



Safeguarding at Bloomsbury International: Policy and Procedure

Contents

General Statement	2
What is safeguarding?	2
Who is Bloomsbury safeguarding?	3
a. Children	3
b. Vulnerable adults	3
Why does Bloomsbury have a safeguarding policy?	3
Who is responsible?	3
How does Bloomsbury safeguard?	6
Why is a code of conduct necessary?	12
Code of safeguarding conduct for all staff	12
DOs:	12
DON'Ts:	13
Safeguarding Procedure – Child Protection	14
What is an allegation?	14
Understanding abuse	14
Grooming	14
Sexual abuse	14
Emotional abuse	14
Physical abuse	14
Neglect	14
Controlling, coercive and threatening behaviours	15
Dealing with Disclosure of Abuse and Procedure for Reporting Concerns	15
What to do if an allegation is made (applicable for against an adult or child)	16
What happens next?	17
Background	17
Initial discussion	17
Possible Suspension of a direct employee, student or service	17
Confidentiality	17
Resolution of allegations and action by school	17
Records	17
Associated Policies / Documents	17

General Statement

Bloomsbury International UK Ltd is based in Central London (6-7 Southampton Place, London WC1A 2DB) and is an adult school teaching English language to international students of 16 years and above all year round. Approximately 10% of Bloomsbury students are under the age of 16 years, most of whom attend during the summer months (June – August). Within the 90% of the remaining students, approximately 10% are 16/17 year olds who attend throughout the year.

Bloomsbury is fully committed to creating a safe learning environment that promotes security and well-being for all students, staff and visitors, no matter their age, gender or race. The School recognises that all students may be vulnerable; particularly children and young people (under 18 year olds) and has relevant policies, procedures and practices in place to safeguard everyone involved, complying with the legal duty of care for under 18s.

A summarised version of this policy can also be found on Bloomsbury International's website, in the Student Handbook and will be emailed to parents/guardians, group leaders, agents and homestay providers upon registering for a course.

In doing so, Bloomsbury aims to show its commitment to safeguarding as well as expectations that adults associated with the school will be expected to share the school's ethos and actively engage in looking after under 18s safely.

What is safeguarding?

There is always a possibility that any child can be hurt, put at risk of harm or abuse, regardless of their age, gender, religion or ethnicity.

Safeguarding is protecting children and young people from maltreatment, providing them with safe and effective care, and enabling them to have the best outcome.

Safeguarding is to build, and not compromise relationships of trust between U18s and adults, to ensure systems are in place for the well-being of all students, and to have clear procedures in place in case things go wrong (made accessible to all students and adults working with them).

Safeguarding is also carrying out risk assessments in order to minimise the occurrence of accidents or putting students at danger.

Who is Bloomsbury safeguarding?

a. Children

Safeguarding practices are most commonly applied to children and young people under 18.

b. Vulnerable adults

A vulnerable adult is defined as a person aged 18+, who has any of the following:

- a dependency upon/requirement for assistance from others in the performance of basic functions
- a severe impairment in the ability to communicate with others
- a reduced ability to protect themselves from assault, abuse or neglect. This can be as a result of a learning or physical disability (normally not dyslexia), a physical or mental illness, chronic or otherwise (incl. an addiction to alcohol, drugs) or a reduction in physical or mental capacity.

For simplicity reasons, this document shall use the term 'young people' when referring to those being safeguarded.

Why does Bloomsbury have a safeguarding policy?

All organisations have a legal duty of care toward the young people (U18s) use a safeguarding policy. Bloomsbury aims to ensure safety for all of its students, at all times and across all services; including tuition, various accommodation types, transfers and social activities.

Who is responsible?

Everyone plays an important part to ensure that young people are safeguarded.

- Managing Director
 - Designated Safeguarding Lead/ and Safeguarding Person/s
(serious day to day matters for U18, training, recording events)
 - Welfare Officer/s
(welfare matters for U18/18+, recording events)
 - Teachers
 - Administration staff
 - Social activity coordinators and supervisors
 - Group leaders
 - Any other adults who work with Bloomsbury students e.g. host families, taxi drivers
- All students



The Managing Director

Mrs Mori (Building 6, ground floor, Main Office)

To be involved in any major decisions and must always be informed before making a referral or contacting an external organisation.

Designated Safeguarding Lead

Louise Newman (Building 6, ground floor, Main Office) louise@bloomsbury-international.com

Designated Safeguarding Person

Adam Bartosik (Building 6, Reception) adam@bloomsbury-international.com

To be responsible for the overall safeguarding within the school and to implement the policy by raising awareness amongst staff members and other adults who work with under 18s. Main responsibilities:

- To be available for students and staff should they wish to report any incident or ask for help, both during and out of school hours (contactable by the person with the emergency phone)
- To always be available to provide advice and support to other staff on issues relating to all students' protection, especially young people, on a daily basis.
- To oversee referrals of cases of suspected abuse or allegations to the relevant investigating agencies
- To maintain an official record of any protection referral, complaint or concern (even where that concern does not lead to a referral)
- To ensure that parents/guardians/group leaders of young people within the school are aware of the school's protection policy
- To liaise with employers and training organisations that receive young people from the school on long term placements to ensure that appropriate safeguards are put in place
- To ensure that all Bloomsbury staff working with young people receive Level 1 Safeguarding training at the start of their employment (online, face to face or in-house by a Level 2 Safeguarding Officer)
- To meet quarterly to discuss any current issues associated with child protection which may present a danger to children and that staff should be aware of.
- To organise an annual refresher Level 1 Safeguarding for all staff.

The Welfare Officer/s

Louise Newman (Building 6, ground floor, main office) louise@bloomsbury-international.com

Helena Ramalho (Building 6, ground floor, main office) helena@bloomsbury-international.com

- To be responsible for the students' well-being and safety at all times whilst at the school.

Any student seeing or hearing of any incidence of behaviour(s) listed below, must immediately inform the Welfare officer(s), who will take the appropriate course of action and will advise the Designated Safeguarding Lead/Person/s whenever necessary. Main responsibilities:

- To be available for all students should they wish to report any incident or ask for help
- To provide pastoral care to all students as required
- To provide advice and practical guidance to living in the UK, or life in London
- To provide emotional support in the following cases:
 - Homesickness
 - Abusive behaviour
 - Loneliness / isolation / depression
- To ascertain any problems regarding high absenteeism
- To participate as required in child protection procedures
- To liaise with parents/guardians/sponsors as required regarding sickness

c. Other members of staff:

- Are expected to be aware, vigilant and report any concerns or allegations to the DSL/DSP at the school
- Have particular responsibility to be available to listen to all students at the school, especially young people, on a daily basis.

d. Other adults working with Bloomsbury students:

- Are expected to be aware, vigilant and report any concerns or allegations to the DSL/DSP at the school or contacts outside of the school, e.g. LCSB, NSPCC or Police.
- Have particular responsibility to be available to listen to all students, especially young people, on a daily basis

e. All students

are expected to look after each other and raise concerns with a responsible adult if necessary

Telephone Numbers:

School Office: +44 (0) 207 242 2234

School 24 hour Emergency: +44 (0) 7762 425 376

Emergency Services: 999 (or 112)

NSPCC 0800 800 5000

Child-line 0800 1111

How does Bloomsbury safeguard?

The School is committed to ensuring the safety of all its learners by having an accessible whistle-blowing policy (when a worker reports suspected wrongdoing at work) and procedure in place. Various measures are taken in order to achieve this, indicated as follows.

Classes and Registers

Students of 16 years and above can study in our adult classes but will be taught by a DBS-checked member of staff. Students below 16 years old will not be in the same classes as over 18s. Where group study is not available (for example, if we receive an individual booking and there is no group to join – usually outside of summer), individual lessons are offered.

Ages are added to all registers and any students under 18 are immediately contacted if they do not arrive for class (please see the Attendance Policy for further details).

Student Cards

At Bloomsbury, all students, staff and visitors are given lanyards/cards which have a certain coloured card relevant to their age or reason for being on-site (as shown below).

Dark Purple = Staff

Light Purple = Students 18 years+

Yellow or Green = 16/17 years old

Red = under 16 years

Blue = Visitors

Student Card code	
Dark Purple	Staff
Light Purple	18 years +
Yellow or Green	16/17 yrs
Red	Under 16 yrs
Blue	Visitors

If the card is not worn, teachers may refuse students' entry to class.

Any person on sight that is unknown to a member of staff and/or not wearing a lanyard may be approached and asked to prove their identity, be identified by another member of staff or asked to leave the premises.

Students under 18 must also wear their student cards on Bloomsbury-led off-site activities.

Contact



The student cards have the School's contact details on as shown.

This is also made known to the parents/guardians by including it on the Parental Consent Form.

Parental Consent Forms

Every student under 18 must have a completed Parental Consent Form before they start their course. This provides a web link to the School/accommodation rules and the safeguarding summary. It also provides the School emergency number and asks for the parent's/guardian's contact details in order to ensure contact can be made at any given time.

For students with permission to travel alone, in addition to the parental consent form further questions are asked, including:



- What is his/her current level of English?
- Is he/she able to comprehend information given in English well?
- Has he/she been to London before? If yes, did he/she stay in the same place previously?
- Has he/she travelled by London transport before?
Does he/she travel alone to and from school in his/her own country?
- Please give a brief description of the town/city the student lives in
- What would he/she do if an accident happened on the way to school or on the way back to their accommodation when unsupervised?
- Please provide information of the route the student will travel to/from school

(see Safeguarding email template) Group Leader Forms

All group leaders will be police-checked (or the equivalent, by their agent(s)) and will be inducted by one of our safeguarding officers on their first day at school. Group leaders must sign a declaration on their form which includes rules for them and their group, and also a link to our Safeguarding Policy. A summary of our Safeguarding Policy is also printed and handed to them.

Site

The School has 3 buildings, 2 of which are joined and a 3rd which has its own entrance. When the School has Junior groups and classes, they are based in the 3rd building as to keep them separate from the adult (16years+) learners.

CCTV

There is CCTV throughout the school which is under surveillance by the Managing Director.

Risk Assessments and Health & Safety

- Completing weekly checks of the premises, including all buildings and rooms.
- Completing risk assessment for off-site activities, including supervision ratios.
- Ensuring that healthy food is available to students in the canteen by certifying café members to Level 2 Food Safety and Hygiene
- Checking work places for appropriate Health and Safety processes and systems before students attend work placements.
- Group leaders arranging own activity (unsupervised by Bloomsbury International)
 - Risk assessments are carried out for independent off-site activities. The Students Services Manager discusses the activity with the leader(s) and advises accordingly. The group leader signs the risk assessment.
- If we receive an enquiry from a student with a disability, which may affect their stay with us, we shall complete a risk assessment form. After completing the risk assessment form, we shall inform the student and discuss possible options.

Supervision ratios

The following staff/group leaders to students ratios apply for both on and off-site activities:

- 1:6 (under 8s) / 1:10–15 (8–10s) / 1:15–20 (11+)

The School would exceed these ratios if the safety and welfare of the students required it. There should be enough supervisors to deal with an emergency.

Educating over 18s

- Ensuring adult students and visitors are aware of under 18s in the school by noting in the Visitors book at reception
- Ensuring our students are aware of different age groups in the school by including the information in the Student Handbook, informing them during their first day induction (explaining the different coloured student cards), and displaying the “Safety in London” document around the school.

Educating under 18s

- Ensuring student’s parents/guardians receive the necessary documents and information prior to arrival pertaining to parental consent, Safeguarding procedures, staying safe in London and school rules

Educating staff

- Staff members complete Safeguarding Training, PREVENT Channel awareness,
- Staff members are aware of radicalisation and extremism, Child Sexual Exploitation and Female Genital Mutilation and are trained to be aware of signs and report to these DSL or Welfare Officers
- Bloomsbury International staff are placed in a position of trust. That is to say that they are in an occupation that has authority over another person. The position of trust offences are in place to try to protect children over the age of 16, who despite being over the age of consent have the potential to be vulnerable to sexual abuse by people in positions or trust (Sexual Offences Act 2003).

School Rules

- Are given during the first day induction, including information on staff members, school rules, available facilities at the school, health and safety, E safety and evacuation and first aid procedures
- The rules and emergency contact details are further promoted through the Welcome Booklet, Student Handbook and on posters around the school
- Social Programme: ages are clearly marked if for over 18 years only (e.g. welcome drinks)

Group Inductions

- Groups are inducted separately by combining the Monday induction slideshow and also the
- “Safety in London” document

Airport Transfers



Bloomsbury strongly recommends organising airport transfers for under 18s and makes it compulsory for under 16s if travelling without a responsible adult.

- The school works with a provider who only uses licensed and DBS-checked drivers
- As soon as a taxi transfer is booked and confirmed, the School sends a confirmation document to the student/parent/agent with instructions, a copy of the sign which will be held and contact numbers of the taxi company, the School and the School's emergency phone.
- If the student is not present at the collection point: the driver will contact the School who will verify the arrival details or contact the student. If the student is not contactable, the School will try another number which has been provided (parent/agent).
The School will advise the driver accordingly.
- If the host is not present or if there is a problem with the booking: the taxi driver or student will call the School who will contact the host or accommodation provider. The School will advise the driver accordingly. In cases of emergency, another accommodation will be arranged.

Bloomsbury International allows 16 and 17 year olds to travel independently from their entry point in the UK to their accommodation providing the details of how are given on the Parental Consent form and that the route is considered safe by the Student Services Manager/Registrars.

Welfare meeting (every Tuesday)

- Emailing under 18s on their first day, inviting them to attend
- Highlighting it on the welcome booklet on students' first day
- Inviting all-aged students by promoting the meeting on posters around the school

Accommodation

- From the various types of accommodation offered, under 18-year-old individuals are only offered homestay accommodation.
- All accommodation placements must meet British Council guidelines.
- The School ensures that under 16s are not placed in the same accommodation where they will have to share facilities with over 18 students.
- 16 and 17 year olds may be placed in a homestay with guests of over 18 years but this is confirmed by the parent/guardian before booking and the main host will always be DBS-checked. The students will also be in separate rooms.
- Curfews*: the School ensures that under 18s return by curfew times by educating the host families and group leaders (including curfew time on booking form: under 16s 9pm / 16/17yrs: 10pm).
- Educating the host families/residence staff and accommodation providers of Safeguarding Policy on our website by adding a summary to booking forms and also a web link.



- On occasion, under 18 year olds may be placed in residences, but only when in groups and after ensuring they comply with our safeguarding policy (a responsible and vetted adult must always be present, especially overnight). This also has to be agreed by our Designated Safeguarding Lead/ Person/s before booking.

When staying in the Residential accommodation the ratio of residential adults to student will be at least 1-20 for students aged 12-17 and 1-15 for students under 12.

First aid facilities and an appropriately trained member of staff will be available at all times together with information on the most local A&E service.

***If under 18s do not return to their homestay by curfew time**

1. The host family are required to inform their employer (the accommodation provider) or inform the school
2. The school will try to contact the (group leader, where applicable) or missing student
3. The School will try to contact the missing student's friends (if known)
4. The school will contact the emergency contact or next of kin
5. If the student is not found, s/he can be reported missing to the Police (via 101).
The person with the emergency phone must keep the host family and student's emergency contact/next of kin updated
6. Any updates must be communicated with all parties involved, including the Police and a report must be written on return to work and kept on the student's file
7. in order to prevent a reoccurrence, a written agreement must be signed by the student and their parent/guardian to agree that any reoccurrences will result in expulsion from the school and its services, with no refund offered

Other School Policies

Recruitment

Induction

Attendance

Dealing with Abusive Behaviour

Equal opportunity

Complaints

Confidentiality

Success and progression

Substitution

Welfare

Prevent

Fire Policy

First Aid Policy

Social / Off-site Activities – Instructions for Students and Leaders

Safe recruitment of staff

Bloomsbury International is committed to following safer recruitment practices and ensures that all roles involving responsibility for, or those with substantial access to, under 18s will have suitability checks, for example with the Disclosure and Barring Service (DBS). These roles include teaching, administration, social activities, management staff and group leaders.

- The School ensures that management and all relevant staff are trained to a minimum safeguarding level 1 and that students are aware of safeguarding arrangements
- Other practices include checking proof of identity and qualifications, ensuring any gaps in CVs are satisfactorily explained, following up references and checking specifically if there is any reason that applicants should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18.



These safer recruitment practices also apply to external providers of transfers and accommodation, where we would obtain a written statement to ensure adults working with under 18s are DBS-checked (at least the main host in homestay accommodation). In the case of group leaders we ask them to sign a declaration in order to confirm they have no criminal convictions that would affect their duties, and their agent to sign that they have completed a full background check.

- The School includes questions in the application part of recruitment process:
 Applicants responding to advertisements for any position are informed of the necessity of being DBS-checked. Heads of departments follow up their references and in the interview process ask candidates to explain any gaps in their employment.
 Both Bloomsbury's application and reference form clearly ask if the referee is aware of any reasons why the applicant should not work with U18s:

Do you know of any reasons for the applicant not to work with under 18s	Yes	No
If yes please comment further:		

In the event of not receiving a written reference, the Head of Department endeavours to telephone the referee

Due to the sensitive nature of the subject, open-ended questions are asked during interviews relevant to the post in order to assess the candidate's eligibility for working with U18s and extract information that could give rise to a concern; e.g.

- What experience do you have with regard to students under 18 years of age?
- Would you object to being DBS checked?
- How do you feel about being friends with an under 18 student on your social network?
- What age groups do you have experience teaching?
- What is your favourite age group to teach and why?
- What methodology would you adopt if you were to teach a group of children?
- What teaching techniques would you use if you were to teach a 14-year-old on a 1-1 basis?

The School includes Safeguarding in the induction process:

Heads of Departments explain to newly-appointed members of staff the principles of safeguarding students and their welfare, both on and off site activities. An induction checklist is signed to acknowledge full understanding and the delivery of all policies and handbooks.

Pending DBS checks:

Whilst waiting for a new DBS check, Bloomsbury International would act upon a staff member's previous DBS if applicable.

We would ensure the member of staff is never left alone with the U18s; that a Safeguarding Officer is onsite at all times and if teaching, s/he would be instructed to teach with the door open. Group Leaders after having been police checked are required not to leave the premises (Building 8) whilst their students are receiving tuition in the event of having to supervise an U18 who, for whatever reason, needs to leave the classroom during the lesson. Teachers are also instructed to use their mobile phones and contact the Reception if they have identified a safeguarding issue. A Designated Safeguarding Person immediately goes to Building 8 to assist.

Criminal Records

Any offer of employment would depend on the severity of the misdemeanour and the time that has elapsed since the offence was committed.

No offer of employment would be made to an applicant who was not able to produce a valid criminal check as this is an essential requirement for the teaching position.

Why is a code of conduct necessary?

Bloomsbury International's aim is to build trust between under 18 year olds and adults. Bloomsbury aims to create a safe school culture and to protect both adults and under 18s from any behaviour which might be misunderstood.

Code of safeguarding conduct for all staff

DOs:

- behave appropriately at all times and be an excellent role model to under 18 students; including appearance and dress code and appropriate use of language
- wherever possible, work in an open environment and be visible to others when working with young people e.g. avoiding private or unobserved situations
- be alert to signs of abuse or information that suggests abuse
- report any concerns and suspicions and pass on relevant information to the Designated Safeguarding Person/s
- be aware, as far as practically possible, of the support agencies available to young or vulnerable people i.e. Connexions, Child line, and the NSPCC
- maintain a safe, professional distance in all relationships with learners, e.g. if a learner makes sexual approaches or suggestions, tell them that this is inappropriate, explain why and remove yourself from the situation and inform the Designated Safeguarding Person/s
- treat young and vulnerable people with dignity and fairly. It is important to encourage learners to respect each other's boundaries and so help them to develop their own sense of rights, as well as helping them to know what they can do if there is a problem
- give enthusiastic and constructive feedback rather than negative criticism
- actively prevent learners from accessing any form of inappropriate material via the Internet and social networking sites by having a filtering device installed in both School premises and School managed Student Residences
- Educate students on E-Safety:
 - do not give personal details or photos to anyone online (e.g., full name, contact details) or meet with them as it can be dangerous,
 - do not to accept messages, emails or open files from people they do not know or trust as some can contain viruses or unpleasant messages
 - do not to believe all online information as some may be untrue or people can lie about who they are, always to check online information with other websites, books or a member of staff
 - if something makes them feel uncomfortable or worried, they must tell a parent, host parent or staff member.
- In relation to accommodation; inform students in advance if you wish to clean or inspect their bedrooms
- If sharing the same accommodation with under 18s, prepare a bathroom rota in order to ensure they have their own privacy



- Use licensed taxi drivers who are DBS-checked

DON'Ts:

- spend excessive time alone with a child or vulnerable adult away from others
- allow situations where visitors are left alone with the learners under your supervision
- socialise with young or vulnerable learners on occasions when it does not constitute part of your normal duties, on or offline
- use any visual, audio-visual or written material in the classroom that exposes young adults to harm; be it physical, emotional or sexual.
- give young or vulnerable people prescription drugs or medication
- use inappropriate or offensive language
- drink alcohol, smoke or use drugs when working with under 18s, nor make jokes with reference to them
- wear revealing clothing, especially when sharing accommodation with under 18s
- allow under 18s to rent a DVD of a 18+ certificate (advertised on the back cover)

Safeguarding Procedure – Child Protection

What is an allegation?

Information which indicates an adult may have:

- behaved in a way that has/may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child in such a way that indicates s/he would pose a risk of harm if working closely or regularly with a child

Understanding abuse

Grooming

- of a victim. Showing interest in / forming an attachment with the person when the ultimate motive is sexual gratification.
 - of adults. Make other adults see them as trustworthy, which will therefore give the abuser clearer access to (especially under age) victims.
- Grooming, done by a person in a position of trust to anyone under 18 is a crime.

Sexual abuse

- forcing or enticing a young person to take part in sexual activities, which can happen over the internet, so that the abuser is in a different country to the victim
- even if a child is happy with the attention and willing, it is still sexual abuse if s/he is under age
- high-incidence of teen abuse of other teens; befriending/loving a needy friend, then turning on them
- the abused can show inappropriate sexualised play or awareness, e.g. via drawings / promiscuous behaviour or inappropriate needy attention-seeking behaviour

Emotional abuse

- is often persistent, for example in bullying
- can be compounded by abuser making children wary of authority/other adults trying to help them
- abused can show aggression and withdrawal, two extremes, in one day
- can show inappropriate needy attention-seeking behaviour



- can be connected to conditions such as anorexia
- self-harmers can be victims of serious emotional abuse or sometimes 'following fashion'

Physical abuse

- is potentially the most dangerous as abused can die
- with bruising, look for symmetry (2 black eyes/bruising on both shoulders) as a sign of abuse
- burns or scalds that have a clear edge are usually caused deliberately not accidentally
- finger marks need to be checked; does the story fit/sound plausible?
- MSP (Munchhausen Syndrome by Proxy), the abuse of another person, typically a child, to seek attention/sympathy for the abuser; creating symptoms for the victim to obtain repeated medical care.

Neglect

- thrives away from home environment
- unused to supervision; can be almost feral in behaviour as they don't understand boundaries
- physical and medical care needs ignored
- neglect can happen in all levels of society (e.g. leaving children unattended is neglect)

Controlling, coercive and threatening behaviours

Often seen in teenage abusive relationships where one partner dominates the other in a range of ways, e.g. forced sexual activity, repeated insults and put downs, stopping partner from seeing friends/family, checking on partner all the time (texts/social media etc.), using physical violence, taking money, forcing partner to work, controlling what partner wears.

The dominant partner makes the other feel subordinate and deprives them of ways to be independent. They may use threats, humiliation and intimidation to harm and punish their victim. These behaviours are often evident in 'honour' based violence, female genital mutilation (FGM) and forced marriage.

Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

(How staff should respond when a student asks to talk to them about something private. Useful phrases are shown in italics.)

<i>Should</i>	<i>Shouldn't</i>
Stay calm and be available. (The student has put their trust in you.)	Refuse to listen; e.g. tell them you're too busy or to see them later. Or over-react.
Find out the general subject area. Ask <i>'What is it about?'</i>	Assume it's something related to abuse.
If subject matter does require privacy and you are in public place, suggest to student to go somewhere quieter, e.g. a quiet corner of a large space, or probably better, a classroom that has large windows. If you need to use a regular room without large windows, ensure the door is left open and you are sitting within view.	Start asking more questions. Show worry or concern with your facial expressions.
Best to quickly tell another staff member where you are and that you are having a private meeting with a student.	Be in a room on your own with a student with the door closed.
Try to sit at right angles to student rather than directly opposite or next to them. Be open and	Draw too much attention to the situation.
	Promise confidentiality if they ask you to keep a secret. Explain <i>'If it's necessary, I will tell somebody else (who can help more than I can.)'</i>



ready to listen. Ask **'What do you want to tell me?'**

Be open, calm, patient and listen. Your role is only to hear what they have to say - and try and remember their exact words.

If appropriate, you can say; **'Is there anything else you want to tell me?'**

If the student hasn't already told you, you are allowed to ask only **'When did this happen?'**

Put words in their mouth or make any comments on what they tell you.

Write while they are talking to you.

Ask any direct or leading questions or start probing. (That could jeopardise any subsequent police investigation, if that becomes necessary.)

When student has told all they want to, reassure them and say **'You've done the right thing to tell me.'**

Find somebody responsible (usually another staff member) to sit with them whilst you respond.

Tell the Designated Lead/Person what has happened.

Immediately afterwards, write a report of the meeting using the student's exact words, giving only facts and record time, date, place etc. (the DSL will give you a form). If the student's language level was low, state that in your report.

Ensure report is filed in proper (secure) place.

Once you have handed matter over to the Designated Lead/ Person (or other senior staff) and completed and filed your report, and you know the student is being looked after, (it may be appropriate to go and see the student again to make sure they are OK), make sure you look after yourself. Being told information about child abuse is often very upsetting.

Leave the student alone after they've disclosed. Make it clear to staff member sitting with student not to ask any questions; just be a reassuring presence

Tell any colleagues what the student has said (apart from one of those listed as needing to be told).

Write any opinions, or draw any conclusions about anything. Don't write any comments about the accused.

Try and 'improve' the student's English if it wasn't grammatically accurate or vocabulary was wrong. (That is a job for any police or social services people to do.)

Talk to any colleagues about what has happened.

It is not for staff to decide if the allegations are true or not. Their role is only to listen, report as accurately as possible and allow the official procedure to then take over.

What to do if an allegation is made (applicable for against an adult or child)

This may be made directly to the DSL/DSPs or to any other adult and then passed to the DSL/DSPs.

- make sure the child is safe and supported / reassured. Remain calm.

- the DSL will **inform the Managing Director immediately**

- if/when safe and appropriate, try to return the child to their normal routine.



- ensure that a clear written record has been made (using a standard form), signed and dated by the person who made the allegation / heard the allegation from a child
- if the allegation refers to the Managing Director, inform the DSL or a fellow DSP or contact another senior manager
- the Managing Director or DSL must **contact the LCSB immediately**
- **no decisions must be made without referring to the LCSB**
- If an allegation is made against a Bloomsbury International student under the age of 18, the procedure is the same for any allegation, however, particular care will be given to support the alleged perpetrator.

What happens next?

Background

The LCSB's role is to provide advice and guidance to schools dealing with allegations and, if necessary, to liaise with the police and other agencies and to monitor the progress of cases to ensure they are dealt with quickly and consistently.

Bloomsbury International has a duty of care to their direct employees and students therefore would provide adequate support for anyone facing an allegation and provide a named contact should a direct employee or student be suspended.

Initial discussion

There will be an initial discussion between the DSP/s/Managing Director and the LCSB, at which some actions will be agreed:

- immediate action to protect student
- when and what parents should be told
- what should be said to the adult or child facing the allegation and should s/he be suspended

Possible Suspension of a direct employee, student or service

Suspension is not an automatic response and should only be considered where children are at risk of serious harm or the concern is so serious it would result in immediate dismissal/expulsion/termination.

If the person or service is suspended, the reason must be communicated to them within one day.

Possible outcomes from initial discussion	What to tell / do with accused person, always agreed with LCSB
1) Strategy Meeting - usually held within 3 days	Tell person about allegation, using minimum detail. Inform of possible/likely courses of action. School appoint named person to support accused. Advise accused to contact professional organisation.
2) Referrals to Social Care and/or Police for investigation	As above
3) No Further Action	School decides what internal action to take, possibly disciplinary action and certainly an investigation by the DSL/DSPs/Managing Director.



Confidentiality

The school must maintain confidentiality regarding the accused. Until any investigation, either internal or external has been completed; the identity of the accused must not be released. The Managing Director, DSL and DSPs need to manage the situation particularly thinking of gossip and leaks to the media.

Resolution of allegations and action by school

Resolution	Action by school
Allegation substantiated, leading to prosecution and dismissal	Inform DBS (or relevant organisation/s); record kept on file
Allegation substantiated, leading to disciplinary action or dismissal	May need to inform DBS; record kept on file
Allegation unsubstantiated or unfounded	Summary report kept in staff/student file for future clarification and reduce need for reinvestigation; copy given to accused
Allegation malicious	Report removed from file. Disciplinary action required against perpetrators of malicious story.

*** Malicious, unfounded or unsubstantiated allegations must not be referred to when writing references, issuing documents**

* If allegation is unsubstantiated, unfounded or malicious, school must support the member of staff or student on return to work/school, especially if they have been suspended.

Records

Documents relating to an investigation are retained and locked in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained in a confidential file. These records can be accessed by the Safeguarding Officer/s and Managing Director, and if necessary, an official outside agency.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the school's statutory duty to inform the statutory body under the current legislative safe recruitment procedures.

Where any allegation has been made, the Designated Safeguarding Lead, together with a senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the school's procedures and/or policies and/or which should be drawn to the attention of the Managing Director.

Associated Policies / Documents

For further information on safeguarding students, please view the following:

["Stay Safe in London" document](#)

[Social Programme Activities – Instructions for Students and Leaders](#)

Parental Consent Forms

Timetable with school and accommodation rules

Group Leader Form

What is PREVENT strategy?

The school understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations following its policies and procedures.

What is Radicalisation?

It is an act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

What is Extremism?

Extremist organisations can develop and popularise ideas which create an environment conducive to violent extremism and terrorism. It can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as any religious extremism.

Why does Bloomsbury have a zero tolerance policy towards any form of radicalisation or extremism?

Bloomsbury International is aimed to ensure that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist related activity.

Who is responsible?

Everyone plays an important part in it.

- Managing Director
- Designated Safeguarding Person/s and Safeguarding Officer/s
- Welfare Officer/s
- Teachers
- Administration staff
- Social activity coordinators and supervisors
- Group leaders
- Any other adults who work with Bloomsbury students e.g. host families, taxi drivers
- All students



a. The Managing Director

Mrs Mori (Building 6, ground floor, Main Office)

To be involved in any major decisions and must always be informed before making a referral or contacting an external organisation.

b. The Designated Safeguarding Lead

Louise Newman (Building 6, ground floor, Main Office) louise@bloomsbury-international.com

Designated Safeguarding person

Adam Bartosik - (Building 6, ground floor, Reception) adam@bloomsbury-international.com

To be responsible for ensuring the policy is carried out effectively. Main responsibilities:

- Working with local partners - make and maintain contact with the local police PREVENT department and local authority
- Arranging trainings - in-house sessions with a guest speaker, external seminars and online training materials are made available to all staff.

c. The Welfare Officer/s

Louise Newman (Building 6, ground floor, main office) Louise@bloomsbury-international.com

Helena Ramalho (Building 6, ground floor, main office) helena@bloomsbury-international.com

To be responsible for the students' well-being and safety at all times whilst at the school.

Any student seeing or hearing of any incidence of behaviour(s) which could be considered to be radicalisation, must immediately inform the Welfare officer(s), who will take the appropriate course of action and will advise the Designated Safeguarding Person/s whenever necessary. Main responsibilities:

- To be available for all students should they wish to report any incident or ask for help
- To liaise with parents/guardians/sponsors as required

d. Other members of staff:

- Are expected to be aware, vigilant and report any concerns or allegations to the DSL/DSPs at the school
- Have particular responsibility to be available to listen to all students at the school, especially young people, on a daily basis.

e. Other adults working with Bloomsbury students:

- Are expected to be aware, vigilant and report any concerns or allegations to the DSL/DSP/s at the school or contacts outside of the school, e.g. Police PREVENT department.
- Have particular responsibility to be available to listen to all students, especially young people, on a daily basis



f. All students

All students are expected to look after each other and raise concerns with a responsible adult if necessary

Telephone Numbers:

School Office: +44 (0) 207 242 2234

School 24 hour Emergency: +44 (0) 7762 425 376

Anti-Terrorist Hotline: 0800 789 321 Reporting terrorist material online at

https://eforms.homeoffice.gov.uk/outreach/terrorism_reporting.ofml

Terrorist material could include:

- articles, images, speeches or videos that promote terrorism
- content encouraging people to commit acts of terrorism
- websites made by terrorist organisations
- videos of terrorist attacks
- messages intended to stir up hatred against any religious or ethnic group.
- bomb-making instructions

How does Bloomsbury PREVENT?

Raising awareness and educating

- Promoting equal opportunity and tackling discrimination to learn to understand others, to value diversity and promote shared values.
- Promoting a safe and supportive international environment via clear expectations of accepted behaviours and those, including radicalisation and extremism, that will not be tolerated.
- Promoting British values, culture and traditions, including democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs.
- Promoting social activities to explore London and the UK
- Promoting anti-bullying and abusive behaviour policy to minimise hate and prejudice based bullying



Providing information and School Rules

- Are given during the first day induction, including information on staff members and school rules
 - Ensuring our students are aware of the matter by including the information in the Student Handbook and Safeguarding Policy, which can be found on our website and around the school premises.

Safeguarding young people and inducting junior Groups

- Groups are inducted separately by combining the Monday induction slideshow and also the “Safety in London” document

Recognising the signs:

- students talking about exposure to extremist materials or views outside school
- changes in behaviour, e.g. becoming isolated
- fall in standard of work, poor attendance, disengagement
- changes in attitude, e.g. intolerant of differences/having closed mind
- Asking questions about certain topics (e.g. connected to extremism)
- offering opinions that appear to have come from extremist ideologies
- attempts to impose own views/beliefs on others
- use of extremist vocabulary to exclude others or incite violence
- accessing extremist material online or via social network sites
- overt new religious practices
- drawings or posters (e.g. in accommodation) showing extremist ideology/views/symbols
- students voicing concerns about anyone

Procedure

The following steps may be taken when dealing with incidents:

- If radicalisation behaviour is suspected or witnessed it must be reported to the Welfare Officer/s.
- Once reported, the incident will be dealt with immediately by the Welfare Officer/s.
- A clear account of the incident will be recorded and given to the Designated Safeguarding Lead/Safeguarding Persons
- The Welfare Officer/s will interview all concerned and will further record the incident.
- Parents, guardians and/or agents will be kept informed, where necessary.



• Punitive measures will be used as appropriate and in consultation with all parties concerned. Students who have been a victim of abusive behaviour will receive full support from Bloomsbury International by:

- offering an immediate opportunity to discuss the experience with the Welfare Officer/s
- offering continuous support and reassurance

The accused student or staff member will also receive full support from Bloomsbury International by:

- being given the opportunity to discuss the events
- establishing the wrong doing and the need to change behaviour
- advising and supporting him/her to seek professional help
- if s/he is a student, inform parents, guardians and/or agents to help change the attitude, where necessary
- if s/he is a staff member, inform their line manager to help change the attitude, where necessary

In the occurrence of any radicalisation behaviour, the following disciplinary steps will be taken:

1. The giving of an official verbal and written warning (outlining point 2 of disciplinary steps), in the hope to cease offending.
2. In the event of a second occurrence (even if the victim or offence differs from the first), permanent exclusion from the course and any other services (e.g. accommodation). No refund or alternative arrangements will be made.

In the event of a staff member feeling / being victimised, they are advised to speak with their line manager/s or Managing Director.

If the abuser is a staff member, the action to be taken will follow the 'disciplinary procedures' within the staff handbook.

This policy will be annually reviewed by the Safeguarding Officer/s and approved by the Managing Director. The review will be based upon any occurrences (recorded on the CLASS database), any student feedback (first week and end of course questionnaires) and any staff feedback (every 3 months on survey monkey).