

## **SAFEGUARDING POLICY**

Norwich Study Centre (NSC) recognises its duty to provide a safe environment for all members of the school, including students, teachers and all other school staff. The school works to prevent them from being harmed or badly treated.

### **Child Protection and Vulnerable Adults Policy**

NSC is fully committed to safeguarding the welfare of children and vulnerable adults in accordance with our Duty of Care. NSC understands that it is our responsibility to make all efforts to promote safe practice and to protect children and vulnerable adults from any harm and abuse. NSC will deal appropriately with any allegations, reports or suspicions of abuse. NSC staff and other adults, including students, work together to ensure the wellbeing of all members within a safe school environment.

Our policies and procedures are determined by the following legislation:

- The Children Act 1989
- Local Government Act 2000
- The Sexual Offences Act 2003
- Protection of Freedom Act 2012
- Children Act 2004
- Counter-Terrorism and Security Act 2015

### **Definitions for the Purposes of these Guidelines**

- Safeguarding means protecting the health, wellbeing and human rights of a child and/or a vulnerable adult at risk, enabling them to live safely and free from abuse and neglect.
- A child refers to anyone under the age of 18.
- A vulnerable adult refers to anyone who is older than 18 but has been living in the UK for less than 6 months and does not have the ability to communicate in English easily.

All staff at NSC, as well as homestay providers, receive appropriate safeguarding and child protection training to enable them to be aware of their responsibilities within their role.

### **Safeguarding**

Designated Safeguarding Lead (DSL): Kumi Wiedmann (School Director)

Direct telephone: 01603 619 091

Email: [kumi@flyingclassrooms.co.uk](mailto:kumi@flyingclassrooms.co.uk)

The DSL has overall responsibility to ensure NSC meets the aims of this policy.

### **Out of Hours**

The NSC emergency contact number is: 07800907804. Please only contact this number in a real emergency.

### **Referrals to Local Authority**

Referrals to the Local Authority Designated Officers (LADO) must be made via email [lado@norfolk.gov.uk](mailto:lado@norfolk.gov.uk) or [cs.norfolkladosecure@norfolk.gcsx.gov.uk](mailto:cs.norfolkladosecure@norfolk.gcsx.gov.uk) using the [correct referral form](#).

Initial referrals may also be made by telephone: 01603 223473

Children's Services Customer Service Centre & the Multi Agency Safeguarding Hub: 0344 800 8020 (24 hours)

### **Norwich Study Centre will:**

- Follow safe recruitment procedures to check the suitability of all staff working with children and vulnerable adults according to the [Staff Recruitment policy](#).
- Have a clear code of conduct in place for staff and other adults who may come into contact with children and vulnerable adults.
- Provide appropriate staff training, guidance and procedures to meet the academic and pastoral needs of our students and provide opportunities for staff to develop their skills and knowledge, particularly in relation to the welfare and protection of children and vulnerable adults.
- Ensure all school staff and visitors are aware of their responsibility to follow the standards that are detailed in the organisation's policies, and work at all times to maintain high standards of practice to protect children and vulnerable adults from harm, abuse and exploitation.
- Ensure all staff and visitors understand their duty to report concerns that arise about children and vulnerable adults to the school's designated person.
- Ensure that parents/guardians, agents and host families are encouraged to be involved in the work of the school, and have access to all guidelines and procedures.
- Ensure that all school staff are aware of the safety procedures and regulations for face-to-face and online live courses for both young learners and adults.

- Provide staff with guidelines for online safety in class and online activities for students.
- Provide staff with guidance and support on how to maintain their own wellbeing and safety whilst working online.

## **Code of Conduct**

The Code of Conduct sets out a list of guidelines that NSC expects all adults and children to understand and follow at all times.

## **Guidelines for Conduct with Children**

Any member of staff or other adult in the school is in a legal position of trust. Any kind of sexual activity or luring towards sexual activity with a student under the age of 18 is an abuse of trust and against the law (Sexual Offences Act 2003) and could lead to prosecution.

It is vital that all staff understand these guidelines for working and interacting with children as they are in a position of trust and have a duty of care. NSC expects all adults to act appropriately with students at all times and never put themselves in a situation which could be misconstrued:

- Staff and other adults must never initiate close physical contact with children.
- Staff and other adults should make themselves aware of what is considered acceptable/unacceptable behaviour in different cultures. When in doubt, staff and other adults should keep safe and draw a boundary between the student and themselves.
- Staff must not meet children outside school (or the context in which you would normally meet them) for personal reasons on a one-to-one basis as this leaves the staff member or other adult open to allegation.
- Staff and other adults should be aware that different cultures have different sensitivities to various subjects. Staff and other adults should therefore evade controversial topics.
- Staff and other adults are required to keep communications appropriate to their professional relationship. Passwords or other personal data should not be shared with children.

- Mobile phones: Staff and other adults must not give out their personal telephone numbers to children.
- Social Networking Sites: Staff and other adults should not engage with children on social media. Children should never be accepted as "friends".
- Staff must not give children their personal email addresses. All teaching staff are allocated an NSC email address to use when contacting students. If students wish to contact other members of staff via email, they should use the main NSC email, info@flyingclassrooms.co.uk, from which emails will be passed onto the relevant person. Replies should be made in person but if an email reply is necessary, it should be sent from an NSC email address.
- Permission to photograph or film children in class will be sought using the Parent Consent Form, before the student arrives. Photos and videos will only be used:
  - To support learning
  - For promotional material
- If leading a group visit during a lesson, or a Social Programme Activity, the responsible adult must complete the documents necessary for the visit including a risk assessment, and ensure that any under 18s are clearly listed.
- The responsible adult must ensure that they have the mobile telephone number of any U18s in the group and the telephone number must be used for no other purposes and deleted immediately after the completion of the visit. The responsible adult should clearly explain the destination, the route, and what to do should they be separated from the group.
- It is against the law for any students under 18 to have alcohol. If the subject of alcohol or drugs comes up during conversations between staff and under 18 students, adults are required to treat this matter seriously.

### **Guidelines for Conduct with Adults (18s and over)**

These guidelines relate particularly to behaviours and conduct in relation to adults (including vulnerable adults).

Communicate appropriately with students at all times and never put yourself in a situation which could be misconstrued:

- Staff and other adults should not initiate close physical contact with a student, as this can be unwelcome and misconstrued.

- Staff and other adults should make themselves aware of what is considered acceptable/unacceptable behaviour in different cultures. When in doubt, staff and other adults should keep a formal relationship with the student.
- If meeting adults outside school (or the context in which you would not normally meet them) this should be in a group of adults. Any one-to-one meetings, for school-related business only, should be held in the school. This will avoid any allegation.
- Staff and other adults should be aware that different cultures have different sensitivities to various subjects. Staff and other adults should avoid controversial topics.
- While students are studying at NSC, staff and other adults are expected to keep communications appropriate to their professional relationship. Passwords or other personal data should not be shared.
- Mobile phones: Staff and other adults must not give out their personal telephone numbers.
- If leading a group visit during a lesson, or a Social Programme activity, the responsible adult must complete all documents necessary for the visit.
- The responsible adult must clearly explain the destination, the route and what to do should they be separated from the group.
- Adult students can be accepted as "friends" on social media only after their course has ended.
- Staff must not give students their personal email addresses. Whilst the student is registered at the school, communication with a student should only be for professional purposes and only using the school email account allocated to them.

### **Guidelines for 16 and 17-year-olds joining Adults Courses**

The Designated Safeguarding Lead (DSL) will liaise with the Director of Studies to ensure that course content is relevant and appropriate for students aged 16 and 17. During the course, the teacher will supervise the language and behaviour used- if the teacher has any concerns, they should speak to the DSL.

### **Exceptional Circumstances**

In the case of a student aged under 16 joining the school and no Young Learner class being available, the School will make an exception and allow students aged under 16 to join the adult class with parental consent. The School will closely monitor this student on their

course, and other students in the class will be made aware of the School's expectations of them.

### **Guidelines for Conduct of Online Learning for Under 18s**

The school accepts students aged 11-17 years old for live online English courses. For more information about our guidelines for conduct of online learning for under 18s, see our [Policy](#).

The Online Safety Coordinator is: Kumi Wiedmann (DSL).

### **Online Safety Before and During Online Courses**

For information about safety for Under 18s and adults online, see our [E-Safety Policy for Under 18s](#) and our [Online Safety Policy](#).

### **Online Concerns/Complaints Procedure**

If any concerns or complaints are received, the investigation of them follows the procedure demonstrated in the Safeguarding Policy – see below.

### **Concerns Reporting Procedure**

School staff and other adults should recognise that it is important to be aware of NSC's child protection and vulnerable adults' procedures so that they know how and when to respond.

### **Recognising and Raising a Concern**

It may be that you have concerns about a student's wellbeing, but they have not actually said anything to you. If such a situation arises, you should speak to a Designated Safeguarding Person.

It is important that you do not feel afraid about passing on your concerns. The information may be a small detail but could help a designated person to get a better understanding of the student's situation. Any concerns, however seemingly trivial, should be passed on to the designated person.

### **Reporting a Concern:**

1. Fill out a Concern or Allegation Form (see Appendix 1). Forms can also be provided by the safeguarding team.

2. Report it as soon as possible to a DSP, ideally in person; if not possible, over the telephone or by email marked as urgent.
3. The DSP will consider further action but will always report it to the DSL.
4. The concern will be recorded by the DSP / DSL.
5. Advice may be sought from the Local Safeguarding Children Board (LSCB). The parties involved will be spoken to about the concern. This will be handled sensitively and thoughtfully.
6. You may not be provided with feedback after the investigation.
7. All information is recorded throughout and included within the Annual Safeguarding Report.

If you do not have access to the correct form, make notes including:

- The nature of your concern
- What is the evidence that led to the concern
- What the student said (if a discussion has taken place)
- What you said or did in response

### **Several Categories of Abuse**

#### **Physical abuse:**

- Hitting/ pushing/ wounding
- Denying mobility

#### **Psychological and emotional abuse:**

- Forced social isolation
- Not allowed to see friends
- Cyber bullying

#### **Sexual abuse:**

- Sexual act
- Sexual harassment
- Pornography

#### **Organisational abuse:**

- Lack of care and respect for dignity and privacy
- Poor professional practice due to inadequate structures

If you notice something you don't feel is right, you need to report it to the DSP / DSL:

- If you see anything that concerns you

- If another student or adult tells you about a concern
- If a student tells you directly about abuse (disclosure)

It may be that you are approached by a student who wants to talk to you about something that has happened or is happening to them. They will tend to choose someone that they trust or know well and this will not always be their class teacher. It may be any member of staff or other adult with whom they have formed a good relationship.

### **Allegation Procedures**

An allegation is where someone has told you directly that something has happened i.e. they have seen it with their own eyes or it happened to them. If you are simply worried or suspect something is a concern, please follow the below procedures.

### **Disclosure**

If you are approached by a student wanting to talk you should:

1. Ensure the child or vulnerable adult is safe from harm – this is your first priority if you decide they are at immediate risk of harm.
2. Listen positively and reassure them. If you can, try and ensure a degree of privacy but this may not always be possible. Whilst this might be an alarming situation to find yourself in, it is important to act immediately.

Advice when helping the student when abuse is alleged:

- Be prepared to listen and comfort.
- Do not show revulsion or distress, however distasteful the events are.
- Stay calm and controlled.
- Let the student know at once that it was not his/her fault and restate if appropriate.
- Reassure the student that they have done the right thing to tell you.
- Do not make false promises, i.e. that you will keep the abuse a secret or that the police will not be involved.
- Do not promise confidentiality.
- Make them aware that disclosure will be reported to only those that need to know and can help.
- Do not question the student; try to limit your involvement to listening. A child can be interviewed only once.



- It is also important that it is not your responsibility to investigate suspected cases of child abuse, only to report them to a DSP.
- Ensure the child or vulnerable adult is safe from harm – this is your first priority if you decide they are at immediate risk of harm.

After finishing the disclosure;

As soon as possible tell a designated safeguarding person (DSP) and fill in a Concern or Allegation Form –see Appendix 1 (or write down) what was said and done.

It is vital that confidentiality is maintained at all times and the identity of the student and the person alleged to have harmed them must not be shared with anyone else.

Next Steps to be taken:

1. It will be reported to the Local Safeguarding Children Board (LSCB), normally by the DSL or, in their absence, the DSP.
2. The allegations will be recorded by the DSP / DSL.

### **Procedure: Allegation against a Staff Member**

If a child protection allegation is made against a staff member or adult connected with NSC:

- DSL will follow guidance provided by local child protection authorities.
- If they advise that NSC should investigate the allegation, the NSC staff disciplinary procedure will be followed.
- Depending on the situation, the staff member / adult may be suspended during the investigation, and provided with support as outlined in the NSC disciplinary procedure.

### **Procedure: Allegation against another Student under 18**

If a child protection allegation is made against another under 18 NSC student, NSC will appoint a suitable DSP to support the person who has been accused:

- The under 18's parents, along with the group leader & agent if appropriate, will be informed of the allegation and kept informed at every stage of the developing situation.
- DSL will follow guidance provided by local child protection authorities.
- If other agencies become involved, e.g. police, the under 18 will be accompanied throughout the process by their DSP support.

- If other agencies are not involved and NSC need to carry out an internal investigation, the under 18 accused will be supported by the DSP arranged by Norfolk Safeguarding Children Board (and accompanied by them to any interviews).

### **Concern or Allegation Form**

Please see the procedure in the policy document and complete it if you have any Safeguarding concerns about an under 18 student or vulnerable adult. You must complete the boxes in bold; the other information can be filled in by DSP later if you do not know.

### **Concern/ Allegation Form**

<b>Date</b>	
<b>Student first name</b>	
<b>Student family name</b>	
<b>Gender</b>	
<b>Date of birth</b>	
<b>Nationality</b>	
<b>Group/individual</b>	
<b>Name of person noting concern</b>	
<b>Role/connection with the school</b>	
<b>Date and time concern noted</b>	
<b>Location</b>	

<p><b>Concern</b> (please provide as much detail as possible)</p> <p>N.B if reporting a disclosure/allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more if needed.</p>	
<p><b>Signed:</b></p>	

**Response to Concern**

This is to be filled in by the DSP.

Response	By whom (full name)	When (Date & Time)

**Referral Form – (information to be sent to LSCB)**

<b>Date &amp; Time (form submitted)</b>	
<b>Name of School</b>	
<b>Referrer's name and contact details</b>	

**Details of staff/other Adult or Student Involved**

<b>Full name</b>	
<b>Date of birth</b>	
<b>Gender</b>	
<b>Nationality</b>	
<b>Any disability</b>	
<b>Role/connection with school</b>	
<b>Home address</b>	

**Details of Student under 18 Involved**

<b>Full name</b>	
<b>Date of birth</b>	
<b>Gender</b>	
<b>Nationality</b>	
<b>Any disability</b>	
<b>Home address</b>	
<b>Parents name</b>	
<b>Is student known to be at risk?</b>	

**Details of Alleged Incident**

<b>Date and Time of incident</b>	
<b>Place of incident</b>	
<b>Brief circumstances of incident</b>	

<b>Name of potential witnesses</b>	
<b>Any other information?</b>	

## Nature of Allegation

<b>Category (Physical/sexual)</b>	
<b>Was technology involved</b>	
<b>If yes, what type</b>	
<b>Signed (by person submitting referral)</b>	

If you have any concerns about safeguarding issues, come to see the safeguarding team.

School Director

Reviewed 02 Nov 2023



Accredited by the  
**BRITISH  
COUNCIL**  
for the teaching  
of English in the UK