



Safeguarding Policy and Handbook

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Policy Statement

Firstly, at Skool Cornwall we recognise that we have a duty of care to young people that employ our services. To ensure that duty of care is met, we have a robust safeguarding policy that is consistent and embedded in our business practice. This handbook details the relevant policies and procedures relating to our approach to Child Protection and Safeguarding. We recognise that the welfare of children and vulnerable adults is paramount. All students, whatever their age, culture, disability, gender, language, racial origin, religious beliefs, and/or sexual identity, have the right to be kept safe and given protection from abuse.

Context

Skool Cornwall is a private language school. We offer our international students English Language improvement, we also offer students GCSE and A Level tuition retake courses online. Our Students ages range from 11-70, however only adult students are taught in our physical setting, children are offered online tuition 1:1 and via our live-streaming service on YouTube. Adult students stay from a week up to 2 months. They stay with host families in a homestay environment.

Terminology

All adults that are to abide by this policy will be referred to as **ALL** in this document.

Safeguarding refers to representative measures in place to ensure that there are processes and procedures that deal with keeping young people safe.

Child Protection is a term that encompasses measure that protect children from direct harmful behaviour.

Designated Safeguarding officer : Toby Keane (Founder)

Designated responsibility: Rebecca Gray (Operations Manager)

Statement

We are committed to safeguarding all children in our care. We believe that it is always unacceptable for any child to experience abuse of any kind and we recognise our responsibility to safeguard the welfare of all children by a commitment to practice which protects them.

Entitlement

All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

Purpose and aim of the policy

We recognise at Skool Cornwall the we have a responsibility to every child that employs our services. To that end Skool Cornwall will provide staff with guidance and training on procedures they should adopt in the event that they suspect a child may be experiencing, or be at risk of, harm. This policy applies to everyone that comes into contact with Skool Cornwall - including as applicable - Teachers, Sessional Workers, Agency Staff, Suppliers, Volunteers, Students on work experience, as well as anyone working on behalf of Skool Cornwall. All those adults involved will know that they should alert Skool Cornwall's Safeguarding officer - Toby Keane, and also

Cornwall Council LADO (01872 326536), as well as the NSPCC (0808 8005000). We adhere to the Legislation set out in: Working Together to Safeguard children 2018.

Roles and Responsibilities

Both Rebecca Gray (07973 795045) and Toby Keane (07870 665472), Safeguarding officer, are responsible for delivering the Safeguarding Policy. Equally, seasonal teaching staff will have a responsibility to carry out procedure set out in this document. Our safeguarding policy will be available on our website, and students will all be briefed on the standard of care that should expect, albeit this briefing will be dependent on the individual, subject to age and maturity, but all will be aware that there is safeguarding in place and all will be provided with the location of this document.

In order to write this document, we have taken appropriate measures, we have read the legislation outlined in Working Together to Safeguard Children 2018. We have also used the writing guidance outlined by the British Council. We have also been guided by safeguarding policies in place at schools and charities in the County. Our policy is available to download on our website, there are hard copies in the school.

Code of Conduct

Overview and principles

Skool Cornwall has two main contexts:

The first is to provide adults with an immersive English Language experience, that includes showcasing Cornwall and British culture. Our intention is to enable adults to progress with their English Language learning in a unique context, unbound by the classroom. We are committed to the well being of each student and ensure that they feel safe at all times. Our culture is one of learning and respect - we oppose absolutely behaviour that is inappropriate, and discourage firmly behaviour that can be misconstrued, we aim to protect all adults and students from inappropriate conduct.

The second aspect of our school is our online provision.

We offer free, live-streamed content for 11-16 year-olds. We only employ qualified teachers to deliver this content and have a robust e-safety policy which aims to moderate this online context. We also offer group and 1:1 tuition, online, for a fee.

Position of Trust

We recognise that all Adults working with children under 18 work in a position of trust, and as such, with specific reference to the Sexual Offences Act 2003 any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law (even though legal age of consent is 16).

Setting standards

We expect all adults that work with our students to adhere to being:

- excellent role models
- encouraging of students
- kind
- advocates of a safe environment
- well prepared for the delivery of activity or service
- we also expect all to appreciate that the welfare of the child is paramount, and as such:
Be familiar with this safeguarding policy
- be alert to signs and indicators of possible abuse indicators.
Deal with a disclosure of abuse from a child in line with the guidance set out in this policy and inform the designated Safeguarding Officer (Toby Keane).

Adult interaction

All adults must be mindful that inappropriate physical contact is entirely prohibited and unacceptable.

Adult socialising with Under 18s (going to bars/ nightclubs) is deemed as entirely unacceptable. We expect appropriate adult behaviour, and that all adults are examples of good behaviour, and as such they should employ appropriate language at all time.

Appropriate appearance

We expect all adults to dress appropriately when engaged on a student activity. All adults must be aware that they set an example in class, on activities, in accommodation, and on activities in the evening.

Alcohol, drugs and smoking

Adults must provide a good example to young people, and an example that is realistic. That being said, All adults in a position of trust have a duty of care to educate young people on the misuse of addictive substances. Taking illegal substances is entirely prohibited and will result in immediate disciplinary procedure.

IT & Social Networks

We understand that children use a range of IT devices and social networking platforms. We discourage the use of mobile phones in class, and we condemn all acts of online bullying. Children found to be using IT inappropriately be that involved in bullying or visiting inappropriate sites on-line will be disciplined in line with our disciplinary procedure. Should inappropriate usage be concerning, if for instances children are using or posting sexual images, and we deem it an issue of child protection, we will not hesitate to contact our MARU, or LADO.

For more information on E-Safety protocols and Code of Conduct, please see the E-safety section of our Safeguarding Policy, on page 24.

Accommodation

We recognise the benefit host family accommodation provides in welcoming students from all around the world. We also recognise the special responsibility that being a host family involves. As such, appropriate behaviour must be observed at all times particularly with regards to expectations around privacy. Crucial to wellbeing of students and host families the mutual respect required - students must have access to private bedrooms and bathrooms.

Transport

All those transporting students are required to have appropriate car insurance. Those transporting students must have a recent DBS certificate. Alex and Toby have vehicles for company use, the use of own transporting children by another teacher is discouraged, unless in special circumstances.

Whistleblowing

We recognise that all staff and employees of Skool Cornwall are responsible for maintaining the safety and well being of each child; as such all have a legal obligation to inform management of any concerns about colleagues not following Code of Conduct. Staff who report this (or any other problems) will (a) not be penalised and (b) their report will remain confidential.

Child protection

At Skool Cornwall we understand that all children in our care should feel safe. We value all students and recognise that children are frequently vulnerable. Our safeguarding policy aims to provide a clear practise and process to keeping children safe. All employees and host families must acknowledge that they have read our safeguarding policy, which is available online. All should know the steps and processes required set out in the policy.

Nominated Safeguarding officer

Toby Keane, is the nominated safeguarding officer, he is contactable on his mobile 078706654 tobu@skoolcornwall.com in his absence, Rebecca Gray, 07973 795045 rebecca@skoolcornwall.com is the deputised officer. Toby has advanced safeguarding training: CP3.

Purpose and aim of procedure:

We aim to ensure that those children who attend and/or participate in our courses, including activities or events organised by Skool Cornwall receive the protection and support they need if they are at risk of abuse or radicalisation. This procedure provides clear direction to all staff at Skool Cornwall if they have concerns that a child is in need of protection.

Ways that abuse might be brought to your attention include:

- A child might make a direct disclosure about him or herself
- A child might make a direct disclosure about another child.
- A child might offer information that is worrying but not a direct disclosure
- A child might make a direct disclosure.
- A member of staff or host family member might be concerned about a child's appearance or behaviour or about the behaviour of an adult towards a child.
- A member of staff or host family member might offer information that is worrying but not a direct disclosure.

When talking to a child - who has told you that they are/or another child is being abused - please take account of the following guidance:

- Reassure the child that telling someone about it was the right thing to do
- Tell them that you now have to do what you can to keep them (or the child who is the subject of the allegation) safe.
- Let the child know what you are going to do next and who else needs to know about it
- Let the child tell his or her whole story - but don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying.

- Ask the child what they would like to happen as a result of what they have said, but don't make or infer promises you can't keep.
- Give the child the ChildLine phone number which is 0800 1111.
- Adults should inform Toby Keane or Rebecca Gray immediately if there is any concern.

How to help a child in immediate danger or in need of emergency medical attention: Skool does not teach children on site, but we recognise our role in the community as responsible adults and so include the below procedures.

- If the child is in immediate danger and is with you, remain with them and call the Police.
- If the child is elsewhere, contact the Police and explain the situation to them
- If the child needs emergency medical attention, call an ambulance and while you are waiting for it to arrive, get help from Skool Cornwall's first aider (Toby Keane/ Rebecca Gray).
- If a first aider is not available, use any first aid knowledge that you may have yourself to help the child.
- A decision will need to be made about who should inform the child's family and the Local Authority Children's Social Care Department and when they should be informed. If you have involved the Police and/or the health services, they should be part of this decision. Consider the welfare of the child in your decision making as the highest priority.

Issues that will need to be taken into account are:

- The child's wishes and feelings.
- The parent's right to know - unless this would place the child or someone else in danger, or would interfere with a criminal investigation.
- The impact of telling or not telling the parent.
- The current assessment of the risk to the child and the source of that risk.

Once any immediate danger or emergency medical need has been dealt with, follow the steps set out in the **Flow Chart to Follow when Responding to Signs of Abuse** in this Handbook.

Member of staff has concerns about a child's safety or welfare



Member of staff makes notes of their concerns using the reporting form, and discusses them with Skool Cornwall's Designated Safeguarding Officer or Rebecca Gray if DSO is unavailable



If there is still uncertainty about the concerns, Skool Cornwall’s Designated Safeguarding Officer can discuss with the child’s social care department or with NSPCC Helpline without disclosing the identity of the child/ family.

No further child protection action needed. Staff member and line manager decide whether to discuss the initial concern with other services (e.g. school etc.) to ensure that the child’s needs are being met elsewhere.



Skool Cornwall’s Designated Safeguarding Officer refers to Local Authority Children’s Social Care Department and confirms in writing within 48 hours.

If the child’s family does not already know about the concern, the member of staff or manager discusses it with them unless:

Still concerned	<ul style="list-style-type: none"> - A family member might be responsible for child - Someone may be put in danger by the being informed - Informing the family might interfere criminal investigation 	No Longer concerned	<p>abusing the family with a</p>
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Members of staff refers to those who work directly for Skool Cornwall either as a teacher, or host family or contractor.

Recognising symptoms of abuse

Recognising child abuse is not easy. Skool Cornwall does not believe it is the responsibility of its staff members to decide whether or not child abuse has taken place - or if a child is at significant risk of harm from someone. However, all that work for and with Skool Cornwall have both a responsibility to act in order that the appropriate agencies can investigate and take any necessary action to protect a child.

This section starts by providing greater detail about the four core categories of abuse detailed in the UK Government's guidance "Working Together to Safeguard Children".

Sexual abuse: A child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact and it can happen online. Sometimes the child won't even understand that what's happening to them is abuse - or that it is wrong.

Defining child sexual abuse: There are two different types of child sexual abuse - "contact abuse" and "non- contact abuse". Further information on each type is detailed below:

Contact abuse involves touching activities where an abuser makes physical contact with a child, including penetration. **It includes the following:**

- Sexual touching of any part of the body-whether the child's wearing clothes or not
- Rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
- Forcing or encouraging a child to take part in sexual activity
- Making a child take their clothes off, touch someone else's genitals or masturbate

Non-contact abuse involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet and flashing. **It includes the following:**

- Encouraging a child to watch or hear sexual acts
- Not taking proper measures to prevent a child being exposed to sexual activities by others
- Meeting a child following sexual grooming with the intent of abusing them
- Online abuse including making, viewing or distributing child abuse images
- Allowing someone else to make, view or distribute child abuse images showing pornography to a child
- Sexually exploiting a child for money, power or status (This is known as child exploitation and is covered in further detail later in this section).

Changes in behaviour which can **indicate** sexual abuse include:

- Staying away from certain people
- Avoiding being alone with people, such as family members or friends
- Seeming frightened of a person or a reluctance to socialise with them
- Showing sexual behaviour that's inappropriate for their age
- Becoming sexually active at a young age
- Being promiscuous
- Using sexual language or knowing information that you wouldn't expect them to
- Having physical symptoms such as anal or vaginal soreness, an unusual discharge, sexually transmitted infection (STI) and/or pregnancy.

Emotional abuse: Children who are emotionally abused suffer ongoing emotional maltreatment or emotional neglect. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development as well as causing serious harm.

Defining emotional abuse: Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child.

Physical abuse: It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them.

Defining physical abuse: Physical abuse is deliberately hurting a child and causing injuries such as bruises, broken bones, burns or cuts. There's no excuse for physically abusing a child. It causes serious, and often long-lasting, harm - and in severe cases, death. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell - this is known as fabricated or induced illness (FII).

Neglect: Neglect is the ongoing failure to meet a child's basic needs. It's dangerous and children can suffer serious and long-term harm and neglect is the most common form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents or carers. A child who is neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death. There are **four** specific types of neglect and each is listed below with further detail:

Physical neglect: This is failing to provide for a child's basic needs such as food, clothing or shelter. It is also failing to adequately supervise a child, or provide for their safety.

Educational neglect: Failing to ensure a child receives an education.

Emotional neglect: Failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, intimidating or isolating them. This form of neglect is often the most difficult to prove.

Medical neglect: Failing to provide appropriate health care, including dental care and refusal of care or ignoring medical recommendations.

Neglect can have serious and long-lasting effects. It can be anything from leaving a child home alone to the very worst cases where a child dies from malnutrition or being denied the care they need. In some cases, it can cause permanent disabilities. Neglect can be really difficult to identify, making it hard even for professionals to take early action to protect a child.

Changes in behaviour which can indicate neglect: Having one of the signs or symptoms below doesn't necessarily mean that a child is being neglected. However, if Skool Cornwall staff members ever notice multiple - or persistent - signs then it could indicate that there is a serious problem. Children who are neglected may have: Poor appearance and hygiene, health and development problems and housing and family issues.

Domestic abuse: Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. However, domestic abuse isn't just physical violence - it also includes any emotional, physical, sexual, financial or psychological abuse. It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers. Witnessing domestic abuse is also child abuse. Teenagers can also suffer domestic abuse in their relationships. Domestic abuse can seriously harm children and young people.

Defining domestic abuse: Domestic abuse can include the following:

- Sexual abuse and rape
- Punching, kicking, cutting, hitting with an object
- With holding money or preventing someone from earning money
- Not letting someone leave the house
- Reading emails, text messages or letters
- Threatening to kill or harm them, another family member or pet.

Bullying and Cyberbullying

There is clear evidence that bullying is abusive and will include at least one or more of the four core categories of abuse - sexual abuse, emotional abuse physical abuse and/or neglect. For this reason, bullying in all its forms has been included in Skool Cornwall's Child Protection & Safeguarding Policy.

Bullying and cyberbullying: Bullying can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

Defining bullying: Bullying is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. Bullying includes the following:

Verbal abuse- such as name calling and gossiping

Non-verbal abuse- such as hand signs or text messages

Emotional abuse- such as threatening, intimidating or humiliating someone

Exclusion-such as ignoring or isolating someone

Undermining- by constant criticism or spreading rumours

Controlling or manipulating someone

Physical assaults- such as hitting and pushing

Making silent, hoax or abusive calls

Online or cyber bullying- further details are provided below

Defining online or cyberbullying: Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos. Children may know who's bullying them online - as it may just be an extension of offline peer bullying they are already experiencing - or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of an individual engaging in bullying behaviour. Because cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - it can feel like there is no escape.

Cyberbullying includes the following:

- Sending threatening or abusive text messages
 - Creating and sharing embarrassing images or videos

- Trolling – which is the sending of menacing or upsetting messages on social networks, chat rooms or online games
- Excluding children from online games, activities or friendship groups
- Setting up hate sites or groups about a particular individual
- Encouraging young people to self-harm
- Voting for or against someone in an abusive poll
- Creating fake accounts, hijacking or stealing online identities - with the aim to embarrass a young person or cause trouble using their name
- Sending explicit messages- also known as sexting
- Pressuring children into sending sexual images or engaging in sexual conversations

FURTHER GUIDANCE ON SKOOL'S ONLINE CODE OF CONDUCT AND SAFEGUARDING PRACTICES CAN BE FOUND IN OUR E-SAFETY POLICY ON PAGE 24

- Bullying can also be motivated by a discrimination towards the person being bullied. Further details of these types of bullying are provided below:

Racial bullying - identified by the motivation of the bully, the language used, and/or by the fact that victims are singled out because of the colour of their skin, the way they talk, their ethnic grouping or by their religious or cultural practices

SEN & Disability bullying - this is where children are singled out because of a disability and which deaf children can be bullied more than other children with SEN's or disabilities

Sexual bullying - behaviour, which whether physical or non-physical, is based on a person's sexuality or gender; and is when sexuality or gender is used as a weapon by boys or girls towards other boys or girls. Sexual bullying is more prevalent towards girls than boys

Homophobic/Bi-phobic bullying - irrational dislike, hatred or fear of individuals that are, or are perceived to be lesbian, gay or bisexual

Transgender bullying - transgender is an umbrella term to describe people whose gender is not the same as - or does not sit comfortably with - the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, cross dresser, non- binary, gender queer.

Changes in behaviour which can indicate a child is being bullied or cyber bullied: It can be hard for adults, including parents, to know whether or not a child is being bullied. A child might not tell anyone because they're scared the bullying will get worse. They might think that they deserve to be bullied, or that it's their fault. However, the following should be looked out for by Skool Cornwall staff members and volunteers:

Belongings getting "lost" or damaged

Physical injuries - such as unexplained bruises

Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school Not doing as well at school

Asking for, or stealing, money- to give to a bully

Being nervous, losing confidence, or becoming distressed and withdrawn

Problems with eating or sleeping

Bullying others

Child sexual exploitation and child trafficking

Child sexual exploitation (CSE): Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status. Children may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children are trafficked into - or within the UK - for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Defining child sexual exploitation: Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people - or a third person or persons - receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition e.g. being persuaded to post sexual images on the Internet and via mobile phones without immediate payment or gain.

In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common. Involvement in exploitative relationships being characterised in the main by the child's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Child trafficking: Child trafficking is child abuse and is a type of abuse where children are recruited, moved or transported and then exploited, forced to work, or sold. They are often subject to multiple forms of exploitation. Children are trafficked for many reasons which include:

- Child sexual exploitation
- Forced marriage
- Domestic servitude such as cleaning, childcare, cooking
- Forced labour in factories or agriculture
- Criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another. Trafficked children experience multiple forms of abuse and neglect because physical, sexual and emotional violence are often used to control victims of trafficking. Children who are trafficked are also likely to be physically and emotionally neglected.

Defining child trafficking: The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in human beings' (Official definition of child trafficking produced by the Council of Europe and ratified by the UK government in 2008).

Female genital mutilation (FGM)

There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous - as well as being a criminal offence.

Defining female genital mutilation: Female genital mutilation is the partial or total removal of

external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or sunna.

The UK law and female genital mutilation: FGM has been a criminal offence in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. Since July 2015, anyone can apply to the court for an FGM Protection Order if they are concerned that someone is at risk of FGM. Breaching an FGM Protection Order is a criminal offence with a maximum sentence of five years' imprisonment. Since October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales.

Professionals must make a report to the Police, if, in the course of their duties:

- They are informed by a girl under the age of 18 that she has undergone an act of FGM
- They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18

Changes in behaviour which can indicate a child has undergone female genital mutilation: A girl or woman who has had FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear

Changes to look out for which may indicate a child is at risk of undergoing female genital mutilation:

A girl at immediate risk of FGM may ask a teacher, or another adult for help if she suspects FGM is going to happen, or she may run away from home or miss school. Although the girl may not know what's going to happen, she might talk about:

- Being taken 'home' to visit family
- A special occasion to 'become a woman'
- An older female relative visiting the UK

Please note: Although this Handbook is specifically concerned with child protection and safeguarding, the following is relevant to this aim:

There is no requirement for automatic referral of adult women with FGM to adult social services or the Police. Therefore, referral to the Police must not be introduced as an automatic response when identifying adult women with FGM - and each case has to therefore be individually assessed. Adult women with FGM should be supported by offering referral to community groups who can provide the appropriate support, and clinical intervention - or other services as appropriate e.g. through an NHS FGM clinic. However, the wishes of the woman concerned must be respected at all times.

Where this note becomes of relevance to Skool Cornwall's child protection and safeguarding policies is that if the woman who has undergone FGM is pregnant - then the welfare of the unborn child or others in her extended family must be considered at this point - as these children are potentially at risk of FGM also and safeguarding action must be taken accordingly.

If any Skool Cornwall staff member is in any way concerned about a girl being at risk of FGM they must immediately bring their concerns to the attention of Skool Cornwall's Designated Safeguarding Officer.

Keeping Records of concerns

Use the **Reporting Concerns about a Child Form** (available for Skool Cornwall's Designated Safeguarding Officer). The form should be signed and dated by all those involved in its completion and kept confidentially and in line with Skool Cornwall's Data Protection Policy. The name of the person making the notes should be written alongside each entry.

If an adult is accused

Skool Cornwall has developed clear policies and procedures for dealing with allegations against Skool Cornwall employees volunteers and host families) who work with children. Examples of allegations that would be covered by this policy, although no intended to be exhaustive, include:

- Behaviour that has, or may have, harmed a child
- Criminal acts against or related to a child
- Behaviour toward s a child or children in a way that indicates they may pose a risk of harm to children

Principles: In the first instance, any such allegation against an adult must be reported immediately to Skool Cornwall's Designated Safeguarding Officer.

Reporting time limits: Skool Cornwall's Designated Safeguarding Officer is accountable for contacting the Local Authority's Designated Officer and informing them of all allegations that have come to their attention **within 24 hours of the allegations being made.**

What to do if an allegation is made, or information is received: There are potentially two issues that need to be dealt with as a matter of urgency:

Is a child in immediate danger or do they need emergency medical attention?

- If a child is in immediate danger and is with you, remain with them and call the Police
- If the child is elsewhere, contact the Police and explain the situation to them
- If the child needs emergency medical attention, call an ambulance and, while you are waiting for it to arrive, get help from Skool Cornwall's first aider
- If a first aider is not available, use any first aid knowledge that you may have yourself to help the child.
- You must also contact your line manager and Skool Cornwall's Designated Safeguarding Officer to let them know what is happening
- The Skool Cornwall staff member or Skool Cornwall Director should also inform the child's family if the child is in need of emergency medical attention - and arrange to meet them at the hospital or medical centre.

The parents/carers should be informed that an incident has occurred; that the child has been injured; and that immediate steps have been taken to get help.

Is the adult at the centre of the allegation working with children now?

If this is the case, the concern needs to be discussed immediately with Skool Cornwall's Director and the Designated Safeguarding Officer. Either the Director or Designated Safeguarding Officer should then, in a sensitive manner, remove the staff member or volunteer involved in the allegation from direct contact with children.

It should then be explained to the person, in private, that there has been a complaint made against them, although the details of the complaint should not be given at this stage. The person should be informed that further information will be provided as soon as possible but that, until consultation has taken place with the relevant agencies and within the organisation, they should not be working with children. It may be best, under the circumstances, for the person to return home on the understanding that the either Skool Cornwall's Director or Designated Safeguarding Officer will telephone them later in the day.

The information provided to them at this stage will need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the Local Authority's Designated Officer, the Local Authority's Children's Social Care Department and the Police.

If the person is a member of a Trade Union or other professional organisation, they should be advised to make contact with that Body. Arrangements should also be made for the Skool Cornwall's staff member or volunteer to receive ongoing support in line with the responsibilities the organisation has towards their welfare.

Conducting an investigation:

Once any urgent necessary steps have been taken, attention can be given to dealing with the full implications of the allegations. There are up to **three** possible lines of enquiry when an allegation is made:

- A Police investigation of a possible criminal offence.
- Enquiries and an assessment by the Local Authority Children's Social Care Department about whether a child is in need of protection.
- Investigation by Skool Cornwall and possible disciplinary action being taken against the person in question. This will include implementing a plan to manage any risk posed by the individual to children connected with Skool Cornwall until the outcome of the other investigations and enquiries are known.

Taking disciplinary action: If the initial allegation does not involve a possible criminal offence, Skool Cornwall's Designated Safeguarding Officer consider whether formal disciplinary action is needed.

Dealing with a criminal offence: If there is reason to suspect that a criminal offence may have been committed (whether or not the threshold of 'significant harm' is reached), the Local Authority's Designated Officer will contact the Police and involve them in a similar strategy discussion, which will include Skool Cornwall's Designated Safeguarding Officer.

The Local Authority's Designated Safeguarding Officer - and any other representative from Skool Cornwall - will cooperate fully with any discussion involving the Police and will ask for similar cooperation from the Police in terms of the sharing of information relevant to the person's employment or volunteering with the organisation.

Discussions with the Police will also explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place - or whether disciplinary action

must wait until the criminal process is completed.

Talking to parents about the allegation or concern: If the child's parents/carers do not already know about the allegation, Skool Cornwall's Designated Safeguarding Officer and the Local Authority's Designated Officer will discuss how they should be informed and by whom.

Training

Toby Keane the Designated Safeguarding Office has advanced multi agency training (Child Protection Level 3). As such, he is responsible for providing Level 1 training to staff. Rebecca Gray has attended level 2 child protection and training. Training will be delivered to host families prior to the arrival of students, and to teaching staff upon appointment, and annually thereafter.

Online safeguarding courses are available at <https://www.virtual-college.co.uk/courses/safeguarding-courses> The in house training and safeguarding that we provide covers:

- Understanding the legislation and any specific regulations regarding safeguarding
- Skool Cornwall's procedures for responding to, reporting, recording and referral of concerns, allegations or disclosures of abuse
- The relevant process for reporting and managing allegations against staff and volunteers
- Ongoing anti-bullying support, training and guidance to be effective at preventing and responding to all forms of bullying, including racist homophobic and sexual bullying

Safer Recruitment

Skool Cornwall is committed to safer recruitment and we are committed to keeping all the children within our care, and who interact with our services, safe. Skool Cornwall is committed to equality, valuing diversity and working inclusively across all of its activities - and this applies also to the selection, recruitment and induction of new staff and volunteers. To this end, Skool Cornwall aims to have a workforce that reflects a variety of backgrounds and cultures and who can provide the relevant knowledge, abilities and skills that are required.

Our **Safer Recruitment policy and procedure** applies to any person responsible for the recruitment, selection and induction of employees, volunteers, activities providers and Host families at Skool Cornwall.

Our recruitment policy is founded upon the best person for the job principle. The purpose of this Safer Recruitment Policy is to ensure that Skool Cornwall :

- Recruits and selects the best possible people available to join and work with the business
- Takes all reasonable steps to prevent unsuitable people joining and working with the business
- Recruits, selects and manages all employees and volunteers in a way that complies with legislation designed to combat inequality and discrimination
- Does all it can to achieve and maintain a diverse workforce
- Has recruitment and selection processes that are consistent and transparent
- Assesses and judges applicants as competent before an offer of employment/ becoming a host family is made.
- Inducts properly and fully all new staff and volunteers

Skool Cornwall recognises that:

- Those that work for and with the business are its greatest asset.
- Unsuitable individuals sometimes seek out opportunities via employment and volunteering to have contact with children in order to harm them
- Some groups face unfair discrimination in the workplace
- Children, as well as their families and carers, all benefit from the organisation's efforts to recruit and select a skilled and committed workforce, drawn from a diverse range of backgrounds
- Newly recruited employees and volunteers cannot possibly perform their roles effectively unless they are inducted properly and receive on-going support and supervision as appropriate.

Single central record

Skool Cornwall will ensure it meets its legal requirements for vetting staff, and volunteers, 3rd party service providers and host families who work with children and work in Regulated Activity. To this end, Skool Cornwall will ensure its safe recruitment processes are recorded on a Single Central Record - and which will include information on DBS checks. Skool Cornwall's Single Central Record is a comprehensive record on which the safe recruitment of all Skool Cornwall staff and volunteers (who work with children) will be recorded. The details collated on Skool Cornwall's Single Central Record will include the following information relating to the staff member or volunteer:

Identity details: Including full name, full address, date of birth, date employment/volunteering commenced and ID verification details.

Role details: including job role, department and contract type.

Safe guarding qualifications: including copies of certificates and dates of safeguarding training.

Vetting details: Including dates of checks relating to DBS. We require at least one adult in host family to hold a current and in date DBS.

Right to work details: Including types of evidence used to complete the check.

YD2 self-declarations: Where these are required (whilst waiting for DBS), all staff, service providers and host families are required to complete if applicable

Referencing details: including when references were requested and received and who checked them.

Leaver details: Including dates, exit interviews and whether references have been issued.

Where an Skool Cornwall staff member or volunteer leaves the business - as a consequence of a safeguarding concern, complaint or allegation - the Single Central Record will record this event.

Skool Cornwall will always have taken advice in line with Skool Cornwall Child Protection

Procedures in these circumstances prior to this happening.

Skool Cornwall uses the Single Central Record to support its Safer Recruitment of Staff and Volunteers.

Children's welfare and Implementing Safeguarding

Use of Risk Assessments

We are committed to keeping children safe whilst they are under our care, and this is largely in an online context. To this end we practise rigorous safeguarding including up to date and clear risk assessments for online learning on the public forum, YouTube and on our social networking pages: Facebook, TikTok and Instagram.

Supervision Ratios

As we do not teach students under 18 in a physical setting, supervision ratios do not apply at Skool.

Missing Students

As we do not teach students under 18 in a physical setting, a missing student policy does not apply at Skool.

Welfare Provision

We recognise that fundamental to the successful practise of our school is the safety and well being of all the students that we teach regardless of age, culture, disability, gender, language, racial origin, religious beliefs, and/or sexual identity, have the right to be kept safe.

First Aid and Medical

There will always be a qualified first aider either delivering lessons in the classroom or on activity. We will ensure that out on activity the qualified first aider carries a fully stocked first aid kit. Upon induction both Directors are responsible for providing health and safety rules and procedures, including first aid facilities, and emergency evacuation procedures. First aid kit is located at our offices at Trenance Cottages, and in the cafe, and in the museum. If there are incidents where first aid is required, an incident report must be filled out (detailed below) and parents will be immediately informed. Should your child have a medical condition or allergy, please ensure that you have filled in the appropriate detail on our registration form, and clear instructions are given to the directors.

Behaviour and Discipline

We believe that our School offers unique experiences to young people; experiences that enable language learning, as well as being culturally rich. Our ethos is founded upon mutual respect. Our e-safety policy and guidance includes our rules on acceptable online behaviour and code of conduct for students' personal and mutual safety and well-being - this can be found on our website and for students and parents to view and agree to on our social channels.

All staff and employees will be provided with Skool Cornwall's behaviour policy, and will be expected to clearly set the right examples.

It is our responsibility to ensure children are treated fairly by all adults working with them at Skool Cornwall - and so they know what is expected of them.

Our code of behaviour for children is intended to:

- Identify acceptable behaviour for children
- Promote self-respect and self-control
- Raise children's self-esteem and self confidence
- Encourage individual responsibility for behaviour and outline the consequences of poor behaviour
- Encourage children to recognise and respect the rights of others
- Encourage cooperation at all times and in all situations
- Promote the values of honesty, fairness and respect
- Anticipate and resolve any conflict that may arise
- Ensure that children are aware of when sanctions will be put into place

Dos and don'ts:

Children are expected to:

- Co-operate with each other
- Be friendly
- Listen to each other
- Be helpful
- Follow this code of behaviour and other rules
- Stick to the e-safety agreement when using the internet, social networking sites, mobile phones etc.
- Have good manners
- Respect each other's differences
- Treat all staff and volunteers with respect

Children shouldn't:

- pick on or make fun of each other
- Bully each other
- Yell or shout at others
- Be abusive
- Use equipment to be abusive or to cyber bully e.g.by using mobile phones to send nasty messages, taking and sharing photos without permission, sending nasty emails, or 'trolling' (leaving unkind comments on a webpage, live-stream comment box or social network profile)

Fire Safety

Skool Cornwall will take all necessary steps to prevent the outbreak of fire on its premises - so far as reasonably practicable - and will put in place measures to protect all employees, volunteers and visitors in the unlikely event of a fire. Skool Cornwall's Health & Safety Officer (Toby Keane)

has overall responsibility for putting this Policy into effect, although Skool Cornwall's Directors and all employees, volunteers, children, as well as parents and carers who use its services and facilities have responsibilities for assisting in these aims too. The furtherance of effective fire safety will be achieved by Skool Cornwall:

- Ensuring that all Skool Cornwall's employees and volunteers are provided with appropriate information and instruction regarding the fire prevention measures and the emergency procedures, including any instruction required in order for them to carry out their particular role.
- Keeping employees and volunteers informed of any changes that are made to Skool Cornwall's fire safety procedures and fire safety risk assessment.
- Ensuring that all children, parents/carers and visitors to Skool Cornwall's premises are briefed on the evacuation procedures.
- Ensuring that the premises have appropriate fire-fighting equipment, detectors, alarms and emergency lighting.
- Arranging for the testing and maintenance of fire safety, electrical and gas installations and equipment.

Airport Transfers

We provide services language courses to adults throughout the year. We are frequently asked to provide advice and recommendation to all students and arrange transport solutions. We ensure that all vehicles used to transport adults that we organise possess adequate insurance, the driver a clean license and the vehicle is road-worthy.

E-SAFETY POLICY

The purpose of Skool Cornwall's e-safety policy is to:

- Protect children and young people who make use of information technology (such as mobile phones, games consoles and the Internet) as part of their involvement with the organisation.
- To provide Skool Cornwall's staff members and volunteers with the overarching principles that guide the organisations approach to e-safety.
- To ensure that, as an organisation, Skool Cornwall operates in line with its values and within the law in terms of how information technology is used.

We recognise that the use of information technology is an essential part of everyone's lives; it is involved in how Skool Cornwall as an organisation promotes itself, and gathers and stores information; as well as how we all communicate with each other.

It is also an intrinsic part of the experience of the children who visit Skool Cornwall - as they all do so online via our YouTube channel through the 'Lockdown Lessons' project or social networking pages: Facebook, TikTok and Instagram.

However, it can present challenges in terms of if it is used responsibly and - if misused either by an adult, young person or a child - can be actually or potentially harmful to them.

Skool Cornwall will seek to promote e-safety by:

- Developing a range of procedures that provide clear and specific directions to Skool Cornwall staff members and volunteers on the appropriate use of ICT
- Supporting and encouraging the children attending Skool Cornwall / Lockdown Lessons online to use the opportunities offered by mobile phone technology and the internet in a way that keeps themselves safe and shows respect for others
- Incorporating statements about safe and appropriate ICT use into the codes of conduct, both for staff members and volunteers, as well as for children
- Ensuring that any images of children and families are used only after written permission has been obtained - and then only for the purpose for which consent has been given
- Any social media tools used in the course of Skool Cornwall's work with children and families will be risk - assessed in advance by the member of Skool Cornwall staff or volunteer wishing to use them
- Providing effective management for Skool Cornwall staff and volunteers on ICT issues, through supervision, support and training
- Examining & risk assessing any emerging new technologies before they are used within the organisation

Lockdown Lessons - live-streamed content on YouTube

We understand that the use of a public forum like YouTube can expose students and adult users to specific risks and the threat of:

- Exposure to hate-speech, offensive language, bullying, or trolling
- Exposure to users who present themselves as of a comparable age, but are not who they say they are
- Unwanted contact from other users of any age
- Online grooming

Skool Cornwall seeks to mitigate these risks through the following safe-guarding practices:

1. Our lessons are live-streamed and we invite student interaction. Whilst the live-streamed lesson is running a second adult is at all times monitoring the comments to delete and block any user who breaks our code of conduct through expression of hate-speech, offensive language, bullying, or trolling - or who we believe is operating under an alias or posing as a child.
2. Our e-safety advice and code of conduct are published on our social media sites, our website and our YouTube channel: we regularly draw users' attention to this and the advice therein - and ask that students and parents adequately assess the risks involved in accessing and engaging on a social media platform or live-streaming site.

Online Safety and Code of Conduct

By accessing our live-streamed content, commenting during lessons or on posts on YouTube, Facebook, TikTok or Instagram, you are agreeing to abide by Skool's code of conduct as members of our virtual school. Users who abuse or disrespect the safe online space we seek to create will not be allowed to access it and will be reported to the platforms' moderators.

- A) **DO NOT** engage in any form of communication with another user on the platform outside of the lesson
- B) Staff will speak to students through YouTube Skool's comment function, Lockdown Lessons Facebook page, or through their professional email accounts - they should not use their personal social media accounts for communication, and should report students who seek to access them through these channels. **The email address for the Lockdown Lessons project is: lockdownlessons@skoolcornwall.com** Please do not engage with online communication with anyone who contacts you from a different account.
- C) **Inform the teachers at Skool if you are approached online by another user** - even if the communication is friendly. We can be contacted on the above email address.
- D) **NEVER share your personal details with another user** who appears on our network, or on the wider internet. Ensure your social media privacy settings are secure.
- E) Be mindful that although we seek to create a safe, online space for young people, **some users are not who they say they are. We will always monitor our students' interaction** - there is always a second adult online during lessons monitoring the comments - and swiftly block and report to YouTube users we suspect to be operating under an alias. However, keep yourself and others safe by protecting your own identity, never sharing your personal details, and informing an adult - Rebecca or Toby or your parent/carer - if you think there is a user operating under a fake identity or who has approached you privately.
- F) **Respect others:** users who employ offensive language, language that is racially motivated, inflammatory or discriminatory - or who are deemed to be bullying others - will be instantaneously blocked from commenting and possibly reported to the service's moderators.
- G) We take allegations of online bullying seriously and **will report any users we witness bullying**, or who we deem likely to have engaged in bullying, to the service. Online bullying is a crime.
- H) It is possible to watch our lessons outside of YouTube, live, through Crowdfunder if you do not accept the risks associated with this public streaming service. You can also watch these lessons after they have gone live.

Radicalisation and Extremism: PREVENT

The Prevent Duty requires specified authorities to have due regard to the need to prevent people from being drawn into terrorism. The Prevent Duty is part of the Counter-Terrorism & Security Act 2015 and commenced with effect on 1st July 2015.

The Prevent Strategy is seeking to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat that is faced from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health
- Under the Prevent Duty, all schools and childcare providers are considered specified authorities and therefore must have due regard to the need to prevent people being drawn into terrorism.
- N.B: Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The definition of extremism for the purposes of Skool Cornwall's interpretation of its responsibilities under the Prevent Duty also includes calls for the death of members of our armed forces, whether in this country or overseas.

Skool Cornwall is committed to the protection and safeguarding of all children that utilise the services it offers. As such, Skool Cornwall will have due regard to the Prevent Duty and will take the steps outlined below as part of our commitment to child protection and safeguarding.

Risk Assessment

Whilst Skool Cornwall realises that there is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology, as with managing our other safeguarding risks and responsibilities, we will be alert to changes in a child's behaviour which could indicate that they may be in need of help or protection. Skool Cornwall accepts that children at risk of radicalisation may display different signs or seek to hide their views, we will use their professional judgement in identifying children who might be at risk of radicalisation and bring any concerns they have to Skool Cornwall's Designated Safeguarding Officer -who will ensure that any action taken is proportionate.

Where it is felt that there is a concern with regard to radicalisation, then our Designated Safeguarding Officer will make the referral to the **Channel Programme**.

(The Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages).

British Values

British values will be integrated into the working practise of Skool Cornwall. These values are:

Democracy: Respect for democracy and support for participation in the democratic process

The rule of law: Respect for the basis on which the law is made and applies in England

Individual liberty: Support and respect for the liberties of all within the law

Mutual respect and tolerance of different faiths and beliefs: Support for equality of opportunity for all and respect and tolerance of different faiths and religious and other beliefs.

As a consequence of the diverse and international backgrounds that the children that access our services come from.

If a member of staff, volunteer or host family has a concern that a particular child is at risk of radicalisation, then in the first instance they should refer to Skool Cornwall's Designated Safeguarding Officer.