

## **Instill Education safeguarding policy**

### **Our safeguarding policy**

This policy applies to all staff, including senior managers, paid staff, volunteers and seasonal workers, agency staff, students or anyone working on behalf of Instill Education.

Basil Paterson (part of Instill Education) is a British Council accredited English Language School.

We accept students aged 16+ on to our programmes all year round. Students under 18 stay with host families, or with their own families/designated guardians. We also, on occasion, accept students under 16 in a closed group or for individual tuition.

We seek to maintain a safe and supportive environment for the young people in our care. We accept and recognise the responsibility as follows:

- To safeguard the welfare of the young people who attend our courses
- To continually develop awareness of any issues which may harm the young people in our care
- By sharing information and acting promptly and professionally to any concern

The Designated Safeguarding Lead for Basil Paterson is Lauren Davis The Student Welfare and Experience Manager. Our Principal Claire Hunter has level 3 (Specialist) Safeguarding Training. The Student Welfare and experience manager. They both have an overall picture of safeguarding in the school and are involved in decision making as appropriate. We have a member of staff contactable 24 hours a day, 7 days a week on our emergency phone. They, and all other members of admin and teaching staff, have basic Safeguarding Training.

We commit to reviewing this policy every 12 months, or if there are any changes in circumstance. Claire Hunter, (Principal), and Lauren Davis, (Student Welfare and experience manager), will be responsible for this.

- This policy applies to all young people attending our courses regardless of gender, ethnicity, nationality, disability, sexual orientation or religion.
- “Young Person”, “Child” or “Student” in this context refers to anyone under the age of 18 who will attend, is attending or has attended Basil Paterson.
- “Safeguarding” refers to our commitment to reduce risks and provide appropriate general care for students.
- “Child Protection” refers to our commitment to protect children from any kind of abuse.
- This policy covers all employees and any other adults involved in delivering courses or support to young people in our care.
- Basil Paterson will take all reasonable steps to ensure that adults who work with our students but are not directly employed by us (e.g. staff at host centres, transport

contractors, cleaners etc.) are PVG (Protection of Vulnerable Groups) checked. They should also be aware of our code of conduct.

- We create and promote a strong safeguarding ethos amongst our staff and promote awareness of safeguarding.
- This policy applies to both real world and online environments.
- This policy has been formulated in accordance with the provision of the Children Act 1989, The Human Rights Act 1998 and the United Nations Convention on the Rights of the child (ratified by the UK Government in 1991).

### **Our assumptions and principles in framing this document**

1. All children have the right to be treated with respect and be safeguarded from harm.
2. We welcome students from all backgrounds and will not permit discrimination by students or staff on the grounds of religion, gender, sexual orientation or ethnicity. We will show particular sensitivity to students who are from territories in the midst of international conflict.
3. Adults working with young people must recognise the trust placed in them and must treat this trust and power with the highest responsibility.
4. Any sexual relationship or activity by any adult involving a child or any attempt to encourage this ("Grooming") is unacceptable and will lead to disciplinary and legal action.
5. Everyone has the right to say "no" if any person tries to do something to them which they feel is wrong.
6. All children have the right to be supported against bullies.
7. All children must feel they can tell an adult about any incident that frightens, confuses, or makes them unhappy.
8. All children must know if they go to an adult for help they will be listened to seriously and supported.

### **Legal framework**

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- Children Act 1989
- United Nations Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014

- Special educational 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. Keeping Children Safe in Education 2016
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015. Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government, 2017

This policy should be read alongside our policies and procedures on:

- Child Protection
- E-safety
- Social media
- Preventing Extremism and Radicalisation
- Alcohol Drug and Tobacco
- Recruitment and selection (Scotland)
- Recruitment of host families
- Health and Safety
- Recruitment of Ex-offenders (Scotland)
- Secure storage, handling, use, retention and disposal of Disclosure Information
- Anti-Bullying

These are outlined in the Child Protection Policy and the Employee Handbook.

We recognise that:

- The welfare of the child is paramount, as enshrined in the Children Act 1989. All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse. Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues. Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

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, a deputy and a lead board member for safeguarding
- adopting child protection and safeguarding practices through procedures and a code of conduct for staff and volunteers
- developing and implementing an effective e-safety policy and related procedures
- providing effective management for staff and volunteers through supervision,

support, training and quality assurance measures

- recruiting staff and volunteers safely, ensuring all necessary checks are made
- recording and storing information professionally and securely, and sharing information about safeguarding and good practice with children, their families, staff and volunteers via leaflets, posters, one -to-one discussions
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving 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. ensuring 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.

## **Basil Paterson Edinburgh Safeguarding-related Policies and Procedures**

In response to our safeguarding commitments above, Basil Paterson operates the following policies and procedures which relate, either directly or indirectly, to safeguarding:

### **Policies**

Child protection

Anti-bullying

Attendance and punctuality

Behaviour

Dealing with Abusive Behaviour

Disclosure – recruitment of ex-offenders

Disclosure - secure storage, handling, use, retention and disposal of disclosure information

Drugs, Alcohol and Tobacco

E-safety

Host family recruitment

Pastoral care

Preventing extremism and radicalisation

Safer recruitment and selection

Social media

Supervision

- Policies are updated annually and company-wide policies can be found in the Instill Education Employee Handbook, hard copies of which are available in each department.
- These policies are available in full on our website. Reduced versions of the anti-bullying policy, attendance and punctuality policy, behaviour policy, drugs, alcohol

and tobacco policy, e-safety policy and social media policy can be found in accessible language in the Student Handbook.

- Selected policies are displayed on boards throughout the college, such as the supervision policy, E-safety policy and anti-bullying policy.
- Parents of students aged under 18 are made aware of our safeguarding policies when they complete the parental consent form at the booking stage.

### **Safeguarding Team**

Jozef Windsor: Senior Manager and Safeguarding Lead

Lauren Davis: Student Welfare and Experience Manager (Designated Safeguarding Lead)

Claire Hunter: Principal (Specialist Training)

If none of the above are available to manage a Safeguarding incident or concern, the below staff are also available on site:

Claire Samuel: Head of Secondary (Specialist Training)

### **Child Protection**

Child Abuse is most often used to describe ways in which children are harmed with damage to their physical or mental health. There are four broad categories of abuse as follows;

- Physical; through hitting, shaking, squeezing etc.
- Sexual; Through inappropriate physical contact, the taking of indecent images of students or the encouragement of sexual activity by students for the purpose of adult gratification.
- Emotional; Through persistent lack of affection, unrealistic adult demands, verbal bullying including cyber-bullying.
- Neglect; Failing to provide basic needs of food, proper clothing, suitable supervision.

### **Other Dangers**

We must also be aware of the issues of Child Sexual Exploitation (CSE) and Female Genital Mutilation (FGM).

### **Child Sexual Exploitation (CSE)**

CSE is a form of sexual abuse. It concerns young people being forced, manipulated or coerced into taking part in a sexual act, often in exchange for something they want or

need. Often the young person knows and trusts the abuser. The abuser will often become controlling and will force the young person to do things that they would not normally feel comfortable with. It commonly involves people using their power over the young person ie. someone in a position of trust.

**Female Genital Mutilation (FGM)**

FGM is also known as “cutting” and is sometimes referred to as female circumcision. FGM has no benefit and is not supported by any religion. FGM is a crime in Scotland (Scotland FGM Act 2005). It is against the law to carry out FGM in Scotland or to take a girl abroad for FGM. It is also a crime for a person to assist or arrange the FGM of another person, even if the FGM occurs outside Scotland. A person convicted under the Scotland FGM Act 2005 is liable to imprisonment for up to 14 years.

If you are concerned about a girl of any age who may be at risk of FGM you should report it as you would any other disclosure or concern. The Designated Safeguarding Lead can then report the concern to Social Care Direct.

**How to react if you suspect Child Abuse**

- If you notice any physical or behavioural signs they should be reported as soon as possible. You should report them to The Designated Safeguarding Lead (Claire Hunter) or one of the other staff who are trained to a higher safeguarding level (Lauren Davis).
- If you suspect an adult is a threat to a student in some way you must report as above.
- If a student tells you they are being abused react calmly as follows:

What to do	What not to do
Stay calm.	Don't panic or over-react. It is unlikely that the alleged victim is in immediate danger.
Listen, hear and believe.	Don't probe for more information. It is not up to you to question the student.
Give them time to say what they want to say. Remember TED ( <b>T</b> ell me, <b>E</b> xplain to	Don't make assumptions, paraphrase or offer alternative explanations.

me, <b>Describe</b> to me).	
Reassure them that they have done the right thing by telling.	Don't make promises i.e. that you won't tell anyone (you have to), or that it will all be ok (you don't know that it will).
Explain what will happen next and who you have to tell, explain this is essential to give them the very best support.	Don't delay or try to deal with the situation yourself. Your job is to listen and refer it is not your job to investigate.
Act immediately in accordance with the procedure laid down in this policy	Don't make negative comments about the alleged abuser. Don't gossip with colleagues about the situation. You should only tell those who need to know.
Record in writing as accurately as possible what was said as soon as you can.	Don't make a student repeat a story unnecessarily.
Report as per the Disclosure pathway	

**If an adult is accused of abuse Basil Paterson will**

- Immediately remove the adult from all possible contact with students.
- Carry out immediate investigations and inform the child's parents.
- We will follow the Disclosure Pathway. This may ultimately result in criminal prosecution and/or a referral to Disclosure Scotland.

**If a student is accused of abuse Basil Paterson will**

- Immediately remove the student from contact with other students.

- Carry out immediate investigations and inform the student's parents.
- Follow the Disclosure Pathway as appropriate and defer to Social Care Direct for advice as needed.

### Other Welfare Considerations

#### **Risk Assessments**

We carry out risk assessments for all activities including a safeguarding and/or Prevent duty risk assessment as appropriate. We also have general risk assessments for the school and sites we use, these are kept in the office and are available to be reviewed by staff.

#### **Supervision Ratios**

We ensure that there is always an adequate adult presence. Staff to student ratios are currently 1:15 with a minimum of two staff at all times.

#### **Fire Safety**

Emergency building evacuation procedures are explained to staff at induction. We have regular fire drills in the main school building. All host families must carry out a fire risk assessment annually which also encourages them to have an exit plan which they will share with students.

#### **First Aid/Medical Issues**

A list of qualified first aiders is displayed in the staff room at all sites and in the office of the school. The location of first aid items is explained to staff on induction and all first aid boxes are stocked and maintained by the Principal and Accommodation and Welfare Officer. Medical information is requested from parents at the enrolment stage. Medical and Welfare notes are shared on a need to know basis by the Accommodation and Welfare Officer.

#### **Visitors**

Any visitors or contractors working in the school while under 18s are present will not be left unsupervised. A member of staff will accompany the person at all times while they carry out their work. All members of staff have lanyards to identify them. We also have visitors lanyards to use as necessary.

#### **Anti-Bullying**

We have a strict anti-bullying policy which is available for students and staff to read. A simplified version is displayed in the classrooms and on notice boards. We also display posters in relation to cyber-bullying.

#### **Recruitment and selection**

- All members of staff involved in recruitment (Principal, Academic Manager, Accommodation and Welfare Officer) have received training in safer recruitment



- All job advertisements include a clear safeguarding statement indicating our commitment to safer recruitment and aspects of the selection procedure which relate to safeguarding.
- A Single Central Register is held for all staff and updated regularly.
- All staff, including cleaners, contractors and caretakers, must register with the Protection of Vulnerable Groups scheme, or apply for an update, before they start working at Basil Paterson.
- Two written references are required for every new employee. Our reference request form specifically asks whether the candidate should not work with children.
- All new employees are required to read and sign the Instill Education Child Protection policy as part of their induction process.
- Questions related to safeguarding are included during the interview process, to assess suitability.

## **Staff training**

- There are four trained Designated Child Protection Officers at Basil Paterson, including a designated Safeguarding Lead. Two members of staff in the English Language College have received Advanced Safeguarding Training for Designated Safeguarding Leads.
- Staff are made aware that, under the 2003 Sexual Offences Act, they are operating in a Position of Trust, and anyone who engages in any sort of sexual activity with students under the age of 18 is breaking the law.
- All other members of staff, including teachers and the administrative team, attend annual safeguarding refresher training, led by one of the DCPOs. They also receive Prevent training during this session.
- The college Principal and Accommodation and Welfare Officer have received specific training on the Prevent Duty.
- All members of staff have read and signed the Staff Code of Conduct for Interaction with students. Staff are aware of the effect their appearance may have on students, and that they must present and conduct themselves appropriately.
- Details of all staff training and updates are held on the Single Central Register.
- There are notices throughout the college reminding staff of who to contact if they

have a concern about a child.

### **Protection of Vulnerable Groups**

- All staff, homestay hosts and regular overnight guests where under-18s are accommodated, caretakers, cleaners and regular contractors have received a PVG disclosure through Basil Paterson. The PVG scheme record must be received back before employment starts.
- Taxi companies and tour companies have provided a disclosure statement confirming their staff have been PVG checked.
- PVG information is held digitally on a secure PVG tracking spreadsheet. Three members of staff involved in recruitment have access to this spreadsheet.
- The company has a clear policy on the secure storage, handling, use, retention and disposal of disclosure information.

### **Attendance and Punctuality**

- The college has a clear Attendance and Punctuality Policy which is displayed on all classroom notice boards, appears in the Student Handbook, can be downloaded on the website and forms part of the student contract.
- Attendance is logged digitally every Monday morning and a meeting is arranged with any students whose attendance fell below 80% the previous week.
- A clear procedure of verbal and written warnings is followed and logged digitally in cases of non-attendance.
- Students aged under 18 are required to sign in and out of the building.
- Students aged under 18 are highlighted on classroom registers. Teachers are required to alert the Welfare Officer immediately if an under-18 does not arrive for class.
- Attendance and punctuality is an agenda point during the student induction on the first day.

### **Accommodation and Homestays**

- Students aged under 18 have the following accommodation options: half-board homestay organised through Basil Paterson, homestay organised independently with parental consent, or accommodation with family.

- Students aged 16/17 have a curfew of 22.30. Homestay hosts are required to call the emergency phone if a student aged 16/17 is more than 30 minutes late.
- All homestay hosts and regular overnight guests where under-18s are accommodated must become a member of the PVG scheme.
- Students aged under 18 are not accommodated in the same homestay as over 18s.
- Two character references are obtained for any new hosts accommodating students under the age of 18. This reference asks whether the referee has any reason to believe the applicant should not host students under the age of 18.
- Hosts who accommodate students under the age of 18 are required to read and sign the Basil Paterson and Host Agreement annually, which makes specific reference to their duty of care for younger students and their responsibilities, as outlined above.
- Hosts who accommodate students under the age of 18 are required to complete introductory online safeguarding training.

### **Social and Cultural Programme**

- The Welfare Officer provides the Social and Cultural Programme Coordinator with a list of students aged 16/17 on a weekly basis
- The college has a Supervision Policy which specifies the required ratio of staff to students for activities taking place both on and off the college premises. This policy is displayed in the student common room and can be downloaded on the website.
- Posters clearly state which activities are not suitable for students aged under 18. The Social and Cultural Programme Coordinator is responsible for ensuring younger students do not attend these activities.

### **Student Induction and Code of Conduct**

- All students receive a Student Handbook on the first day, which includes information about all aspects of their course and studying at the college, including a code of conduct, information about travelling around Edinburgh, medical information and names/responsibilities of admin staff members.
- In addition to a general induction with the Academic Manager, the Welfare Officer meets all under-18s on their first day, reiterates the code of conduct and what younger students can and can't do while staying in Edinburgh.
- Under-18s are required to read and sign the Code of Conduct for Under-18s, in

addition to the general code of conduct. Copies of these can be found in the Student Handbook, and in the common room of the school.

## Information for Parents

- Parents or guardians must complete a parental consent form at the booking stage for any students under the age of 18. The parental consent form clearly describes our commitment to the safety and welfare of our younger students, the level of supervision they will have and the code of conduct for under-18s.
- If parents choose to arrange their own homestay accommodation, they must complete a separate consent form showing they understand the safeguarding implications of this choice.
- All safeguarding-related policies are available in full on the Basil Paterson website.

## Emergency Phone

- Basil Paterson Edinburgh has a 24-hour emergency phone, carried by a member of staff on a rota basis. The emergency phone number is provided in the digital pre-arrival information pack and in accommodation booking confirmations. The Basil Paterson landline answerphone message also includes the emergency phone number.
- Basil Paterson students are reminded of the emergency phone number in their induction.

## Other

- Safeguarding is an agenda item on the weekly admin and teachers' meeting. The Principal and Student Welfare & Experience Manager also hold regular meetings (every 2 - 4 weeks) where Safeguarding is on the agenda.
- Students' contact details are checked on arrival and updated at regular intervals throughout their course.

## Special Groups

On Occasion we will accept students under 16 years old on in a closed group or on an individual tuition basis. These groups are subject to a safeguarding risk assessment being carried out prior to the enrolment being accepted. General measures taken to ensure the safety of these students include, but are not limited to;

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- classes being held on separate floors to any students over 18
- having separate toilets for the students from the closed group
- timetables being staggered so that students are not on breaks at the same time
- extra staff in place to supervise break times

We are committed to reviewing our policy and good practice annually at a minimum.