

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 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.

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

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 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.

Safeguarding Team Contact Details

Name / Role	Email	Contact number during office hours: Weekdays 9am-5pm unless otherwise specified <small>Personal contact details redacted to align with GDPR</small>
NILE Designated Safeguarding Person & Designated Emergency Phone holder - Miriam Anderson	miriam@nile-elt.com	Office Tel: 01603 664473 Ask for Miriam.
NILE Designated Safeguarding Lead Mike Riley	mike@nile-elt.com	Office Tel: 01603 664473 Ask for Mike
Support DSP Thom Kiddle	thom@nile-elt.com	Office Tel: 01603 664473 Ask for Thom
Support DSP Lucy Oram	lucy@nile-elt.com	Office Tel: 01603 664473 Ask for Lucy
Support DSP Natasha Patel	natasha@nile-elt.com	Office Tel: 01603 664473 Ask for Natasha Office hours: Monday, Tuesday and Thursday from 8:45 to 17:15.
Support DSP Alice Warby	alice@nile-elt.com	Office Tel: 01603 664473 Ask for Alice

All of the above staff members are based at Delta House, which is the NILE building at 78-80 Upper St Giles St Norwich, NR2 4DS.

Miriam, Lucy, Alice and Natasha are based in the Student Services Office on the ground floor.

Mike and Thom are based in the Academic Office on the top floor of Delta House.

If a DSP is not contactable out of office hours use the **NILE Emergency number: 07889649768**

If the DSP or DSL are unavailable anyone with a safeguarding concern can contact The Children's Advice and Duty Service (CADS). NILE staff members can call 0344 800 8021. Members of the public or host families can call 0344 800 8020.

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 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.

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 two to three years with English UK, British Council, High Speed Training, or other provider relevant to ELT or the education sector.

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 The Norfolk Safeguarding Children Partnership on <https://norfolkscsp.org.uk/>.

For a free Level 1 safeguarding course please go to: [accreditation-uk.english.britishcouncil.org](https://www.accreditation-uk.org/English/BritishCouncil/)

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 guidelines regarding Safeguarding and Child Protection in the appointment of all staff as well as guidance from Norfolk Safeguarding Children Partnership.

Staff are expected to follow our Code of Conduct which sets out the expected standards of behaviour.

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.

Roles and Responsibilities

NILE's Designated Safeguarding Person (DSP), Miriam Anderson, is responsible for managing safe working practices for the protection of students and staff. However, the overall responsibility for safeguarding at NILE lies with Deputy Director Mike Riley (DSL) and Director Thom Kiddle. The DSP works closely with the Designate Safeguarding Lead (DSL), and together they undertake an annual review of NILE's policies and procedures regarding Safeguarding, Child Protection and At-Risk Adults. The DSP is trained to Level 3 and the DSL to Level 2 and in Safer Recruitment.

The DSP & DSL are assisted by Thom Kiddle, NILE's Director and Support DSP who is trained to Level 2 and in Safer Recruitment. They are supported by Lucy Oram who is trained to Level 3 and Alice Warby and Natasha Patel who are both Level 2 trained. The whole Safeguarding Team undergo training every 2-3 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 DBS checks are in place for staff undertaking regulated activity with students under the age of 18. DBS records are checked yearly or before each iteration of work with under 18s.

- to ensure that all staff working with those under 18 have received appropriate safeguarding information during induction and get Level 1 training every 2-3 years in order to be able to recognise and identify signs of abuse and to make a referral following NILE's 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 DSP 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.

Records and Confidentiality

Our organisation cannot guarantee confidentiality if there is a child safeguarding concern, as we will need to share these concerns with the Children's Advice and Duty Service. It is an expectation that our organisation will seek consent to share information first unless to do so would place somebody at risk of harm or undermine a criminal investigation.

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.

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

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, i.e 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.

Online Safety

Online Safety includes the use of photography and video, the internet and social media sites, mobile phones and smart watches. Please refer to the ICT Code of Conduct, Filtering and Monitoring policy and Sharing Nudes and Semi-nudes policy for information on NILE's online safety measures.

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 will not take or publish photographs of under 18s without prior signed parental consent.

Please refer to the Staff Code of Conduct for guidelines on contact with students; 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, Miriam Anderson, immediately. In her absence contact the DSL, Mike Riley.
- 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 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 Director Thom Kiddle informed
- ensure that any student being interviewed by the police has a supportive member of staff of his or her own choosing present
- make a written record as soon as possible after the incident and within 24 hours
- keep this written record in a secure place

Definitions of Abuse and Neglect from Working Together to Safeguard Children 2023

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Child protection is defined as: 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.

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.

Additional safeguarding concerns to be aware of are:

- Child Sexual Exploitation
- FGM – Female Genital Mutilation
- Forced Marriage
- Honour Abuse
- County Lines
- Child Criminal Exploitation
- Radicalisation
- Online Abuse
- The Prevent Duty

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

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 Designated Safeguarding Person, 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 Miriam Anderson 01603 664473 or miriam@nile-elt.com.

Policy Review

We will always make any changes immediately to our procedures in line with Norfolk Safeguarding Children Partnership guidance on norfolkscp.org.uk. This policy will be reviewed again in January 2025.

Relevant Guidance and Legislation

- Working Together to Safeguard Children (July 2018 – last updated 2023) - [Working together to safeguard children - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- 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_re_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 www.legislation.gov.uk/ukpga/1989/41
- Keeping Children Safe in Education (September 2023) - [Keeping children safe in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- Every Child Matters 2004 www.gov.uk/government/publications/every-child-matters-statutory-guidance
- NSPCC Guidance www.nspcc.org.uk/
- Abuse of Position of Trust Legislation under Sex Offenders Act 2003 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 webarchive.nationalarchives.gov.uk/20130404002518/https://www.education.gov.uk/publications/eOrderingDownload/Framework%20for%20the%20assessment%20of%20children%20in%20need%20and%20their%20families.pdf
- Information Sharing (July 2018 – last updated July 2023) - [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- Norfolk Continuum of Needs Guidance 2023: [Norfolk Guidance to Understanding Continuum of Needs | NSCP | PWWC \(norfolkscp.org.uk\)](http://norfolkscp.org.uk) [When to Call the Police NPCC \(National Police Chief's Council\) \(last updated 2020\)](http://www.npcc.norfolkscp.org.uk)
- Sharing nudes and semi-nudes: how to respond to an incident (UK Council for Internet Safety) Dec 2020 www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
- The Online Safety Act 2023
- Data Protection Act 2018
- Norfolk Safeguarding Children Partnership Policies and Procedures [Polices & Procedures | Norfolk Safeguarding Children Partnership \(norfolkscp.org.uk\)](http://norfolkscp.org.uk)

Safeguarding Report Form

This form is to be filled in by anyone who has a concern, or has been reported to about a concern, about the safety and/or welfare of someone at NILE.

Please complete this form and give it to the Designated Safeguarding Person (DSP), Miriam Anderson.

In her absence, please pass the form to Designated Safeguarding Lead (DSL), Mike Riley.

Student Name		Under 18?	
Student Gender		Student Nationality	
Your Name		Your job role	
Date of reporting		Time of reporting	

Describe the safeguarding concern as factually as possible. Include who you are concerned about and why, including any behavioural or physical signs. If you are reporting something that has been reported to you, please include who you spoke to and the circumstance of how it was reported to you. Please also describe any action you have taken. Continue on plain piece of paper if needed and attach to report.

Your Signature:	
-----------------	--

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

<i>To be completed by DSP/DSL</i>							
Name		Date & time report received		Safeguarding Report number:		Incident report number:	
Please circle:		Referral made to DSL / Safeguarding team (specify)/ NILE Director / police / First aid administered / visit to medical facilities / referral made to other agency (specify) / Other					
Action to be taken by DSP / DSL							

Incident Report Form

This form is to be completed by anyone who has experienced, witnessed or been reported to about an incident regarding someone at NILE.

Please complete and return to the Designated Safeguarding Person (DSP), Miriam Anderson.

In her absence, please give to the Designated Safeguarding Lead (DSL), Mike Riley.

Name of person(s) involved		Under 18?	
Nationality(/ies)		Gender(s)	
Your Name		Your job role	
Date of incident		Time of incident	
Date of filling in report		Time of filling in report	
Type of incident Please circle:	Attendance / Behaviour & discipline / Bullying / Child Protection concern / Health concern / Racial / Welfare / Other		
Describe the incident as factually as possible. Include who was involved, where it happened, what was said or done and by whom. Include what was the situation leading up to it. If you are reporting something that has been reported to you, please include who you spoke to and the circumstance of how it was reported to you. Please also describe any action you have taken. Continue on plain piece of paper if needed and attach to report.			
Your Signature:			

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

<i>To be completed by DSP/DSL</i>							
Name		Date & time report received		Safeguarding Report number:		Incident report number:	
Please circle:		Referral made to DSL / Safeguarding team (specify)/ NILE Director / police / First aid administered / visit to medical facilities / referral made to other agency (specify) / Other					
Action to be taken by DSP / DSL							