



SKOLA Safeguarding Policy 2023

Safeguarding is the action to promote the welfare of children and protect them from harm.

Safeguarding means:

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It protects individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures. This details how to respond to concerns about a child. (NSPCC)

Written by

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Principal SKOLA English in London

Signed off by

Ben Toettcher, Jan 2023

Director SKOLA English in London

With reference to British Council, English UK, and Government guidelines (KCSIE 2022 & WTSC 2018) and law (Children Act 1989 and 2004). To be read in conjunction with [Keeping children safe in education 2022: for school and college staff \(part 1\)](#)



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1. POLICY STATEMENT

Safeguarding children is the responsibility of all adults. SKOLA thus aims to provide a safe and supportive environment for all students and staff. We use safer recruitment procedures to appoint staff. We will train staff to recognise, record, report, and refer to a variety of welfare issues.

All the adults working for / with SKOLA English in London are expected to:

- Read this policy
- Always adhere to this policy
- Always safeguard the welfare of all students
- Promote a safe environment
- Report any concerns or allegations to the Designated Safeguarding Persons (DSP)

SKOLA English in London is a year-round language school. We offer short term English courses and activities to children aged 5 – 17. We operate on 2 summer sites.

- SKOLA Regent's Park, Regent's University, Inner Cir, London NW1 4NS
- SKOLA Gloucester Gate, 14 Gloucester Gate, London NW1 4HG

In our centres we provide homestay accommodation. We use three agencies (Perfect Hosts Homestays, Hosts International and Britannia). We also have a door-to-door car service through Atlas Cars.

1.1 Who the policy applies to

- The policy applies to all children who are students of SKOLA English in London. All staff employed by SKOLA English in London. All adults who work with the school (e.g., group leaders, DJs, cover teachers, coaches, etc.) at any of our centres. It applies to anyone regardless of gender, race, religion, or sexual orientation.
- A 'child' or 'student' in the context of this policy refers to anyone under the age of 18. They are, were or will be a student at SKOLA English in London.
- An 'adult' refers to all members of staff employed by SKOLA or through any contractors. Also group leaders, parents, and any visitors to the school.
- Homestay hosts will follow the relevant parts of our Safeguarding Policy. Those contracted by homestay providers will also follow the policies of the companies.
- 'Employer' in this context refers to SKOLA English in London

1.2 Designated Safeguarding Persons

The designated safeguarding persons are:

Designated Safeguarding Lead:

Connor Middleton, Director of Studies. Email: connor@skola.co.uk, Tel: 02073877575

Deputy Designated Lead:

Beverley Escoffery, Central Manager. Email: Beverley@skola.co.uk, Tel: 02073877575

DSL Responsibilities

- Keep up to date with the best practices/ legislation/ inspection criteria
- Update policy after a review, a legislation update.
- Review policy annually, after a legislation update, or any safeguarding incident
- Records: keep secure and format in an easy to read and usable form. They should be reviewed regularly.
- Train: provide safeguarding training for all staff. Ensure all staff are up to date with latest training and safeguarding practices/ policies.

- Create and send referral/ local authority contacts
- Create and maintain Safer School Culture
- Enact Safer Recruitment
- Availability to both staff and students
- Understand the views of the children

1.3 Policy Review

We will review this policy annually. So, it is up to date with all legal and accrediting body requirements or after major updates. We welcome feedback from staff or group leaders to improve our safeguarding systems. All designated safeguarding persons will contribute to reviewing the policy. The Director will sign it off.

1.4 Policy Availability and Formats

This policy is shared with all staff. A printed copy will be available in the staff room. The Staff Handbook has a highlight version of this document.

1.5 Associated Policies and Documents

Staff members should also familiarise themselves with the following policies/ documents:

- Health and Safety Policy
- Recruitment Policy
- Abusive Behaviour Policy
- Guidelines for Taking Students on Excursions
- Absence Policy
- Supervision Policy
- Use of Electronic Devices Policy
- Risk assessments
- Regent's University Safeguarding Policy
- Homestay and Transport providers' Safeguarding Policy

2. CHILDREN'S RIGHTS

All children have the right to:

- Be safe and happy
- Say 'no' if any person tries to do something they feel is wrong
- Be listened to
- Be taken seriously when reporting any incidents/ allegations
- Be respected and safeguarded from harm
- Privacy
- Be referred to professional help if needed
- Be protected from abuse and bullying

3. CODE OF CONDUCT: SAFER WORKING PRACTICE FOR STAFF

All adults will aim to create a safer school culture. All staff will try to build trust between them and children. They will avoid possible misconstrued situations. Staff should act as role models for the students. Management will act as role models for staff and students.

3.1 Duties of Staff

1. **Duty of care.** All adults have a duty to keep children safe and protect them from any abuse.
2. **Duty to report.** Staff should report inappropriate contact with children to senior managers. Report any allegations or suspicions.
3. **Duty to treat all students with respect.** No staff member should favour any students. Be fair and consistent.

3.2 Adult Interaction

1. **Professional relationship.** Staff to maintain professional boundaries between them and the students. You are in a position of influence. Do not use your position to your advantage.
2. **Physical contact.** Keep physical contact brief and never touch a child in a way that is indecent. Seek permission before making physical contact. Be aware of cultural/religious views on touching and be sensitive to issues of gender. If you need to show something (e.g., in sports or drama) it should be in an open environment and for least time necessary. Use this procedure: show alone > ask permission > show with student.
3. **Physical intervention.** Use only in exceptional circumstances in a way that maintains dignity and safety. Never use force or degrading treatment to punish a child. In case of bad behaviour follow the procedure outlined in the staff handbook.
4. Any inappropriate contact may be considered a 'Position of Trust' offence according to Sexual Offences Act 2003.
5. **Social contact:** Do not seek social contact with a student or their family outside the school.
6. **Infatuations.** If a student develops an infatuation with you, inform your manager as soon as possible. Record this information and maintain professional boundaries.
7. **Sexual comments.** No suggestive or sexual remarks about a student (in any form).
8. **Never alone.** Avoid being alone with a child. If you need to speak to them in private, do it in a place where someone can see you.

3.3 Adult Conduct

1. **Use appropriate language.** Always be aware of your language when speaking to and around the students. Never lose your temper or raise your voice.
2. **Confidentiality.** You may have access to confidential information about the students. However, this should always remain confidential and only shared if it's in the interest of the student.

3. **Dress code.** Dress in a way which is appropriate to your role. Wear the SKOLA shirt provided. Don't wear anything considered inappropriate. For example, miniskirts, rudely worded t-shirts, anything too tight or revealing. In a residential setting wear appropriate nightwear.
4. **Smoking and alcohol.** Staff must not smoke or drink on school premises and/or in the presence of the students.
5. **Gifts.** All gifts given to a student publicly and for positive behaviour (e.g., SKOLA Star Awards) not to favour a student.

3.4 Electronic and Social Media Contact

Electronic contact includes telephone communication and online environments. Staff should maintain the same professional standards in electronic contact.

Safe practices:

- Do not start, establish, or seek to establish electronic contact with a student
- Use only the school camera(s) to take photos/ recordings of the students. No school camera is unavailable? You may use your camera but delete images after storing them on a school computer. Do this in the presence of a colleague. Do not store images of students on your personal device.
- Avoid using your personal mobile when communicating with a child. In case of an emergency (e.g., if they get lost on an excursion), delete the number afterwards. Also, if a student uses your mobile (e.g., to contact a parent) delete the number afterward.
- Do not lend personal removable media (USB sticks, CDs, portable hard drives) to students
- Do not exchange any personal data with students (i.e., personal phone numbers or emails)
- Make your social media accounts private so students can't access them. If a student sends you any messages. Don't reply. Record the details. Notify your manager.
- Do not send or accept any friend requests from students on social networking sites.
- Do not post or distribute any photos, videos of or information about the students.

SKOLA will not use the images of students without their parents' consent. All staff will know which students have not given consent. Staff should ask for consent from students and other staff before taking a picture or video.

4. WELFARE SYSTEMS

SKOLA will have certain welfare systems in place to always ensure the students' safety. These include:

4.1 Risk Assessments

These are in place for all on and off-site activities. They are revised regularly. All students will be inducted before each activity and reminded what to do in case of emergency. They must sign each activity to show they have read and understood the risks.

4.2 Behaviour and discipline procedures

Staff will follow guidelines outlined in the Staff Handbook when disciplining students. Staff should aim to be positive when dealing with behaviour issues. Praise good behaviour.

4.3 Staff photo board

There will be a board in each premises. This has staff photos, names, and titles. So, students know who works in the school and what are the responsibilities of each member of staff. Students will also receive this information during induction.

4.4 Missing students

Avoid losing students. But in case a student goes missing follow the procedures below

How to avoid missing students?	What to do if a student goes missing
IN CLASS	
<ol style="list-style-type: none"> 1. Establish rules with your class: students are not allowed to go out of class during lessons 2. Be on time for the lessons; lead by example 3. Check the register before each lesson 	<ol style="list-style-type: none"> 1. Inform a member of the management or admin team as soon as possible. 2. If it is the first lesson the admin team will follow the guidelines in the absence policy 3. If it is the second lesson ask the other students if they have seen the missing student. Try to establish his/ her whereabouts and inform a member of the management or admin team.
DURING EXCURSIONS/ STUDY TRIPS	
<ol style="list-style-type: none"> 1. Remind the students of the rules before every excursion/ activity 2. Never allow students to go anywhere alone 3. Make sure all students have wristbands/ cards with the school's emergency number 4. Headcount the students as often as possible. Do this before leaving the school, getting to the station, on the platform, on the train, etc.. 5. When reaching your destination establish a meeting point where the students should go in case they get lost 6. Make sure there is a member of staff at the front and back of the group 	<ol style="list-style-type: none"> 1. Stop the group as soon as you realise that a student has gone missing. One member of staff should go back to search for the student 2. Try to contact the student, you can call the school and a member of the management team will contact the student and advise them what to do 3. Call and/ or wait for a call from a member of staff responsible for the emergency number

STUDENTS IN HOMESTAY MISSING CURFEW	
<ol style="list-style-type: none"> 1. Students and parents will receive information about curfew times before arrival 2. Homestay hosts will remind students about these rules every time students go out 3. Homestay hosts will ensure students have all necessary travel information and contact numbers 4. Students will only go out if they have a mobile phone with them 	<ol style="list-style-type: none"> 1. Homestay hosts will attempt to contact the student 2. Homestay hosts will call the school emergency number 3. School will attempt to contact the student 4. If student cannot be contacted within 2 hours police will be notified

4.5 Safety and First Aid

The school has the following in place to ensure the student's safety:

1. Staying safe information: The student handbook includes information on how to stay safe during their time in the UK. They can apply when in school, on the school campus and on excursions but also in their own time.
2. Emergency number. All students are given a wristband with the 24-hour school emergency number. They are asked to always wear the wristband.
3. Travelling to and from school. Students under 14 must be brought to school by a guardian or use the school bus service. Students over 14 may travel on their own. But only if parents/ guardians complete the appropriate permission form. Appropriate guidance will be given to such students to help them with their journey.
4. Permission forms: Parents/ guardians sign appropriate permission forms for the students, which include:
 - a. Permission to travel to and from school on their own (only for students aged 14-17)
 - b. For free time on excursions (only for students aged 14-17). This allows students to have up to an hour of free time during Saturday excursions. But they must follow the rules outlined in the staff handbook. This is a privilege that the staff can withdraw.
 - c. To use student's photographs, audio recordings, etc. in the school's promotional materials
 - d. For students 14 and over in homestay: to go out unaccompanied in the evenings and at weekends. But students must follow rules set out in a separate document and follow the curfew times. These are 9.00 pm for students aged 14-16 and 10.00 pm for students aged 17.
 - e. Consent for emergency medical treatment
5. Transfers. Homestay students travelling alone must book a transfer from the airport/ station. This will be clear to parents/ guardians/ agents. They will receive a warning if they fail to make appropriate arrangements for the child's arrival. The UK Border Agency may refuse entry (e.g., they may suspect Child Sexual Exploitation). For UMs a departure transfer includes accompanying the student to check-in.
6. Visitor book. All visitors to the school must read the visitor leaflet and sign the visitor book. This is at reception (name, time in and out and purpose of visit). A staff member should oversee any visitors

7. Absence policy. The school will follow a strict absence policy when dealing with student absences.
8. First Aid and medical. First aid given by qualified staff. They should follow the general guidelines. Record all cases of first aid in the incident book.
 - a. In case of an emergency. If a parent or guardian is unavailable. A staff member will go with the student into an ambulance or walk-in centre.
 - b. If a student falls ill when in homestay, the homestay provider will look after them. If not, they will make alternative arrangements. They will take the student to the doctor (if necessary).
9. Road Safety. Induction on how to behave while walking on the street before each excursion. Appropriate supervision will ensure road safety.
10. Fire safety. Induction on what to do in case they hear the fire alarm and where the fire meeting point is.
11. Going home procedure: This will follow the guidelines outlined in the staff handbook. Parents/ guardians of students who are picked up need to sign a list daily. Students leaving on their own are also required to sign out. If the student will be picked up by someone other than parent/ guardian the school needs to be informed in advance. The appointed person needs to show an ID.
12. Students going home early: students may be allowed to go home early only if consent is given by parents/ guardians. In such cases they need to sign out.

4.6 Supervision ratios

We are obliged to provide adequate supervision for all the students. This is for lessons, excursions, activities, breaks. Also, for accommodation, when in residential centres. Supervision ratios will be stated in the risk assessments.

During excursions and activities, we will provide a minimum amount of supervision outlined by the DfE publication Health and Safety of Pupils on Educational Visits. But we aim to exceed it. The staff to student ratio will be in the risk assessments.

When deciding on staff/student ratio several factors need to be considered:

1. Gender, age, and language ability of the group
2. Pupils with special educational or medical needs
3. Nature of the activity
4. Experience and competence of the adults in the party
5. Requirements of the organisation/location to be visited
6. Competence and behaviour of the children
7. Type of accommodation provided
8. First aid cover

Important notes to staff:

- Staff should follow the supervision guidelines outlined in the staff handbook. They should never leave the students unattended.
- Staff should pay extra attention to students while travelling on the underground.

- During outside activities, at least two staff members should be with students. This is in case of an emergency.
- Staff should be always vigilant when outside the school.

Permission to be out of class:

No students should be out of class without the teacher's permission. Students should visit the toilet during break and before lessons only. But if necessary, schedule suitable breaks for the toilet. This could be for young students or SEN students.

Note any absence from the class in the register

4.7 Age-appropriate activities

All activities must be appropriate to the child's abilities and development stage. This will be outlined in the risk assessment of each activity. Here are some examples of important things to take into consideration:

- Films: make sure any films or clips are age appropriate.
- Contact games: Do not mix younger and older children in contact games. Some girls may not want to be mixed with boys, respect that.
- Art and Crafts. Use age-appropriate utensils used during art and crafts. Younger students should use plastic needles and safety scissors.

4.8 Homestay Accommodation

All homestay providers follow the Safeguarding Policy and Code of Conduct. This is provided by the homestay agencies and SKOLA. The Homestay Agencies are Hosts International, Perfect Hosts Homestays and Britannia.

Private fostering

SKOLA, homestay agencies and parents inform local councils about any private fostering. This is when a child (under 16) stays with and is cared for by an unrelated adult for at least 28 days. This private arrangement is agreed between the parent and carer.

4.9 Online Safety

SKOLA will take all measures to help our students stay safe when they go online. Student folders will contain guidance about being safe: not believing all they read, not sharing personal data or photos with people they don't know, etc.

All internet usage will be supervised by teachers. Appropriate filters will be placed to block inappropriate websites.

Students are not allowed to use mobile phones in the school and during out of class activities.

Cybercrime is criminal activity committed using computers and/or the internet.

There are 4 areas of risk that staff need to be aware of:

1. **content:** being exposed to illegal, inappropriate, or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
2. **contact:** being subjected to harmful online interaction with other users. For example, peer-to-peer pressure or advertising. Also, adults posing as children to groom or exploit them. Grooming or exploiting could be sexual, criminal, or financial.
3. **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
4. **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

4.10 Mobile and smart technology

Classrooms at SKOLA Regent's Park have interactive smart boards. Most students have mobile phones in the school. Students are not allowed to use their mobile phones inside the school premises or on excursions. Breaking this rule will result in the phone being confiscated (for the day).

The Wi-Fi is password protected. Students are not allowed to access the WIFI. The WIFI passcode should not be shared with students. Only age-appropriate material should be displayed on the interactive smart boards. Websites to be vetted before use in the classroom. Contact the DSL if inappropriate content is seen by students.

4.11 Mental Health

All staff should be aware that mental health problems can show a child has suffered abuse. Also, it could be a sign they are at risk of suffering abuse, neglect, or exploitation.

Only trained professionals should attempt to make a diagnosis. But Education staff see children every day. So, they can identify behavioural changes in children. This could suggest that a child is having or at risk of mental health.

Schools and colleges can access advice to help them identify children in need of support. This includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, act quick. Follow the child protection policy and speak to the DSPs.

4.12 PREVENT Radicalisation & Extremism

PREVENT is a government strategy to stop people becoming involved in extremism. This includes supporting terrorism. These could result in entering the criminal justice system.

To prevent extremism and radicalisation we will:

1. Ensure all staff are familiar with the term's radicalisation and extremism. Also aware of the problems related
2. Educate students about acceptance and tolerance on a range of views
3. Promote British values. For example, democracy, rule of law, individual liberty, mutual respect, and tolerance.
4. Educate staff to identify vulnerable students. Some factors which make students vulnerable may include:

PERSONAL	EXTERNAL
Not having a sense of identity/belonging Loss/ bereavement Isolation/ exclusion Personal crisis Mental health issues Sense of injustice Being a victim of a hate crime/ discrimination	Family values Global events Inspirational speaker Peer pressure Media bias Having friends/ relatives harmed Extremist material

Educate staff to be vigilant and look out for signs of extremist behaviour. This may include:

1. Change in attitude
2. Becoming intolerant/ closed minded
3. Being isolated
4. Overt new religious practices
5. Fall in work standard
6. Accommodation changes, e.g., posters, etc.
7. Asking questions about certain topics
8. Focus on IT safety

Staff will raise any concerns to the Prevent Lead Connor Middleton. Connor is also the Designated Safeguarding Lead. He will train staff at induction and through the summer school on the Prevent strategy. This will include the push and pull factors. These can lead to radicalisation. This training will help staff help identify vulnerable children.

5. RECOGNISING CHILD ABUSE AND BULLYING

5.1 Types of abuse

There are four categories of abuse. Use the acronym PENS to help remember them:

1. **Physical.** For example, hitting, kicking, shaking, poisoning, burning. Also, female genital mutilation (FGM). This is illegal in the UK. It is also illegal for it to happen to any British national abroad.
2. **Emotional.** For example, manipulating a child, never saying anything kind to them, threatening them.

3. **Neglect.** This is failing to meet the child's basic physical and/ or psychological needs. For example, failing to provide adequate food, clothing, and shelter. Also failing to protect children from harm or not providing adequate supervision.
4. **Sexual.** For example, forcing a child to take part in sexual activities. This could be both physical and non-physical. This could include exposing them to pornography or taking indecent pictures. Also grooming a child in preparation for abuse (including over the internet).

Domestic Abuse

Harm can include witnessing harm to others. This is particularly possible in a domestic setting. Domestic abuse includes Psychological, Physical, Sexual, Financial and Emotional. This can happen wholly online. They can have a short term and long-term impact on children's ability to learn, health and well-being. Domestic abuse can happen to anyone. Teenagers in relationships can also experience domestic abuse from their partner.

Staff have a key role in recognising the signs of domestic abuse. They should record and report concerns to the DSL. Staff should build a positive relationship built on trust with students. This is so students feel safe to voice their concerns.

5.2 Typical signs of abuse

All the categories of abuse have both physical and psychological signs. Some to watch for are:

1. Physical abuse:
 - a. Has unexpected bruises, burns, etc.
 - b. Wearing clothes to cover injuries, even in hot weather
 - c. Refusal to undress for e.g., sports
2. Sexual abuse:
 - a. Acting in an inappropriate sexual way with objects or peers
 - b. Becoming withdrawn or clingy
 - c. Personality changing, seeming insecure
 - d. Unaccountable fear of places or people
 - e. Becoming secretive
 - f. Physical signs such as unexplained soreness around genitals, sexually transmitted diseases
3. Emotional abuse:
 - a. Delayed physical or emotional development
 - b. Shows extremes of passivity or aggression
 - c. Overreaction to mistakes, or continual self-deprecation
 - d. Neurotic behaviour (rocking, hair twisting, self-mutilation/harm)
4. Neglect:
 - a. Often hungry
 - b. Badly dressed in clothes that need washing
 - c. Poor appearance and personal hygiene; unwashed, hair not brushed
 - d. Lacks needed medical or dental care
 - e. Often tired
 - f. Might abuse alcohol or drugs

Some of these may appear naturally as the children are in a new environment. But, in extreme cases, these might be indicators of a deeper problem.

5.3 If a child discloses abuse

A child may choose any adult to talk to; so, all adults need to know the right way to respond. If a child discloses abuse follow the procedure outlined in the next section of this Policy.

5.4 Bullying

Bullying is usually a repeated action intended to hurt someone. It can be physical or emotional. It is not tolerated at SKOLA.

The first and most important rule is to respect the staff and other students. Children who are LGBTQ+ can be targeted by other children. A child who is perceived by other children to be LGBTQ+ can be as vulnerable as children who identify as LGBTQ+.

Identifying bullying:

Bullying can take many forms, it can be:

1. Physical assault
2. Making threats
3. Teasing
4. Name-calling
5. Cyber bullying
6. Lack of respect for someone's property
7. Exclusion
8. Teenage relationship abuse (TRA)
9. Harmful sexual behaviour (HSB)

Sometimes it is not obvious. Sometimes the bully might not even be aware that they are hurting someone. A bullied student may feel too frightened or worried to tell a member of staff. That is why it's important for the staff to be always observant. It is best practice to observe during break times and activities.

How to deal with bullying:

1. Don't ignore it. React and confront the behaviour. Don't assume it's 'teasing'.
2. Remain calm. Don't argue or get into conflict with the students. Displaying anger will not enable the student to reflect on their behaviour.
3. Report all cases to the Designated Safeguarding Staff yet trivial they may seem. Record everything in the incident book
4. Deal with the students individually. Don't attempt to sort out the facts while everyone is present. Students may get into an argument with one another. If you talk to them on a one-to-one basis, everyone will be able to say their side of the story.
5. Hold bystanders accountable – they provide an audience for the bullies. Explain that this type of behaviour is wrong and is not tolerated. They also have a responsibility to stop bullying.

6. Listen and don't prejudge - it's possible that the person you suspect to be the bully is being bullied.
7. Elicit examples from the offender: examples of bad behaviour and the cause/ effect of it. Tell them that this kind of behaviour is unacceptable. Ask them to consider an appropriate way of putting things right.
8. Ensure that any apology is done with a member of staff present and recorded in the Incident Book.
9. Inform the Designated Safeguarding Staff. They will inform the parents of what happened and how it was resolved.
10. If the bullying continues EST will do its best to protect the victim which may include changing or restricting the activities of the bully. Parents will be informed.
11. If a student continuously bullies others he/she will be expelled.
12. For detailed information please see the Policy for Dealing with Abusive Behaviour in the Staff Handbook

5.5 Child Exploitation

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are growing concerns in the UK. Concern for SKOLA is for children travelling alone to the UK who do not attend the courses. CSE and CCE can be linked to 'County Lines' where UK criminal gangs use vulnerable children to move drugs around the country.

Training to spot the signs of abuse

Staff and students have a relationship built on trust. Staff will have a professional curiosity and create safe spaces for disclosure. No victim blaming or judgement.

Record incidents. The DSL will report to local authority children's social care (The local authority designated officer, LADO). Any immediate risk of harm to students will be reported to the police.

5.6 Honour Based Abuse

Female Genital Mutilation

This procedure is illegal in the UK (Female Genital Mutilation Act 2003). It is considered child abuse, however most FGM families don't see it as a form of abuse. This procedure is carried out on a broad age range of girls and always has harmful consequences.

Some short-term consequences involve severe pain, emotional/ physical shock, haemorrhage, wound infections.

Some long-term consequences involve vaginal, pelvic infections, difficulties in menstruating/ passing urine. Also damage to the reproductive system, complications during pregnancy, and PTSD.

Girls who are more at risk of FGM:

- Girls from less integrated communities
- Familial history of FGM
- Sister who underwent FGM
- Girl withdrawn from personal, social and health education

Signs that FGM might take place:

- Older visitor (e.g., from country of origin)
- References to FGM in conversation
- Girl may confide (e.g., that she will have a special procedure or will become a woman)
- Long holiday abroad/ parental statement to take child on long holiday

Signs that FGM has taken place:

- Difficulty in walking
- Long time in toilet
- Urinary/ menstrual problems (e.g., very painful periods)
- Behaviour changes

If staff notice any of the above they should notify Designated Safeguarding Staff immediately. If a girl discloses FGM, staff should treat it as abuse and handle it like other forms of abuse, outlined in the next section.

Forced Marriage

Forced marriage this is when you face physical pressure to marry. For example, threats, physical violence, or sexual violence. Also, emotional, and psychological pressure. For example, if you're made to feel like you're bringing shame on your family.

Students may be travelling to the UK and using SKOLA as a cover for marriage against their will. Staff need to be aware of the possibility for certain cultures to practise this. Speak to the DSL if they have any concerns.

Forced Marriage Unit

fmu@fcdo.gov.uk

Telephone: 020 7008 0151

From overseas: +44 (0)20 7008 0151

Monday to Friday, 9am to 5pm

Out of hours: 020 7008 500

5.7 Harmful Sexual Behaviour

Harmful sexual behaviour (HSB) is age-inappropriate sexual behaviour by children. It is harmful or abusive.

Peer-on-peer sexual abuse is a form of HSB between children of a similar age or stage of development.

Child-on-child sexual abuse is a form of HSB that takes place between children of any age or stage of development.

Problematic sexual behaviour (PSB) is developmentally inappropriate or socially unexpected, sexualised behaviour. It doesn't have an overt element of victimisation or abuse.

Statutory guidance for schools in England says staff should act on the assumption that all children and young people could be affected by child-on-child sexual violence and harassment (Department for Education (DfE, 2022)

Policies and Procedures

All staff and students should follow the Code of Conduct. This outlines the expectations of behaviour. Any concerns should be recorded and reported to the DSL.

All staff will be trained in what HBS is and how to report it. The training and policy will be reviewed and updated annually, after an update or incident.

Any concerns, observed or disclosed, should be taken seriously, and reported to the DSL without delay. Do not assume the concern has already been reported.

Take immediate action to keep the student safe.

A Risk assessment needs to be made if sexual violence or harassment has been reported. These should include the following question:

- How to protect the victim?
- Any other victims?
- Who is the alleged perpetrator?
- How to protect all other children at the school?
- When was the time and location of the incident?

The assessment should also include any action required to make that location safer.

5.8 Sharing nudes and semi nudes

Sometimes referred to as 'sexting'. This is the sharing of sexual images or videos of yourself or others. Image refers to moving (video) or still (picture) from now on.

If the person in the image is under 18, it is an indecent image.

An indecent image refers to a sexual image of a child (under 18). This includes nude or partially clothed children. Also, children posing sexually in self-generated images. This is according to the Sexual Offences Act 2003 England and Wales.

It is illegal to make, have and distribute any 'indecent' imagery of someone under 18. This includes imagery of yourself or another child if you are under 18. According to the Protection of Children Act 1978 England and Wales; Sexual Offences Act 2003, England, and Wales.

Indecent imagery does not always mean nudity.

But images are likely to be defined as such if they meet one or more of the following criteria:

- nude or semi-nude sexual posing e.g., displaying genitals and/or breasts or
- overtly sexual images of young people in their underwear
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually

- sexual activity that includes animals

Any potential incidents should be reported to the DSL.

If the incident is between a child and an adult, report to the police. See NPCC 'When to call the police' document. If it is between children, the DSL will conduct a further review. This includes an interview with any child or young person involved. So, they can establish the facts and assess the risks. The DSL will define the incident using the *Finkelhor and Wolak's typology of youth-produced* assessment model.

If posted indecent images of child are posted online:

Send signposts to the IWF and Childline's Report Remove tool at www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/.

Report Remove helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible to minimise the number of people that have seen the picture.

6. HANDLING ALLEGATIONS

6.1 When to react to allegations:

All adults have a duty of care towards the students, in and out of school. They need to respond in the following circumstances:

1. If you notice any signs of abuse (above), tell the Designated Safeguarding Person(s)
2. If you suspect any adult may be a threat to a child, or behaves inappropriately towards a child tell the Designated Safeguarding Staff
3. If a child tells you that they are being abused act according to the outlines below
4. If you overhear a conversation that relates to safeguarding concern
5. If you have a gut feel that something is wrong because of changes in behaviour

Don't assume that a report has been made or that a concern is too small.

6.2 If a young person tells you they are being abused

VERY IMPORTANT!!

A child may choose any adult to speak to, therefore it's very important that all staff know how to react if a child discloses to them.

You should do the following:

1. Allow them to speak freely without interruption and accept what they say
2. Be understanding and reassuring but do not give your opinion
3. Tell them you will try to offer support, but you must pass the information on
4. Tell the Designated Safeguarding Staff

5. Write careful notes of what was said, using actual words wherever possible
6. Pass your report to the Designated Safeguarding Staff

6.3 Dos and Don'ts

If a child approaches you to disclose that they are being abused remember about the rules below:

DO	DON'T
<p>React calmly and reassure victims that they are being taken seriously, that they will be supported and kept safe to build trust.</p> <p>Be aware of your non-verbal messages</p> <p>Keep responses short, simple, slow, and gentle</p> <p>Observe and listen but don't ask for more information than you need</p> <p style="text-align: center;">VERY IMPORTANT!!</p> <p>Ask open questions:</p> <ul style="list-style-type: none"> ● Tell me... ● Explain to me... ● Describe it to me... <p>Be careful not to ask leading questions and remember you are not conducting an interview</p> <p>If you suspect FGM ask value-neutral questions (<i>Have you been closed? Have you been cut down there? How long does it take to pass urine?</i>)</p> <p>Assure the child:</p> <ul style="list-style-type: none"> ● What you are saying is important ● I'm glad you were able to tell me ● I will do my best to help you ● This is so important I need to talk to someone else about it <p>If you have a difficulty in understanding the child because of language or 'finding the right words' give them time or find someone who can help.</p> <p>Tell the child they have done the right thing by telling you</p> <p>Write a report that includes what has happened, what you have seen, suspected, or been told immediately. The location and when it happened.</p>	<p>Stop a child who is freely talking about what happened</p> <p>Ask for more information than you need</p> <p>Make comments or judgements about what is shared (e.g., "That must have been awful!")</p> <p>Victim Blame: don't focus on the behaviour of the victim or give them the impression they are creating a problem. Focus instead on the behaviour of the person who abused the young person.</p> <p>Speculate or accuse anybody</p> <p>Make promises that you cannot keep</p> <p>Tell the child that you will not tell anyone else</p> <p>Tell all the staff</p>

<p>Avoid stating your feelings but write a factual description of what happened You should write word-for-word what the child said.</p> <p>Speak to the Designated Safeguarding Staff as soon as possible</p>	
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6.4 If an adult is accused

Our aim is to provide a safe environment for our students. But we do recognise that sometimes behaviour of adults may lead to an allegation of abuse. You must inform the principal immediately if an allegation is made. Also, if you receive information that someone is not suitable to work with children. The allegation would also suggest a member of staff is not suitable to work with children. The Principal will notify the Designated Officer within one working day. The designated officer is from the Local Authority Safeguarding Board.

For SKOLA Gloucester Gate:
Camden Local Authority Designated Officer (LADO)
E. LADO@camden.gov.uk / 020 7974 4556

For SKOLA Regent's Park
Westminster Duty Child Protection Advisor/LADO
E. [lodo@westminster.gov.uk](mailto:lado@westminster.gov.uk) / 020 7641 7668

The LADO will guide the school if the allegation is found to be true. If a case is either unfounded, false, malicious, or unsubstantiated, the Principal will lead an investigation to determine if any lessons can be learnt from the incident.

6.5 If a child is accused

Any allegations made will be investigated by the Principal straight away. The guardians of the child will be notified as well as the Designated Officer. The DSL needs to understand the role of Appropriate Adult if a child is accused of criminal behaviour. See [safeguarding.link/pace](#)

6.6 Keeping records

All records need to be kept in a secure, locked place so when you complete them return them to the Designated Safeguarding Persons. No records don't mean it isn't happening.

7. SAFER RECRUITMENT

7.1 Overview

SKOLA English in London aims to recruit suitably qualified and experienced teaching and non-teaching staff appropriate to the type of courses we deliver and the type of students we

enrol on our courses. Our aim is to choose staff who are not only appropriately qualified but also aware of safeguarding and child protection issues. To avoid attracting staff who are seeking employment with children for the wrong reasons SKOLA will adopt safer recruitment practices.

7.2 Recruitment materials

Publicity: Publicity will state that we are an organisation that is committed to safeguarding and welfare of children, and we seek to maintain a safe and supportive environment so that any potential staff looking at our publicity will be aware of their expectations.

7.3 Information for applicants

Advertising: Advertisements for any positions will include the information that we are committed to safeguarding. Candidates will be informed that they will have to explain gaps in their CV, will undergo a DBS check and references will specifically ask whether there is any reason that the candidate should not be employed to work with under 18s.

7.4 Safer recruitment stages

Applying

Selected candidates will be sent an application form to retain control of the applicant's information. This form has a section relating to child protection where the candidate can share any information.

Shortlisting process

Candidates are shortlisted based on the fit between their skills and experience in relation to the job description and person specification. The same criteria will be applied to all the applicants. At least 2 people will be involved in the process of shortlisting candidates to avoid subjective judgments. Also, it is less likely that any information will be missed if two people scrutinise the applications. Any gaps in the person's history or inconsistencies must be identified. Interviewers should perform an online search of each candidate to identify any incidents or issues that may have happened and explore them at interview.

References

All candidates will be asked to provide names and contact details of 2 professional referees. One of these should be the current or most recent employer. If a candidate has worked with children previously a reference should be obtained from the person or organisation that employed the candidate in work with children (whether this company/ person is the candidate's current/ most recent employer).

During the interview:

At the start of the interview the candidate will be asked to show a photo ID and original documentation confirming qualifications. These documents will be copied during the interview. Before starting the interview, the candidate must sign a declaration regarding suitability to work with children. This is an opportunity to discuss any relevant information at an early stage. However, self-disclosed information cannot be used for short-listing. Fair

assessment criteria should be applied. Once short-listing has taken place the disclosed information can then be considered.

The candidates will be informed that a DBS check will be carried out on all successful candidates. The 2 disclosures can be compared against each other to highlight any issues. The candidate will be asked specific questions to ensure that they are genuinely interested in the post for the right reasons.

Background check:

All successful candidates will undergo a DBS check before the commencement of employment or, in exceptional circumstances, during the first week of employment. In case of staff living abroad for a long period of time before the start of employment, an appropriate police check from the country of residence will be required. The TRA Teacher Services System will no longer list teachers who have been sanctioned in EEA member states. Important note: Under the Rehabilitation of Offenders Act convictions become spent after a period (this depends on the conviction). However, there are some situations in which a person must declare any criminal record (including one that is spent) and one of these situations is when someone is applying to work with children.

7.5 Applicants awaiting DBS

In case an applicant's DBS/ Police check does not come through before the start of employment the new employee can start work under exceptional and justifiable circumstances. There will be a record of such a decision.

We will write a risk assessment for the employee in question. We will do the following:

- Obtain 2 positive references that state that there is no reason why this employee should not be working with children
- Observe the employee within the first few days
- Ask the employee to teach in a classroom near the office with the door open and a senior member of staff supervising
- In case of afternoon activities, the employee will not be solely responsible for the students, they will be working with other staff who have DBS

The employee will not be solely responsible for any under 18s until the DBS comes through.

7.6 If a disclosure shows a criminal record:

The applicant's suitability will be judged on a case-to-case basis. If a person has a criminal record we will consider those which are relevant to the job. The following factors will be considered:

- Seriousness and nature of offence(s)
- Nature of appointment
- Age of offence(s)
- Frequency of the offences

The disclosure will be discussed with the prospective employee and at least 2 people will participate in the decision process.

8. STAFF TRAINING

8.1 Responsibility

SKOLA will do everything we can so that our staff are trained and aware of all safeguarding aspects. The management team is responsible for training and making sure all staff members are familiar with our Safeguarding Policy.

The people responsible for safeguarding will have at least level 2 or 3 Safeguarding qualification. At least 1 person in the recruitment team will be qualified in Safer Recruitment.

8.2 How training is delivered:

- A copy of this Policy will be included in the Staff Handbook. All staff will be asked to read it and sign a form stating that they have read and understood it
- All staff will complete an online Safeguarding course before starting work. In case any candidates have safeguarding certificates they will be asked to provide a copy
- The staff induction procedures will include a safeguarding session. All staff (including admin, catering staff, etc.) will be trained in safeguarding.
- All group leaders will be given a copy of this Policy to read and sign.
- Knowledge about safeguarding will be regularly updated and revised during staff meetings

9. WHISTLEBLOWING

If you have any concerns about students or fellow staff members, report it to a senior staff member. All such concerns will be treated as confidential and will be investigated.

10. FAILURE TO COMPLY

Non-compliance with the policy on contact with students under 18 will result in disciplinary procedures. Employers have a duty to and will remove an individual from regulated activity where there is a risk of harm to children. Employers have a duty to refer the suspicion or allegation to external authorities where there is a risk of harm to children. Once you have read this document give the DSL a fist pumps the next time you see them.

Connor Middleton, SKOLA English in London
Updated: Jan 2023, next update Oct 2024

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