Safeguarding Policy

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Introduction:

1.1 : Policy Statement

The Children Act 1989 defines a 'child' as a person under the age of 18. The Management of Health and Safety Regulations 1999 regard a 'child' as a person who is not over the minimum school leaving age and a 'young person' as a person who has not attained the age of 18.

The aim of Nacel English School London is to ensure all students study in a safe and secure learning environment, in particular those under 18 years of age and vulnerable adults.

We believe that all young people and adults at risk, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to safeguarding from abuse.

Nacel English School London recognises its duty of care to all its students, and meets its child protection responsibilities through safer recruitment, regular staff training, a clear code of conduct and appropriate communication.

1.2: Policy Review

This policy will be reviewed yearly by the Designated Safeguarding Lead (Nick Studden) and signed off by the UK Senior Executive (Anabela Barros) after approval by the board of directors. Yearly reviews will ensure that the policy reflects up-to-date legislation, British Council requirements, best practice guidelines and feedback from staff and students. The next review is due in November 2027. The policy will also be reviewed in light of significant changes such as changes to personnel or if there is a significant incident. When necessary the safeguarding policy will be reviewed by a safeguarding professional

1.3 Distribution

A copy of this policy will be displayed in all staff rooms and offices around the school. New employees will be sent a digital copy and will be required to read and sign prior to commencing employment they. In addition, all host families and group leaders will receive a safeguarding pack which they are required to read. A condensed version of this policy is available in student welcome packs. This policy is available on our website for parents, host families and agencies to view, and available to any person upon request. The policy can also be printed upon request in Reception.

1.4 Associated Policies and Documents

- Abusive Behaviour Policy
- Health and Safety Policy
- Homestay Host Guidelines
- Risk Assessments
- Staff Recruitment Policy
- Teacher & Student Handbooks
- Under 18s Student Guide

Designated Safeguarding Personnel:

2.1 Designated Safeguarding Officers (DSOs)

All members of staff at Nacel English School London undertake basic safeguarding training and have a duty and a responsibility to safeguard all students.

Nacel English School London has three Designated Safeguarding Officers/Welfare Officers (Nick Studden, Makiko Tao & Anica Valeriano) and their identities are advertised around the school on noticeboards. Officers meet and greet new students who are under 18 on their arrival at Nacel and explain that should any problems, queries, needs or concerns relating to their welfare arise, they are their first port of call. Students can also email any concerns to safeguarding@nacelesl.co.uk In addition, the officers provide support and information to colleagues on welfare matters. The officers have both received Specialist (Level 3) Child Protection and Safeguarding Training. DSOs have completed Specialist (Level 3) Safeguarding training.

If a student, or a member of staff, has any concerns about a student under 18 years of age, they are to speak to the DSOs (Nick Studden, Makiko Tao & Anica Valeriano). They can also email safeguarding@nacelesl.co.uk

2.2 Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (Nick Studden) has received training up to Specialist (Level 3) in Child Protection and Safeguarding. The DSL has overall responsibility for child protection and safeguarding within the school. If the DSL is absent, the DSOs (Makiko Tao & Anica Valeriano) provide cover. The Designated Safeguarding Lead (Nick Studden) is the primary source of contact for all safeguarding queries or concerns. The Deputy Designated Safeguarding Leads (Makiko Tao & Anica Valeriano) are the main points of contact if the Designated Safeguarding Lead is not on the premises.

2.3 Training for Staff

Nacel English School London recognises its responsibility to ensure that all members of staff are adequately trained in safeguarding in accordance with their level of interaction with students under 18. All staff members receive safeguarding training, and safeguarding is included in teacher training sessions and meetings. Designated Safeguarding Officers have had Specialist (Level 3) Safeguarding training and the DSO (Designated Safeguarding Officer) holds Specialist (Level 3) Safeguarding training. Safeguarding notices and safeguarding policies are placed in staff rooms for teachers to access and promote awareness.

Training is refreshed every 2 years and it is the responsibility of the UK Senior Executive of the School (the school manager) to ensure all members of staff have completed at least Basic (Level 1) Safeguarding training.

Training is provided online and face-to-face from the LSCP (Local Safeguarding Children Partnership), and some staff members also attend training provided by English UK.

Code of Conduct

3.1 Statement of Intent

It is the policy of Nacel English School London to safeguard the welfare of all students, particularly those under 18 years of age, or vulnerable adults. This includes protecting them against forms of abuse; physical, emotional and sexual, and creating a safe and secure environment in which they can study comfortably. Nacel members of staff should show respect at all times, behaving in an appropriate manner. They should also show an understanding for students' individual safety and welfare.

3.2 Guidelines

The following guidelines are in place to protect both staff and students in our care:

- Staff must treat children and young people with respect, dignity and equally – teachers should not show favouritism.
- No alcohol or drugs are permitted on the school premises.
- Teachers must not swear or use inappropriate language in the classroom. Teachers should challenge any inappropriate language used by a young person, child or an adult working with young people.
- Staff must always listen to what a child or young person is saying and value each child and young person.
- Encourage and praise each student.
- Respect a young person's right to privacy.
- There must be no form of physical contact between teachers and students. Only in exceptional cases where contact is needed to prevent people from danger or physical harm should physical contact be applied. This should be a last resort and great care should be taken in order to prevent inflicting an injury on another person.
- Teachers should not give out personal emails or phone numbers, or communicate with students via social media. All communication should be done through the school.
- All members of staff should maintain a professional relationship with students at all times.
- All members of staff should dress appropriately and conventionally. An extra degree of moderation is required when teaching students under 18 years of age.
- Students under 18 years of age must attend class. They must sign it at reception upon arrival at school. Reception staff will then check daily at 9.45 to ensure all students under 18 are present at school.

- Students under 16 years of age are not permitted to leave the school premises during lessons. Exceptions may be made for students to leave the premises during break and lunch hours but permission must be given by the school.
- Encourage all students not to discriminate on the grounds of religious beliefs, race, gender, social class or lack of ability.
- Not let any allegations of abuse of any kind go unchallenged or unrecorded.

3.3 Adult – U18 interaction

Nacel English School London employees must maintain a professional relationship and abide by the code of conduct **(3.2 Guidelines)** with all students, including under 18s, both inside and outside of school. Physical contact of any kind is strictly forbidden except in order to prevent injury as stated in (**3.2 Guidelines**) the previous section.

3.3 Whistleblowing

Whistleblowing has been defined as: '*the disclosure by an employee or professional of confidential information which relates to some danger, fraud or other illegal or unethical conduct connected with the work place, be it of the employee or his/her fellow employees'*. (Public Concern at Work Guidelines 1997).

Nacel English School London is committed to high standards in all aspects of the school and will treat whistleblowing as a serious matter. Staff members must report concerns and these will be taken seriously, investigated and appropriate action taken in response. It is a legal requirement for staff to inform the Designated Safeguarding Lead or management of any concerns about colleagues not following the Code of Conduct. Staff who report this (or any other problems) will (a) not be penalised and (b) their report will remain confidential. Nacel English School London offers assurance that members of staff are protected from reprisals or victimisation for whistleblowing action undertaken in good faith. All reports will remain confidential.

If any member of staff would like further advice or feel like their concerns are not being taken seriously, they can connect the NSPCC helpline on 0808 800 5000.

3.4 Position of trust

All members of staff at Nacel English School London are aware that inappropriate behaviour towards students under 18 is unacceptable.

In addition, all members of staff understand that, under the *Sexual Offences Act 2003*, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a student under 18 may be a criminal offence, even if that child is over the age of consent.

3.5 Electronic Contact with Students

Electronic contact involves the communication or publication of information, or images, between two or more people using an electronic device such as mobile phones, computers, iPads etc. All members of staff are instructed not to give out personal emails or phone numbers or communicate with students via personal social media. This policy applies to contact before and after a student's course. If a teacher is supervising students on an activity, not on the school premises, the teacher must carry and use a mobile phone provided by the school.

Implementing Safeguarding at Nacel English School London

4.1 Staff Recruitment Policy

To ensure that employees working for Nacel English School London are suitable for work with children, the following procedures will be followed:

All staff must submit a CV with their application and all gaps in CVs must be explained satisfactorily.

The interview process will also include relevant questions about an applicant's experience and attitude to working with U18s.

Proof of qualifications will be required and a minimum of two references will be followed up. The reference request will ask if the referee has any reason to believe that the employee is unsuitable for work with children.

Staff will be required to confirm that there is no reason why they should not be employed in situations where they have responsibility for, or substantial access to, persons under 18.

Staff members are asked to agree to undergo a fresh enhanced DBS check before they commence employment with the school. The DBS check is valid with the school for a period of three years. DBS checks requested by previous employers are not transferable.

If a DBS check subsequently reveals matters which materially affect the suitability of a person for employment with Nacel English School London, the school will discuss matters with the prospective employee and reserves the right to withdraw any provisional offer of appointment or to terminate a contract under the Disciplinary Procedure for misrepresentation or failure to disclose material facts during the job application/interview process.

It is against the law for the school to knowingly employ anyone who is on the DBS children's barred list. If a DBS check has not come back by the time the applicant is due to start work, there should be exceptional and justifiable circumstances for employment to commence prior to receiving clearance.

In this case, all measures will be taken to ensure that this employee does not have unsupervised access to students aged under 18.

4.2 Overseas Police Check

All new applicants for positions within the school who have lived or worked abroad for a continuous period of six months or longer within the last 5 years will be required to produce a record of clear conduct from the local police in the country concerned.

4.3 Pre-Arrival Transfers

All students under the age of 16 entering the UK MUST book our return airport transfer service unless they are travelling with a named adult relative.

We strongly advise students aged 16 and 17 to do the same, to avoid any problems upon arrival. If however, a student does not book airport transfers, we ask the parent/guardian to notify us of the alternative arrangements.

Our transfers are provided by registered drivers (with mini-cab licences) who all have completed DBS checks

Each of these drivers completes a DBS check to obtain a mini-cab licence.

4.4 Emergency Phone Number

All international students are provided with two emergency phone numbers, therefore students are able to contact a member of staff out of school hours should a problem or concern arise. The person responsible for the emergency phone has contact numbers for the local police, doctor, hospital, local child protection officers and the safeguarding officers.

4.5 Arrival at Nacel English School London

On arrival at Nacel, all students are provided with an induction and information about student code of conduct. Throughout this induction, particular attention is paid to providing students with the rules and regulations at Nacel English School London and when living with a host family e.g., curfews and restrictions.

The staff members who run the introduction are mindful of the English ability of the students and visuals are used where necessary. In addition, students are informed that it is essential that the school is kept up-to-date with their current information e.g. mobile phone number and address.

4.6 Lessons

Teachers are made aware of any students in their class that are under 18 years of age as their names are highlighted on the register. Students under 16 will be taught in closed groups and not study with students of 18 years of age or older.

At Nacel English School London classes start at 9:30am and 13:45pm. We ask under 18s who are not studying in closed groups to sign in at Reception. The sign-in book for under 18s is checked daily by reception staff at 9.45. If a student under 18 years of age is still not present 15 minutes after the lesson begins, reception staff will

attempt to contact them. If they are unable to reach them, the students' parents, guardians, or emergency contact will be contacted. If no contact is made with the student after 4 hours, the police are normally contacted. However, this may be earlier or later than 4 hours depending on evidential circumstances.

Once the student is back attending lessons, an interview with the student is conducted to check the reason for the absence and check whether there are causes for concern. The reason for the absence is recorded on the class register.

With regards to the lesson content, teachers will check that the materials they use in the classroom will not be harmful in any way to under-18s; dealing with alcohol, drugs, sex etc. There may also be some under-18s who are not as mature for their age as they otherwise might be expected to be and particular attention needs to be paid to this. Therefore, teachers will ensure all lesson material is age-appropriate. Furthermore, 18 certificate films must not be shown to students under 18 years of age, and teachers should be aware of content of songs/videos before they are shown.

At Nacel English School London all students have mid-term tutorials. For tutorials conducted with students under 18, the door is to be left open as staff members should avoid being on their own with a student in a room.

Online lessons

For online lessons, security settings will be set so that messages cannot be sent between students. Emails for the online lesson link will be sent separately so that students will not have access to the email addresses of other students.

4.7 Critical Incident Procedure

Definition of a Critical Incident

A critical incident is **any situation that poses an immediate risk to the health, safety, or wellbeing of one or more individuals**. This includes, but is not limited to:

- Serious injury or illness
- Missing student
- Allegations or disclosures of abuse
- Fire or natural disaster
- Major behavioural incident or violence
- Transportation accident
- Security threat or terrorism
- Death (student or staff)
- Pandemic outbreak or contagious illness

1b. Critical Incident Response Team (CIRT)

Role	Responsibility	Person Assigned	Trained Deputy
Incident Leader	Overall coordination	*Anabela Barros*, School Manager	*Nick Studden*, Academic Manager
Communications Officer	Liaison with parents, media, embassy (if needed).	*Anabela Barros*, School Manager	*Jihyoun Song*, Administration Manager
Welfare Officer	Manages student well-being and pastoral care	*Nick Studden*, Academic Manager (and DSL)	*Makiko Tao*, Accommodation Manager (and DDSL)
Logistics Officer	Coordinates transport, accommodation, staff deployment	*Makiko Tao*, Accommodation Manager	Akiko Kawanishi, Administration Officer
Health & Safety Lead	Liaises with first aiders, medical services	*Makiko Tao*, Accommodation Manager (and First Aider)	*Jonathan Edney*, Teacher (and First Aider)

1c. Immediate Response Procedures

🔷 **Step 1: Ensure Safety**

- Remove individuals from danger if safe
- Administer first aid
- Contact emergency services (999 in the UK)

🔷 **Step 2: Alert Chain of Command**

- Notify Incident Leader and CIRT, and Nacel English School London (Finchley site) as soon as possible
- Document time and nature of incident

🔷 **Step 3: Secure the Scene**

- Limit access to the affected area
- Collect witness details but **do not interview** (leave this to authorities)

🔷 **Step 4: Account for Everyone**

- Headcounts or roll call using class registers
- Identify any missing persons immediately

🔷 **Step 5: Activate Communication Plan**

- Alert parents/guardians sensitively
- Notify teachers/group leaders
- Prepare holding statements for stakeholders

- Contact respective embassies/consulates

2a. Location-specific emergency procedures

Incident Type	Action
Fire	• Activate nearest alarm • Evacuate to designated fire assembly point (to the left of The Joiners, 51 Ballards Ln, London N3 1XP) • Class teachers take registers • Do not re-enter building until cleared by Fire Service
Medical emergency	• Notify a First Aider immediately • If serious, call 999 • Keep student calm and maintain privacy
Violence or intruder	• Activate lockdown procedure (secure entry points, hide with students, and maintain communication using phones or any other items available. Specific safe rooms and escape routes are designated in both school and boarding building. Staff follow clear emergency steps, remain out of sight, and stay in place until the all-clear siren is given). • Call 999 • Communicate silently with staff via agreed codeword system.
Power outage / infrastructure failure	• Alert the School Manager*, Anabela Barros*, as soon as possible. • Relocate lessons/activities if safe. • Ensure emergency lighting/backup is available.
Water/gas leak or hazard	• Evacuate affected area. • Alert the School Manager*, Anabela Barros*, as soon as possible. • Shut off utilities if trained and safe to do so.

Please also see the appendix for the full version of the Critical Incident Plan.

4.8 First Aid and Medical Care

We have 2 members of staff who hold a first aid certificate and their identities are posted on noticeboards in the school. Certificates are renewed every 3 years. Untrained staff are not permitted to administer any prescribed medication to students. There are first aid kits located in reception and the teachers' room. An additional first aid kit is available to be used by the social activities organiser on excursions and trips, if deemed necessary when completing a risk assessment. All first aid kits are equipped with British Red Cross approved contents and are regularly checked and updated with equipment when required.

Parents or guardians of students under 18 are required to inform the school on enrolment of any physical or psychological conditions or illnesses as well as informing of any allergies or any medication that the student will be taking. The enrolment includes a signed consent form in case of emergency medical treatment. All students under 18 requiring medical attention will be accompanied by a responsible adult.

4.9 Fire Safety

All students are informed of the evacuation procedure in the event of fire during the student induction, ensuring students under 18 in particular, are fully aware of the procedure. Information regarding fire safety is contained in classroom folders in each classroom, in the student handbook, and on posters displayed around the school.

Regular fire drills are conducted twice a year.

All homestay accommodation is visited and inspected by the Accommodation Officer. A gas safety certificate and fire safety risk assessment are required to be provided by the host family.

4.10 E: Safety

All computers within the school premises and the student wi-fi network are protected by secure firewalls so as to prevent students from accessing inappropriate content online, or content that may cause offence. We provide all under 18 students with a student guide, in addition to the student handbook, which provides information and advice on how to stay safe when surfing the internet and using social media.

Due to the difficulties of ensuring all host families have up-to-date firewalls, all students who are under 18 are advised to only use their own personal devices and not the host families' devices.

4.11 Off-site activities

At Nacel we run a weekly social activity for students which we endeavour to ensure is as safe and as accessible to under-18s as possible.

Risk assessments are created for each off-site activity. Careful consideration is given to supervision ratios, ensuring all students have emergency contact numbers and detailed information on meetings points etc.

The minimum supervision ratio for any social activity involving students under 18 is one member of staff to every 15 students. Nacel English School London reviews this ratio depending on the nature of the activity.

For all social programme activities and class excursions leaders/teachers should have a list of names of all students in their group and mobile phone numbers (where possible) especially those under- 18. All students should also have the number of the school mobile phone used by the teacher on external activities. Students should also have the emergency school contact telephone numbers in case of an emergency.

Students under 18 should not be left alone when on school excursions or activities in public places. Exceptions may be made depending on the excursion or activity after assessing the risks involved. In such cases, where possible students should be told to stay in groups of at least 4 and a meeting point and time to return should always be established.

When using public transport with a group of students the social activities leader/group leader should ensure students stay together. In the case of there being

two group leaders with larger groups, one should take the lead while the other brings up the rear to ensure no students are left behind.

Head counts should also be conducted at every change of train to ensure no-one has been left behind as well as at regular and appropriate intervals.

It is the responsibility of the social activities organiser/group leader to be aware of the environment that they are taking students into. They should ensure all students understand where and at what time to meet the group after their free time is over.

On returning to the school, under no circumstances should anyone under 18 be allowed to leave the group without the permission of the school. It is the responsibility of the social activity's leader to ensure that all under-18s return safely to the school.

Should students under 18 wish to take part in weekend day trips, which are organised by an outside company, Nacel English School will require signed confirmation from the student's parents allowing permission.

Students under 18 will not be supervised 24 hours a day as they will travel to school by themselves or with children in the same group. However, the group leader and school will always be available via an emergency contact number. In addition, the students will always be supervised by a responsible adult during school hours, overnight and usually during the day when not at school.

4.12 Host Family

At Nacel English School London, we take care to match each student with the appropriate homestay so that they are able to enjoy each other's company and have the opportunity to experience something new and practise their English. We provide detailed safeguarding and child protection materials to all of our homestay providers.

Unless travelling as part of a closed group for students under 18, we *only* provide host family accommodation as host families act as *caring and responsible UK0 parents*. The main carer will hold an enhanced DBS (Disclosure & Barring Service) check and historical data is checked for each household before recruiting host families. Students that are part of a group arriving and departing at the same may be roomed with another student(s), of the same sex and similar age. An adult host family who has been DBS certified with Nacel English School must be present overnight and usually during the day when students under 16 years of age are present at their accommodation. Students under 18 years of age must not stay in the same host family accommodation as students of 18 years of age and above.

Students under 16 years of age must return home immediately after school lessons or activities finish for dinner with their host family. If the student is later than the agreed time the host family will contact the school emergency number. Students between 16-17 years of age must return home by 10pm Sunday to Thursday and 11pm on Friday and Saturday. Our homestays have a duty to contact the school if this rule is broken and the student fails to return to the homestay in the evenings.

Nacel English School London will attempt to contact the student, but if the student does not respond, emergency contacts/parents/legal guardians will be contacted. If no contact is received from the student after 4 hours, the police will be contacted.

All students under 16 must return to their host families immediately once lessons or activities have finished. If a student is more than 30mins later than the expected arrival time and the host family has had no contact with the student, with satisfactory information about why they are late, the host family must call the emergency phone number immediately.

Closed groups of under 18s must follow the rules agreed between the school and group leader. The curfews however cannot be later or more lenient than those stated above for under 18s.

Stricter curfews may be enforced, if a written and signed request is received by a parent/legal guardian/group leader.

An exception for the curfew may be made for closed groups attending an activity or event with their group leader. This will only be for activities or events that are pre-agreed as part of a group's booking and listed in their group's schedule and of which the school are aware. In such cases host-families will be informed.

If a student wishes to leave their accommodation and find their own alternative, even if they are living with a person over 18 years old who is acting as their guardian, Nacel English School London requires a signed letter from the student's parent/legal guardian. Without a parent/legal guardian signature, students are not allowed to leave our accommodation.

Due to the fact that 16 and 17-year-olds are considered children, written consent is required from the child's parents or legal guardians for their child to meet with and be supervised by a person other than their host family or group leader. In such cases written consent must be completed by the parent / legal guardian and received by the school. The written consent must contain the full name, British address and contact details of the trusted adult who will supervise their child.

This does not apply to students in a closed group who are under 16. Written consent to leave the supervision of the group leader or teacher is not accepted.

All students under 18 will have their laundry done for them (1 wash per week)

A Single Central Record is used to ensure that all necessary documents have been done and are up-to-date.

4.13 Private Fostering

Private Fostering is someone other than a parent who cares for a child under 16 years of age, or under 18 years of age if they are disabled.

In cases where a Nacel English School student who is under 16 or under 18 and disabled is staying with a host family for more than 27 nights the local authority will be informed at least six weeks before the arrangement begins.

Child Protection

5.1 Overview

All staff are responsible for monitoring for signs and symptoms of physical and psychological abuse and neglect and reporting any concerns to the school's welfare and safeguarding officers.

The following are the main forms of maltreatment, and include signs that may be indicators that a form of abuse has taken place:

5.2 Physical Abuse

Physical abuse can be defined as an intentional act causing injury or trauma to another person. In the majority of cases, children are victims of physical abuse, but adults can also be victims. Physical abuse can involve punching, kicking, hitting, biting, burning, scalding, throwing or beating with objects such as belts, sticks etc.

It can also include giving a child alcohol or illegal drugs, poisoning, suffocating or drowning them.

5.3 Signs of Possible Physical Abuse

- Unexplained injuries, bruises, burns etc.
- Neglect
- Often hungry – may beg or steal food
- Wearing clothes that are dirty and need washing
- Poor personal hygiene – unwashed hair, poor appearance
- Requires dental or medical care
- Often tired
- Might abuse alcohol or drugs

5.4 Emotional Abuse

Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child, often leading to cause severe adverse effects on the child's emotional development. Emotional abuse may involve conveying to a child that they are worthless or unloved, inadequate, or valued only in that they meet the needs of another person. It can also include not allowing the child the opportunity to express their opinion – deliberately silencing them or making fun of their views.

Emotional abuse can also involve bullying, or cyber-bullying, causing a child to feel frightened or in danger.

Children who are emotionally abused are usually suffering from another form of abuse or neglect, but this is not always the case.

5.5 Signs of Possible Emotional Abuse

- 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
- Unexpected or unexplained change in behaviour
- Sleep or speech disorders
- Negative statements about themselves
- Extreme shyness
- Running away, stealing and lying.

5.6 Sexual Abuse

Sexual abuse involves forcing or enticing a child or a young person to take part in sexual activities, whether or not the child is aware of what is happening. This can involve physical content 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. Abusers can be men, women or other children.

5.7 Signs of Possible Sexual Abuse

- Eating disorder such as anorexia or bulimia
- Become withdrawn or clingy
- Personality changes – seeming insecure
- A fear of people or places
- Changes in eating habits
- Becoming secretive
- Emotional abuse
- Shows extremes of passivity or aggression
- Sudden speech disorders
- Neurotic behaviour
- Acting in an inappropriate sexual manner with objects or peers

5.8 Female Genital Mutilation (FGM)

Female Genital Mutilation is the ritual removal of some or all of the external female genitalia for non-medical reasons. Female Genital Mutilation occurs mainly in Africa, and to a lesser extent, in the Middle East and Asia. Although our school has very few students from these backgrounds, we will continue to review our policy annually as it is illegal in the UK to allow female students to undergo female genital mutilation either in this country, or abroad. We have a duty at Nacel English School London to

report any concern we may have about our female students at risk of FGM to the police and social services.

5.9 Child Sex Exploitation

Child sex exploitation is where children receive something (gifts, drugs, money, attention) as a result of sexual activity. Signs to be aware of include unexplained gifts, older boyfriends/girlfriends, missing school and associating with bad company.

5.10 Prevent – Awareness and Referral

Prevent is part of a Government initiative to develop a robust counter terrorism strategy – CONTEST. The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

English language schools like ours are asked to focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within colleges and other training settings.

For the purposes of this strategy, violent extremism in the name of ideology or belief is defined as violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activity in the name of an ideology or a set of beliefs.

Nacel English School London recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism and we encourage all our students to mix. Consequently, we arrange social activities to promote integration and a community feeling for students. Provisions are put in place to accommodate specific needs and ensure that opportunities to forge friendships with other students are plentiful and accessible; for example the *Nacel "Buddy System*".

To minimise the risk of radicalisation and violent extremism we promote the following, highlighting Core British Values around the school, to our host families:

- mutual respect and tolerance of those with different faiths and beliefs
- tolerance and harmony between different cultural traditions by enabling students to acquire an appreciation of and respect for their own and other cultures
- respect for other people

- an acceptance that other people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour
- understanding of the importance of identifying and combatting discrimination

There is no typical profile for a person likely to become involved in extremism. If there are concerns that a student, through changes in behaviour and language, is showing signs of becoming radicalised and involved in an organisation which could ultimately harm the student and the study centre then this needs to be reported to the Designated Safeguarding Lead or their deputy immediately and they will seek advice from the LSCP.

Responding to Issues

6.1 Responding to Allegations or Suspicions

It is the duty of all Nacel English School London staff to disclose cases of abuse or allegations of abuse to the DSOs / DSL in confidence. It is NOT for staff to decide whether or not a suspicion or allegation is true. Staff are responsible for acting on any concerns.

If a child tells you they are being abused, react as follows following the **4R's** process: **Receive, Reassure, React, Record** as recommended by British Council.

	What to do	What not to do
Receive	Be prepared to listen carefully and let the child explain what happened Stay calm and controlled Give the person the chance to say what they want to say. Use **TED** to help you: **T**ell me, **E**xplain to me, **D**escribe to me Take everything seriously Communicate with the student in a manner that is appropriate to their age and preference	Don't act shocked as this may prevent the child from continuing to talk and they may shut down. Don't ask leading questions Don't assume, don't paraphrase and don't offer alternative explanations. Don't make a child repeat a story unnecessarily. Don't judge the situation
Reassure	Reassure them that they have done the right thing in talking to someone. Acknowledge how difficult this must be for them to talk about	Don't promise to keep the information confidential or that everything will be OK. You can't guarantee this.
React	Explain to them what you have to do next; who you need to talk to	Don't interrogate or ask questions, let the child talk. Don't 'gossip' with colleagues about what has been said to you
Record	Record the date, time and place of the conversation Make brief notes at the time of talking to the student.	Don't throw away your original notes Don't include your own interpretation of events.

	Ensure you are objective throughout the report If there is, or seems to be, immediate risk to a child or children, contact the police directly.	Try to use the words used by the child – include swear words, slang etc.

6.2 Dealing with Allegations

6.2.1 Allegation of abuse by a student:

It is the responsibility of all members of staff and adults at Nacel English School London to be aware and vigilant and to report allegations or concerns immediately. Therefore, members of staff, after having received information that causes concern about the welfare of a student, should complete an Incident Case Log form as soon as possible. Incident forms can be collected from Reception.

In the absence of the Designated Safeguarding Officers, reports of concern should be referred to the Designated Safeguarding Lead.

Once a report has been completed, further questioning with the student should be avoided, unless the purpose is to gain clarification of factual information, as a child should only be interviewed once.

In response to the information received, Nacel's primary action is to ensure the student is safe. A meeting will then take place between the DSO and the DSL, and any other member of staff that may be of help, to decide an appropriate course of action and it is at this point where the following actions will be discussed:

- The immediate action that must be taken to ensure the safety of the child
- When and what the parents/guardians should be told
- What should be said to the alleged perpetrator

This allegation or concern should not be discussed with anyone else, and the identity of the student and the person alleged must not be shared with others. The school must maintain complete confidentiality.

The school has a legal obligation to report any suspicions of inappropriate behaviour with a child or young adult to the LSCP (Local Safeguarding Children Partnership). Likewise, any suspicions of child sexual exploitation or FGM will be reported to the LSCP. Both are the responsibility of the DSL, or in their absence, the DSO. Social workers then have a maximum of 24 hours to reach a decision about how to respond to a referral.

If the disclosure of abuse is about somebody in the student's home country, the same procedure is followed. The relevant authorities in that country will also be informed.

6.2.2 Allegation against a staff member:

Nacel English School London takes its duty of care to all those who are involved in child protection issues very seriously; whether it is reporting a concern, acting as a witness or indeed being the subject of an allegation.

If an allegation is made by a student against a member of staff at Nacel English School London, the DSL will follow guidelines provided by the local child protection authorities.

If an allegation is made against the Designated Safeguarding Lead (DSL), it should be reported to the UK Senior Executive (school manager) who will report to the Local Authority Designated Officer (LADO) immediately.

If the allegation regards the Deputy Designated Safeguarding Lead (DDSL), it should be reported to the Designated Safeguarding Lead (DSL).

If an allegation regards the Proprietor, it should be reported to the Designated Safeguarding Lead immediately.

Nacel English School London's primary duty of care must be to protect all students. It may therefore be considered necessary to assign a member of staff to alternative duties, or to suspend an individual, in the short-term, whilst a detailed investigation is carried out. Where accused of inappropriate behaviour, staff will always be given the opportunity to explain the situation and their actions. Staff and students can be assured that decisions will never be taken lightly.

There will be no detrimental action taken against staff who raise or are the subject of genuine concern that turns out to be unfounded. If staff are subject to malicious allegations, then they can be assured that this will be dealt with under the school's disciplinary procedure.

6.2.3 Allegations against a Nacel English School London Student:

It may occur that an allegation is against a student studying at Nacel; either an adult or a child themselves. In this case, Nacel English School London has a duty of care to both parties involved. The procedure is the same for any allegation, however on this occasion particular care will be given to support and ensure the alleged perpetrators confidentiality.

The school will offer care and support to the alleged victim, and may ask the alleged perpetrator to change host families, or exclude them from the school whilst an investigation is conducted. The DSL will contact the LSCP (Local Safeguarding Children Partnership) immediately and Nacel English School London will follow instructions from the LSCP.

6.3 Keeping a Record

Records generated for the purpose of child safety are processed in accordance with the Data Protection Act 1998, which requires that personal information held for these records is:

- Adequate, relevant and not excessive for the purpose of which it is held.
- Accurate and where necessary kept up-to-date
- Not kept for longer than necessary for its purpose

All records, information and confidential notes should be kept by the Designated Safeguarding Lead in separate files in a locked room or in secure electronic files. Only the school manager and Deputy Designated Safeguarding Lead will have access to these files.

Contacts:

7.1 Useful Telephone Numbers

Nacel English School London	0208 343 3567 Office hours (Monday – Friday) 09:00 – 17:30
Nacel English School London Emergency Number	07383 627108 07383 631707 Out of office hours
Immediate Emergency – Police, Fire, Ambulance	999
Non-emergency – Police	101
Non-emergency – NHS Direct	111
ChildLine	0800 11 11
British Transport Police	020 7830 8800

7.2 Key Contact List of Professionals

CONTACT/ORGANISATION	PHONE NO.	HOURS OF OFFICE	DESCRIPTION
Children's Social Care Carolyn Greenaway	0208 359 4066	9am – 5:15pm Mon – Thurs 9am – 5:00m Friday	If you have any concerns about a child contact the Social Care Referral and Assessment Team

LSCP (Local Safeguarding Children's Partnership) https://thebarnetscp.org.uk/bscp	0208 359 4066		
MASH (Multi-Agency Safeguarding Hub) Barnet mash@barnet.gov.uk	0208 359 4066 (Mon-Fri 9-5.15) 0208 359 2000 (outside hours)	9am – 5:15pm Mon – Thurs 9am – 5:00m Friday	Contact MASH if you have any concerns about a child or a young person in Barnet
Police Child Abuse Investigating Team	0208 733 5070	8am-6pm	
NSPCC	0808 800 5000		www.childline.org.uk

_7.3 Additional Resources

- Free online Child Protection training from Barnardo's

http://www.barnardos.org.uk/trainingandconsultancy.htm

- The Safe Network provides safeguarding information related to activities outside the home.

http://www.safenetwork.org.uk/Pages/default.aspx

- Further information about child abuse

www.nspcc.org.uk/preventing

- British Council guidance on under-18s

http://www.britishcouncil.org/education/accreditation/information-centres/care-children

- Barnet Safeguarding Children Board Development Manager

https://www.barnet.gov.uk/bscb-home/training.html

- London Safeguarding Childrens Board

http://www.londonscb.gov.uk/

- Further information about Female Genital Mutilation (FGM)

https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/

- Further information about abuse and preventing abuse

https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/

- Staying safe on the internet

http://www.saferinternet.org.uk/

APPENDICES

APPENDIX 1.5 STAFF DECLARATION

This is to confirm that I have received, read and understood the Nacel English School London Safeguarding Policy.

- Leaflet on FGM
- Leaflet on Child Sexual Exploitation
- Child Abuse
- Code of conduct
- Core British Values
- Prevent Leaflet

Name _____

Job title _____

Date _____

Signature _____