**STAFF SAFEGUARDING POLICY**

**The Children’s Act 1989 states the legal definition of a child is a person under the age of 18. Hosts International accommodates students of all ages and is registered with the British Council with the following unique status for adults and juniors:**

*’Hosts International meets the standards for registration with the British Council as a provider of homestay, private home and independent self-catering accommodation for adults and under-18s for accredited providers in the UK”.*

**A. Policy Statement**

**A1) Context**

Hosts International welcomes foreign students through various schools, colleges, universities, agents and families and places them with homestay hosts and house share accommodations across the UK. We recognise that we have a fundamental duty of care to all of these students as they are living away from home and without their normal support networks. We also recognise the additional duty of care for all under 18s.

This safeguarding policy represents our belief that it is always unacceptable for a child or young person to experience abuse of any kind and it is the responsibility of all adults in contact with young people to safeguard their welfare.

It is noted that all HI staff have undergone Basic Safeguarding Training and senior staff and management hold DBS checks and have been and are regularly involved in British Council, ISI, Ofsted, EAQUALS, ABLS and various other accrediting bodies inspections with partner schools and have been trained to Designated Safeguarding Lead level.

On registration, all homestay hosts are provided with a pack with HI’s Safeguarding Policy, a guidebook along with various other materials.

**A2) Terminology**

- Safeguarding: *caring for children appropriately and protecting them from that which is*

*not in their best interests*

- Child Protection: *Protecting children from abuse*

- Abuse: *all forms of physical and/or emotional ill treatment, sexual abuse, neglect or*

*negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health (including female genital mutilation or forced circumcision), survival, development or dignity in the context of a relationship of responsibility, trust or power*

- All adults: *Refers to all adults who are involved with the children (including group leaders and homestay hosts)*

- Child Protection Manager: *Member of staff with overall responsibility for child protection and safeguarding issues.*

**A3) Under 18’s entitlement**

We recognise that:

* the welfare of the child/young person is paramount
* all children, regardless of age, disability, gender, racial heritage, religious belief,

sexual orientation or identity, have the right to equal protection from all types of harm

or abuse

* working in partnership with children, young people, their parents, homestay

providers, agencies, leaders and teachers is essential in promoting young people’s

welfare.

**A4) Adult’s responsibilities**

This Policy applies to all HI staff including directly employed staff, homestay hosts, accommodation and transport providers, volunteers, interns and anyone working on behalf of the HI. All adults are expected to read and abide by the policy and procedures set out in this document.

**A5)**  **Recruitment Policy**

The purpose of the policy:

* To provide protection for under 18s who receive HI services
* To provide staff with guidance on procedures they must adopt if they suspect a child or young person may be experiencing, or be at risk of harm.

We seek to safeguard under 18s by liaising closely with our partner schools and homestay hosts directly to ensure this policy guideline is considered and/or matches their own policy, including but not limited to the following for under 18 students:

* valuing them, listening to and respecting them
* adopting child protection guidelines through procedures and a code of conduct for all

adults

* recruiting staff and homestay providers safely, ensuring all necessary checks are

made

* sharing information about child protection and good practice with under 18s, their

parents and all adults

* sharing information about concerns with relevant agencies and involving parents

and under 18s appropriately

* providing effective management for all adults through recruitment policies, supervision, support and training.

**A6) Policy review**

We ensure that this policy is communicated and understood and that there are sufficient

resources available for its implementation.

**A7) Roles and responsibilities**

Responsibilities for the implementation of this policy are as follows:

U18s: Responsible for understanding the policy, looking out for each other and raising any concerns with adults if necessary.

Adults: Responsible for understanding the policy and pro-actively engaging with its requirements.

Designated persons:

In HI there is a Child Protection Manager whose role it is to oversee the standards and practices across the group.

**B) Code of Conduct**

**B1) Overview**

Hosts International recognises the importance of creating a safe culture where trust is built between staff and under 18;s and both are protected from any behaviour which runs contrary to this culture. We achieve this through adherence to the policies laid out in this document and a genuine environment of care fostered by robust procedures and recruitment and training activities.

**B2) Setting standards**

The key elements of our code of conduct are interaction, appearance, intoxicants, IT and social networks, accommodation and transport. We expect all adults working on behalf of Hosts International to provide an excellent role model for all students in their care and to cultivate a respectful, safe and secure environment for staff and students.

**B3) Interaction**

- Maintain professional physical and relationship boundaries, and act in a way appropriate to your Duty of Care

- Do not make suggestive or inappropriate remarks to or about any adult or U18. Inappropriate remarks include innuendo, swearing and discussing their or your own intimate relationships.

- Other than in exceptional circumstances, do not communicate directly with U18’s via email or text messages and only then with prior consent from the child’s parent or guardian.

- Do not engage in behaviour that may be misconstrued as ‘grooming’ an U18 for example giving money, presents or favours or talking or behaving in an inappropriate or unprofessional manner.

- Avoid putting yourself in a situation where you are on your own with an under 18 as far as possible.

- Conduct all interactions in a calm manner, and avoid shouting at U18s wherever this is possible unless there is a health and safety risk.

- Ensure physical contact within clear boundaries to avoid any allegations of inappropriate touching.

- If you are required to be in a one-to-one setting with an U18, consider how this can be managed effectively (i.e. leaving a door open, using a room that has a window in the door, positioning yourself within sight of the door and considering if the one-to-one setting is really necessary)

**B4) Appropriate appearance**

Adults must present an appearance which:

- promotes a positive and professional image

- is appropriate to their role

- is not likely to be viewed as offensive, revealing or sexually provocative

- does not distract, cause embarrassment or give rise to misunderstanding

- is absent of any political or otherwise contentious slogans

- is not considered to be discriminatory

**B5) Alcohol, drugs and smoking**

- Do not consume, or allow U18s to consume any alcohol, drugs, cigarettes or intoxicating substances

- Do not provide alcohol, drugs, cigarettes or intoxicating substances to U18s

- Do not work under the influence of any intoxicants or drugs

**B6) IT and social networks**

- Do not share your personal social media details with any under 18s

- Do not take any images or videos of under 18s on your personal recording equipment

**B7) Accommodation**

- Abide by the accommodation rules and guidelines

- Do not enter private areas without first gaining the student’s permission, or in the case of needing to search property, without informing them first and doing so in their presence, preferably with another adult present.

**B7a) Accommodation – House Share**

All staff must follow this procedure when entering a student house share

a) to be clearly identified as Hosts International Staff by workwear or ID

b) to announce themselves on going into the property

c) when about to enter a private bedroom to knock three times and announce themselves then repeat the knock three times and the announcement. If no response after two attempts, then the room can be presumed empty and entry made

d) If a student is found in a room the member of staff must make an immediate withdrawal and conduct all conversations from outside the room. Entry must only be after permission has been given by the occupant.

e) best practice must be to always have two members of staff present but we acknowledge that this cannot always be possible

**B8) Transport**

- Abide by the specific guidelines of your local centre

- All transport providers, whether staff or contractors, to have appropriate suitability checks

**C) Child Protection**

**C1) Overview**

We meet our child protection responsibilities by:

- Creating policies and procedures to comply with all regulatory requirements and guidelines

- Reviewing these policies and procedures annually

- Training all staff to an appropriate level of awareness and procedural competence with periodic review

- Making all policies and procedures available to all our stakeholders

**C2) Nominated/designated person(s)**

HI has two Child Protection Managers who work to ensure a safe environment for our staff and students.

**C3) How to respond to concerns**

Scenarios which may cause an adult to have safeguarding concerns about an U18 are:

- An U18 tells an adult they are worried about another U18

- An U18 tells an adult of an issue that concerns themselves

- Anyone from outside the Hosts International reports a potential issue

- An adult witnesses behaviours of another adult which cause concern

- An adult sees in an U18 non-verbal indications of safeguarding concerns

In the event of any one of the above adults must:

- Follow the Guidelines outlined below

- Report immediately to the CPM

- Explain your concerns and the reasons behind them

- The CPM will advise you on the next step.

**C4) Recognising symptoms of abuse**

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm.

It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race or ability.

Abusers can be adults (male or female) and other young people, and are usually known to and trusted by the child and family.

There are four main types of child abuse: **physical abuse**, **sexual abuse**, **emotional**

**abuse** and **neglect**. The abuser may be a family member, or they may be someone the child encounters in a homestay situation or during classes, sports and leisure activities. An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child. Abuse may be historic but continuing to affect the child (remember Female Genital Mutilation is abuse and is reportable)

There is no textbook list of signs and signals. Being alert to abuse means:

- Thinking about what you are seeing and asking if it is acceptable practice

- Taking seriously what you are told

- Responding to the stresses behind requests for help or other presenting problems

- Being alert to signals or non-verbal communication or challenging behaviour, and aware that this might indicate unacceptable practice is being deliberately hidden or denied.

- Reporting any doubts to the Child Protection Officers

**C5) How to respond to a child or young adult telling you about abuse**

When someone talks to you about alleged abuse, remember you are *not* investigating the situation, just listening.

If a child discloses abuse, remember that this may be the beginning of a legal process, as well as of a process of recovery for the child. Legal action against a perpetrator can be seriously damaged by any suggestion that the child’s words have been influenced in any way by the person they told.

The following guidance must be followed as far as possible:

* Rather than directly questioning the child, just listen and be supportive.
* Never stop a child who is freely recalling significant events, but don’t push the child

to tell you more than they wish.

* Do not promise to keep the information a secret. Rather you must inform the child

that you will have to share this with the person responsible for their safety.

* Write an account of the conversation immediately afterwards, as close to verbatim as possible. Make a note of what they actually said, using his or her own words and phrases.
* Describe the circumstance in which the disclosure came about.
* Where physical harm is being reported use a body map to indicate the location of

cuts, bruises and abrasions, noting the colour of any bruising.

- Hand your record to the designated senior person, who will contact the appropriate authority.

**C6) Keeping Records**

- All serious concerns communicated to the CPM using the form shown attached will be responded to on the same day

- Access to the safeguarding file is only available to the CPM and any official outside agency as appropriate.

- Details of allegations must always remain on a person’s confidential file, no matter whether it was malicious or suspect. It is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person’s confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future CRB Disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after a period of time. The record must be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

- The CPM will take advice from the Designated Officer (formerly LADO), police and local authority social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;

- How to manage speculation, leaks and gossip;

- What if any information can be reasonably given to the wider community to

reduce speculation; and

* How to manage press interest if and when it must arise.

**C7) If an staff member is accused**

The CPM will then work with the Designated Officer (formerly LADO)/Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child.

**D) Training**

The Child Protection Manager has overall responsibility for ensuring all adults have appropriate training and that this is updated annually. Additional sessions will be organised where deemed appropriate by the Child Protection Manager.

- All adults employed by HI must complete a minimum of the Online Basic Safeguarding training and be fully aware of the HI Safeguarding Policy.

- Staff with access to U18s must also be in possession of a recent DBS check and sign the HI Self Declaration where this is pending.

- The HI CPM must complete Designated Safeguarding Lead training

- All adults employed by HI must take the Prevent online training course and hold a completion certificate.

**E) Safer Recruitment**

Hosts International follows Safer Recruitment guidelines set down for all recruitment interviews. For roles with substantial access to U18s there are questions exploring the applicant’s awareness of safeguarding. For example: ‘Safeguarding is key to everything we do. What do you understand by this term’

References are always followed up for new staff members.

**E4) Applicants are informed that:**

- References will be followed up

- All gaps in CVs must be explained satisfactorily

- Proof of identity and (where applicable) qualifications will be required

- Appropriate suitability checks will be required prior to confirmation of appointment.

**E5) If applicants awaiting suitability checks**

In the UK, In the event that a DBS check has not been completed by the start date of a new employee, commencement of employment can take place only with restrictions. The decision will be made by the Line Manager, with the agreement of the CPM and rationale must be completed and signed by both parties. This judgment will be based on an assessment of the risk compared to the consequences of the decision. If the employee does commence work, they must have signed a self-declaration.

**E6) Applicants with a criminal record**

In the event that a disclosure shows that a potential employee or member of staff has a criminal record, the situation will be judged by the CPM will take into account the seriousness and nature of the offence, the nature of appointment, the age of the offence and the frequency of the offence. The disclosure will be discussed with the prospective employee and any decisions made must be in writing and signed by the recruiter and the CPM.

**Who do I contact?**

|  |
| --- |
| **Title: Designated Safeguarding Lead (DSL) for Child Protection****Named person: DSL Andrew Ballam-Davies****Mobile telephone: 07836 245277****Email: andrew@hosts-international.com****Responsible to: Local Authorities** |

**The responsibility for all child protection and safeguarding matters sit with the DSL. This lead responsibility cannot be delegated but the DDSL’s can support the DSL**

|  |
| --- |
| **Title: Deputy Designated Safeguarding Leads (DDSLs)****Named person: DDSL Harsha Brown****Mobile telephone: 07789 392816****Email:** **harsha@hosts-international.com****Responsible to: Andrew Ballam-Davies DSL****Named person: DDSL Lavinia Shivdasani****Mobile telephone: 07771 626120****Email:** **lavinia@hosts-international.com****Responsible to: Andrew Ballam-Davies DSL** |

October 2019

Review Date: October 2020

**Hosts International Ltd**

**Safeguarding Reporting Form**

Please complete if there are any safeguarding concerns about an under 18 student. You must complete the boxes in **CAPITAL LETTERS** so there is no misunderstanding

|  |  |
| --- | --- |
| **Date** |  |
| **Student first name** |  |
| **Student surname** |  |
| **Gender** |  |
| **Date of birth** |  |
| **Nationality** |  |
| **Group / individual** |  |
| **Student ID** |  |
| **Name of person noting concern** |  |
| **Role/connection with student** |  |
|  |  |
| **Date and time concern noted** |  |
| **Location** |  |
| **Concern** *(please provide as much detail as possible)* NB: If reporting a disclosure / allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more. |  |
| **Signed** |  |

**Response to concern.** This section to be filled in by the DSL

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

|  |  |  |
| --- | --- | --- |
| **Response & follow up** | **By whom** *(full name)* | **When** *(date & time)* |
|  |  |  |