



Safeguarding Policy, Procedures and Guidance for Safe Working Place and The Protection of U18s and Vulnerable Adults

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1) POLICY STATEMENT

Safeguarding under 18s is about doing things the right way and doing things properly. That means ensuring that no under 18 student at MC Academy is subject to maltreatments such as bullying, physical, emotional or sexual abuse, and neglect.

Context

MC Academy is an English Language School for international students (aged 16 or above) which provides morning and afternoon classes all year round, at all levels and also provides Closed Classes (for students younger than 16) at its Summer School

Definitions

Safeguarding is an umbrella term for Looking After children (i.e. those aged 18 or below, referred to as U18s in this document), whereas Child Protection is best considered as protecting children from direct harmful behaviour

1.1 SAFEGUARDING STATEMENT

Every child and young person, defined as any person under the age of 18 (U18), who attends the school should be able to do so in a positive, supportive, and safe environment in order to achieve their full potential. (This is the responsibility of every member of staff). MC Academy recognises its responsibility to safeguard the welfare of all U18s by protecting them from physical, sexual or emotional harm, and from neglect and bullying. MC Academy is therefore committed to providing a safe environment for all U18s and we seek to fulfil our responsibility by:

- Following a Safer Recruitment Policy, ensuring that all applicants who work within MC Academy are interviewed and asked to provide at least two references, at least one of them written; all such references will be followed up.
- It is mandatory for new employees to undergo an online safeguarding awareness course before they start their employment with MC Academy.
- Applicants will be informed that the work, either paid or voluntary, involves working with young people,
- Ensuring that staff are trained to recognise the symptoms of possible abuse (physical, sexual, emotional and neglect) and how they should respond to suspicions of abuse and attend continuous training throughout their employment by attending in-house CPD sessions delivered by the DSL or external training organised by the DSL.
- Ensuring that all staff are aware of, understand and apply the direction in the Code of Conduct,
- Sharing information and acting promptly and professionally to any concerns,
- Appointing two Safeguarding Officers and a Senior Manager who has overall responsibility for all major decisions in this area. (At MC Academy this Senior Manager is the Director of Studies who is also the Lead Designated Officer. In Liverpool there is also a safeguarding lead.)
- Reviewing the policy on an annual basis or more frequently in accordance with changes in legislation and guidance on the safeguarding of U18s and vulnerable adults or any changes within MC Academy. This will be done with input from the Designated Officers, teachers, support staff and feedback from other stakeholders. The Policy review will be signed off by the Director of Studies
- This full policy is available on the MC Academy website. A simplified version is available/will be sent to Homestay Hosts, Group Leaders and any regular visitors who are likely to have contact with U18s

1.2 KEY PRINCIPLES

All MC Academy’s staff and students are required to take shared responsibility for the safeguarding and welfare of any under 18s and vulnerable adults.

U18s entitlement	❖ The welfare of U18s must be the paramount consideration
	❖ All U18s have a right to be protected from any maltreatment or abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation
School’s responsibility	❖ The proprietor and his management team must ensure that they comply with their duties under legislation. They must have regard to related guidance to ensure that the policies, procedures and training at MC Academy are effective and comply with the law at all times
	❖ to continually monitor and review these policies and practices
	❖ to foster a culture of openness and support for students and staff alike, whilst respecting the relevant expectations of confidentiality
	❖ ensure that neither students nor adults are put in situations of vulnerability at any time
	❖ ensure that all staff have clear job descriptions which make clear their roles in the school (<u>HR updating</u>)
	❖ all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
	❖ Working in partnership with other organisations, children and young people and their parents and carers is essential.
	❖ The school is committed to working in partnership with the Police, Social Services Departments and Local Safeguarding Children’s Boards (LSCB) in accordance with their procedures. This is essential to enable these organisations to carry out their statutory duties to investigate concerns and protect all children and young people.
Adult’s responsibilities	❖ It is everyone’s responsibility to report any concerns regarding abuse to the Designated Safeguarding Officers, Rahila and Paul.
	❖ Every adult, as a responsible individual, is required to abide by the Code of Conduct (page 5) in order to safeguard and promote the welfare of looked after U18s
	❖ Every member of staff is in a position of trust , in particular those who teach, support, guide or in any way interact with students, young people and vulnerable adults
	❖ To report and record any incidents or indications (verbal, written or physical) that suggest an U18 may have developed an infatuation with an adult in the workplace
	❖ To always acknowledge and maintain professional boundaries

Designated persons' responsibilities	<ul style="list-style-type: none"> ❖ To ensure that the policies and procedures, adopted by MC Academy, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff. ❖ It is important that parents/guardians know what to expect, at MC Academy, especially concerning any periods when U18s are unsupervised. This is particularly important in relation to clarifying expectations where 16–17-year-olds are accepted on adult courses. This information is given in writing before enrolment. ❖ Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.
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1.3 ASSOCIATED POLICIES

There are policies and procedures that have already been created by MC Academy and this policy is to complement and reinforce attempts to protect our U18 students:

- **Health & Safety Policy**
- **Behaviour and Discipline Policy**
- **Risk Assessments**
- **Internet Policy**

Our Safeguarding policy aims to follow relevant legislations and guidelines which include:

- The Children Act, 1989, 2004
- Human Rights Act, 1989
- Safeguarding children and Safer Recruitment, 2007
- Working Together to Safeguard Children, 2013
- Guidance on Child Protection, Records Retention and Storage, 2007
- Sexual Offences Act, 2003
- Keeping Children Safe in Education (DfE) 2016
- FGM Act 2003
- National Guidance for Safer Working Practice for Adults who Work with Children and Young People.
- Care of Under 18s: Guidance for ELT Providers (British Council)

2) CODE OF CONDUCT

The following guidelines are intended to provide a safe school culture where both adults and U18s are protected from any behaviour that might be misinterpreted. All staff (and volunteer workers) are in a Position of Trust and, as such, are forbidden under the terms of the Sexual Offences Act (2003) of engaging in any sexual activity of any sort with U18s (even though the legal age of consent is actually 16 in the UK)

YOU SHOULD:

- ✓ Comply with the MC Academy's principles, procedures and guidance which support the development and well-being of all students, including U18s and vulnerable adults.

- ✓ Treat all students, including U18s and vulnerable adults with respect
- ✓ Take reasonable care of students, including U18s and vulnerable adults under your supervision with the aim of ensuring their safety and welfare
- ✓ Maintain appropriate standards of confidentiality, honesty and integrity
- ✓ Report any concerns about the protection of students, including U18s and vulnerable adults, in accordance with this policy

3) CHILD PROTECTION

3.1 OVERVIEW

In the context of this policy, 'child protection' does not imply preventing accidents (covered by our Health and Safety Policy) but it specifically refers to the protection of children from any form of maltreatment so as to sustain the child's social, educational and mental development.

3.2 SAFEGUARDING CHILDREN PROCEDURE – If you observe abuse as it is taking place.

This could take a number of forms, for instance seeing an adult hit a child, observing a member of staff using inappropriate restraint on a young person witnessing the neglect or basic care needs of a disabled child:-

Child Protection Procedure

1. Inform the perpetrator of your concerns.
2. Ask or advise them to stop the action immediately.
3. Ask or advise them to move themselves to an area where there is no contact with children
4. Tell the student that you will immediately be informing the senior manager at the school.

If the perpetrator fails to desist, take appropriate action to stop the abuse and call for assistance.

If the perpetrator does desist, stay with the child until you can transfer them to the care of another responsible adult.

- Take notes (what you have heard or seen)
- Keep the notes taken, without amendment, omission or addition
- The notes should be dated and signed. Include the following information: WHAT YOU SAW, WHO SAID WHAT, WHAT ACTION YOU TOOK + DATE, TIME, LOCATION, NAMES AND PERPETRATOR

3.3 RECEIVING ALLEGATIONS AND MAKING REFERRALS

- All allegations and concerns of abuse must be taken seriously, regardless of how 'unbelievable' the situation may seem.
- Any suspicions of abuse, whether involving staff, a student or member of a host family need to be reported to the Safeguarding Officer
- The person against whom the allegation is made will be informed of it and interviewed immediately. Following the interview, if there is any potential substance to the allegation:

1. Staff and directors	They will be suspended from their duties pending further, investigation.
2. Students	They will be required to suspend their attendance at the school and find alternative accommodation.
3. Host families	All students will be immediately removed and re-housed and all future bookings suspended until the matter has been fully investigated.

- Confidential records of the allegation will be kept as well as all subsequent proceedings.
- Unfounded allegations will result in all rights being re-instated. Founded allegations will be passed on to the police and will result in a termination of employment/voluntary services.
- Staff who report such concerns (or, indeed, any other problems at MC Academy) will not be penalised and their report will remain confidential. If they feel that their concerns are not being addressed by the persons responsible, there are other whistleblowing channels available. Guidance can be found at Advice on whistle-blowing

3.4 RECEIVING ALLEGATIONS AND MAKING REFERRALS

- MC Academy does not act as an investigative authority, therefore it is essential to make referrals to the relevant child welfare and law enforcement agency to ensure the appropriate protection and support to the child.
- If a child is in immediate danger or is at risk of harm, a referral should be made to children’s social care or the police immediately. Anyone can make a referral. When referrals are not made by the designated safeguarding lead, she should be informed as soon as possible (Keeping Children Safe in Education)
- (The contact details of LADO Manchester can be found on the cover page of this document. A copy of the Referral form needs to be completed is available in Appendix V)
- **MC Academy is legally required to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed by MC Academy, due to safeguarding concerns, or would have been had they not resigned.**

3.5 CHILD TELLING AN ADULT

If you are in direct contact with the person raising the concern, for instance through a phone call, receipt of a complaint or as part of an inspection interview.

Do	Don't
Stay calm and be available	Refuse to listen or over-react.
Find the general subject area.	Assume it's something related to abuse
Does the subject matter require privacy ? If yes – inform another staff member where you are and explain that you are having a private meeting with a student.	Start asking more questions ; show worry or concern with your facial expressions . Be in a room on your own with a student with the door closed . Draw too much attention to the situation.
Be open, calm, patient and listen .	Promise confidentiality if they ask you to keep secret.
Tell the student what you are going to do next .	Leave the student alone after they've disclosed.
Tell the designated person what has happened.	Tell any colleagues what the student has said (apart from one of those listed as needing to be told)
Immediately afterwards, write a report of the meeting (Appendix IV). Ensure report is filed in secure place.	Ask direct or leading questions or make any comments on what they tell you. Write while they are talking to you. Write any opinions , or draw conclusions. Try and ' improve ' the student's English if it wasn't grammatically accurate or vocabulary was wrong.

3.6 CHILD ACCUSED OF ABUSE

Staff should recognise that children are capable of abusing their peers. Our responsibility is to ensure our child protection work includes procedures to minimise the risk of peer on peer abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with. Such abuse takes different forms (such as sexting and physical bullying) and we must always make clear that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. It should be reported and dealt with in the same way as other abuse. In addition, victims of peer-on-peer abuse will be supported by the Designated Safeguarding Officers, in conjunction with parents and guardians as appropriate.

3.7 FEMALE GENITAL MUTILATION

Female Genital Mutilation (FGM) is illegal in the UK and there is a legal duty for teachers to report it if they find out or are told that it has happened. The first step is for the teacher to report this to the Police (this is statutory) and then to inform one of the Designated Officers. This applies only to U18's. For adult women, the normal Safeguarding reporting process should be followed

3.8 KEEPING RECORDS

All related records are stored by the Lead Designated Officer in office. Access to these records is by the Designated Officers and, if necessary, an officer of an outside agency

Following the guidance contained within Data Protection Act 1998: Guidance to Social Services (2000), personal information should not be stored for longer than 6 years after the subjects last contact with the authority. Exceptions for the 6 year period will occur when records:

- Need to be retained because the information in them is relevant to legal action that has been started
- Are required to be kept longer by law
- Are stored for historical purposes (e.g. in a situation where the organisation was party to legal proceedings or involved in proceedings brought by a local authority)
- Relate to individuals and providers of services who have, or whose staff, have been judged unsatisfactory

When records are being kept for more than the 6-year period, files will be clearly marked and the reasons for the extension period clearly identified.

4) TRAINING

In order to minimise any risks to children, every member of staff needs to be adequately trained to ensure the understanding of their roles and responsibilities. At MC Academy, all staff are required to do:

1. Basic Awareness Safeguarding for ELT, including 'Prevent' from Gallery Teachers.
2. All staff are given and are required to read Section 1 of the DfE document Keeping Children Safe in Education as part of their Induction. This is available on the staff drive.
3. Both electronic and hard copies of staff CPD sessions are kept by the DOS.
4. In order to protect children and our employees, staff are not permitted to work alone with a child in a secluded area that cannot be monitored. All our classrooms have glass wall partitions which help us to minimise risks of misconduct or students making unfounded accusations.
5. Every member of staff should read and adhere to the MC Academy Code of Conduct .
6. All trips are to be supervised by staff and no activity should be undertaken without written permission of their parents/guardians.
7. Any contracted staff, particularly teachers, as well as CELTA trainees will be given basic information on how this policy works.

5) SAFER RECRUITMENT

5.1 OVERVIEW

In MC Academy we firmly believe that the best results are achieved when the students are cared for by well trained, compassionate and enthusiastic adults with whom they can develop appropriate attachment and build positive relationships (the Children act, 1989; Section 22). As a result we have certain Recruitment Policy and procedures that investigate appropriate attitudes to relationships with students (Appendix VI) as well as to deter, reject or identify people who might abuse children or are unsuited to work with them Recruitment refers not just to teachers but all staff, Homestay Hosts and any outside agencies and agents appointed to act on behalf of MC Academy.

5.2 RECRUITMENT PROCEDURES

The vital part of child safety is prevention; therefore, the following measures are taken to ensure that only those who do not pose a risk to children are employed.

1. Job contracts and advertisements	State that MC Academy works to protect children and that those seeking work will be assessed regarding their suitability to work with children.
2. An application form	Elicits information regarding applicant's past
3. Face-to-face interview	It will explore candidate's suitability to work with children (<i>Appendix VI</i>)
4. Passport/ID/Employment Visa	Confirm identity and eligibility to work in the UK
5. DBS check	Verification of criminal record (if any)
6. References	To obtain objective and factual information to support appointment decisions.
7. A complete employment history with a reasonable explanation for gaps.	
8. Compliance with Safeguarding requirements ('Induction Checklist for New Teachers')	

5.3 APPOINTING NEW STAFF

Following the British Council requirements and a statutory guidance outlined in 'Keeping Children Safe in Education' (2014) we have created specific procedures that need to be followed when appointing new members of staff.

1. DBS CHECK	Every member of staff who is involved in a 'regulated activity' ¹ relating to children will need an Enhanced DBS check. <i>The School Staffing (England) Regulations 2009, the Non-Maintained Special Schools (England) Regulations 2015 and the Education (Independent School Standards) Regulations 2014</i> require proprietors to check that a person to be appointed is not subject to an interim prohibition order or a prohibition order. Anyone who has been barred will not be employed. (¹) more than 3 days in any period of 30 days ('Keeping Children Safe in Education 2014')
2. DBS CERTIFICATE TRANSFER	A new DBS Certificate will not be required if an employee already possesses one with an update service. a. correct level (Enhanced) b. correct workforce (Child workforce)

5.4 GROUP LEADERS

Safer recruitment also applies to group leaders and hosts because they have responsibility for or substantial access to U18s, unsupervised access or overnight supervision. MC Academy has formal agreements in place with the agents to ensure suitability checks have been done on all adults accompanying U18s. In addition to this, MC Academy obtains signed self-declaration forms from all group leaders and ensure they are made aware of the organisation's safeguarding policy and practices. Group leaders who are appointed by an agency need to be checked by the agency in their own country and the agency must confirm to MC Academy that these checks have been done and that the leader has been cleared. A police certificate of good conduct is the most appropriate documentation. In addition, the importance of clear rules of conduct, good supervision and vigilance from all staff are re-iterated. DBS checks are not relevant for an overseas national who has not been a UK resident.

5.5 HOMESTAY HOSTS

Homestay hosts and their adult family members cannot receive children until the criminal check has been received. A home-based role DBS check may be used to cover the family members over 18.(check Appendix IX for extra information for Hosts)

5.6 SPECIFIC OTHER STAFFS

MC Academy employs an agent to manage the airport transfers (see section 6.6). An Enhanced DBS Certificate is seen by the DfE as appropriate in this situation, as is also the case for regular visitors, supervised volunteers and contractors such as cleaners if they have unsupervised access to U18s.

5.7 SINGLE CENTRAL RECORDS

All documentation to ensure full and correct procedures are carried out and are recorded as such, is administered by the Human Resources.

6) WELFARE/IMPLEMENTING SAFEGUARDING/ADULT & UNDER-18 INTERACTION

6.1 ABSENTEEISM (GENERAL)

6.1a Tier 4 provision (Attendance Policy 2013)

There are additional requirements for those students on Tier 4 visa:

1. If the student fails to enrol they will be reported with the reason for non-attendance (if known) within 10 days of the expected start date
2. If the student fails to attend for 10 consecutive lessons without contacting the school with a valid reason beforehand they will be reported.

As well as the legal requirements for Tier 4 Students, regular attendance at school is essential to ensure uninterrupted progress and to enable all students to reach their full potential. To this end MC Academy has a rigorous policy of checking and following up student attendance.

There are a number of steps that the student admin team follow.

1. On an informal basis attendance is checked via Intrinsic on Wednesday morning to show those students who haven't attended school that week. If there has been no contact to explain the absence then we would ring or email just to check if they were ok and remind them that they must let us know if they will not attend school for any reason.
2. On Friday the 5 and 10 day absences are printed from Intrinsic. Letters are sent either in the post or by email to these students warning about their level of absence. This could be either a first or second warning depending on how many times the absence has occurred.
3. If absence persists once the 5 and 10 day letters have been issued then the Director of Studies will contact the student with details of a meeting to take place in school to discuss their attendance.

6.1 b U18s (additional requirements)

Being mindful of our duty of care to students under the age of 18 the following procedure will be adhered to.

1. Admin team will highlight any students under the age of 18 on the register.
2. If an U18 is not in class 15 MINUTES AFTER LESSON STARTS, the admin team will contact the student or person taking responsibility for them such as the agent / parent or host family to find out where they are.
3. An absent U18 student is interviewed to check reason for non-attendance so as to ensure whether there are causes for concern or not.
4. Outcome of the interview to be recorded on student's file on the enrolment system.

6.2 VISITS AND TRIPS

It is employees' responsibility to remember their professional boundaries. To ensure the safety of staff and U18s...

- The formal risk assessment for such trips has to be undertaken in advance.
- **Obtaining formal consent and providing parents/carers with information of the activities and the conditions of the trips in which their children will be engaged (this is done through the Parental Consent form for Under 18 to Participate in Activities).**
- Under 16s will also be monitored during the breaks of their lessons. Whenever possible, students in closed groups will have different breaks and will be monitored by a member of staff when using the bathroom facilities as these are located outside of the main school building.
- Before a trip, students will be given our social programme phone number (07523645186)
- If a child does not appear at any time expected, the Visit/trip leader should ring the student on their mobile phone repeatedly for 15 minutes. If there is no answer, contact:
 - I. the school directly (if in school time)
 - II. the school emergency number (if after school time)
 - III. Majid Abufares or Rahila Tauqeer to discuss the situation (if no response from the emergency number)
- The supervision ratio for MC Academy Social activities both on- and off-site is:
 - 9 to 14 years
 - 1 adult for 10 to 12 children

15 to 18 years
1 adult for 10 to 15 children

Telephone contact numbers for out-of-hours Majid Abufares (School Owner and Principal) 07958 716944 and Rahila Tauqeer (Safeguarding Lead) 07554640222.

It is important to have a high enough ratio of adult supervisors to pupils for any visit. The factors to take into consideration include:

- Sex, age and ability of group;
- Pupils with special educational or medical needs;
- Nature of activities;
- Experience of adults in off-site supervision;
- Duration and nature of the journey;
- Type of any accommodation;
- Competence of staff, both general and on specific activities;
- Requirements of the organisation/location to be visited;
- Competence and behaviour of pupils;
- First aid cover.

6.3 PHOTOGRAPHY AND VIDEO

The images of a child must not be used without the specific approval of the parent/guardian. Also, make sure that:

- You don't take unauthorised images of children at MC Academy.
- All children to be photographed are appropriately dressed.
- You do not take photographs focussing on one child.

6.4 ELECTRONIC CONTACT WITH U18s

Staff are expected to follow the same professional distance in any electronic contact (including telephone communications such as texting and on-line environments) with children as they would in usual day-to-day situations. The following directions apply to all members of staff:

- Do not initiate electronic contact with a child.
- In a situation when a child contacts you electronically, remember to be friendly, professional and neutral. When a child seeks to establish an inappropriate personal relationship, inform your employer and send a copy of any relevant communications.
- Avoid situations that involve the exchange of professional information.
- If a child confides sensitive information to you electronically, such as details of abuse, react as shown in Section 3.6 (Child Telling an Adult).
- Staff should not give their personal contact details to children, including their mobile telephone number.
- Staff should only use equipment e.g. mobile phones, provided by MC Academy to communicate with children, making sure that parents have given permission for this form of communication to be used.
- Staff should only make contact with children for professional reasons and in accordance with any organisation policy.
- Staff should recognise that text messaging is rarely an appropriate response to a child in a crisis situation or at risk of harm. It should only be used as a last resort when other forms of communication are not possible.
- Staff should not use internet or web-based communication channels to send personal messages to a under18/young person.

6.5 INTERNET SAFETY

We are aware of the risks associated with the internet, mobiles and social networking sites, such as:

- Cyber bullying
- Grooming
- Potential abuse

- Exposure to inappropriate content
- Racism

We make all our students aware of possible risks and dos and don'ts of internet use during their induction. Also, pupils can familiarise themselves with other students' ideas on internet safety by looking at the posters created and displayed in the computer room and leaflets obtained from NSPCC.

Learners who are in closed groups are accompanied by either a group leader or a teacher at all times which minimises opportunities for mis-use.

Encouraged online activities:

- The use of e-mail between pupils(s) and teacher(s), between pupil(s) pupil(s), between school and pupils for information and homework purposes.
- Use of the Internet to investigate class topics to encourage language and personal development.
- The development of pupils' general research skills which can be applied in further education and employment.

6.6 EXTREMISM (see MC Academy Policy on Prevent)

- From day one, our students are made aware of the rules that we follow in our school regarding respect, equality and racism and consequences when these are disobeyed.
- Our welfare officers Nisrin and Rahila are available to discuss in confidence any issues that may arise.
- All our classrooms, except the PC room, have a single transparent wall through which we can see what happens in the classroom and act accordingly. Teaching one-to-one lessons in the PC room must be done with the door open.
- The common area where students spend their breaks is open.

6.7 TRANSPORTING CHILDREN AND YOUNG PEOPLE

There will be occasions when adults are expected or asked to transport children as part of their duties. Adults, who are expected to use their own vehicles for transporting children should ensure that the vehicle is roadworthy, appropriately insured and that the maximum capacity is not exceeded.

It is a legal requirement that all passengers should wear seat belts and it is the responsibility of the staff member to ensure that this requirement is met. Adults should also be aware of current legislation and adhere to the use of car seats for younger children. Where adults transport children in a vehicle which requires a specialist license/insurance e.g. PCV or LGV- staff should ensure that they have an appropriate licence and insurance to drive such a vehicle.

It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with the parents/carers.

There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

This means that adults should:

- Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive.
- Be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer.
- Record details of the journey in accordance with agreed procedures.
- Ensure that their behaviour is appropriate at all times.
- Ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned.

6.8 HOMESTAY (see MC Academy Homestay Handbook)

Home Visits: There are staff at MC Academy for whom home visits are an integral part of their work (Accommodation Officers) and the school has appropriate policies and related risk assessments in place to safeguard U18s and these adults.

A risk assessment ('Risk Assessment' / 'Homestay Checklist') is always done to evaluate any known factors regarding U18, parents and others living in the household. Following an assessment, appropriate risk management measures are put in place before visits are agreed. Where little or no information is available, visits should not be made alone. There will be occasions where risk assessments are not possible or not available, e.g. when emergency services are used. In these circumstances, a record must always be made of the circumstances and outcome of the home visit. Such records must always be available for scrutiny. Specific consideration is given to visits outside of 'office hours'. Staff should:

- Agree the purpose for any home visit with senior management.
- Adhere to agreed risk management strategies.
- Always make records including times of arrival and departure and work undertaken.
- ensure any behaviour or situation which gives rise to concern is discussed with one person in the management team or the safeguarding team.
- Ensure that they have access to a mobile telephone and an emergency contact person.

Under no circumstances should an adult visit a child in their home outside agreed work arrangements or invite a child to their own home or that of a family member, colleague or friend. If in an emergency, such a one-off arrangement is required, the adult must have a prior discussion with a senior manager and the parents or carers and a clear justification for such arrangement is agreed and recorded.

6.9 BEHAVIOUR MANAGEMENT

All children and young people at MC Academy have a right to be treated with respect and dignity, even in those circumstances where they display difficult or challenging behaviour.

Adults should not use any form of degrading treatment to punish a child. The use of sarcasm, demeaning or insensitive comments towards children and young people is not acceptable in any situation. Only sanctions or rewards which are part of the behaviour management policy, which is widely publicised and regularly reviewed, should be used. The use of corporal punishment is not acceptable.

6.10 MISCELLANEOUS

- Staff should remember the value of being positive with U18's and giving regular praise, but not gifts.
- Staff should always be fair, consistent and considerate in their dealings with U18's.
- Staff should avoid physical contact other than in exceptional circumstances, when it cannot or even should not be avoided (i.e. situations in which the well-being or safety of the child would otherwise be at risk, such as a fire or protection from an assailant.) Even then, staff should always be fully conscious of the risk of their actions being misconstrued.
- First Aid and Administration of medicine to Under 18s should only be done in accordance with the MC Academy policy. Staff who do so must comply with reporting requirements, make other adults aware of what is being done, explain to the child what is happening, always act and be seen to act in the best interests of the child and always ensure that appropriate risk assessment is undertaken first.
- Staff should not socialise with U18's outside of school.
- Staff should never smoke or drink when working in the presence of U18s and should always use the opportunity to encourage suitable attitudes for U18s on such matters.
- Staff should dress in ways which are appropriate to their role and this may need to be different to how they dress when not at work. They should ensure they take care to ensure they are dressed appropriately for the tasks and the work they undertake. Those who dress in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations.

For further details, staff should refer to the National Guidance for Safer Working Practice for Adults who Work with Children and Young People.

7) ONLINE LEARNING

7.1 INTRODUCTION

All teachers and members of staff at MC Academy must be compliant with our safeguarding policy for online learning. All teachers and members of staff will receive training to recognise and prevent online abuse from occurring at MC Academy.

7.2 TYPES OF ONLINE ABUSE

Types of online abuse include the following:

- Online grooming
- Online Radicalisation
- Harmful content
- Online bullying (peer on peer abuse)
- Child sexual exploitation

7.3 GROOMING TACTICS

- Identity deception, i.e. pretending to be younger
- Giving advice or showing understanding
- Buying gifts
- Giving attention
- Promises of taking them trips, outings or holidays, if they meet
- Isolation
- Persuasive rather than coercive

7.4 SIGNS OF ABUSE

- Talking about older or new friends they've met online
- Talking about money or gifts they've received online
- Becoming secretive
- Worried about being away from their phone
- Having a new phone or more than one phone
- Receiving large number of calls

7.5 WHY ISN'T ABUSE OFTEN REPORTED?

Sometimes, students may be reluctant to report abuse received online for a number of reasons. Reasons to acknowledge/consider may include:

- They don't want their friends/parents to know
- They don't know it's wrong or serious
- They are frightened or ashamed
- They want to protect their abuser
- They might fear being separated from their abuser

7.6 WHAT TO DO IF A STUDENT REPORTS ABUSE TO A MEMBER OF STAFF?

DO:

- Stay calm; try not to show shock
- Listen carefully
- Show sympathy
- Tell the person that they did a good/ right thing in telling you
- Tell them you are treating the information seriously
- Inform them that you can't keep the information they disclose confidential
- Be aware of the possibility that medical evidence might be needed

DO NOT:

- Press the person for more details
- Promise confidentiality
- Make promises you cannot keep, i.e. I won't let this happen to you again
- Contact or confront the accused
- Be judgmental, i.e. why didn't you run away?
- Stop someone during a disclosure, or they might never tell you again

7.7 RECORDING LESSONS

MC Academy prohibits the recording of lessons for safeguarding reasons. The recording of lessons can pose questions such as:

- Who are they for?
- Who is monitoring them?
- How/ where will they be stored?
- How long will they be kept for?

7.8 ONLINE ETIQUETTE

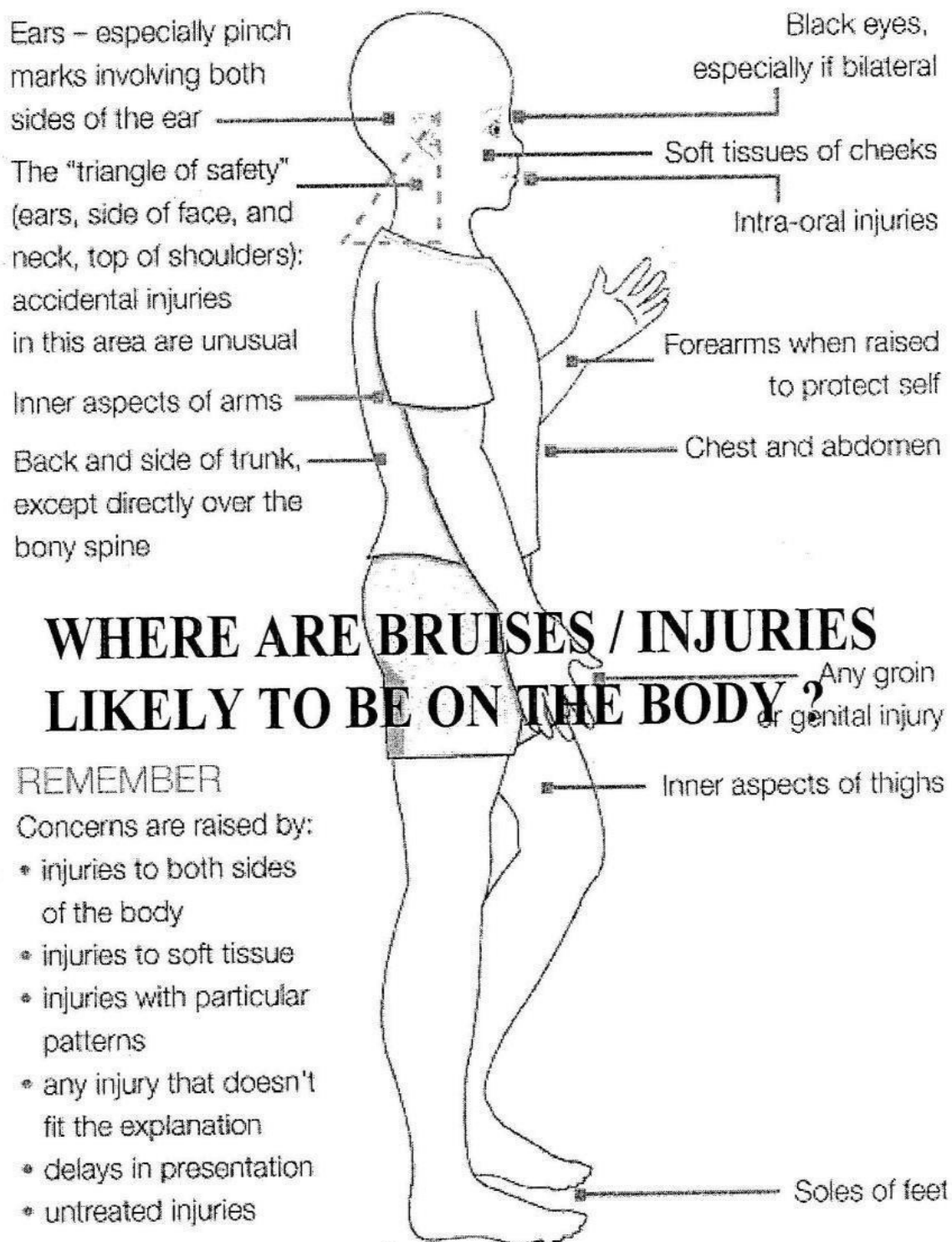
- After this, students must give a legitimate reason for not having their camera on, i.e. religious reasons.
- Students must use their full names on Zoom. No pet names or nicknames are permitted
- Students will sign a declaration including stating that they will not record lessons or share inappropriate material via Zoom. Students are also prohibited from using/sharing inappropriate backgrounds.

7.9 USEFUL WEBSITES

- CEOP www.ceop.police.uk/safety-centre
- Get safe Online <https://www.getsafeonline.org/social-networking/online-abuse>
- SWGfl <https://swgfl.org.uk/magazine/advice-on-safe-remote-learning-amidst-coronavirus/>
- POSH <https://swgfl.org.uk/services/professionals-online-safety-helpline/>
- Internet Watch Foundation www.iwf.org.uk
- Think U Know <https://www.thinkuknow.co.uk/professionals/>
- Revenge Porn Helpline <https://revengepornhelpline.org.uk/>

8A) APPENDIX I - IDENTIFYING CHILD ABUSE

Identifying child abuse can be difficult as it has various forms.



WHERE ARE BRUISES / INJURIES LIKELY TO BE ON THE BODY?

Any groin or genital injury

REMEMBER

Concerns are raised by:

- injuries to both sides of the body
- injuries to soft tissue
- injuries with particular patterns
- any injury that doesn't fit the explanation
- delays in presentation
- untreated injuries

8B) APPENDIX II - RECOGNISING SYMPTOMS OF ABUSE

Abuse, defined as any behaviour towards a person that deliberately or unknowingly causes harm or violates their rights, may vary with the age of the child. Not every child will exhibit every symptom. As well as signs, children may tell you of abuse. Always listen. Internationally, four main categories of abuse are generally recognised:

Type and Definition	Recognising
Sexual	<ul style="list-style-type: none"> ➤ 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 ➤ becoming secretive
Emotional	<ul style="list-style-type: none"> ➤ delayed physical or emotional development ➤ shows extremes of passivity or aggression ➤ sudden speech disorders ➤ overreaction to mistakes, or continual self-depreciation ➤ neurotic behaviour; e.g. rocking, hair twisting, self-mutilation
Physical	<ul style="list-style-type: none"> ➤ unexplained bruises, burns, etc. (see Appendix I , p.11) ➤ wearing clothes to cover injuries, even in hot weather ➤ refusal to undress for sports, or join swimming sessions
Neglect	<ul style="list-style-type: none"> ➤ often hungry ➤ badly dressed in clothes that need washing ➤ poor appearance and personal hygiene ➤ lacks needed medical or dental care ➤ often tired ➤ might abuse alcohol or other drugs
Bullying	<ul style="list-style-type: none"> ➤ physical ➤ emotional ➤ name-calling ➤ showing lack of respect for another's property ➤ excluding somebody from a social group (Appendix IV, Reacting to Bullying)

8C) APPENDIX III - REACTING TO BULLYING

1. Investigate all reports
2. Ensure all reports of suspected bullying are recorded
3. Bullying has taken place: refer to DOS (Joseph Grogan)
4. Help a student to put the things right; support when carrying out apology
5. Alternative: bring both parties together for a 'no blame' meeting to clarify the situation
6. Ensure that staff is present during any apology or reconciliation and that is it recorded
7. Details need to be sent to the Directors who will inform parents of both parties of the situation
8. Bullying continues - the Director of studies will take immediate action to protect the bullied person
9. The same person continues to bully - student will be sent home

8D) APPENDIX IV - CONCERN FORM

Please complete if you have any concerns about an under 18 student. You must complete the boxes in bold; the other information can be filled in later.

Date	
Time	
Location	
Student	
First name	
Family name	
Gender	
Date of birth	
Nationality	
Group/individual	
Student ID	
Name of the person noting concern	
Role in the school	
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 of this form if you need more space.	

Signed		
Response to concern.		This section to be filled in by the Safeguarding Officer.
Do parents / group leader / agent / homestay / other need to be informed? Yes/No		
Response	By whom (full name)	When (date & time)

8E) APPENDIX V - REFERRAL FORM

Date & time	
Name of School	
Referrer's name and contact details	

Details of Staff/ Other Adult or student involved

Full Name	
Date of Birth	
Gender	
Nationality	
Disabilities	
Role/ connection with school	
Home address	

Details of student under 18

Full name	
Date of birth	
Gender	
Nationality	
Disabilities	
Home address	
Parents name	

Is student known to be at risk?	
---------------------------------	--

Details of Alleged Incident

Date and Time of Incident	
Place of Incident	
Brief Circumstances of Incident	
Name of Potential Witnesses	
Any other information?	

Nature of Allegation

Category (physical/sexual/ emotional)	
Was technology involved?	
If YES, what type?	

Signed (by a person submitting referral)

8F) APPENDIX VI - INTERVIEW QUESTIONS

(for potential staff /adapt for hosts)

1. What attracted you to teaching / this post / this school?
2. Give an example of how you dealt with bullying behaviour between students. What did you do? What made it successful? How could you have done it better?
3. Young people can develop 'crushes'. How would you deal with that?
4. What would you do if you were concerned about a colleague's behaviour towards children?
5. What motivates you to work with young people?
6. Give an example of how you've managed poor student behaviour.
7. What makes a school a safe and caring place?
8. How would you define an appropriate teacher (or school secretary/whatever job) – pupil relationship?
9. When do you think it is appropriate to physically intervene in a situation involving students? How would you go about that?

10. What are staff's responsibilities in child protection?
11. Give examples of what would consider appropriate and inappropriate behaviour.

8G) APPENDIX VII - HOMESTAY HOSTS

INTRODUCTION

The role of the host family is very important in contributing to a student's successful stay in MC Academy and our students like to be regarded as members of their host family as this provides them with opportunities to practise their English conversational skills as well as to immerse themselves into English culture. This should be both an enjoyable and enriching experience for the host family and the student.

We ask you to treat your student as a member of your family and to take him/her out on family outings, to the shops or to places of interest in the area when possible, and to involve him/her in your daily activities.

UNDER-18 STUDENTS

- The U18 students will be attending the adult programme at MC Academy. All our U18 students receive extra attention and specific rules need to be followed in order to protect them from any kind of maltreatment. Therefore, we seek your assistance in ensuring that they are cared for properly by informing us of any signs of abuse (see Appendix 1) or behaviour problems.
- The U18s have to agree and obey the curfew times when staying in your house as they have been put in place to ensure the students safety. The curfew time can only be extended in a situation when the U18 students are accompanied by a responsible adult (Family Consent needed if it is not Host Family).

13 & under	21.30 (but under the supervision of a Group Leader or staff member at all times)
14 - 15	22.30 (but under the supervision of a GL or staff member at all times)
16 -17	23.00



- Students who are U18 cannot be hosted in the same house with any over 18 students.
- Home stay hosts report to the Accommodation Officer any concerns with their students, from health issues to attendance. Information is then passed on to the relevant member of staff to be dealt with.
- A responsible host must always be present overnight and when students are at home.

HOUSE RULES

Every family has their own way of doing things and your student will be much happier if they understand from the beginning what these are. To make them feel at home, please explain to your student what your house rules are i.e. the use of the bathroom, what time breakfast and dinner are served and what access they have to the kitchen for drinks and snacks.

MEALS

- Hosts provide breakfasts and evening meals from Monday to Friday as well as school lunches (on parental request). On weekends and public holidays pupils are provided with three meals according to their dietary or social provisions.
- Please let your student know when meal times are and provide a cold meal/salad if the student is unable to attend at the regular time. We would expect the student to inform you of their absence

TRANSFERS FROM THE AIRPORT TO THE HOST FAMILY

- All unaccompanied under 18s are collected from the airport unless the parent/guardian makes alternative arrangements and informs the school of these.
- We work closely with Manchester Homestay Agency who organises these transfers and makes sure that a person who deals with the U18s has been DBS checked

MISSING STUDENT(S) PROCEDURE FOR HOSTS

If your student has not returned home after an hour beyond an agreed curfew time, and you are worried about their safety, please follow the procedure below:

1. Try to contact the student directly to find out where they are. If they are too far away to walk, or if they do not know the way home it is best to make them wait where they are and pick them up if you can, or send a taxi for them. Make sure the taxi driver knows their name and ask the student to only accept a taxi driver who knows their name. The student will have to pay for this taxi.
2. If you are unable to get in touch with the student than notify the Manchester Homestay or phone our emergency line (see Contacts section). They may be able to contact one of their friend's hosts if they are likely to be together.
3. If all else fails and you have no idea where they are you will have to notify the police. You will need a full description of the student, the area they may be in, any contact details you may have, friends or relatives in the area, health or medical conditions etc.
4. **Remember if you think the student may be in danger, or a crime may be in progress, call 999.**

CULTURE SHOCK/HOMESICK STUDENT(S)

For many students this will be the first time they have been away from home and it may take some time for them to adjust to the different way of life. Culture shock can describe different behaviours from withdrawal, tiredness, anxiety and confusion. If you feel that your student is unhappy and homesick try to encourage your student to talk about their home, be welcoming and find out what he/she likes to do in their spare time.



Parental & Guardian Consent Form

IMPORTANT!

This form must be signed and returned to the school before your child can start their course at MC Academy. Please complete this entire form in **BLOCK CAPITALS**.

Student Details

Student's Full Name			
Date of Birth		Age	
Gender			
Contact Number			
Email Address			
Course Start Date		Number of Weeks Studying	

Parental/Guardian Details

Parent/ Guardian Full Name			
Date of Birth		Age	
Gender			
Contact Number		Level of English (Low, Medium, or High)	
Email Address			
Full Home Address			
If the Parent/ Guardian DOES NOT speak English, then please provide details of a person that speaks English, in case of			

an emergency.	
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Is your child staying in MC Academy Accommodation?
If **Yes**, then please go to **Part 1**. (Do not complete Part 2). If **No**, then please go to **Part 2**. (Do not complete Part 1).

PART 1: Child Staying in MC Academy Accommodation

Your child will be provided with:

- Accommodation
- Their own Bedroom
- Breakfast, packed lunch, and evening meals from Monday to Sunday.

*Disclaimer: If your child prefers an alternative lunch, please ensure they have enough extra money for this.

Emergency Contact Number for Guardian in the UK

Name of Guardian	
Relation to the Student	
Contact Number	

These details are required in the event of an emergency, for example, an accident or illness.

Consent to Student staying at MC Academy Accommodation

Although we will ensure the welfare of the child, MC Academy does not take responsibility for:

Forename & Surname of the Child	
Name of the Parent/Guardian	
Signature of the Parent/Guardian	

*Disclaimer: You are ultimately responsible for the child. If any problems occur, you will be asked up to find alternative accommodation.

PART 2: Child Staying with a Guardian in the U.K.

As the Parent/Guardian for the Student, you will adhere to the following rules:

1. Enforce strict time keeping policies.
2. Be aware that the child will be solely under your responsibility outside of the lessons.
3. Provide all daily meals.
4. Contact the school in the case of an emergency (for example: the student is missing, has had an accident, has fallen ill).
5. Ensure that the student does not purchase or consume illegal substances such as alcohol or cigarettes.
6. Guarantee that the under 18 year old does not participate in the activities which are seen as inappropriate for under 18s (e.g. going to night club).

IMPORTANT!

Students can speak with our Safeguarding Officers if they have any questions regarding their living arrangements whilst studying at MC Academy.

Details of the Guardian looking after your Child

Full Name			
Date of Birth		Nationality	
Relationship to the Child		Occupation in the UK	
Contact Number		Emergency Contact Number	

Address of the Guardian where the Student will stay

House Number			
Street Name			
City		Postcode	

I authorise:

Forename & Surname of the Guardian in the U.K.	
--	--

To look after:

Forename & Surname of the the	
-------------------------------	--

Declaration

In the case of accidents and injuries, parents and guardians are liable for insurance cover of the student. MC Academy does not cover students under these circumstances:

- Students must understand that there is always a risk of accident or injury.
- In the unlikely event of an accident or an illness during the event which needs immediate treatment, I agree to my son/daughter receiving First Aid and Medical Treatment from qualified staff.
- On such visits the member of MC Academy staff will pay particular attention to your son/daughter's safety and will have their mobile phone recorded on the register.
- The member of staff will ensure that you son/daughter has the school number/ emergency number entered in their phone and/or written on their ID card.
- The member of staff will brief your son/daughter on what to do in the event of a problem or getting lost.

Occasionally we may take photographs or film pupils at our school for educational purposes. The images that we take of our students may also be used to promote the school.

Do you consent? Please circle the options.

 Yes No

Please check our website for specific information regarding under 18 students or ask reception for a copy of Safeguarding Policy and A Guide for Host Families.

I have read all the information given and understand all the points made.
We understand that the above student will be enrolled on
their specified course at MC Academy.

Forename & Surname of the Parent/ Guardian	
Parent/Guardian Signature	
Date	