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Safeguarding and Child Protection Policy & Procedures

How we protect children and young people from harm

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Approved by:	Jose B, Managing Director Anna Bogacz School Manager
Applies to:	All members of staff All homestay providers All group leaders All external suppliers
Context:	Country Cousins organises tuition courses, activities, accommodation and transfers to children aged 7 to 17 all year around.
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Policy Statement

The welfare of the child is paramount, as enshrined in the Children Act 1989. All children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately. All staff and Group Leaders working with children and vulnerable adults, whether paid or unpaid, have a responsibility to report concerns to the appropriate officer.

Terminology

This policy uses some terms frequently; to avoid misunderstanding. the following definitions apply:

Safeguarding or Child Protection: *Safeguarding* is a broader term than child protection. It encompasses everything we do to look after our students, providing them with the best possible care and the safest possible circumstances. Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. *Child protection* is part of safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child[1].

Child / Children: The Children Act 1989 states that the legal definition of a child is 'a person under the age of 18'.

Young Adults: The school allows children aged 16 and 17 to integrate more freely with those aged 18 or over, and affords them a degree of freedom and responsibility – as is appropriate to their age. In order to clarify this difference, we use the term Young Adult. However, the school recognises that there is legally no difference, and a Young Adult is also a child.

Vulnerable Adult: Country Cousins is an organisation which organises educational visits for children aged 7 to 17. However, the school believes that any foreign language student, regardless of age, could be considered vulnerable to abuse. This is due to their ability to communicate or understand being inhibited by their language level; furthermore, they are vulnerable as a result of living in a foreign, and unfamiliar, country. This is therefore defined as any foreign language visitor aged 18 or over.

Staff: This refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

Child abuse: This is defined as '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 by another child or children'.[2]

Parent: This term refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

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[1] <https://learning.nspcc.org.uk/safeguarding-child-protection/> accessed on 23 October 2019.

[2] Department of Education, 'Keeping Children Safe in Education: for school and college staff (part 1)', < https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> accessed on 23 October 2019, page 7.

Statement

The policy exists so that Country Cousins, as an educational organisation, implements appropriate arrangements, systems and procedures to ensure that any child or young person should never experience abuse of any kind.

We have the responsibility:

- To promote the welfare of all children and young people and to keep them safe.
- To have a duty of care to safeguard all students under the age of 18 from harm. All children have a right, in line with legislation, to protection and this has been extended to include adults at risk.
- To protect employees and staff from any false allegations of improper conduct in this regard.

It is recognised that Country Cousins has a duty to help employees, staff and students understand their responsibilities, through guidance, support and training, to minimise risk and to avoid situations, where possible, where abuse or neglect might arise or be alleged.

We will seek to keep children and young people safe by:

- valuing them, listening to and respecting them.
- appointing a Designated Safeguarding Lead (DSL) for children and young people, and a deputy member for safeguarding.
- adopting child protection and safeguarding practices through procedures and a code of conduct for staff and volunteer, and ensure consistent good practice across the school.
- developing and implementing an effective e-safety policy (p. 24) and related procedures.
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures.
- recruiting staff and volunteers safely and ensuring all necessary checks are made; this includes drivers, homestays and agents.
- recording and storing information professionally and securely. We will share information about safeguarding and good practice with children, their families, staff and volunteers via leaflets, posters and one -to-one discussions.
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know; we will always involve children, young people, parents, families and carers appropriately.
- using our procedures to manage any allegations against staff and volunteers appropriately.
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise. This ensures that we have effective complaints and whistleblowing measures in place.
- ensuring that we provide a safe physical environment for our children, young people, staff and volunteers by applying health and safety measures in accordance with the law and regulatory guidance.

This policy has been formulated in accordance with provisions of:

- The Children Act 1989
- United Convention of the Rights of the Child 1991
- Human Rights Act 1989
- Data Protection Act 1989
- Sexual offences Act 2003
- The Children Act 2004
- Safeguarding of the Vulnerable Adult Guidance 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014

- Special Education Needs and Disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities. HM Government 2014.All employees are expected to comply fully with the procedures laid out in this policy.

Roles and Responsibilities

All employees and adults have the statuary responsibility to report all incidents, and concerns of safeguarding nature, to one of the school Designated Safeguarding Officers immediately.

Contact details:

Jacquie Almond
Designated Safeguarding Lead (DSL) – with responsibility for school
help@country-cousins.com **T**. 01271 862834

Jose Brinkmann
Designated Safeguarding Person (DSP) – with responsibility for activity programmes and travel jose@country-cousins.com **M**. 077177 21286 **T**. 01271 862834

LADOs-
Ladosecure-mailbox@devon.gov.uk **T.** 01392 384964

Devon Multi Agency Safeguarding Hub (MASH)
mashsecure@devon.gcsx.gov.uk **T** 0345 155 1071

NSPCC helpline 0808 8005000

The **Designated Safeguarding Lead (DSL)** will be the person who is appropriately trained and acts as a source of support and expertise to the organisation. The DSL keeps written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child's general file.
Other responsibilities would be:

- To ensure that all staff sign to indicate that they have read and understood this policy
- To ensure that the child protection policy is updated annually
- To make this policy available to all staff and employees, homestays, and parents.

The **deputy designated person** is appropriately trained and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

Homestay

The Accommodation and Welfare Officer will have the responsibility in their role to:

- visit and see all members before accepting any family as a homestay for students under the age of eighteen (U18s). All members of the family and any regular visitors to the home must be declared and their details entered on the homestay database;
- ensure that there is a bank of Enhanced DBS checked homestay families for all students U18;

- to ensure that students' parents or guardians provide written consent for activities or excursions outside of the agreed programme;
- to review homestays who host students U18 every 12-18 months;
- to check homestay details on an annual basis to ensure that records are accurate;
- to ensure that all U18s and their homestay families conform to the school's agreed evening curfew;
- to remove from the homestay database any families that are not suitable and any serious concerns will be immediately reported to the local authority (MASH mashsecure@devon.gcsx.gov.uk **T** 0345 155 1071) ;
- to ensure that homestay families complete on an annual basis the Children's Act 1989 (Part 1X) form declaring any convictions or offences against children for all family members and regular visitors.
- to facilitate basic safeguarding training.

Administration

Staff at the reception desk and activity leaders will have the responsibility to:

- to meet with students on their first day of school to ensure that they are aware of the school's expectations of them in terms of their behaviour and that they are happy and safe;
- to ensure that when they meet with a Group Leader or any other new member of staff they are aware of how to contact and who to contact if they need to speak to any of the DSP members for advice and support;
- to ensure that all students are familiar with the 24 hour emergency telephone number on their wrist band and understand that they can call this number at any time;
- to ensure students' contract of care paperwork is in place before student arrival and if not identify the students on site and organise for them to understand it and sign it.

Teaching and registration

To ensure that all class registers are checked and absences of any students are recorded and followed up immediately by members of the welfare department and if appropriate escalate to the DSP team to investigate further;
Director of Studies who does the registers reports to reception of any missing students. Reception then passes on the message to Welfare and they investigate any further, first step by trying student's contact number, them homestay.

Social Programme

The Lead Activity Leader, as advised by the Managing Director, will have to:

- ensure that there is a variety of age-appropriate social events or activities;

- risk assessments are performed in advance of every activity or excursion;
- refuse requests for changes that do not allow enough time for proper assessment of risk.

Suppliers

All suppliers (taxi and coach drivers, and outside sport contractors) have obtained current DBS checks and have signed disclaimer forms.
Basic safeguarding training has been provided and they are aware of how to report any incidents regarding abuse.

Reporting responsibilities

All adults have a statutory responsibility to report all incidents, and concerns of a safeguarding nature to any of the DSP immediately.

A concern can be classified as any incident, allegation, evidence or suspicion of abuse.

Incidents that must be reported:

- If you accidentally hurt a student,
- If a student is involved in an accident,
- If a student seems distressed in any way,
- If a student appears to be sexually aroused in your presence or by your actions,
- If a student misunderstands or interprets something you have said or done,
- If a student makes a disclosure of abuse to you.

It is important that all adults feel comfortable to report any incident without fear of reprisal. All reports will be dealt with in confidence and further action/referral will follow legal guidelines.

Policy Availability

This policy will be available on the Country Cousins website, and a hard copy will be available to read from the Policies file in reception.
The Policy will also be part of the staff induction programme.

There is a condensed version of this policy for printing and staff files.

We are committed to reviewing our policy and good practice (page 10) annually.

CODE OF CONDUCT

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about the appropriate action to take. Abuse can occur within many situations including the home, school and the sporting environment. You will have regular contact with young people and you will play a central role in identifying cases where a student needs protection.

All suspected cases of poor practice must be reported, following the guidelines in this document.

- All staff and responsible adults will promote an atmosphere of tolerance and respect and will actively challenge extremist views that threaten this atmosphere.
- Staff and responsible adults will promote core British values of democracy, the rule of law, individual liberty and tolerance of different beliefs and cultures. Staff will report any concerns to the PREVENT lead (please read the PREVENT section in page 25 carefully).
- All staff and responsible adults need to set standards and be excellent role models. For example, be somebody children can trust, use appropriate language, be punctual, be fair and do not have favourites, do not give preferential treatment, give clear instructions, be positive, react and respond appropriately to a variety of situations.
- All staff and responsible adults must enact professional boundaries.
- All staff and responsible adults must treat all students and young people with due respect.
- All staff and responsible adults need to have appropriate appearance and to dress in a manner that is appropriate to their role.
- All staff and responsible adults should refrain from smoking, drinking alcohol and of course taking any form of illegal drug.
- All staff and responsible adults should not swear in front of young learners.
- All staff and responsible adults should be aware of Country Cousins guidelines on the use of social networks and misuse of IT, (please read section on IT and Social network in page 11).
- All staff and responsible adults should be aware of the correct action to take with regard to arranging transportation for children.
- All staff and responsible adults have a duty of care towards all students but in particular towards students under the age of 18.
- All staff and responsible adults should avoid all forms of physical contact with students unless in certain clearly-defined situations (e.g. administering of first aid by a trained first aider ideally in the presence of another member of staff).
- All staff and responsible adults should share any concerns with the appropriate member of staff immediately

This Code of Conduct is built upon in the following sections which give examples of good practice and poor practice.

Good Practice

All staff should be encouraged to demonstrate exemplary behaviour in order to promote a child's welfare and reduce the likelihood of allegations being made. The following are common sense examples of how to create a positive culture and climate.
Remember, following good practice can be as much for your benefit as for the student's benefit.

You should:

- work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- implement this policy at all times – remember, other people may misinterpret your actions, no matter how well intentioned.
- challenge unacceptable attitudes of behaviour from other members of staff or students.
- set an example you wish and expect others to follow.
- treat all young people equally, avoiding favourites.
- respect a young person's right to personal privacy.
- make the experience of studying with Country Cousins fun and enjoyable: promote fairness, confront and deal with bullying.
- treat all young people (including disabled young people) equally, and with respect and dignity. Put the welfare of each young person first, before winning or achieving goals.
- maintain a safe and appropriate distance with young children in your care (e.g. it is not appropriate for staff to have an intimate relationship with a child or to share a room with them).
- avoid unnecessary physical contact with young people. Where any form of manual/physical support is required it should be provided openly and with the consent of the young person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the young person's consent has been given. Keep any physical contact with a child brief and don't touch a child anywhere that would normally be covered by a swimming costume.
- use the procedure: demonstrate – ask permission – touch if you have to touch a child – for example to demonstrate a sporting technique. However, it is always best to avoid touching at all and simply to demonstrate the technique.
- try to ensure that other students and if possible other staff members or group leaders are present if physical contact is prolonged or sensitive - for example to comfort a crying child, if someone is injured or if you have to separate fighting children.
- request written consent from the group leader if staff are required to transport young people in their cars. **You should avoid doing this alone. The Transport and Facilities Manager will authorise the travel.**
- if students have to be supervised in changing rooms, ensure you work in pairs with the appropriate gender of staff doing the supervising.
- be an excellent role model - this includes not smoking or drinking alcohol in the company of young people.
- give enthusiastic and constructive feedback rather than negative criticism.
- recognise the developmental needs and capacity of young people and disabled adults – avoiding excessive training or competition and not pushing them against their will.
- keep a written record of any injury that occurs, along with the details of any treatment given. This should be recorded in the incident books provided they are kept within the Welfare Officer's office.
- ensure you know the location of medical consent forms for the administration of emergency first aid (provided you are qualified to do so) or other medical treatment, if the need arises.
- recognise if a student is developing a 'crush' on you. Do nothing that might be construed as encouraging this. Inform the Welfare Officer. Never flirt with a student or make sexually suggestive or provocative comments, even in fun.

Poor Practice

It is not always easy to distinguish poor practice from abuse. It is therefore NOT the responsibility of employees to make judgements about whether or not abuse is taking place. It is however their responsibility to identify poor practice and possible abuse and to act if they have concerns about the welfare of the child

You should not:

- spend time alone with young people away from others.
- betray a situation of trust.
- permit abusive peer activities (e.g. initiation ceremonies).
- share changing rooms, washrooms, toilets or bedrooms with children. Always warn children before entering these places. Avoid being in these places with children unless absolutely necessary, and pay particular attention to avoid being alone with a child in these places. Always make sure you are there with another member of staff of the correct sex.
- take young people alone in a car on journeys, however short the distance is.
- engage in rough, physical or sexually provocative games or contact, including horseplay.
- engage in inappropriate language with young people – whether through writing, phoning, email or internet.
- hit, throttle, push, kick or otherwise act aggressively – either physically or verbally – towards a child even in pretence.
- share a room with a child.
- enter children's rooms alone in a residence or invite children into your rooms.
- take young people to your home where they will be alone with you.
- allow or engage in any form of inappropriate touching.
- allow children to use inappropriate language unchallenged.
- make sexually suggestive comments or threats to a child, even in jest.
- reduce a child to tears as a form of control.
- fail to act upon and record any allegations made by a child.
- do things of a personal nature for children, or disabled adults, that they can do for themselves.
- invite or allow children to spend time with you alone and unsupervised.

N.B. It may sometimes be necessary for staff to do things of a personal nature for children, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of the child concerned and the group leader. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Do not take on the responsibility for tasks for which you are not appropriately trained.
It is also important to note that some members of staff also act as host families, in which case some rules differ.

IF IN DOUBT – REPORT IT!

IT and Social Networks

Country Cousins staff and employees must be aware that the we will treat unacceptable **'electronic behaviour',** through social media and other means, in the same way as we would treat other unacceptable behaviours.

The term '**social media'** is used within this Code to describe dynamic and socially interactive networked information and communication technologies, through which personal information or opinions can be presented for public consumption on the Internet.

Staff must exercise the same discretion and maintain the same professional distance in any electronic contact with children as they would in normal day-to-day life.

Electronic contact includes telephone communications (including texting) and on-line environments.

Broadly speaking, never engage in any electronic communication with any pupils under the age of 18.

In particular:

- Never initiate electronic contact with a child unless for clear pedagogical purposes that have been sanctioned by the School Director or Director of Studies.
- If a child contacts you electronically, keep your tone friendly, professional and neutral.
- Avoid situations that involve the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.
- If a child seeks to develop an inappropriate personal relationship with you electronically, do nothing to encourage this; inform the School Director or Director of Studies and send a copy of any relevant communications. Do not engage in electronic communication with a student.
- If a child confides sensitive information to you electronically – such as details of abuse, react as described in this policy document.
- Do not initiate or accept 'friendship' requests from children, however innocent these requests may seem, as this provides access to photos and other intimate details of each other's personal lives.
- Do not establish or seek to establish social contact with pupils under the age of 18 during or after the course.
- Do not give personal email addresses or personal phone numbers to students under 18.
- Do not communicate via email, text, phone or social networking sites, blogs, web pages or instant messaging services with under 18s.
- Do not post photos or videos of students under 18 on any social networking sites.
- Do not distribute (by any means) images or information about students of any age.
- Always avoid becoming personally involved in a student's personal affairs.
- Always be aware that personal web profiles can be viewed by anyone and therefore you should be especially cautious about public web profiles and privacy settings.
- Always seek advice from a line manager if an under 18 seeks to establish social contact with you. **Normally, you should never do this.**

Use of photographic/filming equipment

There is evidence that some people have used sporting events and summer camps as an opportunity to take inappropriate photographs or film footage of young and disabled people in vulnerable positions. All members of staff should be vigilant and any concerns should to be reported to the School Director and the incident recorded by the member of staff. There is no intention to prevent teachers/staff using video equipment or photography legitimately. However:

- group leaders and students must give their written consent to any photography,
- any photography/filming must take place in an open, public area and never in isolation,
- the reasons why any photography/filming is taking place must be fully explained to those concerned,
- the results of any photography/filming must be carefully stored, controlled and used only for the purpose for which they were intended.

Accommodation

At Country Cousins, we have adopted the English UK Code of conduct for homestays.
All our homestay families will be signing the following Code of conduct when registering every year.
The code necessitates:

- To encourage the student to speak English as much as possible in your home.
- To encourage the student to feel at home and to treat him/her as a member of the family rather than a paying guest.
- Not to host other students of the same native language at the same time unless by special arrangement with the students and the schools.
- Not to host students aged over 18 years with students aged under 18 years of age, unless by special arrangement with the students and school.
- To provide a clean and comfortable student environment in which it is possible for the student to carry on his/her English studies properly when appropriate.
- To provide the student with a balanced and appropriate diet.
- To show due concern for the welfare, safety and security of the student during his/her stay.
- To give the student reasonable and regular access to the bathroom and laundry facilities.
- To maintain a close liaison with the student's school, so as to be in a position to help resolve any problems that the student may encounter during his/her stay.
- To respect the student's different cultural background and to be sensitive to the needs of the student.

Transport

Drivers (taxi and coach) at Country Cousins are fully trained and must be aware of the following:

- They must be fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or ability to drive.
- That the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer.
- That they record details of the journey in accordance with agreed travel procedures.
- That their behaviour is appropriate at all times.
- That there are proper arrangements in place to ensure vehicle, passenger and driver safety.
- That they must report any unexpected journey and the reasons for it to the Transport and Facilities Manager or Managing Director and inform them, if possible, before beginning any unexpected journey, if not at the earliest opportunity.
- That any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned.
- That they may transport U18s in emergency situations or may need to provide children with lifts if the alternative situation places a child at risk.
- The importance of calling an ambulance to deal with serious medical emergencies.
- That they must adhere to all legal requirements while driving U18.
- Staff understand that they must take regular breaks when driving and should be aware of the dangers associated with tiredness when driving.
- That drivers must also be responsible for the laws relating to the use of **mobile phones** whilst driving. In the event of an accident, mobile phone records may be examined to ascertain whether the driver was engaged on a call at the time of the accident.

Whistleblowing

There may be situations whereby staff or volunteers have genuine concerns about the conduct of a colleague towards a participant. All members of staff and volunteers at Country Cousins have the right and the responsibility to raise concerns – without prejudice to their own position – about the behaviour of staff, managers, volunteers, students or others, that may be harmful to those in their care and will receive appropriate support when doing so.

In accordance with the Public Interest Disclosure Act 1988[3] Country Cousins will support and protect those staff and students who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions.
Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers.

For more information on procedures and principles on how Country Cousins deals with Whistleblowing, please ask for a copy of the full policy. (*Whistleblowing policy and procedures*)

[3] *http://www.legislation.gov.uk/ukpga/1998/23/section/2*

CHILD PROTECTION

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or 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 a stranger. They may be abused by an adult or adults, or by another child or children. Although abuse is often divided into the below four categories for ease of description, two or more forms of abuse are often found together.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing 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.

Recognising Symptoms of Abuse

While abuse of young people at Country Cousins is extremely unlikely, we should not assume that it could happen.

Our duty of care to young people and vulnerable adults extends to watching out for signs of potential abuse.

Some signs may vary with the age of the child or vulnerable adult. Not every child or vulnerable adult will exhibit every symptom. As well as signs, children and vulnerable adults may tell you of abuse.

Always listen and follow the procedures for responding to allegations of abuse (below).

Here are some signs to look out for that may indicate a child or vulnerable adult is suffering from abuse;

Sexual abuse	**Emotional abuse**
• Acting in an inappropriate sexual way with objects or peers • Nightmares, sleeping problems • Becoming withdrawn or clingy • Personality changes, seeming insecure • Unaccountable fear/dread of particular places or people • Changes in eating habits • Physical signs such as unexplained soreness around genitals, sexually transmitted diseases • Becoming secretive	• Delayed physical or emotional development • Shows extremes of passivity or aggression • Sudden speech disorders • Overreaction to mistakes, or continual self-depreciation • Neurotic behaviour (rocking, hair twisting, self-mutilation)
Physical abuse	**Neglect**
• Has unexplained bruises, burns etc. • Wearing clothes to cover injuries, even in hot weather	• Often hungry; may beg or steal food • Badly dressed in clothes that need washing • Poor appearance and personal hygiene; unwashed, hair not brushed • Lacks necessary medical or dental care • Often tired • Might abuse alcohol or other drugs

Other specific types of Abuse (CSE and FGM)

In addition to the types of abuse mentioned above, two other specific types of abuse that staff must be aware of are Child Sexual Exploitation (CSE) and Female Genital Mutilation (FGM).

Child Sexual Exploitation

This is a form of sexual abuse where U18s are exploited to engage in sexual activity in return for money, gifts, drugs, affection or status. CSE[4] does not always involve physical contact as it can happen online or involve pressure from peers or cyber bullying.

Signs to look for in U18s include:

- Having a much older boyfriend / girlfriend.
- Appearing with unexplained gifts or new possessions.
- Associating with others involved in exploitation.
- Misusing drugs or alcohol.
- Being absent from school, going missing or regularly coming back late to homestays.

Female Genital Mutilation

Female genital mutilation[5] is a practice that can cause severe and long-lasting damage to physical and mental health. It is carried out for religious, social or cultural reasons, however there are no medical reasons for carrying it out.

It is a criminal offence if done in the UK. Staff should be aware that a person who has suffered FGM may ask for help without being explicit about the problem due to embarrassment or fear.

Any causes for concern are to be reported to the DSL.

[4] http://www.proceduresonline.com/swcpp/devon/p_ch_sexual_exploit.html

[5] http://www.proceduresonline.com/swcpp/devon/p_fem_gen_mutil.html

Procedure for reporting allegations or suspicious of abuse

It is the duty of Country Cousins staff to disclose cases of abuse or allegations of abuse to the DSL without delay.

- ✓ It is NOT for staff to decide whether or not a suspicion or allegation is true.
- ✓ All suspicions or allegations of abuse must be taken seriously.
- ✓ If a member of staff has suspicions, they should contact the DSL or DSP in confidence.
- ✓ If a vulnerable adult, child or young person starts to talk to the staff member directly, they should allow that person to disclose and should allow them to continue talking (following the guidelines below).
- ✓ They should then see the Designated Safeguarding Lead (DSL) or Person (DSP) in confidence.
- ✓ The DSL will then report it to the Devon Multi Agency Safeguarding Hub (MASH)[6] by phoning 0345 155 1071 or e-mail: mashsecure@devon.gcsx.gov.uk

What to do if abuse is suspected or disclosed

- Never guarantee absolute confidentiality, as Child Protection will always have precedence over any other issue.
- Endeavour to meet the child in a semi-public or visible space if possible – leave doors open to rooms, sit near windows etc.
- Listen to the child, rather than question them directly.
- Offer them reassurance without making promises, and take what the child says seriously.
- Allow the child to speak without interruption.
- Accept what is said – it is not your role to investigate or question.
- Do not overreact.
- Alleviate feelings of guilt and isolation, while passing no judgment.
- Advise that you will try to offer support, but that you must pass the information on.
- Explain what you have to do and who you have to tell.
- Record the discussion accurately, as soon as possible after the event,
- Use the child's words or explanations –do not translate into your own words, in case you have misconstrued what the child was trying to say – *if the student's language level is low, state that in your report*

[6] *http://www.proceduresonline.com/swcpp/devon/p_report_concerns.html.*

Handling Disclosure by a Child

Care must be taken to remain calm and to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

Ideally, a child making a disclosure should be taken immediately to the, School Director or DSP. In the event that this is not immediately possible, these notes will help you in handling the disclosure.

Receive ➔ Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down. Accept what is being said without judgement. Take it seriously.

Reassure➔ Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is being said seriously. Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns. Tell the child that you will need to tell some people, but only those whose job it is to protect children.
Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React➔ Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in their own words what happened, but don't ask leading questions. Do ask open questions like "Is there anything else that you want to tell me?" Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English. Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and to whom you have to talk. Refer directly to the named (DSP). Do not discuss the case with anyone outside the child protection team.

Record➔ (this would be for the Designated Safeguarding Lead or Designated Safeguarding Person)
Make some very brief notes at the time and write them up in detail as soon as possible. Do not destroy your original notes in case they are required by the court. Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang. Record statements and observable things, not your interpretations or assumptions – keep it factual

Information to be recorded in the formal report

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern. There will be a *Child protection incident form*[7] part of your employee pack. If you don't have it with you at the time to record this information, the report should include the following:

- The child's name, age and date of birth of the child.
- The child's home address and telephone number.
- Whether or not the person making the report is expressing their own concerns or those of someone else.
- The nature of the allegation; include dates, times, any special factors and other relevant information.
- Make a clear distinction between what is fact, opinion or hearsay.
- A description of any visible bruising or other injuries. Also, any indirect signs, such as behavioural changes.
- Details of witnesses to the incidents.
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
- If the child/student's language was low.
- Have the parents been contacted? – If so, what has been said?
- Has anyone else been consulted? If so, record details.
- If the child was not the person who reported the incident, has the child concerned been spoken to? If so, what was said?
- Has anyone been alleged to be the abuser? Record details.
- Where possible referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact social services or the police direct, or the NSPCC Helpline on **0808 800 5000**, or Child line on **0800 1111**

Record Keeping

All records, information and confidential notes should be kept by the Designated Safeguarding Lead in separate files in a locked room or in secure electronic files. Only the School Director and Director of Studies, Managing Director or another nominated senior manager and the Designated Safeguarding Lead will have access to these files.

Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know basis only. This includes the following people:

[7] *Appendix 1*

- the Directors
- the parents of the person who is alleged to have been abused
- the person making the allegation
- social services/police▪ The alleged abuser (and parents if the alleged abuser is a child)

TRAINNING

The DSP and DSL, have both received formal training up to level 3.

All current staff have received training from the DSP in the key issues of Child Protection.

New staff receive the same training as part of the induction process. All staff sign a declaration that they have received and understood this training and comprehend the importance of the issues raised.

All staff, new and existing, complete a short online course in Basic Awareness of Child Protection Issues.

Country Cousins undertakes to provide training sessions and to promote understanding and awareness of the Safeguarding and Child Protection Policy. This will happen:

- via the induction process (see below) with all new members of staff.
- via 'cascade training' provided by the Country Cousins DSPs through PowerPoint presentations.
- via frequently making 'Safeguarding' a standing item on at least 2 meeting agendas before the summer season, thereby raising awareness.

Country Cousins undertakes to review on an annual basis, at a minimum, the practice and implementation of its Safeguarding and Child Protection Policy and to provide any such further training as may be deemed necessary

We will assist staff through training to:

- Analyse their own practice against established good practice, and to ensure their practice is not likely to result in allegations.
- Recognise their responsibilities and demonstrate how to report any concerns about suspected poor practice or possible abuse.
- Respond to concerns expressed by a child or young person.
- Work safely and effectively with children.
- Receive advisory information outlining good practice and informing staff about what to do if they have concerns about the behaviour of an adult towards a young person.
- Gain national first aid training (where necessary).

Inductions

All employees will receive an induction that will take place on their first day of work, during which:

- checks will be made that self-disclosure forms have been completed,
- qualifications will be substantiated,
- the job requirements and responsibilities will be clarified,
- Safeguarding and Child Protection procedures will be explained and training needs will be identified,
- they will be asked to sign the organisation's Code of Conduct, Safeguarding and Child Protection Policy when signing the Self Declaration form.

SAFER RECRUITMENT

Country Cousins recognises that anyone may have the potential to abuse children in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children while they visit us.

Country Cousins follows a policy of safer recruitment which means:

- References will include a specific enquiry as to whether there is any impediment to the employee being employed in a situation where they will have responsibility for the care of, or substantial access to, children.
- A self-disclosure form about any criminal record and suitability to work with young people must be completed prior to employment.
- All references will be followed up.
- We will require completion of a DBS disclosure before the induction day and normally prior to employment commencing.
- Staff must provide proof of identity prior to taking up employment with Country Cousins.
- Any gaps in CVs must be explained satisfactorily.
- Applications for employment will normally only be accepted via the official Country Cousins application form.

All advertisements for staff and host families will state 'Country Cousins follows a policy of safer recruitment'. Furthermore, some of the questions asked in interview will be specifically designed to explore the candidate's attitude towards working with young learners.

In the event that we have to employ someone before receiving a formal DBS disclosure, additional checks on suitability will be undertaken by way of obtaining extra references (over and above 2), verbal or written. Evidence or disclosure of a criminal record will not necessarily result in a candidate not being appointed to a position. Naturally, the nature of the disclosure will be taken into account and if deemed irrelevant to dealing with young people, the candidate may well be successful if all other employment criteria are met. Such issues will, of necessity, be dealt with on a case-by-case basis.

Applicants awaiting DBS

DBS (Disclosure and Barring Service) Checks

Country Cousins will ensure that all existing and new staff have a current Enhanced DBS check and sign a copy of the Children's Act 1989, which will be kept on file, declaring any convictions of offences against children.
An Enhanced DBS check will state whether or not adverse information has been found with regard to the member of staff or homestay family member. This will include any cautions, reprimands and final warnings relevant to the post.
We use https://online.ddc.uk.net/login

Applicants with a criminal record

If the check denotes a previous conviction which does not pose a direct threat to the safety of our students, then further information will be sought. Areas for consideration will be the circumstances surrounding the conviction, the seriousness of the offence, when this took place and whether it was an isolated incident or part of a history. A decision will then be taken by the Managing Director and School Director as to whether or not they are suitable staff or homestay providers

RECRUITMENT OF HOMESTAYS

Homestays receive a visit from the Welfare and Accommodation Officer.
We ask for the following paperwork:

- A Gas Safety Certificate,
- Fire risk assessments,
- Two references, and
- a DBS specific for 'Working at home with U18s'.

Homestay for emergency cover who currently hold an updated DBS certificate from another organisation can be accepted subject to assessing and identifying the risks, see risk assessment attached.

Existing host families will have re-visits every two years, if any issues arise a visit will be arranged as soon as possible.

GROUP LEADERS

Group Leaders are asked to sign the Code of Conduct and to bring a copy of an authority check from an official body in their own country that specifies they haven't had any convictions while working with children.

ENSURING SAFETY

Risk Assessments

Risk assessments are completed for every activity undertaken and are central to effective safeguarding of our students.
The School Registrar ensures that the correct risk assessment is given to relevant staff leading an activity.
That staff member reads the risk assessment prior to departure or prior to starting the activity and signs a master sheet held by the School Registrar stating that they have read and understood the potential risks involved in the activity and what to do should anything happen.
Post activity, the activity leader then signs the risk assessment, with any updates deemed necessary, and returns the sheet to the School Registrar for filing.

An EMERGENCY REACTION PLAN is given to every member of staff conducting an activity both on site and off site.

Supervision Ratios

Staff/adult to student ratios will be age appropriate and activity appropriate but will never be fewer than 1:15 for students aged 12 -17. Group leaders will never be made responsible for students who are not in their own group.

Students are given guidance in inductions and handbooks as to levels of supervision and, in particular, curfew times and what they may and may not do in their spare time. Supervision notes are sent to the student's parents at home so that they are aware of what levels of supervision to expect for their child.

Welfare

Our Designated Safeguarding Persons are named on notices throughout the school. These are normally in the main board in the entrance and the board in the staff room. The School Director, in addition to being DSL, has a pastoral role, this is illustrated on the posters throughout the school. Of course, all staff have a responsibility to ensure a good level of welfare support for all students.

Activities will be age appropriate. In sporting activities, students of roughly similar ages will be put together.

There are signs prominently displayed around the site, showing who to go to for a welfare or safeguarding issue.

First Aid

The School Registrar at Reception is charge of the first aid kits and is to ensure that these are adequate in number and that all staff knows where they may be found (this is included in staff induction). Unless in use, all kits are to stay in their designated position so as to be always accessible. A minimum of two office staff are First Aid trained in case of an incident, so the incident report form is always completed appropriately.

Emergency Phone

The welfare department share the emergency phone on a rota basis. The handover for the emergency phone is on Fridays and the School Director is to provide the following documents:

- List of all individual arrivals for the weekend (this contains student who have booked transfers from the airport, students who will make their own way and students who have booked own accommodation)
- List of group arrivals with accommodation and transfer details

On the following Monday the person on duty is to inform the School Director of what has happened during the week end in terms of emergencies.

Fire Safety

Regular checks are carried out to ensure that the students and staff are not interfering with any firefighting equipment (e.g. propping doors open with fire extinguishers) or with fire exits.

Airport Transfers

All drivers and coach companies used by Country Cousins have DBS clearance. If a student wants to travel independently from the airport to the host family, we still ask for arrival details so we can ensure the family is in when the student arrives.

We also provide the student with information regarding the safest and best way to get to the school.

We use an airline and passengers' management company who are authorised to meet our students including unaccompanied minors on behalf of Country Cousins at Heathrow and Gatwick airports.

E-Safety

We have a contract with a reputed, national Internet provider to manage a secure and filtered Internet service which enables us to safely access and use the Internet and all email. The Internet filtering service will be annually reviewed.
The filtered Internet is designed to protect pupils and school personnel by blocking the following content:

- adult content containing sexually explicit images,
- violent content containing graphically violent images
- hate material content promoting violence or attack on individuals or institutions on the basis of religious, racial or gender grounds,
- illegal drug taking content relating to the use or promotion of illegal drugs or the misuse or prescription drugs,
- criminal content relating to the promotion of criminal and other activities,
- gambling content relating to the use of online gambling websites.

When inappropriate material has been accessed the Internet Service Provider will be contacted and, if necessary, the Police.

Students will be aware of this policy and will be asked to:

- accept the terms of the Student Acceptable Use Agreement before using any Internet resource in school or homestay accommodation;
- be critically aware of the materials they read;
- validate information before accepting its accuracy;
- acknowledge the source of information used;
- use the Internet for research – respect copyright when using Internet material in their own work;
- be aware of the risks of using geo-location tools;
- be aware of the risks of sharing personal information online;
- be aware of the information they share about others;
- only use approved e-mail accounts;
- never take part in 'trolling' or any form of online abuse;
- not divulge their or others' personal details;
- not arrange to meet anyone via e-mail;
- seek authorisation to send a formal e-mail to an external organization;
- not take part in sending spam

Devon Safeguarding Children Board

For more information about E-Safety please visit
Devon Safeguarding Children Board Procedures Manual

http://www.proceduresonline.com/swcpp/devon/p_esafety_abuse_dig_media.htm

Prevent – Radicalisation and Extremism

PREVENT[8] was introduced by the UK government as part of the Counter Terrorism and Security Act 2015.

Although we are not required by law to have a full Prevent policy, Country Cousins seeks to protect its staff and students from being drawn into terrorist activity of any kind.

We inform all our employees and homestay families about PREVENT, which is about safeguarding our staff and students to keep them both safe and within the law. The Prevent duty is not about preventing students from having political and religious views and concerns. The government has defined extremism as 'vocal or active opposition to fundamental British core values.' The four fundamental British core values are:

1) Democracy

2) The rule of law

3) Individual liberty

4) Mutual respect and tolerance of those with different faiths and beliefs and of those without faith.

All staff and homestay families have a duty to be aware that vulnerable adults or children may be drawn into extremism or are in danger of being radicalised. All concerns about any student being drawn into any kind of terrorism as a consequence of radicalisation, no matter how trivial, must be reported.

Our PREVENT lead is Lucy.SKINNER@devonandcornwall.pnn.police.uk

Private Fostering

It is important to be aware of the requirements of the Private Fostering Regulations 2005[9],

These regulations apply to your organisation if you place children under 16 years of age (18 years if disabled) with host families for 27 nights/28 days or more. Please be aware of the following:

- Failure to notify the Local Authority of such an arrangement is a criminal offence.
- The notifications should be made prior to the placement taking place. Ideally six weeks before the placement (see the legislation above for further details).
- Moving children between host families during the period of their stay does not prevent the child from being considered as Privately Fostered. Any child whose stay is for 28 days or more and is within the age limit, should still be notified to the Local Authority, even if they are not intended to stay with the same family for the whole of the period. Moving children between host families or into residential accommodation without informing the local authorities could be viewed as trying to avoid the Private Fostering Regulations and this would be considered by the Scheme as unethical or by many of the Local Authorities as illegal.

The Welfare and Accommodation Officer will contact the children's social services to let them know about students staying for longer than 28 days. Details of student's families abroad and in the UK will be given.

Our contact is: Elaine Newton, Manager, Private Fostering Team,
Follaton House,
Plymouth Road,Totnes TQ9 5RS

01392 383000 (ext 3000) 07814460475

[8] http://www.proceduresonline.com/swcpp/devon/p_sg_ch_extremism.html?zoom_highlight=radicalisation
[9] http://www.legislation.gov.uk/uksi/2005/1533/made