

NILE SAFEGUARDING POLICY

We are committed to safeguarding and promoting the welfare of all children.

Aim

The purpose of Norwich Institute for Language Education's safeguarding policy is to ensure every child at our organisation is safe and protected from harm.

This means we will always work to:

- protect children from maltreatment
- prevent impairment of children's health or development
- ensure that children are homed in circumstances consistent with the provision of safe and effective care
- take action to enable all children to have the best outcomes

This policy will give clear direction to staff, volunteers, visitors and parents about the expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our organisation.

Introduction

Our organisation fully recognises the contribution it can make to protecting children from harm and supporting and promoting the welfare of all children. The elements of our policy are prevention, protection and support.

Our policy applies to all children, volunteers, visitors and staff.

A child is someone under the age of 18 years old.

Our Ethos

Our organisation will establish and maintain an ethos where our children feel secure, are encouraged to talk, are listened to and are safe. Children will be able to talk freely to any member of staff, volunteer or regular visitor to our organisation if they are worried or concerned about something.

All staff, volunteers and regular visitors will, either through training or induction, know how to recognise a disclosure from a child and will know how to manage this. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will do with whatever they have been told.

We will provide activities and opportunities that will equip our children with the skills they need to stay safe.

At all times we will work in partnership and try to establish effective working relationships with parents, carers and colleagues from other agencies and organisations.

General Procedures

When new staff, volunteers or regular visitors join our organisation they will be informed of the safeguarding arrangements in place. They will be given a copy of our organisation's safeguarding policy and told who our Designated Safeguarding Officer for Safeguarding is. They will also be shown the recording format, given information on how to complete it and who to pass it to.

Every new member of staff or volunteer will have an induction period of 3 months that will include essential safeguarding information. This programme will include safeguarding training relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record and issues of confidentiality. The induction will also remind staff and volunteers of their responsibility to safeguard all children and the remit of the role of the Designated Safeguarding Officer.

All staff and volunteers will be asked to read this policy yearly after it has been reviewed and updated if necessary. They will sign to say they have read and understood the policy.

We will display the reporting and referral flowchart when our organisation is operating.

All regular visitors and volunteers to our organisation will be told where our policy is kept, they will be given a set of safeguarding procedures, they will be told who our Designated Safeguarding Officer and alternate staff members are and what the recording and reporting system is.

All parents and carers will be given access to our safeguarding policy and informed of our legal duty to assist our colleagues in other agencies with Safeguarding enquiries and what happens should we have cause to make a referral to Children's Services.

Parents and students will be required to sign a behavioural agreement and complete a form at the start of their child's involvement with the organisation, which includes any vital health or otherwise notable information. This will also include a statement making parents/carers aware by signing they consent to us sharing information with the relevant authorities if we have concerns about the welfare of their child/children, but that we do not have to seek consent if there are serious concerns about harm or likely harm to their child/children.

Training

Every member of staff will undertake appropriate safeguarding training every three years.

We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance. This can be accessed via www.norfolkscb.org. For a free Level 1 safeguarding course please go to: <https://accreditation-uk.english.britishcouncil.org/Default.aspx>

The Designated Officer should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our organisation.

Safer Staff and Volunteers

All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

NILE follows English UK guideline reading Safeguarding and Child Protection in the appointment of all staff as well as guidance from Norfolk Safeguarding Children Board.

We ensure that we:

- Carefully consider the job description and person specification
- Circulate all vacancies widely
- Prepare an information pack
- Ask for a written application form with previous employment history (gaps in CVs must be explained)

satisfactorily)

- Define our selection criteria
- Ask for a written declaration with regards to criminal convictions, spent or otherwise
- Ask for identification
- Ask for originals of any qualifications
- Conduct interviews with at least two people present
- Ask for at least two references, including the last employer. Reference requests ask specifically whether there is any reason the applicant should not be employed in situations where they have responsibility for, or sustained access to, persons under the age of 18
- Gain enhanced DBS checks and checking the Barred Children's List prior to commencement of work where current Government guidance requires us to. Where a DBS disclosure is delayed NILE will risk assess and implement additional supervision.
- Organise a comprehensive induction period which includes familiarisation with our safeguarding policies, staff code of conduct, procedures and safeguarding training.

A NILE member of staff trained in Safer Recruitment will take part in all interviews for teaching and non-teaching positions which involve working with students under the age of 18. Please refer to NILE's full Recruitment Policy for details.

Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for our children. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

We will take all possible steps to safeguard our children and to ensure that the adults in our organisation are safe to work with our children. We will always ensure that the Norfolk Safeguarding Children Board's procedures are followed.

All adults who come into contact with children will be made aware of the steps that will be taken if an allegation is made. We will seek appropriate advice from the Local Authority Designated Officer (LADO) within 24 hours of a concern or allegation being made. The LADO can be contacted via the referral/consultation forms under 'how to raise a concern' at www.norfolkscb.org or a message left on **01603 223473** for ongoing cases.

Staff will not investigate these matters. We will seek and work with the advice that is provided. Should an allegation be made against the Designated Safeguarding Officer or a member of the NILE Safeguarding team, it will be reported by the staff member or volunteer raising the concern directly to the LADO.

There are sensible steps that every adult should take in their daily professional conduct with children. This can be found in the NSCB **Safer Programme Safer Working Practice** (this guidance is on the NSCB website and also included in our procedures).

Records and Confidentiality

If we are concerned about the welfare or safety of any child in our organisation we will record our concerns immediately on the agreed report form and give this to the Designated Safeguarding Officer.

Any information recorded will be kept in a separate named file, in a secure cabinet and not with the child's file. These files will be the responsibility of the Designated Safeguarding Officer and information will only be shared within the organisation on a need-to-know basis for the protection of the child.

Any safeguarding information, including copies of referrals, will be kept in the file and will be added to.

All information is confidential, however if there is a safeguarding or child protection concern about a child, then information can be shared with other agencies, namely the Police or Children's Services.

Reports of a concern to the Designated Safeguarding Officer must be made in writing and signed and dated by the person with the concern.

Roles and Responsibilities

The responsibility for managing safe working practices for the protection of students and staff lies with NILE's Designated Safeguarding Person (DSP), currently Lucy Oram. The DSP works closely with the Deputy Safeguarding Person, currently Mike Riley, and together they undertake an annual review of NILE's policies and procedures regarding Safeguarding, Child Protection and At-Risk Adults.

The lead DSP is trained to Level 3 and in Safer Recruitment and the Deputy DSP to Level 2. They are assisted by Thom Kiddle, NILE's Director, who is trained to Level 2 and in Safer Recruitment. They are supported by Alison Lake and Miriam Anderson who are both trained to Level 2. All the Safeguarding Team undergo training every three years in order to keep knowledge and skills up to date.

The main responsibilities of NILE's Safeguarding team are:

- to ensure policies and procedures are kept up to date and reviewed annually
- to ensure that enhanced DBS checks are in place for all staff undertaking regulated activity with students under the age of 18
- to ensure that all staff working with those under 18 have received appropriate safeguarding information during induction and get Level 1 training every three years, in order to be able to recognise and identify signs of abuse and to make a referral following NILE's published procedures
- to ensure staff are aware of and follow the staff code of conduct
- to refer suspected cases of abuse to the appropriate authorities without delay
- to respond to all Safeguarding concerns swiftly and appropriately
- to raise awareness of child safety issues with staff, students, group leaders and parents
- to maintain secure storage of all referrals, complaints or concerns separately from student files
- ensure NILE's safer recruitment practices are followed

Any concern for a child's safety or welfare will be recorded in writing and given to the Designated Safeguarding Person who will be responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. Our organisation undertakes to remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

Admissions:

It is the responsibility of the DSP to engage in the early identification of young people under the age of 18 and to notify the appropriate members of staff, ie the relevant Directors, the Accommodation Officers and the Social Programme team. It is the responsibility of these staff members to ensure that the planning of courses, activities and of accommodation placements takes Safeguarding and Child Protection issues into account, including the induction, training and guidance of all staff who will interact with young people.

Accommodation:

NILE students are housed with carefully selected hosts. Where students are under the age of 18, every effort is made to place them in homes close to the NILE teaching venue. Students under the age of 18 are advised on personal safety prior to arrival via an information sheet. NILE undertakes a risk assessment when placing any groups containing members under the age of 18 and all hosts are asked to sign a declaration of suitability for them and other house members. The main carers (normally the host and partner) are required to undergo an enhanced DBS check and provide two references. Hosts are provided with a copy of our safeguarding policy each time they host a student under the age of 18.

Off-site activities

Activities involving young people are planned within a clear management framework, setting out the purpose and scope of the activity and the responsibilities of all parties. Risk assessments are carried out for off-site events, ensuring that appropriate recruitment procedures have been followed for all staff. When necessary, requests are made to a third party supplier for DBS checks.

Guidelines regarding contact with students (particularly those under 18)

NILE's guidelines on issues of physical contact between staff and students and time alone with students are designed to reduce the vulnerability of staff and students as well as minimising the risk of a false accusation. This guidance is issued to all staff and to those who house students under the age of 18, although NILE expects that staff should demonstrate exemplary behaviour towards all its students. Intimate or sexual relationships between staff and students under the age of 18 are an abuse of trust which constitutes a criminal offence under Section 16 of the Sexual Offences Act 2003.

NILE staff will not take any photos or images of children.

Please refer to the Staff Code of Conduct for guidelines on contact with students. You can also refer to Norfolk Safeguarding Children Board's Safer Working Practice guidance available in the Student Services office at NILE.

Procedures for Handling Disclosures

A child may decide to disclose information that may indicate they are suffering from abuse or neglect. A child chooses to speak to an adult because they feel that they will listen and that they can trust them. The adult needs to listen to what the child has to say, and be very careful not to 'lead' the child or influence in any way what they say.

It is important that the adult remembers to:

- Stay calm
- Listen and be supportive
- Not ask any leading questions, interrogate the child, or put ideas in the child's head, or jump to conclusions
- Not stop or interrupt a child who is recalling significant events
- Never promise the child confidentiality – it must be explained that information will need to be passed on to help keep them safe
- Avoid criticising the alleged perpetrator
- Tell the child what must be done next (the safeguarding process must be followed)
- Record what was said immediately as close to what was said as possible. Also record what was happening immediately before the child disclosed. Be sure to sign and date the record in ink.
- Contact the NILE DSP, Lucy Oram, immediately. In her absence contact the Deputy DSP, Alison Lake.
- Seek support

If abuse is reported the DSP will:

- take any steps necessary to protect the student from risk of immediate harm
- consult with Mike Riley, Alison Lake and Thom Kiddle and follow advice with regard to contacting parents, other staff, police, doctor, etc
- inform the student of what the next steps will be
- keep the Directors informed
- ensure that any student being interviewed by the police has a supportive member of staff of his or her own choosing present
- keep a written record in a secure place

NILE's DSP will always refer the matter immediately to the Children's Advice and Duty Service (CADS) 0344 800 8021 (directly – not leaving a message). The CADS worker will agree a way forward with us and keep us informed. They will send a written record of our conversation within 5 working days. The outcomes could include a full referral to the Multi Agency Safeguarding Hub (MASH) for further investigation, the Police, or for work with Early Help. We will not investigate and will be led by the Local Authority and/or the Police.

We are clear that the Local Authority and Police must lead any investigation in to any allegation regarding safeguarding.

If we have a concern about a child or children we will telephone the Children's Advice and Duty Service (CADS) on **0344 800 8021** immediately. We will be put through to a Social Worker who will take all of the relevant details. We will make sure we are prepared with full details of the child and family, plus what our concerns are, details of any support we have provided to the child/family and what we would like to happen. We will ensure we gain consent from the parent/carer unless to do so would place the child at further risk of harm or undermine a criminal investigation. If we have not sought consent from the parent/carer, we will inform the CADS worker of this and the reason for this.

The CADS worker will agree a way forward with us and keep us informed. They will send us a written record of our conversation within 5 working days. The outcomes could include a full referral to the Multi Agency Safeguarding Hub (MASH) for further investigation, the Police, or for work with Early Help. We will not investigate and will be led by the Local Authority and/or the Police.

We will make careful records of all conversations, in ink, including the dates and times of who we spoke to, the information shared and the action agreed. We do not need to send a written referral.

Full details on this process can be found at www.norfolkscb.org under 'How to Raise a Concern'.

We understand if we are unhappy about a decision made by CADS or MASH we can use the Resolving Professional Disagreements policy on www.norfolkscb.org and contact the Safer Programme for more advice on this process

We will contact CADS immediately if we have concerns, it is important we do not delay

Working Together 2018

What is abuse and neglect?

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology

can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding and promoting the welfare of children

Defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children are homed in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

For more guidance on recognising different types of abuse and neglect please see appendix 1. This can be found in the policy folders kept in the NILE Staffroom, Student Services office and on reception. Alternatively you can request a copy from our DSP: lucy@nile-elt.com

Child protection

Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Whistleblowing

It is the duty of everyone in the organisation to pass on any allegations or concerns about a child's welfare without delay. In raising a concern or allegation about NILE's practices or the behaviour of colleagues which are likely to put students at risk of abuse or other serious harm, staff are protected in law from disciplinary action or discrimination for 'whistle-blowing', provided they can show that they have acted in good faith.

If you have concerns about NILE or a member of staff and are unsure what to do you can contact the NSPCC Whistleblowing advice line on 0800 028 0285 or email help@nspcc.org.uk

This policy will be reviewed annually.

Complaints

When children, young people, parents, volunteers and staff are unhappy, it is vital they are able to complain. This procedure also links in with the 'whistleblowing' and handling of disclosures procedures, especially when the welfare of children/young people is implicated.

We will ensure any complaints will be taken seriously and referred where applicable to the group leader and Safeguarding Lead

- If the complaint is about a group leader or NILE's Safeguarding Lead, it will be passed onto NILE's Director (Thom Kiddle) and an appropriate member of the safeguarding team.
- The person making the complaint will receive acknowledgement of their complaint within five working days including details of how it is being dealt with.
- Within 30 working days the person making the complaint will receive resolution or details of what has happened so far.
- If there are delays to resolving the issues the person making the complaint should be kept as fully informed as possible.
- There may be a need to identify a third party or higher authority to approach if the person making the complaint is unhappy with the outcome.
- At all times the welfare of the child/young person is of the utmost importance.

Other Relevant Policies

To underpin the values and ethos of our organisation and our intent to ensure our children/young people are appropriately safeguarded the following policies are included under our safeguarding umbrella;

- Major Incident Policy and Emergency Contact Procedure
- Trips and Visits Procedure
- Safeguarding Adults Policy
- Bullying and Harassment Policy
- Administration of Medication Policy
- Substance Misuse
- ICT Code of Conduct
- Staff Code of Conduct (and online code of conduct)
- Safer Recruitment Policy
- Online safety

These documents can be found in the safeguarding folders located in all NILE offices, on Reception and in the Staffroom. If you would like a copy please contact DSP Lucy Oram on 01603 664473 or email lucy@nile-elt.com
The overarching safeguarding policy can also be found on our website.

Policy Review

We will always make any changes immediately to our procedures in line with Norfolk Safeguarding Children Board's guidance on www.norfolkscb.org This policy will be reviewed again in January 2020

Relevant Guidance and Legislation

- Working Together 2018
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf
- What to do if You're Worried a Child is Being Abused 2015
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_are_worried_a_child_is_being_abused.pdf
- Children Act 2004
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441643/Children_Act_Guidance_2015.pdf
- Children Act 1989
<https://www.legislation.gov.uk/ukpga/1989/41>
- Keeping Children Safe in Education
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741314/Keeping_Children_Safe_in_Education_3_September_2018_14.09.18.pdf
- Every Child Matters 2004
<https://www.gov.uk/government/publications/every-child-matters-statutory-guidance>
- NSPCC Guidance
<https://www.nspcc.org.uk/>
- Abuse of Position of Trust Legislation under Sex Offenders Act 2003
<https://www.legislation.gov.uk/ukpga/2003/42/part/1/crossheading/abuse-of-position-of-trust>
- Framework for the Assessment of Children in Need and their Families
<https://webarchive.nationalarchives.gov.uk/20130404002518/https://www.education.gov.uk/publications/eOrderingDownload/Framework%20for%20the%20assessment%20of%20children%20in%20need%20and%20their%20families.pdf>
- Norfolk Threshold Guide
www.norfolkscb.org

Contacts

NILE Lead DSP	Lucy Oram	Email: lucy@nile-elt.com	Office Tel: 01603 664473 Ext. 217
NILE Deputy DSP	Mike Riley	Email: mike@nile-elt.com	Office Tel: 01603 664473 Ext: 204
Support DSPs	Thom Kiddle	Email: thom@nile-elt.com	Office Tel: 01603 664473 Ext: 207
	Alison Lake	Email: alison@nile-elt.com	Office Tel: 01603 664473 Ext: 201

Lucy and Alison are based in the Student Services office of Delta House. Mike and Thom are based in the Directors office in Hales Court House. If a DSP is not contactable out of office hours use the **NILE Emergency number: 07889649768**

Children's Advice and Duty Service (CADS) 24 Hours: 0344 800 8020

Local Authority Designated Officers (LADO) Team: 01603 223473 (open normal working hours)
General Email: LADO@norfolk.gov.uk Secure Email: cs.norfolkLADOsecure@norfolk.gcsx.gov.uk

Norfolk Safeguarding Children Board (NSCB): Tel: 01603 222209 Email: safer@norfolk.gov.uk
Safer Programme: 01603 228966

Norfolk Police: 101

Emergency: 999

Logging a Concern about a Childs Safety and Welfare

Please complete this form and give it to The Designated Safeguarding Person, Lucy Oram.

In her absence please pass the form to Mike Riley, Alison Lake or Thom Kiddle.

NILE 78-80 Upper St Giles Street, Norwich, NR2 1LT			
Student Name		Student Date of Birth	
Student Gender		Student Nationality	
Your Name		Your Role	
Date of incident		Time of incident	
Describe the incident as factually as possible. Include who was involved, where it happened, exactly what happened etc. Remember to describe clearly any behavioural or physical signs you have observed. Please also describe any action you have taken. Continue on plain piece of paper if needed and attach to report.			
Your Signature:			

(Please check to make sure your report is clear now - and will also be clear to a stranger reading it next year.)

<i>To be completed by DSP / Safeguarding Lead</i>					
Name		Date report received		Time report received	
Action to be taken by DSP					