GR, teachers on the FP will be warned if there is an evacuation drill. Junior students follow the same evacuation as the rest of the school, but will gather slightly back from the corner assembly point, and keep as close to the buildings as possible, to avoid any danger of going into the road.

In the event of an evacuation, planned or otherwise, taking place while U16s are in attendance, then members of the Family Programme Admin Team (FP Academic Manager, Assistants or Student Services Officers) will accompany the youngest classes to offer a higher staff:student ratio for better safety.

The Fire Marshal will be checking that all classes are out safely, but the Head of Family Programmes will also check with each teacher separately to ask them to confirm that every child is out of the building, and will relay this information to the Fire Marshal.

In the event that a teacher with responsibility for U16s is also a Floor Fire Officer, and therefore the last out of the building, they will delegate their responsibility for their students to another teacher by giving their register to the teacher in the room next to them, who will assume responsibility for corralling the students from this class and checking they are safely out of the building (and confirming this to the Head of Family Programmes) as well as their own students. Alternatively, if an Assistant or member of the Admin Team is on the floor, the teacher/Floor Fire Officer can instead hand over their Floor Fire Officer responsibility to them by handing over their Hi Vis Fire Officer jacket. They should do whichever option is first available to them, in order to minimise any delay. As a rule of thumb: a teacher responsible for U16s cannot hold both a high-viz Fire Officer jacket AND their register during an evacuation – they must delegate one of these responsibilities by handing over the item to another member of staff.

One-To-One Classes

With any U18s in a private class, the teacher is responsible for escorting the student off the premises during an evacuation and waiting with them while at the assembly point.

With 5- and 6-year-olds, the teacher should attempt to bring the parent/guardian with them during the evacuation – the parent should be waiting outside the classroom. However, if the parent/guardian is not immediately visible, the teacher should not look for them, and should proceed to evacuate without delay, and wait with the student outside. The student will probably be upset due to the noise and crowd, so the teacher should attempt to find the parent/guardian once at the assembly point.

Teachers with under-16 students in a private class should never be Floor Fire Officer. Fortunately, one-to-one classes are not normally scheduled in any of the rooms allocated FFO responsibility, so this is an unlikely scenario, but must be borne in mind by those responsible for allocating classrooms.

Annexe Buildings

When an annexe building, such as 126QG, is used for more than 2 weeks, an evacuation drill should be held. In the event of an annexe building being used for less than two weeks, the students will be instructed in the Fire Action plan, including all escape routes and assembly points during their

induction on their first day in that building, but it is not necessary to hold a drill, unless the Centre Manager has any concerns about the behaviour of students being an issue or the evacuation being particularly difficult (if the building has a confusing layout). It is the Centre Manager's responsibility to ensure that this information is given clearly to all students and to check that it is understood.

F11. AIRPORT TRANSFERS

Airport Transfer Requirements For Under-18s

As explained in Section B9, we require all unaccompanied U18s to book an airport transfer with Frances King.

We only use a reputable firm, which guarantees all their drivers are licenced, insured and DBS checked. We have been working with this firm for many years and work closely with the owner himself.

Exceptions To Airport Transfer Requirement

Exceptions may be made if parents have arranged their own transfer – eg with a family friend who lives in London. For these situations we would require all the details of the arrangement and then agree/disagree to the exception on a case-by-case basis, after a risk assessment by a Level 3 trained member of staff. A record of this will be recorded on the students notes in Gnosis.

Waiting At Airports

Under-16s will be accompanied by a member of staff from the LTP for both arrival and departure.

For departures the staff member will stay at the airport until they have had confirmation that the flight has departed safely. In the event of delays, the staff member must stay and inform the Centre Manager. If flights are cancelled or students are returned to the airport terminal, the staff member will liaise with airport staff until a satisfactory conclusion is reached, staying in contact with the Centre Manager and / or the Emergency Phone operator throughout.

All drivers wait for up to two hours as standard. However, if an under-18 student's arrival is delayed beyond this point, we will ensure there is someone to meet them, even if it means sending a different member of staff or arranging for a new driver, if the first one sent has previous commitments which means they have to leave the airport.

Documentation

Before coming to the UK, unaccompanied minors are issued with a letter to carry with them giving them permission from their parent / legal guardian to travel alone to the UK.

F12. E-SAFETY

Frances King offers free-to-use wifi throughout our buildings in 77GR and 5GG. The SSID given to students is blocked for adult content, so U18s will not be able to access inappropriate content while in our buildings. The wifi in our other centres is controlled by those centres, but we also request that these are blocked appropriately.

Students are required to confirm they will follow e-safety guidelines by approving a splash page when they first connect the student wifi. They will have to re-confirm this once a week.

We ask homestay families to also enable the filter on their wifi to ensure that U18s cannot access restricted sites.

Under-18s are asked to sign a Safe Use agreement at their initial meeting.

In the Under-18 handbook there is a section with advice on IT, which gives the following guidelines for students:

- Do not share your usernames or passwords with anyone nor use anyone's usernames or passwords
- Do not share any personal information (e.g. contact details) about yourself or anyone else online
- Do not meet anyone in real life who you have met online
- Report immediately to a member of staff or your homestay host if you receive any inappropriate message that makes you feel upset or unhappy
- Do not access, share or store any illegal or inappropriate material (gambling, pornography, unpaid music/films, violent or extremist material etc)
- Do not share on the internet or social media any picture of anyone without their consent
- Be polite online. Do not use unkind, angry or bad language

F13. RADICALISATION & EXTREMISM PREVENT

We have a Prevent Policy in place to encourage tolerance and minimise the risk of extremism and radicalisation. This includes staff undertaking Prevent training, anti-extremism posters around the school and the 4 Core Values featuring in many of our Policies. Teachers encourage tolerance in class and will always try to intervene if students express views that contravene the 4 Core British Values of:

- 1) Democracy
- 2) Rule of law
- 3) Individual liberty
- 4) Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith.

We have male and female prayer rooms available, as reports suggest it is safer for students to pray on site than to go to mosques that they do not know, where they could be exposed to radicalisation.

In the event of staff or host families becoming concerned about a student possibly being radicalised or expressing extremism views, the Prevent Lead should be informed, who will take or advise the staff member of appropriate steps.

F14. PARENTAL CONSENT

Any under-18 studying on a Frances King programme is required to have permission from their parents or legal guardians in order to join a course. We use four different Parental Consent forms, depending on which programme they are studying on.

For U18s On Adult Programmes

For unaccompanied 16-17 year olds coming to study on our adult courses, we require their parents or legal guardians to complete a detailed parental consent form included in the document *Advice about Students Aged 16 & 17 at Frances King Adult Schools*. This form includes details of two guardians / emergency contacts, it also covers permissions and medical questions

They parent can give/refuse permission for their child to be given over-the-counter medication and for Frances King staff to sign medical consent forms on their behalf in the event of a medical emergency.

They are asked to give details of any learning difficulties, serious illnesses, allergies, behavioural problems. They are asked if their child requires regular medical treatment or takes regular medication. They are also asked to give details of their child's most recent tetanus injection. Finally they are asked if there is any other information we should know to ensure the health and well-being of their child, and are assured that the information will be treated as confidential.

For Students Aged 16 And Under On Family Programme Courses

Accompanied minors joining our family programme will be staying with a family member, or in exceptional circumstances may be with a close family friend (risk assessed on a case-by-case basis). Regardless of who they are staying with in the UK, parents/legal guardians are sent a copy of the document *London Family Programme Welcome Information*, which gives them information about the courses, and includes the Parental Consent form they must sign before joining their classes. The Parental Consent form includes the student's personal details and two emergency contacts.

They can also give/refuse permission for their child to be given basic medical help / first aid, to go on supervised class trips during lesson time, and photography permissions.

For children aged 14 or over the parent can also consent for the child to travel to/from school alone.

They are also asked whether the child has asthma, epilepsy, allergies, or any other medical condition we should know about. They are also asked if the child is taking any medication.

Students On The London Teenager Programme

Residential students (unaccompanied minors) and day students (accompanied minors) range in age from 12 to 17. As well as the child's personal details and two guardians/emergency contacts, the enrolment form includes parental consent questions:

They must give/refuse permission for their child to be given over-the-counter medication and for Frances King staff to sign medical consent forms on their behalf in the event of a medical emergency.

They are asked for medical information as follows:

- European Health Insurance Card number (for EU citizens)
- Any medication they will bring with them which they take regularly
- Other medication they will bring
- Any serious illnesses, allergies or behavioural problems (examples given)
- Food allergies
- Any other information we should know to ensure the health and wellbeing of their child

Students are parents are sent a copy of the *LTP Manual for Parents & Students*, which includes information on the course, accommodation, rules and advice. The misconduct/exclusion policy is also included in here, which is very important as we may have to expel students who are a danger to themselves or others, and in such cases they will have to return home or be collected by a family member / local guardian immediately.

Under-18s On Group Bookings

Parents / legal guardians of students coming as part of a group with an ETO and group leader must also complete the *Parental Consent and Medical Form (under 18 years)*.

In this form the parent gives permission for their child to travel under the full supervision of the group leader (named in the document) during specific dates stated. It also asks for 2 emergency contacts.

They also give/refuse permission for their child to be given over-the-counter medication and for Frances King staff to sign medical consent forms on their behalf in the event of a medical emergency.

They are asked to give details of any learning difficulties, illnesses, allergies, behavioural problems, and medication. They are also asked to give details of their child's most recent tetanus injection.

F15. PRIVATE FOSTERING

Private fostering occurs when an U16 stays with a family who is not their immediate family for more than 27 nights. This also applies to U18s if the child is disabled.

For private fostering situations, this must be reported to the local authority social care department at least 6 weeks before the arrangement begins.

FK's Policies Regarding Private Fostering

Frances King does not allow U16s in homestay accommodation without a parent or guardian staying with them, so this issue does not apply to homestays. In the exceptional cases where an U16 is staying with a non-family member, the length of stay will be part of the risk assessment carried out, and if the student intends to stay for longer than 27 nights we will not approve that booking.

Frances King has a policy that no student under the age of 16 can stay on our residential courses for more than 27 nights. The bookings department is fully aware of this rule and adheres to it rigidly.

If an U18 declares a disability at the time of booking, the same rule is applied. If a disability is not declared, and is only discovered after arrival with an U18 who has a booking exceeding 27 nights, then Frances King will work with the family to make alternative arrangements, either curtailing the student's course or moving them to an alternative accommodation under parental supervision for the excessive part of their course.

F16. CORPORAL PUNISHMENT

Corporal punishment is never to be used or threatened by any staff, regardless of the student's age.

Use of or threat of use of corporal punishment will be considered gross misconduct.

F17 GDPR & SAFEGUARDING

As per paragraph 75 in KCSIE (2018), Frances King acknowledges that The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Updated: August 2019

By: Kelly Harding, Designated Safeguarding Lead.

APPENDICES**APPENDIX 1: LOCAL AUTHORITY CONTACT DETAILS****Kensington (For 77GR And 126QG)**

Kensington and Chelsea Duty Line – Tel: 020 7361 3013 (Out of hours – 020 7361 3013)

For case consultations or Local Authority Designated Officer referrals, please contact the following:

Sarah Stalker (CSE Lead)

Family Support and Child Protection Adviser (Monday/Tuesday and Wednesday only)

Telephone: 020 7598 4640

Mobile: 07971 322 482

Email: sarah.stalker@rbkc.gov.uk

Rupinder Virdee

Family Support and Child Protection Adviser

Mobile: 07989 155 271

Email: rupinder.virdee@rbkc.gov.uk

Angela Clayton

Family Support and Child Protection Adviser (Wednesday to Friday)

Mobile: 07807 159 907

Email: angela.clayton@rbkc.gov.uk

Sarah Mangold

Tri-borough Safeguarding Practice Lead

Mobile: 07984 016 841

Email: sarah.mangold@rbkc.gov.uk

For LADO consultations and referrals please contact the duty Child Protection Adviser on:

Telephone: 020 7361 3013

Email: KCLADO.Enquiries@rbkc.gov.uk

If you cannot reach a duty CP Adviser you can contact:

Kembra Healy

Safer Organisation Manager and Local Authority Designated Officer (LADO)

Telephone: 07522 217 314

Email: kembra.healy@rbkc.gov.uk

Westminster (For 5GG)

To report a concern about a child or young person in Westminster please contact:

Westminster Access Team – Tel: 020 7641 4000 (Out of hours – 020 7641 6000)

Email: AccesstoChildrensServices@westminster.gov.uk

For case consultations or follow-up enquiries please contact the **Duty Child Protection Adviser** in the first instance on 020 7641 7668.

Leonie Bingham

Child Protection Adviser

Telephone: 020 7641 4199

Email: lbingham@westminster.gov.uk

John Griffin

Child Protection Adviser

Telephone: 020 7641 1615

Email: jgriffin@westminster.gov.uk**Prabha Vashee**

Child Protection Adviser

Telephone: 020 7641 4003

Email: pvashee@westminster.gov.uk**For LADO consultations and referrals please contact the duty Child Protection Adviser on:**

Telephone: 020 7641 7668

Email: LADO@westminster.gov.uk**Wandsworth (For LTP-W)**

Telephone: 020 8871 6622

Out of hours: 020 8871 6000

Email: MASH@wandsworth.gov.ukSecure Email: MASH.Duty@Wandsworth.cjsm.net**All London Local Authorities**Contacts for all London boroughs can be found on the London Safeguarding Children's Board website: <https://www.londonscb.gov.uk/contacts/safeguarding-contacts/>**APPENDIX 2: CONTACTING FK DESIGNATED SAFEGUARDING PEOPLE**

(DSLs are highlighted in bold)

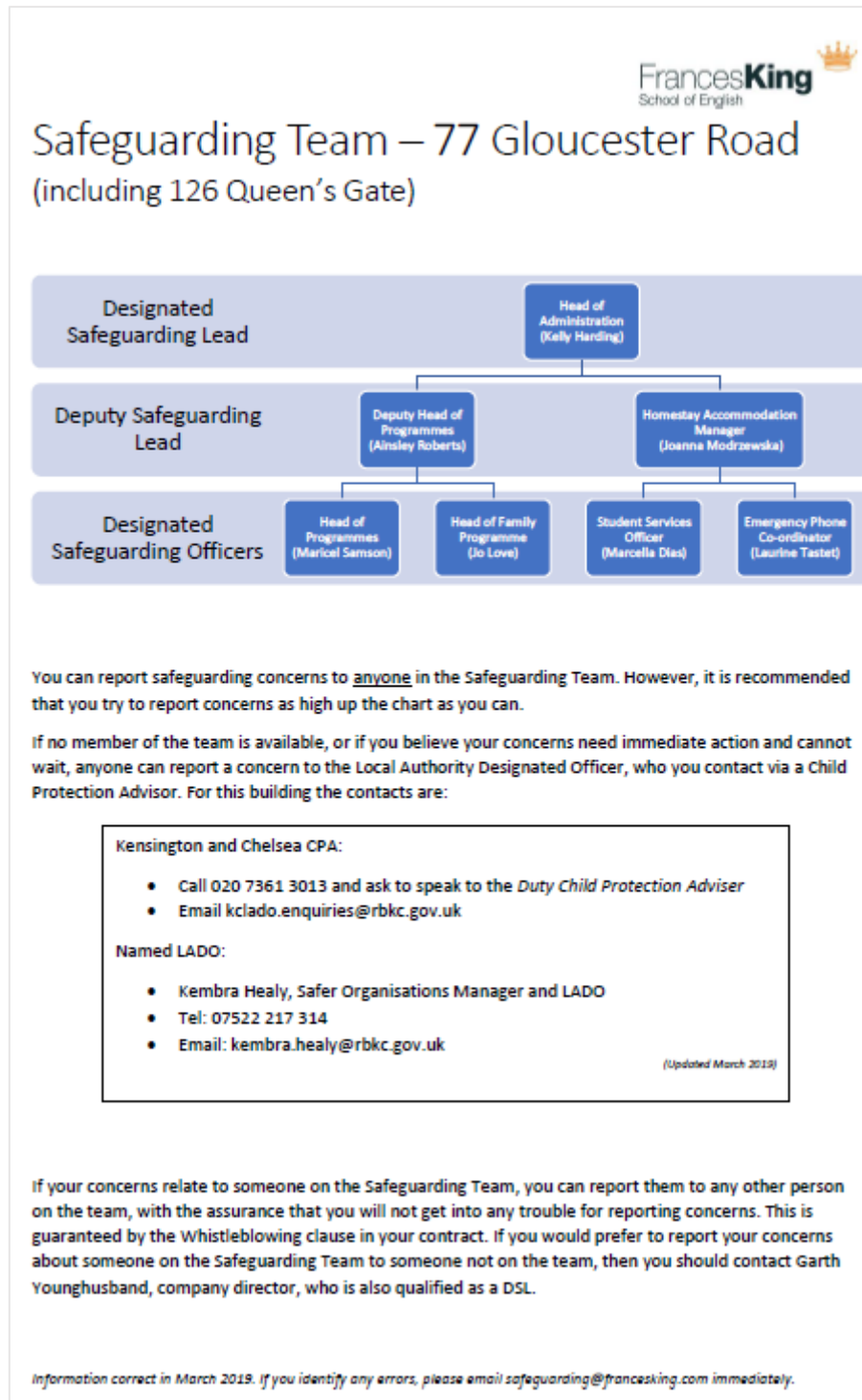
- Ainsley Roberts:
Email: ainsley.roberts@francesking.com
Phone: 07584 682 613
- Garth Younghusband:
Email: garth.younghusband@francesking.com
Phone: 07768 791 666
- **Gavin Hards:**
Email: gavin.hards@francesking.com
Phone: 07583 117 538 (LTP Emergency Phone)
- Isobel Turner:
Email: Isobel.turner@francesking.com
Phone: 07500 560 627 (LTP Emergency Phone)
- **Jo Love:**
Email: jo.love@francesking.com
Phone: 07584 683 784
- Joana Dorobantu:
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Phone: 07583 117 538 (LTP Emergency Phone)
- Joanna Modrzewska:
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- **Kelly Harding:**
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- Laurine Tastet:
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Phone: 07768 325391 (Emergency Phone)
- Maz Aghili:
Email: maz.aghili@francesking.com
- Maricel Samson:
Email: maricel.samson@francesking.com
Phone: 07903 946 960
- Isobel Turner:
Email: Isobel.turner@francesking.com
Phone: 07583 816 646

Centre	Role	Internal Role	Person	Min. Training Required	Current Level
77GR	DSL	Head of Administration	Kelly Harding	Level 3	Level 3
	D-DSL	Deputy Head of Programmes	Ainsley Roberts	Level 3	Level 3
	D-DSL	Homestay Accommodation Manager	Joanna Modrzewska	Level 3	Level 3
	DSO	Emergency Phone Co-ordinator	Laurine Tastet	Level 2	Level 3
	DSO	Head of Programmes	Maricel Samson	Level 2	Level 3
	DSO	Activity Programme Co-ordinator	Isobel Turner	Level 2	Level 3
5GG	DSL	Head of Family Programme	Jo Love	Level 3	Level 3
	D-DSL	Academic Manager	Appointed Annually (2019: Maz Aghili)	Level 3	Level 3
LTP-W	DSL	Centre Manager	Gavin Hards	Level 3	Level 3
	D-DSL	Activities Manager	Appointed Annually (2019: Isobel Turner)	Level 3	Level 3
	DSO	Academic Manager	Appointed Annually (2019: Joana Dorobantu)	Level 2	n/a
Board	DSO	Director	Garth Younghusband	Level 3	Level 3

APPENDIX 3: SAFEGUARDING TEAM SIGNS FOR STAFF REFERENCE

Example Safeguarding Team sign, to be displayed in offices and staffrooms:



APPENDIX 4: SAFEGUARDING RECORDING FORM

Safeguarding Recording Form

To be completed in the event of any safeguarding concerns or issues involving a student, or member of staff intern under the age of 18.

The member of staff who raises the concern or receives a declaration from an U18 should complete the sections in **bold**. Other fields can be completed by the Safeguarding Team.

Date	
DETAILS OF U18	
Full Name	
ST number	
Gender	
DOB	
Nationality	
Group/ETO/Direct	
PERSON NOTING CONCERN	
Name	
Role at FK	
CONCERN RAISED	
Date & Time concern noted	
Details of Concern	
<p><i>Please provide as much detail as possible, using extra pages if necessary.</i></p> <p><i>Please date, number and initial any extra pages.</i></p> <p>If reporting a disclosure from a student, describe as verbatim as possible the conversation.</p> <p>If the conversation was not in English, please write it in the original language and then add a translation.</p>	
Signed	

RESPONSE TO CONCERN

This section is to be completed by a member of the Safeguarding Team.

Do parents / group leader / ETO / homestay / other need to be informed?

Response & Follow up	By whom	When

Follow-up: Changes to Implement

Are there any changes to FK Policy or procedures to be considered as a consequence of this concern/incident?

Suggested change	ST Conclusion

APPENDIX 5: TABLE OF PERMISSIONS AND RESTRICTIONS

Below is a table illustrating the permissions we give to children of different ages studying with us, and the restrictions we apply to them as well.

AGE		5	6	7	8	9	10	11	12	13	14	15	16	17	18	
Permissions	Can join Family Programme	x	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	x	x	
	Can join LTP	x	x	x	x	x	x	x	✓	✓	✓	✓	✓	✓	x	
	Can join Adult Programme	x	x	x	x	x	x	x	x	x	x	x	✓	✓	✓	
	Can travel to school alone (with parental consent U16)	x	x	x	x	x	x	x	x	x	✓	✓	✓	✓	✓	
	Can leave campus (on LTP) with appropriate permissions	n/a	n/a	n/a	n/a	n/a	n/a	n/a	x	x	x	x	✓	✓	n/a	
	Can take private classes	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Restrictions	Must have guardian on premises	✓	✓	x	x	x	x	x	x	x	x	x	x	x	x	
	Must have suitable airport transfer if unaccompanied	n/a	n/a	n/a	n/a	n/a	n/a	n/a	✓	✓	✓	✓	✓	✓	x	
	Must have FK staff member on airport transfer	n/a	n/a	n/a	n/a	n/a	n/a	n/a	✓	✓	✓	✓	x	x	x	
	Door must remain open during 1-1 classes	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	x
	Supervision ratio on Family Programme class trips	1:1	1:6	1:6	1:6	1:8	1:8	1:8	1:8	1:10	1:10	1:10	1:10	1:10	n/a	n/a
	Curfews apply in residences or homestays	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	✓	✓	✓	✓	✓	✓	x

APPENDIX 6: FURTHER READING

Some suggested reading for further information on Safeguarding and Child Protection in the UK:

- Working Together To Safeguard Children Gov.uk [PDF](#)
- Every Child Matters 2004 [PDF](#)
- What To Do If You're Worried A Child Is Being Abuse: Advice For Practitioners [PDF](#)
- NSPCC Guidance [PDF](#)
- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers [PDF](#)