

# Embassy Summer U.K. Safeguarding & Child Protection



Policy:	<b>Embassy Summer U.K. Safeguarding &amp; Child Protection</b>
Version:	<b>2.0</b>
Synopsis:	This policy describes the Embassy Summer U.K. student safeguarding principles and approach. It highlights action that is taken to promote the welfare of children and protect them from harm. It outlines the safeguarding roles, responsibilities of staff and the procedures for identifying and managing safeguarding concerns and issues.
Relevant to:	All members of Embassy Summer staff (including contracted, agency and volunteer staff), group leaders, parents, agents; homestay providers and third-party contractors residing, studying, or working at/for Embassy Summer U.K. operated sites. Embassy Summer is a brand operating as part of EC Young Learners, part of EC English Ltd and this policy also covers the 'EC Academy' and 'EC Study Tours' brands.
Date introduced:	1 <sup>st</sup> March 2011
Next review:	January 2022
Related documents:	<p>Specific policies that should be read in conjunction with this document are:</p> <ul style="list-style-type: none"> <li>EC Staff Handbook</li> <li>EC Equality and Diversity Policy</li> <li>Embassy Summer DBS Policy</li> <li>Embassy Summer Safer Recruitment Policy</li> <li>EC Homestay Recruitment Procedure SOP</li> <li>EC's Code of Conduct for those working with Under 18's</li> <li>Embassy English Missing Person Procedure (Found in Plans for Foreseeable Events)</li> <li>EC Whistleblowing Policy</li> <li>EC GDPR Briefing Note</li> <li>Embassy Summer Anti-Bullying Policy</li> <li>Embassy Summer Plans for Foreseeable Events</li> <li>Embassy Summer Accommodation &amp; Allocation Guidelines</li> <li>Embassy Summer Ratio &amp; Supervision Guidance</li> <li>Embassy Summer Attendance &amp; Absenteeism Policy</li> <li>Embassy Summer Individual Welfare Practice Guidance</li> <li>Embassy Summer Disciplinary Procedures</li> <li>Embassy Summer Complaints Procedure</li> <li>Embassy Summer Student Code of Conduct</li> <li>Embassy Summer Site Risk Assessments</li> <li>Embassy Summer Group Leader Guide</li> </ul>

Date(s) modified/ reviewed:	March 2011 Annually to January 2022
Publication:	This policy is made available to staff, homestay providers and contractors via email. This policy is available to agents and external parties via the company website <a href="http://www.embassyenglish.com/partners/">www.embassyenglish.com/partners/</a> . Group leaders shall receive a summary on arrival at centre. The policy is publicly available on the company website <a href="http://www.embassysummer.com">www.embassysummer.com</a>
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## 1. Introduction

Embassy Summer is committed to safeguarding and protecting children in its care from harm (these children are defined as any person under 18 years old enrolled on a given part of an Embassy Summer course).

Embassy Summer will apply this policy entitlement equally to all children regardless of gender, ethnicity, disability, sexuality or belief.

The department recognises that the nature of its services present unique environments and activities with their own particular risks to the safety and wellbeing of its students.

This policy describes the Embassy Summer U.K. student safeguarding principles and approach. It highlights action that is taken to promote the welfare of children and protect them from harm. It outlines the safeguarding roles, responsibilities of staff and the procedures for identifying and managing safeguarding concerns and issues.

This policy supports Embassy Summer's statutory duty to safeguard and promote the welfare of children and gives due regard to: Keeping Children Safe in Education, September 2018 and Working Together to Safeguard Children, 2018; and is pursuant to The Education (Independent School Standards) (England) Regulations 2014 and Department for Education Boarding Schools National Minimum Standards, March 2015. Those who work with children and senior leaders are required to read Part 1 and Annex A of Keeping Children Safe in Education.

### 1.1. Local Agency Contacts for 2021 Centres

#### **Royal Holloway at RHUL & Gatton Park**

The Local Authority Designated Officer (LADO) for **Surrey** can be contacted via telephone on **0300 1231630**.

Concerns about the welfare of a child can be passed to the appropriate local agency by contacting **Surrey Safeguarding Children Partnership**

In an emergency dial **999** and ask for the Police.

### 1.2. School Contacts

### Royal Holloway, at RHUL

The Welfare Officer, or in their absence the Centre Manager who assumes their responsibilities, is contactable by phone and email at **07388944739** and **[embassyroyalholloway@ecenglish.com](mailto:embassyroyalholloway@ecenglish.com)**

### Gatton Park, at Royal Alexandra & Albert School

The Welfare Officer, or in their absence the Centre Manager who assumes their responsibilities, is contactable by phone and email at **07388944722** and **[embassygattonpark@ecenglish.com](mailto:embassygattonpark@ecenglish.com)**.

The Designated Safeguarding Lead is for Embassy Summer is Ryan Edwards, Embassy Summer Operations Manager, contactable by email and phone at [ryanedwards@ecenglish.com](mailto:ryanedwards@ecenglish.com), 07982718190.

The Deputy Designated Safeguarding Leads are:

Name	Contact Details	Deputy for:
Jason Hanaway	<a href="mailto:jasonhanaway@ecenglish.com">jasonhanaway@ecenglish.com</a> (+44) 07717 344 360	UCL
		Mile End
		Southbank
Phil Spark	<a href="mailto:philspark@ecenglish.com">philspark@ecenglish.com</a> (+44) 01273 339 381	Roedean Academy
		Brighton
		Oxford
		Cambridge
		Portsmouth
Simone Canevari	<a href="mailto:simonecanevari@ecenglish.com">simonecanevari@ecenglish.com</a> (+44) 07450953214	Gatton Park
		Canterbury
		Docklands
		Royal Holloway
		Study Tours & Wellington School

The senior management and leadership team, comprising of the, EC Board of Directors, Embassy Summer Operations Manager, Programme Manager and Centre Manager ensures that the school complies with its duties under the legislation below:

- Children Act 1989
- Children Act 2004
- Education Act 2002 and 2011
- Safeguarding Vulnerable Groups Act 2006
- Education and Inspections Act 2006
- Children and Young Persons Act 2008
- School Staffing (England) Regulations 2009
- Equality Act 2010
- Education Act 2011
- Protection of Freedoms Act 2012
- Police Act 1997
- Police Act 1997 (Criminal Records) Regulations 2002
- Police Act 1997 (Criminal Records) (No. 2) Regulations 2009.
- Prevent Strategy HM Government
- Counter Terrorism and Security Act 2015 (Prevent Duty)
- Working Together to Safeguard Children 2018

## **2. Application of this Policy**

This policy applies to all permanent, contracted, agency and volunteer staff, including those who do not have cause to come into direct or regular contact with students in order to carry out their daily duties.

This policy also applies to those who provide homestay accommodation for students, third-party contractors, visitors and Group Leaders and anyone else who has cause to visit the Embassy Summer centres.

## **3. Policy Aims**

The purpose of the safeguarding policy is to set the policies, practices and provisions in place to ensure all possible steps are taken to:

- Provide a safe environment for the students
- Ensure that all staff act according to the best interests of the students

- Outline responsibilities of all staff and specific roles
- Reduce the potential risk pupils/students face of being exposed to abuse, extremism, radicalisation, exploitation or victimization
- Swiftly and efficiently identify and manage cases where students are at risk or have unmet welfare needs
- Promote the importance of student safeguarding and welfare across all activities
- Regularly evaluate the company approach and practices and audit company records with regard to safeguarding and make any improvements needed

#### 4. Embassy Summer Safeguarding Principles

The principles below underpin company provisions and practices in relation to child protection:

- The summer school site provides a safe and secure environment for all students
- Homestay and residential accommodation provide a safe and secure environment for all students
- All students feel safe and secure and protected from harm
- All students know who to turn to for help, advice or support, can access services confidentially, quickly and easily, and have access to 24 hour support
- A Designated Safeguarding Lead and deputy is appointed for the summer school and has responsibility for the safeguarding and welfare of all students
- The Centre Manager has overall accountability for the safeguarding and welfare of students in a given Centre
- All staff share the responsibility to protect students from harm, which includes being vigilant in identifying possible safeguarding issues and following relevant school policies and procedures relating to safeguarding and welfare
- Students and staff have effective means by which they can raise safeguarding concerns or report issues and are enabled to give their views frequently on the effectiveness of child protection provisions and practices in the summer school
- All staff are aware of members of the Safeguarding and Welfare team and know who to turn to if they need help or advice or have concerns
- Staff have at least one reliable means to contact all students quickly and directly
- All relevant summer school staff are aware of the special needs or particular vulnerabilities of individual students
- The whereabouts of all students under 18 is always known and adequate supervision is ensured

- In cases where a student under the age of 18 is unaccounted for, procedures to locate the student are immediately invoked
- The summer school has procedures in place that enable child protection concerns and incidents to be dealt with promptly and effectively and in line with relevant legislation.

## 5. Embassy Summer Approach to Safeguarding

Embassy Summer's approach to safeguarding follows the Department of Education's guidance set out in Keeping Children Safe in Education, January 2021, which defines the role Embassy Summer should take in protecting the children in the school.

### Excerpt 1 From Keeping Children Safe In Education, January 2021

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

### Excerpt 2 From Keeping Children Safe In Education, January 2021

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

### Excerpt 3 From Keeping Children Safe In Education, January 2021

#### Role of school and College staff

School and College staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

All staff have a responsibility to provide a safe environment in which children can learn and all staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Any staff member who has a concern about a child's welfare should follow the referral processes set out in paragraphs 22-33. Staff should expect to support social workers and other agencies following any referral.

Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

#### **What school and college staff need to know**

All staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include:

- the child protection policy;
- the behavior policy;
- the staff behavior policy (sometimes called a code of conduct);
- the safeguarding response to children who go missing from education; and
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part one of this document should be provided to staff at induction.

All staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All staff should be aware of their local early help process and understand their role in it.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

## **6. Roles and responsibilities**

### **6.1. Governance**

Embassy Summer is a department of Embassy English owned by a single proprietor Embassy Educational Services Ltd, part of EC English and forms part of this Governance structure. Embassy Summer is also a member of Young Learners English UK and the Sussex Safeguarding Forum to ensure that best practice for safeguarding of young people is in line with industry standards.

The Proprietor will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of the Keeping Children Safe in Education, January 2021 guidance.

The Proprietor undertakes an annual review of safeguarding arrangements across all Embassy Summer schools.

### **6.2 Designated Safeguarding Lead**

The summer school department has a Designated Safeguarding Lead, and Deputy Designated Safeguarding Leads who take over duties and responsibilities when the Designated Safeguarding Lead is unavailable.

The Designated Safeguarding Lead has overall responsibility for the safeguarding and welfare of students, supported by other members of school staff. The Designated Safeguarding Lead is the school representative for any safeguarding issue requiring interagency working.

The Designated Safeguarding Lead, Centre Manager and Welfare Officer form the most senior safeguarding group of the school and in the event of one of these members of staff being implicated in a child protection enquiry/incident, the guidance is to contact the LADO as required. Further information on the procedure to be followed in the event of allegations against staff members can be found in the Embassy English Policy on Reporting of Concerns or Allegations of Harm to Students.

The DSL is responsible for:

The Designated Safeguarding Lead is responsible for:

- Ensuring that all staff are aware of and understand the role of the Designated Safeguarding Lead

- Ensuring that all staff are conversant with and follow the procedures outlined in this policy and those that directly support it
- Ensuring that all staff have read and signed Department for Education guidance set out in *Keeping Children Safe in Education* and all updates as they are published
- Providing advice and support to all staff on issues relating to child protection
- Ensuring all staff, including the Centre Manager, have completed and hold an up-to-date certificate for safeguarding awareness training which is updated every 3 years.
- Ensuring all staff complete Prevent training, either face to face or on-line.
- Ensuring all staff receive frequent (at least annually) safeguarding briefings and updates so that their safeguarding practices are current.
- Ensuring that they and their deputies have completed and hold an up-to-date certificate for level 3 child protection training which is updated every 2 years.
- Ensuring that all staff training required and completed in relation to child protection is recorded in a central training log and audited regularly to identify training needs and any recording gaps.
- Ensure that all new staff, including temporary staff and volunteers, receive induction which includes the school's *Child Protection Policy*, the *Staff Code of Conduct for those working with under 18's*, the identity of the Designated Safeguarding Lead and access to Part 1 of *Keeping Children Safe in Education through the Training section of the Embassy Summer Staff App*.
- Ensuring that all students receive a full induction and timely updates on matters relating to safeguarding and welfare.
- Ensuring that all students have sufficient and appropriate means to report concerns, issues and incidents.
- Maintaining a complete and up-to-date record of all child protection-related concerns, issues, incidents, reports, referrals and complaints.
- Reporting children at risk to the Local Authority Designated Officer (LADO), Local Safeguarding Children Partnership (LSCP) or the police as appropriate.
- Ensuring that children in need are getting appropriate individual support, advice and access to services.

- Working holistically and in partnership with other agencies that can provide welfare and safeguarding support and information to students.
- Ensuring that literature and information from agencies who provide welfare and safeguarding services to students are readily available and students are aware of the range of services on offer.
- Ensuring that this policy is made available to students and to their parents/guardians

### **6.3. The Deputy Designated Safeguarding Leads**

The Deputy Designated Safeguarding Leads (Program Managers) are responsible for supporting the Designated Safeguarding Lead in their duties and responsibilities day-to-day, and for assuming these duties and responsibilities in their absence.

### **6.4. Centre Manager**

The Centre Manager has overall accountability for the safeguarding and welfare of students at a particular summer school site.

### **6.5. Welfare Officer**

The summer school Welfare Officer is a go-to person for students with queries, needs or concerns relating to their welfare. In addition the Welfare Officer provides support and information to colleagues on welfare matters. The Welfare Officer liaises closely with the Designated Safeguarding Lead where there is a particular concern about a student's welfare. In the absence of a Welfare Officer the Centre Manager assumes their responsibilities.

### **6.6. All staff**

All staff are responsible for monitoring for signs and symptoms of physical and psychological abuse and neglect and reporting any concerns in accordance with the Embassy English Policy on Reporting of Concerns or Allegations of Harm to Students. All staff are responsible for identifying and reporting to the DSL all students who could benefit from early help.

In the event a staff member has concerns that another member of staff is not fulfilling their responsibility for safeguarding then this must be reported to the Centre Manager or the DSL in their absence. Further information on the procedure to be followed in the event of

allegations against staff members can be found in the Embassy English Policy on Reporting of Concerns or Allegations of Harm to Students.

All other concerns must be reported via the EC Whistleblowing Policy.

Staff are expected to promote positive behaviour in students, encourage them to follow Code of Conduct, follow disciplinary procedures in cases of misconduct, set an appropriate example to students and help and encourage them to stay safe.

## **7. Child protection policies, practices and provisions**

This section describes summer school's policies and procedures, practices and provisions put in place to keep the students safe.

### **7.1. Staff recruitment**

Please refer to the Embassy English Safer Recruitment and Selection Policy for the full recruitment process for the following:

- Temporary and permanent staff, including part-time, ancillary and voluntary staff
- Agency and contract staff, including part-time, ancillary and voluntary staff
- Third party contractors

All recruiting managers will complete Safer Recruitment training either in house or via the NSPCC on-line training

### **7.2. Staff induction process**

All Embassy Summer staff undergo a process of induction to ensure they are adequately prepared for their role and responsibility. This process includes:

1. Receipt of EC's Code of Conduct for those working with Under 18's
2. Receipt of company policies such as Safeguarding and Health & Safety (detailed in EC Staff Handbook)
3. Receipt of Staff relevant handbooks
4. Receipt of Keeping Children Safe in Education, Part 1
5. Pre arrival online training with learning assessment
6. In centre arrival induction

Online training and the in centre induction includes a detailed description of our policies, procedures, practices and provisions in relation to the safeguarding and welfare of our students, specifically the Safeguarding & Child Protection Policy, relevant handbooks & EC's Code of Conduct for those working with Under 18's, the identity of the Designated Safeguarding Lead and their deputies. In addition, all staff must read and sign a current copy of Part 1 of the Department for Education guidance, Keeping Children Safe in Education as part of the onboarding process. Evidence that online training has been completed is retained in a central record.

Staff are familiarised with relevant reporting lines and communication channels within the school to enable them to effectively raise concerns or issues.

Safeguarding awareness training (equivalent to Level 1) training and internal training on security and health and safety are given as part of the online training of all staff.

Staff are informed about the contents of student inductions, the student Code of Conduct, and expectations for their own conduct.

### 7.3. DBS referral when staff leave the summer school

The department has a duty to inform the Disclosure and Barring Services (DBS) and/or National department for Teaching & Leadership (NCTL) if a member of staff who leaves the school has been involved in a substantiated child protection allegation, or any other incident about which the DBS must be made aware, and will do this promptly.

The referrals team can be contacted on 01325 953 795 or at PO Box 181, Darlington DL1 9FA.

Please refer to the Embassy Summer Safer Recruitment Policy for further information.

### 7.4. Staff training

The table below shows the mandatory safeguarding and welfare-related training completed by specific members of staff within Embassy Summer U.K. operations. Other staff may complete some of the training shown below, but it is not mandatory for them to do so.

'Staff' refers to all temporary and permanent full-time and part-time staff, including voluntary staff.

Training	Staff
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British Council Safeguarding for Activity Staff/Teachers/Homestay Hosts/Managers, as relevant to position	All staff –will complete course respective to role
Higher level safeguarding (equivalent to L3 for safeguarding lead)	Designated Safeguarding Lead, Nominated Safeguarding Lead, Deputy Designated Safeguarding Leads
Higher level/advanced safeguarding training (equivalent to L2)	Welfare Officers, Centre Managers
Online Health and Safety	All staff
First Aid	Designated First Aiders
Safer Recruitment	Recruitment Manager  Recruitment Officers  Recruitment Assistants

### 7.5. Staff Conduct

Staff must ensure that their conduct does not pose any risk to the safeguarding and welfare of students and must set them a good example. They must also ensure that their behaviour and actions do not place students and other members of staff at risk of harm or allegations of harm to a student.

Staff must follow the behaviour standards set out in the EC Staff Handbook, and Embassy Summer Policies which is made available on the Staff Meeting Point area of the Embassy Summer App and Website

### 7.6. Group Leaders

There is a systematic process to ensure adults accompanying students on Embassy Summer courses have undergone appropriate suitability checks in their home country in line with Accreditation U.K. guidance.

Accompanying adults will be required to declare their suitability to work with children on arrival. They will also receive a copy of the Safeguarding Policy Summary, the Group Leader guide, the Code of Conduct and an induction containing further information on company Safeguarding & Welfare Policy, roles, responsibilities and communication lines.

### 7.7. Visitors to the summer school

Embassy Summer operates at host institutions which have specific policies and practices for visitors on site. Regardless:

Embassy Summer identification must be worn by all staff, students and group leaders.

Prior authorisation for Embassy Summer visitors to the summer school must be arranged whenever possible. When this is not possible, the summer school Centre Manager and other relevant staff must be informed of a visit to the Embassy Summer as soon as possible after the visitor arrives.

Staff who bring visitors onto the premises are responsible for them and must chaperone them during their visit. Staff who have a verified DBS check in place do not need to be chaperoned, these individuals must be entered onto the SCR (Single Central Register).

Staff must ensure that visitors/third-party contractors carrying out works in the summer school, for whom they are responsible, wear the appropriate safety clothing and equipment and display the appropriate safety signage. Staff are also responsible for ensuring that all related risk assessment requirements are met.

## **7.8. Supervision**

The Centre Manager is responsible for the safeguarding and welfare of boarders whilst they are in residential boarding accommodation. The Centre Manager is responsible for the safeguarding and welfare of students on and off site.

Full details of supervision and monitoring practices can be found in the Embassy Summer's Ratio & Supervision guidance document.

## **7.9. Homestay accommodation**

Homestay accommodation is provided by:

- 1) Hosts International Ltd.
- 2) Hosts Consultancy, a partner of Embassy Summer
- 3) EC English Language Schools (directly)

All homestay accommodation providers are assessed for suitability and agreed services are outlined in the Homestay Provider Service Level Agreement.

Homestay Consultancy receive information and training regarding the safeguarding and welfare of the students they host and all members of the homestay household over 16 years of age have an enhanced DBS check.

Hosts International meets the standards for registration with the Accreditation U.K. as a provider of homestay, private home and independent self-catering accommodation for adults and under-18s for accredited providers in the UK.

Full details regarding homestay safeguarding and welfare practices and provisions can be found in Embassy Summer's Service Level Agreements with external providers.

### **7.10. Off-site visits**

Embassy Summer produces risk assessments for every trip. These are made available to staff and generic control measures are communicated through pre-excursion checklists. Emergency contacts and procedures are made known to all staff. Clear guidance on supervision and free time is provided. Approved transport providers are used. Guidance concerning free time allowance for students is available on the website.

### **7.11. Student induction**

All students undergo an induction process on arrival at Embassy Summer:

- All students receive the Student Welcome Information pack. All students attend an induction presentation to highlight the rules, regulations, safety and communication systems in the school
- All students undertake an induction lesson designed to reinforce and check the understanding of points 1 & 2.

Handbooks, inductions or noticeboards cover the following areas:

- Embassy Summer Rules
- Expectations of student behaviour as defined by the student Code of Conduct
- Specific rules, guidelines and procedures relating to general welfare and safeguarding, security, health and safety and to summer school residences
- Information on other key summer school policies and procedures
- A guide to who's who in the summer school
- Information about summer school facilities and resources, and extra-curricular activities
- Information relating to their academic programme and studies
- Information about the local area, use of local facilities and activities and places of interest outside of the summer school
- Information on summer school-based and independent services available to offer advice on safeguarding and welfare matters and to support safeguarding and welfare needs that may arise
- Information and assistance to support their financial, medical, social, cultural and religious needs where relevant.

### **7.12. Students' attendance and whereabouts**

Attendance at lessons, activities or supervised accommodation sessions is compulsory for all students under the age of 18.

Staff must know the whereabouts of all students during the summer school day and during the hours of curfew. All junior students must be accounted for in morning, afternoon and evening sessions. Vulnerable students (for example, individuals or students out of age range) must be checked at evening curfew.

In addition, homestay providers must be aware of the whereabouts of the students they host during the summer school day and the hours of curfew.

Full information can be found in Embassy Summer Absence and Attendance Guidelines.

Any student whose whereabouts cannot be accounted for immediately invokes Embassy Summer Missing Person Procedures (Plan for Foreseeable Events), further information about which can be found in section.

### **7.13. Missing person procedures**

If staff or homestay providers cannot account for the whereabouts of a student, Embassy Summer Missing Person Procedures are immediately invoked.

Early stages include attempting to contact the student and any known friends or local guardians, and searching summer school premises, including the student's bedroom, and surrounding areas, if applicable. If a student cannot be found, the situation is escalated to the Designated Safeguarding Lead, their deputy or to the person holding the emergency phone if the incident occurs outside of summer school hours.

Please refer to Embassy Summer Missing Person Procedures (Plans For Foreseeable Events) and site risk assessment for further details.

### **7.14. Student conduct and discipline**

All students are encouraged to behave in a positive way, and responsible behaviour is noticed and acknowledged by staff. As guidance for all students, they are asked to follow a Student Code of Conduct. Students who choose not to follow the code will be subject to Embassy Summer Disciplinary Policy and Procedures.

This code and the associated behaviour policies are rigorously upheld by staff to safeguard the welfare of all students and staff and to prevent potentially harmful behaviour from escalating.

Please refer to Embassy Summer student Code of Conduct and Embassy Summer Disciplinary Procedure for further information.

### **7.15. E-safety**

Embassy Summer schools recognise that e-safety is an area of growing concern. Whilst the summer school cannot exert full control over how students choose to conduct themselves online and using electronic devices, maximum effort is made to guide students in making good choices. In addition, certain measures are put in place to prevent the use of electronic devices and the internet for specific potentially harmful purposes.

Staff must not enter into a personal relationship with a student, including a friendship on line, or take photographs or videos that include students other than for authorised purposes. Authorised photographs and videos of students must never be posted online except where staff have given permission to do so for the purposes of marketing and official authorisation has been received from the relevant student(s).

Further details regarding E-safety can be found on site-specific risk assessments, and the Embassy Summer Mobile Application.

### **7.16. Anti-bullying**

Embassy Summer has a zero-tolerance policy on bullying, which applies to students and staff. Steps are taken to prevent it from occurring as well as to eradicate it if it does. Any bullying incident (including cyber-bullying) will be treated as a child protection concern when there is reasonable cause to suspect the student is suffering or likely to suffer significant harm.

There is a well-developed programme of activities and provisions in place to promote social development and integration and equality and diversity amongst the student population.

Staff are encouraged to look out for signs of bullying and report any concerns or issues to the summer school Welfare Officer.

Staff encourage students to report any concerns they have about themselves or fellow students to any member of staff they feel comfortable confiding in.

Please refer to Embassy Summer Anti-Bullying & Harassment Policy for further details.

### **7.17. Equality and diversity**

All members of the summer school community are expected to be familiar with company policy on equality and diversity and to uphold the principles set out within it. In addition, everyone is encouraged to take a role in promoting equality and embracing diversity.

Please refer to EC Equality and Diversity Policy for further details.

### **7.18. Alcohol use and illegal substances**

The Student Code of Conduct gives students specific rules with regard to the use of alcohol and drugs and is clear that illegal substances must not be solicited, sold, used or brought onto summer school premises at any time. Student misconduct with regard to alcohol and illegal substances is dealt with through Embassy Summer Student Disciplinary Policy and Procedures.

However, it is also recognised that behaviour with regard to alcohol and illegal substances may be indicative of a psychological or emotional issue, and staff are made aware to look out for signs and symptoms of underlying issues. Staff can report any concerns they have about students in accordance with the Embassy English Policy on Reporting of Concerns or Allegations of Harm to Students.

### **7.19. Female Genital Mutilation**

Embassy Summer is committed to ensuring that female students are safeguarded against FGM. Staff and teacher who suspect that FGM has been carried out must report these concerns to the DSL or their Deputy who will immediately seek further advice from the child protection services. In the event that that a student has been observed to have undergone FGM or the student informs staff that this has happened, the Police will be notified immediately.

### **7.20. Honour Based Abuse**

In the event a student is identified as possibly being a victim of honour based abuse, this must be referred to the Designated Safeguarding Lead who will refer the student to the appropriate local services.

### **7.21. Child Sexual Exploitation**

In the event a student is identified as possibly being a victim of child sexual exploitation, this must be referred to the Designated Safeguarding Lead who will refer the student to the appropriate local services (see appendix 3)

### **7.22. Monitoring for and recognising signs and symptoms of abuse and neglect**

All staff complete safeguarding awareness training which contains details on how to identify potential cases of abuse.

Staff are expected to be able to recognise signs of physical, sexual and emotional abuse and neglect and report these as soon as possible to the Designated Safeguarding Lead or their deputy.

Further details of recognising the signs of abuse can be found in the Reporting of Concerns or Allegations of Harm to Students Policy

### **Excerpt from Keeping Children Safe in Education, Sept 2018**

All school and College staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact

activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Staff must also be able to identify signs of other potential child protection issues, such as bullying, gang violence, children running away, child sexual exploitation, and children forced to undergo arranged marriage, radicalisation to violent extremism or female genital mutilation. Staff are made aware that child-on-child abuse exists and that it must be considered when identifying potential issues. Information on this and other issues can be found in the latest Department for Education guidance set out in Keeping Children Safe in Education, Part 1 of which is read and signed by all staff.

### **7.23. Reporting Students at Risk**

If a child is believed to be at risk of harm, staff are trained to report this to the Designated Safeguarding Lead immediately. The Designated Safeguarding Lead escalates this straight away to the local safeguarding board or police.

If the Designated Safeguarding Lead or one of their Deputy cannot be reached immediately, for example if the risk is imminent or is identified outside of office hours, the member of staff involved must report the case to the safeguarding board and local police straight away. The Designated Safeguarding Lead must ensure that all staff can access the information they require to be able to do this in an emergency.

### **7.24. Supporting students in need**

We recognise that the students are, in general, more likely to need additional support due to the fact that the vast majorities are a long way from home and experiencing a new culture and environment.

Embassy Summer schools arrange lots of activities around the students' timetables to promote integration and a community feeling for students. Provisions are put in place to accommodate specific needs and we ensure that opportunities to forge friendships with other students are plentiful and accessible.

Staff monitor for potential issues and report any concerns they have. Students are also enabled to identify any needs they have that are not being met by talking to any member of summer school staff and providing feedback via student surveys.

Student communal areas and notice boards provide students with up-to-date information on other independent sources of information, support, and advice.

### **7.25. Supporting vulnerable students**

Some students may be more vulnerable to harm than others, for example students very young, outside of centre's suggested age range, students with special educational needs, disabilities or chronic medical conditions, including students who are adults.

Students who are vulnerable or who have additional needs, including adults, as well as students outside of a centre's suggested age range, have additional care plans in place as a measure to ensure that they are protected from potential harm based on a risk assessment. Additional measures may include regular check-ups with welfare staff and additional or earlier residential curfews.

As is the case for all students, members of the school management team are available to students 24 hours a day to help with queries, concerns and issues.

### **7.26. Prevent – Awareness and Referral**

#### **Excerpt from The Prevent duty, Departmental advice for schools and childcare providers, June 2015**

In order for schools and childcare providers to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified.

Protecting children from the risk of radicalisation should be seen as part of schools' and childcare providers' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Schools and childcare providers can also build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating

controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The Prevent duty is entirely consistent with schools' and childcare providers' existing responsibilities and must not be burdensome.

Embassy Summer recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. To that end we plan to take further steps to minimise the risk of this eventuality by engendering British Values through the school ethos

All staff receive Prevent training. If there are concerns that a student, through changes in behaviour and language, is at risk of becoming radicalised then these need to be reported to the Designated Safeguarding Lead or their deputy immediately and they will seek advice from the LADO, local safeguarding partnership or the Police.

DfE Prevent helpline 020 7340 7264 or [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

The police non-emergency number 101

Crimestoppers 0800 555 111

Anti-Terrorism Hotline 0800 789 321

Information on internet filtering and monitoring can be found on site-specific risk assessments.

### **7.27. Working with parents/agents**

Potentially sensitive information is discussed with parents/guardians/agents with the full knowledge and permission of the student unless there is a safeguarding imperative requiring this to be over ridden.

Parents/guardians/agents are consulted about the specific needs of students who are chronically unwell, have special educational needs or disabilities, or are identified as being vulnerable in some other way.

In addition, parents or agents are contacted early on in disciplinary procedures, especially where there is an issue with a student's attendance, if a student is missing residential curfews, or for any other issue that poses a risk to a student and/or their peers.

### **7.28. Wider safeguarding and welfare support**

Summer school provisions and practices, outlined in this section, are bolstered by the external networks and support the summer school has put in place for students.

The Programme Manager is responsible for ensuring each summer school has established local contacts with GP practices, dentists and hospitals.

In addition, the summer school DSL or Deputy may engage the support of the Local Authority Designated Officer (LADO), national embassy, LSCP, police or other appropriate services when they are concerned that a child is at risk.

### **7.29. Supporting staff involved in child protection cases or the subject of allegations**

The department takes seriously its duty of care to all those who are involved in child protection issues, whether it is reporting a concern, acting as a witness or indeed being the subject of an allegation. Staff members, who are directly implicated or involved in a reported issue, will be provided with a named contact, obtainable from Human Resources, who will provide each individual with confidential support, and progress updates where appropriate.

If a staff member is the subject of an allegation, the department primary duty of care must be to protect all students.

There will be no detrimental action taken against staff that 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 disciplinary procedure.

Guidance on addressing allegations against members of staff is found in the Embassy English Policy on Reporting of Concerns or Allegations of Harm to Students.

### **7.30. Securing the views of students and staff**

Students and staff are requested to provide their feedback about school policies, practices and provisions during their early lessons and at the end of their stay through surveys. The school forms student committees to hear views directly and feedback is a standing agenda for staff and Group Leader meetings.

### **7.31. Confidentiality and reporting and recording information**

Records and reports pertaining to child protection issues are stored securely by summer school staff with access restricted to those who need to know their content in order to ensure a holistic approach to the management of student safeguarding and welfare.

Students are advised that information they share may need to be shared with third parties where there may be a risk of harm to others.

### **7.32. Data protection**

As part of EC, the school needs to collect and use certain types of information about people with whom it deals in order to operate. This includes personal information about current, past and prospective employees, suppliers, clients/customers, professional advisors and administrators, and other organisations with whom it communicates.

In addition, it may occasionally be required by law to collect and use certain types of information to comply with the requirements of Government departments for business data. This personal information must be dealt with properly in the matter it is collected, recorded and used, and this will be in line with UK data protection legislation.

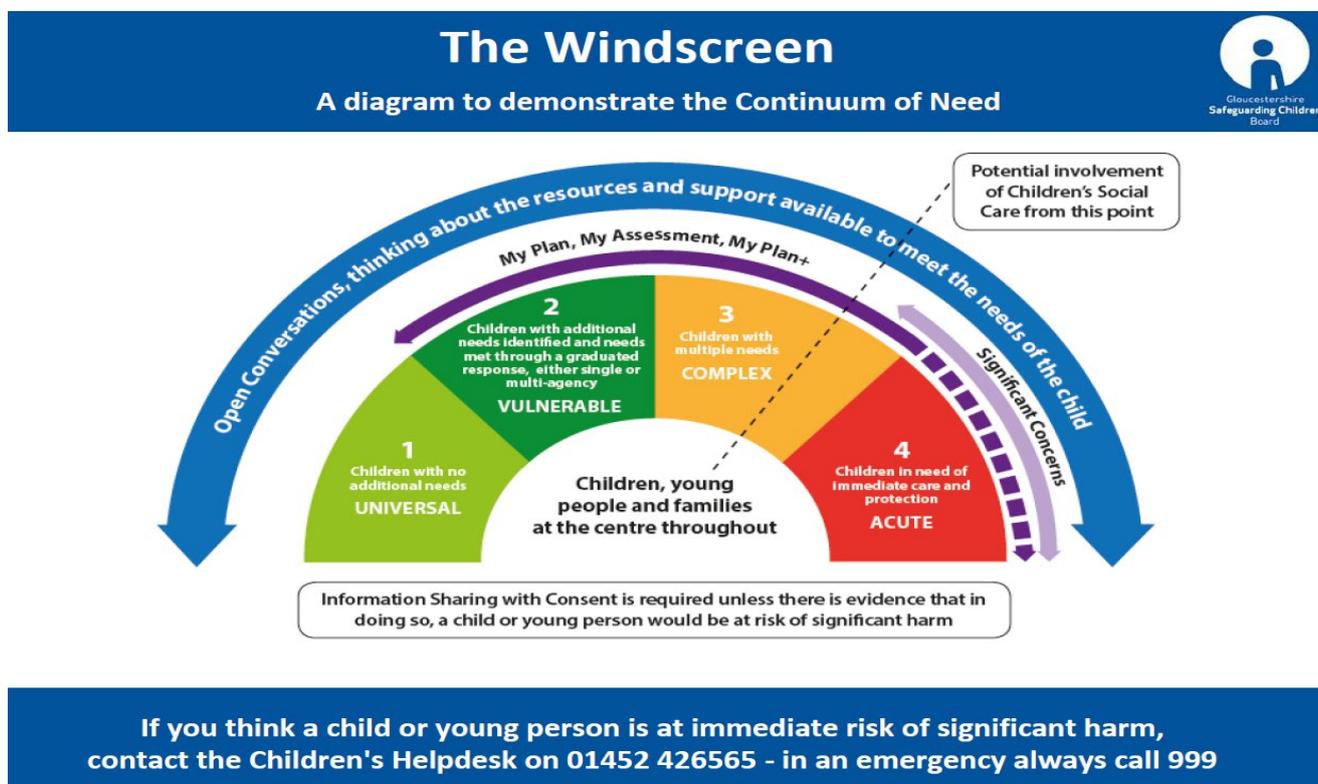
Further details can be found in EC GDPR Briefing Note document.

### 7.33. Summer school self-evaluation

The department monitors the implementation and outcomes of each of its policies and procedures during an annual self-evaluation cycle and carries out critical reviews and revisions to ensure that they are fit for purpose and that areas for improvement are identified. As part of the safeguarding governance structures, the department’s annual review is reported to the Embassy Quality & Insurance Board as part of the annual review of safeguarding.

### 7.34. The Continuum of Need (from Gloucestershire LSCB)

[https://www.gsrb.org.uk/media/12332/loi\\_guidance\\_windscreen\\_091116-67715.pdf](https://www.gsrb.org.uk/media/12332/loi_guidance_windscreen_091116-67715.pdf)



# Threshold Chart

by Lambeth Safeguarding Children Board



<b>Tier 1</b> Universal	<b>Tier 2</b> Children in need of early help	<b>Tier 3</b> Children in need of targeted or specialist support: LA Children's Services Targeted Early Help	<b>Tier 4</b> Children at risk of significant harm: LA Children's Services Children's Social Care
<p>The child or young person has no significant additional needs. Needs that do arise can be met by low level interventions within universal services.</p> <ul style="list-style-type: none"> <li>No referral is required</li> </ul>	<p>The child or young person has low level needs which are not being met by universal services, and so requires some additional early help. An early help assessment and action plan with a lead professional will help identify all areas of need and coordinate a planned response with the child, parents / carers and partners</p> <ul style="list-style-type: none"> <li>No referral to LA Children's Services is required.</li> <li>The child's additional needs will be met in your setting. To achieve this, you will need to identify a lead professional within your agency who will:                             <ul style="list-style-type: none"> <li>With parental consent, complete an Early Help Assessment and Action Plan, and lead on its implementation</li> </ul> </li> </ul>	<p>The child or young person has high level or complex additional needs which require co-ordinated multi-agency support with an early help assessment and action plan; a lead professional; and a team around the family approach. Or it might be a child with safeguarding concerns but no other needs.</p> <p>Needs may meet the threshold as a child in need under section 17 of the Children Act.</p> <p>Children requiring support at tier 3 will usually meet a number of the indicators listed below.</p> <ul style="list-style-type: none"> <li>A referral to LA Children's Services may be required. Contact the First Response Team Professionals' Line 020 7926 3100 or Public Line 020 7926 5555 (24 hours) for advice and guidance</li> <li>If a referral is required, you should seek parental consent for this</li> <li>Complete a Multi-Agency Referral Form indicating a need for support at tier 3 and attaching any previous early help assessments or actions plans. LA Children's Services will assess the referral and determine if a Section 17 assessment is required</li> <li>Children may also benefit from an Education, Health and Care Plan</li> </ul>	<p>The child or young person has an acute level of unmet and complex need and / or requires urgent intervention to protect against significant harm.</p> <p>A child and family assessment is required under section 47 of the Children Act 1989.</p> <p>Children requiring support at tier 4 will usually meet a number of the indicators listed below.</p> <ul style="list-style-type: none"> <li>URGENT action is required</li> <li>Contact LA Children's Services First Response Team Professionals' Line 020 7926 3100 or Public Line 020 7926 5555 (24 hours) for advice and guidance</li> <li>If a child is at immediate risk of harm call the police 999</li> <li>Parental consent is not required for a referral at tier 4. The parent or carer should be notified of the referral unless to do so will place the child or young person at greater risk of harm</li> <li>Complete a Multi-Agency Referral Form indicating a need for support at tier 4 and attaching any previous early help assessments or action plans</li> </ul>
<b>Child's/Young Person's Developmental Needs</b>	<b>Child's/Young Person's Developmental Needs</b>	<b>Child's/Young Person's Developmental Needs</b>	<b>Child's/Young Person's Developmental Needs</b>
<p><b>Abuse and neglect:</b> no physical or material signs of neglect; any injuries within normal range; emotionally warm and stable family environment</p> <p><b>Learning, education and employment:</b> adequate academic progress; meeting developmental milestones</p> <p><b>Health:</b> healthy, no physical or mental health condition or disability; access to health services; regular physical activity and healthy diet; no history or substance misuse</p> <p><b>Emotional wellbeing:</b> positive sense of self; emotionally resilient</p> <p><b>Social development:</b> strong friendships and positive, respectful social interactions</p> <p><b>Behaviour:</b> age appropriate, legal activities; self-control appropriate to age and development; does not run away from home is absent or go missing; does not have caring responsibilities</p>	<p><b>Abuse and neglect:</b> occasional signs of neglect; occasionally dirty, unkempt; occasional, less common injury; parenting lacks emotional warmth</p> <p><b>Learning, education and employment:</b> Underachieving; additional support needed to meet all developmental milestones; at risk of becoming NEET</p> <p><b>Health:</b> physical or mental health condition or disability; missed health checks or immunisations; no physical activity / unhealthy diet impacting on health; early signs that drug or alcohol use is having a negative impact on social well being</p> <p><b>Emotional wellbeing:</b> poor self-esteem; requires additional emotional support; shows early signs of negative, anti-social or criminal behaviour</p> <p><b>Social development:</b> limited social interaction; language and communication difficulties; victim or perpetrator of bullying – some support required</p> <p><b>Behaviour:</b> occasional anti-social behaviour; short lived sympathy for violent / extreme ideology; occasional lack of age appropriate self-control; risk of negative use of internet and social media; occasionally absent, missing from home; occasional caring responsibilities; socially isolated as a result of intolerant views</p>	<p><b>Abuse and neglect:</b> consistent physical and material signs of neglect; frequent injury; volatile and unstable family environment – emotional neglect increasing vulnerability</p> <p><b>Learning, education and employment:</b> seriously underachieving despite sustained interventions; targeted support needed to meet developmental milestones; NEET</p> <p><b>Health:</b> physical or mental health condition or disability significantly affects daily functioning; chronic health problems due to lack of access to services; no physical activity / unhealthy diet seriously impacting on health despite sustained interventions; substance misuse dependency impacts mentally and physically</p> <p><b>Emotional wellbeing:</b> poor self-esteem / sense of identity impacts on daily outcomes; concern of suicide or self-harm; significant deterioration in behaviour and engagement in risky behaviours; fails to meet developmental milestones due to inability of parent/carer to provide emotional support; involvement in negative, anti-social or criminal behaviour and at greater risk of being groomed or exploited by others</p> <p><b>Social development:</b> socially isolated; significant communication difficulties; negative interactions and lack of respect; victim or perpetrator or persistent or severe bullying despite early help interventions</p> <p><b>Behaviour:</b> anti-social behaviour and risk of gang involvement; has associations/affiliation with negative peer groups involved in offending behaviour (group violent offending, street robbery, use of weapons, drugs offences) expresses support for extremism and violence, regular lack of age appropriate self-control; engaged in or victim of harmful use of internet and social media; negative behaviour associated with extremism; persistently missing or absent from home – concern around extremism related to this; caring responsibilities have negative impact; negative and intolerant interactions with others</p>	<p><b>Abuse and neglect:</b> extreme physical signs of neglect; material neglect causing significant harm; unaccounted injuries and child disclosure; long term emotional neglect places child at high risk of / involvement in sexual or other exploitation as perpetrator or victim</p> <p><b>Learning, education and employment:</b> significant delay / impairment to developmental milestones; at risk of significant harm as a result to developmental milestones;</p> <p><b>Health:</b> complex physical or mental health condition or disability has significant adverse impact; complex and chronic health problems due to lack of access to services; no physical activity / unhealthy diet seriously impacting on health and placing at risk of significant harm despite sustained interventions; substance misuse dependency places child at significant risk of harm</p> <p><b>Emotional wellbeing:</b> negative sense of self leads to significant harm; child is exploited and harmed by others as a result; development significantly impaired; self-harming or suicidal; at high risk of CSE</p> <p><b>Social development:</b> completely isolated; little or no communication skills or positive interaction with others; negative interactions and lack of respect; victim or perpetrator of persistent or severe bullying which places well being at risk</p> <p><b>Behaviour:</b> involved in persistent, serious criminal activity (group drugs offences); weapons use, possession with intent to supply violent offending, weapons use, possession with intent to supply extremist and violence; little or no age appropriate self-control places self and others at risk; significant concerns child is at risk of harm due to internet and social media activity; significant concern child is being groomed for involvement in extremist activity; strong links with extremist individuals / groups; child persistently missing or absent with significant concern about sexual exploitation and / or criminal activity; caring responsibilities have significant negative impact with no sign of change. Arrested for a drugs offence outside of London area or stopped and searched out of London in circumstances that may indicate involvement in drugs supply offences at risk of criminal exploitation.</p>

Tier 1 (continued from overleaf)	Tier 2 (continued from overleaf)	Tier 3 (continued from overleaf)	Tier 4 (continued from overleaf)
<p><b>Environmental Factors</b></p> <p>Family is integrated into community; finances used appropriately / in best interest of child, even where limited; stable, suitable accommodation; no negative impact from local area</p>	<p><b>Environmental Factors</b></p> <p>Family is socially isolated; occasionally short of adequate food, warmth or clothing due to financial mismanagement; unclear accommodation with potential health and safety hazard; anti-social behaviour in local area has negative impact; family has temporary right to remain, impacting on child's well being; indirect links to proscribed organisations</p>	<p><b>Environmental Factors</b></p> <p>Family socially excluded – adverse impact on child; regularly short of adequate food, warmth or clothing due to other prioritisation of financial resources; consistently dirty accommodation with health and safety hazards; child victim of anti-social behaviour or crime in local area and at ongoing risk; local area has significant levels of crime and ASB, family at risk of involuntary removal / risk of having limited financial resources increases vulnerability of child to criminal activity; strong links to proscribed organisations</p>	<p><b>Environmental Factors</b></p> <p>Family excluded and child severely affected – family deliberately isolates child from support; consistent inability to manage finances leaves child consistently short of food, clothing and warmth; family has no stable home; local area has high levels of crime, ASB, and has a group violent offending / gang problem, has profoundly negative impact on child – child involved in frequent anti-social behaviour and criminal activity and at high risk of involvement in exploitation as victim or perpetrator; family at risk of deportation / child an unaccompanied asylum seeker; child being exposed to / involved in criminal activity as a result of trafficking; child, close family members / friends or proscribed organisations; victim of serious, sustained and escalating acts of bullying</p>
<p><b>Parental and Family Factors</b></p> <p><b>Protection from harm – physical and sexual abuse:</b> child is protected from danger or significant harm, and is not subject to either sexual or physical abuse</p> <p><b>Neglect:</b> the child's physical and material needs are met</p> <p><b>Domestic abuse:</b> there is no history or incidents of domestic abuse in the family</p> <p><b>Perinatal period:</b> take up of ante / post natal care; coping with parenthood and accessing support as required</p> <p><b>Parenting capacity:</b> to promote child's health, learning and education, emotional wellbeing; consistent parenting and emotional warmth</p> <p><b>Extremism:</b> no evidence of involvement in or support for extremism</p> <p><b>Drug and alcohol use:</b> no evidence of impact on child or on parenting ability</p> <p><b>Physical or mental ill health or disability:</b> no adverse impact on child or parenting ability</p> <p><b>Criminal or anti-social behaviour:</b> no history of criminal activity in family; no family gang involvement</p>	<p><b>Parental and Family Factors</b></p> <p><b>Protection from harm – physical and sexual abuse:</b> evidence of sexual abuse or inappropriate sexual behaviour within wider family network but child is protected from this; child occasionally not protected from accidental harm; physical chastisement within legal limits impacts on child's emotional wellbeing and / or leads to concerns of escalation without intervention; harmful traditional practices are culturally prevalent, but child is protected from these</p> <p><b>Neglect:</b> occasionally neglectful of the child's physical and material needs, increasing their vulnerability</p> <p><b>Domestic abuse:</b> parent / carers subject to occasional non-physical abuse; isolated incidents of violence in family, impact mitigated by protective factors</p> <p><b>Perinatal period:</b> ambivalent to / irregular take up of ante / post natal care; struggles to parent effectively but open to support</p> <p><b>Limited parenting capacity:</b> to promote child's health, learning and education, emotional well being; difficulties in setting boundaries and establishing and maintaining a routine</p> <p><b>Extremism:</b> Some support for extreme views or ideology, but no evidence of active involvement with extremist organisation</p> <p><b>Drug and alcohol use:</b> occasionally impacts on child</p> <p><b>Physical or mental ill health or disability:</b> parent / carer / sibling occasionally affects ability to meet child's needs</p> <p><b>Criminal or anti-social behaviour:</b> history of criminal activity in family; suspicion or some evidence of family gang involvement</p>	<p><b>Parental and Family Factors</b></p> <p><b>Protection from harm – physical and sexual abuse:</b> parent / carer unable to protect family from significant harm; possible inappropriate sexual behaviour from parent / carer; family home previously been used for criminal activity, including prostitution; physical chastisement beyond legal limits; concern child may be subject to harmful traditional practices</p> <p><b>Neglect:</b> regularly neglectful of child's physical and material needs, impacting on outcomes; and placing at risk of grooming or exploitation</p> <p><b>Domestic abuse:</b> parent/ carer has previously experienced and occasionally experiences domestic abuse; domestic abuse within the family with limited sign of change or recognition of adverse emotional impact on the child; child shows sign of emotional abuse and behaviours that indicate risk of becoming perpetrator or victim of abuse</p> <p><b>Perinatal period:</b> does not access ante / post natal care; post natal depression; sustained difficulties in parenting effectively and will not accept support</p> <p><b>Very limited parenting capacity:</b> impacts adversely on child's health, learning and education; child is emotionally neglected and vulnerable to exploitation; significant risk of parent / child relationship breakdown; parent / carer unable to set boundaries; weak or negative family network</p> <p><b>Extremism:</b> family members, parents or carers expose child to involvement in activity that supports or endorses extremism</p> <p><b>Drug and alcohol use:</b> by parents, carers, family members consistently impacts on child</p> <p><b>Physical or mental ill health or disability:</b> of parents / carers / family members impacts on the care of the child</p> <p><b>Criminal or anti-social behaviour:</b> criminal record relating to violent or serious crime may impact on child in household; known gang involvement and drugs supply offences</p>	<p><b>Parental and Family Factors</b></p> <p><b>Protection from harm – physical and sexual abuse:</b> parent / carer unable to protect child from harm, placing child at significant risk; parent carer sexually abuses child or is at high risk of doing so; child is being sexually abused or exploited; parent carer significantly physically / harms child; evidence that child may be subject to harmful traditional practices</p> <p><b>Neglect:</b> consistent failure to meet child's physical and material needs placing child at significant risk of harm, including significant risk of involvement in criminal or sexual exploitation</p> <p><b>Domestic abuse:</b> parent / carer a victim of frequent, domestic abuse; child at significant risk of emotional or physical harm; child is at high risk of being perpetrator or victim of serious abusive behaviour</p> <p><b>Perinatal period:</b> does not access ante / post natal care and uses drugs or alcohol excessively; serious post natal depression causes serious risk to parent and child; inability to parent effectively and refusal to accept help has significant adverse impact on child</p> <p><b>Lack of parenting capacity / deliberately obstructive parenting:</b> has significant adverse impact on child's health, learning and education; long term emotion neglect means child is now at very high risk of involvement in exploitation as perpetrator or victim; breakdown of parent / child relationship places child at risk of significant harm</p> <p><b>Extremism:</b> evidence that child is involved in / actively promoting violent extremism; evidence that parent / carer / child planning to travel to conflict zone to participate in extremist activity</p> <p><b>Drugs and alcohol:</b> drug and alcohol use by parents, carers or other family members severely limits parenting capacity and has a significant adverse impact on child</p> <p><b>Physical or mental ill health or disability:</b> of parents / carers / family members causes or places child at risk of significant harm</p> <p><b>Criminal or anti-social behaviour:</b> criminal record for serious or violent crime, drugs supply offences and or known involvement in group violent offending / gang activity by family members has significant impact on child</p>

### **7.36 Arrangements for dealing with peer-on-peer abuse**

Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include sexting, sexual assault, gender-based issues, initiation rituals and harmful sexual behaviours including sexual violence and sexual harassment and up skirting. Abusive comments and interactions should never be passed off or dismissed as “banter” or “part of growing up”. Nor will harmful sexual behaviours be dismissed as the same or “just having a laugh” or “boys being boys”.

Embassy Summer recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

Embassy Summer recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse. All boarding staff at Embassy Summer complete up to date training on peer on peer abuse to ensure they are vigilant in this regard and regular boarding meetings include peer on peer abuse discussion.

Embassy Summer will take advice from Children’s Services on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, Embassy Summer will ensure that, subject to the advice of Children’s Services, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed.

Confidentiality will be an important consideration for Embassy Summer and advice will be sought as necessary from Children’s Services and/ or the Police as appropriate. Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children’s social care and/or a report to the police against a victim’s wishes, the reasons should be explained to

the pupil and appropriate specialist support offered. Embassy Summer's approach to sexting is that all incidents involving youth produced sexual imagery should be responded to seriously.

When an incident involving 'youth produced sexual imagery' comes to the Embassy Summer's attention: a) The incident should be referred to the DSL or DDSL as soon as possible b) The DSL should hold an initial review meeting with appropriate school staff c) There should be subsequent interviews with the children involved (if appropriate) d) Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. e) At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately. This policy also notes the changes to legislation regarding 'upskirting' as a form of abuse and includes this in this definition.

Sexting Considerations & Risk Assessment a) Vulnerability of the child b) Coercion How shared and where c) Impact on children d) Age of the children. Always refer if: 1. Adult involvement 2. Coercion or blackmail 3. Extreme or violent 4. Under 13 5. Immediate risk of harm XIII. In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported and guided by the DSL and the pastoral team and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk assessment following the local LSCP protocol for managing peer on peer sexual harmful behaviour. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk assessment should consider: a) the victim; b) the alleged perpetrator; and c) the other children (and, if appropriate, staff)

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the

impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe.

This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport. Embassy Summer will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys, whilst at the same time recognising that any of these issues can affect any pupils regardless of their gender.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils are aware of the different ways in which they can speak with a trusted adult in the school, either directly or through other means.
- Ensuring pupils are aware of the different ways in which they can speak with an adult outside of the school through agencies such as Child Line or the NSPCC.
- As a residential provider in education, we will gather pupil voice more broadly to understand the experience of pupils at the centre, so that this can inform the development of safeguarding practice.
- Ensuring that staff are aware of peer on peer abuse and maintain an attitude of ‘it could happen here’, as they do with all areas of safeguarding.
- Ensuring that staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves.

