



Safeguarding & Child Protection Policy

2024

Contents

Contents	1
A – Policy Statements	3
A1: Context.....	3
A2: Statement of commitment & Under-18s’ entitlement.....	3
A3: Rationale & Scope of the Policy	3
A4: Definitions	3
A5: Guiding principles.....	4
A6: Relevant Legislation	4
A7: Combined Approach.....	4
A8: Main areas of Risk	4
A9: Policy review	4
B – Code of Conduct	5
B1: Overview and principles	5
B2: Being an excellent role model	5
B3: Appropriate boundaries	5
B4: Appropriate appearance	6
B5: An environment of trust.....	6
B6: Being vigilant	6
B7: Alcohol, drugs and smoking	6
B8: IT and social networks.....	6
B9: Filtering and Monitoring.....	7
B10: Transport.....	7
C – Accommodation	8
C1: Overview	8
C2: Types of accommodation for under-18s	8
C3: Requirements for under-18 accommodation.....	8
C4: Accommodation staff / Homestay hosts	9
C5: Safer recruitment & training for homestay hosts.....	9
D – Child Protection	10
D1: Overview	10
D2: Nominated / Designated person.....	10
D3: Learning of a concern, and how to respond	10
D4: Recognising symptoms of abuse	11
D5: Sources of abuse	12

D6: Online safety and Cyber bullying	12
D7: (FGM) Female genital mutilation)	13
D8: An under-18 telling an adult (handling disclosures).....	13
D9: If an child is accused.....	14
D10: If an adult is accused Keeping records	14
D11: Keeping records.....	15
D12: Communication with parents.....	15
D13: Confidentiality - Inter-Agency working and Information sharing.....	15
D14: Supply staff and Contractors	15
E – Safer Recruitment & Training.....	16
E1: Overview.....	16
E2: Recruitment materials	16
E3: Recruitment stages.....	16
E4: Information for Applicants	17
E5: Applicants awaiting DBS	17
E6: Applicants with a criminal record	17
E7: Abuse of trust	18
E8: Training – Responsibility	18
E9: How training is delivered	18
E10: Reporting to the DSL.....	18
F – Support.....	19
F1: Staff Support.....	19
F2: Student Support	19
G – Welfare / Implementing Safeguarding.....	20
G1: Use of risk assessments	20
G2: Supervision ratios.....	20
G3: Students with additional Safeguarding needs.....	21
G4: Missing students	21
G6: Welfare provision.....	22
H – Roles and responsibilities.....	23
H1: All Staff.....	23
H2: Senior Management.....	24
H3: Head of Operations	24
H4: DSL/DSO	25
H5: Homestay Recruitment Manager.....	25
H6: Homestay hosts.....	25
I – Equality Legislation.....	26
J – Associated policies and documents.....	27

A – Policy Statements

A1: Context

Britannia Student Services is a student accommodation agency providing a choice of accommodation options for students throughout London. We offer a range of accommodation types, including Halls of Residence, House / Apartment Shares and Homestays for students of all ages.

A2: Statement of commitment & Under-18s' entitlement

We are committed to fostering a warm, friendly, safe and supportive accommodation environment, safeguarding the welfare of all students in our care, regardless of their age, gender, nationality, ethnic origin, religious belief, disability or sexual orientation. We endeavour to create a company philosophy whereby a full commitment to the protection and well-being of children and vulnerable adults is promoted and respected by all our staff and host families. This policy forms the duty of care to which all adults associated with Britannia should adhere at all times.

A3: Rationale & Scope of the Policy

This policy applies to all members of the Britannia Student Services community (including staff, students, volunteers, visitors, partners) who work both inside and outside of Britannia Student Services accommodation and premises, and sets out how the company discharges its responsibilities relating to safeguarding and promoting the welfare of its customers and staff.

Other relevant policies, external links and procedures are referenced on the final page of this document.

This policy will contribute to the safeguarding of those accommodated with Britannia Student Services by:

- Providing a clear plan for the provision of safeguarding at Britannia Student Services.
- Reducing the potential risks students face of being exposed to abuse, extremism, radicalisation, exploitation or victimisation.
- Outlining responsibilities of all staff and specific roles.
- The establishment of a safe and robust safeguarding code, built on common respect, and shared values.

A4: Definitions

- Safeguarding is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes Keeping Children Safe in Education (KCSIE), 2019).
- Child Protection refers to the situation where a child is suffering significant harm, or is likely to do so, and action is required to protect that child.
- 'Children' includes everyone under the age of 18
- DSL: Designated Safeguarding Lead
- DSO: Designated Safeguarding Officer
- Looked after children: Children in care (being looked after by the local authority)
- FGM: Female Genital Mutilation

A5: Guiding principles

- Britannia Student Services recognises that the welfare of its customers is paramount.
- All staff at Britannia Student Services have a responsibility to safeguard children and young people accommodated by Britannia Student Services, irrespective of their role within the company.
- Britannia Student Services recognises its responsibility to have arrangements in place to safeguard and promote the welfare of students under 18 years of age, and vulnerable adults. This is especially important as many of its customers have the additional susceptibility of being away from their home country, culture and family.

A6: Relevant Legislation

- Children Act 1989 and 2004
- Counter Terrorism and Security Act 2015
- The Prevent Duty Guidance 2015
- Keeping Children Safe in Education (2019) is statutory guidance issued by the Department for Education which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- Working Together to Safeguard Children (2015), which sets out the multiagency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm.
- Key documentation, procedures and guidelines are detailed in the reference section on the last page of this policy.

A7: Combined Approach

- All policies which address issues of potential harm, for example anti-bullying, equal opportunities, complaints handling, positive behaviour, will be linked to ensure a combined approach.
- The safeguarding policy cannot be separated from the general philosophy of the company, which should ensure that students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.
- When concerned about the welfare of a child, staff members should always act in the best interests of the child.

A8: Main areas of Risk

The main areas of risk identified are as follows:

- Britannia Student Services staff/students suffering abuse and/or neglect.
- Britannia Student Services staff/students becoming victims of radicalisation, exploitation and/or victimisation.
- Welfare of Britannia Student Services staff/students under threat through external factors or self-harm/neglect.

A9: Policy review

This policy will be reviewed annually or as deemed necessary by the designed Safeguarding Lead (DSL) and will be agreed by all senior management. When reviewing the policy we may request feedback from relevant schools, agents, students and suppliers.

B – Code of Conduct

B1: Overview and principles

As part of our commitment to fostering a safe and supportive accommodation environment, we recognise the need to build trust between adults and under-18s. We achieve this by adhering to the following key principles:

- Being an excellent role model
- Ensuring appropriate appearance
- Recognising appropriate boundaries
- Fostering an environment of trust
- Being vigilant to under-18s' needs

B2: Being an excellent role model

When dealing with under-18s, all adults representing Britannia should conduct themselves in a manner suitable to that of an adult caring for a child, even if they are not directly responsible for them. This would include using appropriate language, acting in a socially acceptable manner and adhering to the appropriate boundaries and appearance as detailed in sections B3 & B4. Adults should endeavour to inspire under-18s with their own behaviour.

B3: Appropriate boundaries

All adults are expected to maintain professional physical and relationship boundaries at all times, and act in a manner appropriate to their duty of care.

- **Verbal interaction:** Adults should not make suggestive or inappropriate remarks, even in jest. These include sexual innuendo, swearing, discussing sex or intimate relationships, and inflammatory remarks regarding race, religion, gender or sexual orientation. Adults should also avoid shouting or raising their voice and conduct conversations in a calm and friendly manner.
- **Direct communication:** When emailing or texting under-18s, ensure that permission has been granted by the child's parent or guardian in advance, and only discuss professional matters such as booking details. Under no circumstances should adults contact under-18s privately.
- **Grooming behaviours:** Adults should be particularly aware of behaviours that could be misconstrued as "grooming". These behaviours include giving money or presents to under-18s, doing favours, and showing favouritism or acting differently towards particular under-18s. Physical contact should be avoided and should always fall within the guidelines laid out below. Be aware that some cultures may be more sensitive to certain behaviours that you may be comfortable with (for example personal space and use of language).
- **One to one situations:** Adults should avoid situations where they are alone with an under-18. If this is unavoidable, consider how this could be managed effectively, for example: leaving a door open, positioning yourself within sight of a door or window, and maintaining an adequate distance between you and the under-18. Note: Homestay hosts may find themselves in situations where they are alone with an under-18 on a more regular basis. Therefore, it is particularly important that they maintain all of the appropriate boundaries in this section at all times, in order to foster a sense of trust with the under-18 which remains even in one-to-one situations.
- **Physical contact:** Physical contact should always be avoided except in exceptional circumstances where the under-18s health, safety or wellbeing is at risk. To avoid any actions being misconstrued, adults must always make their intentions clear before taking action, and if possible obtain the under-18's consent. In addition, wherever possible, ensure that at least one other adult is present before making any physical contact.

- **Socialising:** Adults associated with Britannia (with the exception of homestay hosts) must not socialise with under-18s for reason outside of a professional itinerary. Homestay hosts may invite under-18s to participate in family social events, however one-to-one socialising should be avoided as is it could be misinterpreted by the under-18, especially where there is a language barrier.

B4: Appropriate appearance

All adults are expected to present themselves in a manner which promotes a positive and professional image. This should be appropriate to their role and the surrounding environment. Appearance should not be:

- Revealing or sexually provocative
- Offensive or likely to cause embarrassment or give rise to misunderstanding
- Displaying content which may be perceived as being politically contentious or offensive in any way

Adults should be aware that certain cultures may be more conservative with regards to appearance, and should be sympathetic to this. If staff or hosts have any uncertainty in this regard, they are encouraged to contact Britannia's head office for advice.

B5: An environment of trust

Adults are encouraged to maintain a warm and supportive attitude towards under-18s as well as each other, in order to build trust. Adults should always aim to foster an environment in which under-18s are comfortable raising issues or concerns with adults and feel that they will be listened to and taken seriously.

B6: Being vigilant

An essential part of an adult's duty of care to under-18s is to be aware of any signs of abuse, as detailed in section D4. It is important to understand that these signs may be extremely subtle, but no matter how insignificant they may seem, adults are advised to report them to the DSL as soon as possible. It is not acceptable to do nothing.

B7: Alcohol, drugs and smoking

It is not acceptable to provide an under-18 with alcohol, cigarettes, illegal drugs or other intoxicating substances under any circumstances. Over-the-counter medication such as Paracetamol may be given if needed, as long as consent has been provided by the parents or guardian, and within the guidelines of the medication. Adults should never consume illegal substances, and should avoid consumption of alcohol and cigarettes in the presence of under-18s wherever possible. Adults directly in care of under-18s (eg. hosts or group leaders) must not be intoxicated at any time.

B8: IT and social networks

Adults working with under-18s must not give them their personal email addresses or social media details, and may not add or follow them on Facebook, Twitter, Instagram or any other social media platform. Adults may email or contact under-18s on their personal email addresses or phone numbers using company addresses or phones, but only in relation to business matters. Correspondence by text message should be avoided unless it is the only suitable contact option. Language in any correspondence should always remain professional and should never include any emotive statements or icons.

If under-18s will be accessing the internet on devices owned by hosts / staff, we would advise that this is supervised wherever possible. We would also recommend a guest log-in is created for the under-18's use, with restricted permissions for adult content.

Adults may not take photographs or videos of under-18s on personal recording equipment (including smartphones), nor may they request copies of photographs or videos taken by under-18s on their own recording devices.

B9: Filtering and monitoring

- All staff should receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The DSL should take lead responsibility for understanding the filtering and monitoring systems and processes in place. Information should include appropriate filtering and monitoring on company devices and networks.

B10: Transport

Transport companies are expected to provide written confirmation that all drivers have been DBS checked at least once annually. Under-18s travelling in groups should be organised so that there is at least one adult group leader or representative present in each vehicle, in addition to the driver. For under-18s travelling alone, the transport company must provide Britannia with the driver's full name and telephone number in advance.

When collecting under-18s in the absence of an appointed representative, the driver will be issued with a confirmation, which includes the under-18's unique Britannia ID number. Before releasing an under-18 into the driver's care, the responsible adult is expected to match the ID number from the driver's confirmation with the student's confirmation. The driver's ID details should also be taken as a precaution. After reaching the destination, the driver is expected to accompany the under-18(s) until they can be handed over to the responsible adult who will be taking care of them from this point. This could include:

- **A homestay host:** In this case the driver should ask to see the host's booking confirmation and match the unique Britannia ID with the one on their transfer confirmation. They should also ask the host to produce their ID.
- **A member of check-in staff at an airport terminal:** In this case the driver would be expected to wait until the under-18 has been checked-in by the appropriate airline.

C – Accommodation

C1: Overview

As an accommodation agency, ensuring the safety of under-18s in and around our accommodation forms a key part of our Junior Safeguard Policy. Our responsibility is to ensure the safety and wellbeing of under-18s at all times whilst within the accommodation or when accompanied by the homestay host / Britannia appointed representative.

C2: Types of accommodation for under-18s

Individual under-18s will only be accommodated in specially selected homestays, however certain groups of under-18s may be accommodated in trusted hostels / halls of residence, provided that they are under the supervision of the appropriate number of group leaders (as detailed in section F2).

C3: Requirements for under-18 accommodation

In addition to our normal criteria, accommodation for under-18s must meet the following additional criteria:

- **Homestays:**

- The main caregiver will be DBS checked by Britannia, or hold a relevant, existing DBS disclosure dated within the last 2 years.
- Britannia Student Services centres have a large and ever-changing database of host families. Due to this and the fact that the family members within host families can change without prior warning, Britannia Student Services acknowledges it cannot guarantee that every adult member of every host family has been DBS checked. However, its aim is to do so and will put active measures in place to try to meet this aim. The main caregiver will sign a Junior Safeguard Declaration on behalf of all adult members of the household, declaring they have no prior criminal background.
- Britannia Student Services Homestays are required to update DBS checks every 3 years.
- Accommodation will always include at least breakfast and an evening meal. If lunch is not provided by the host, it should be arranged by the school or agent handling the booking.
- Britannia will provide hosts with curfew times in advance, and hosts will be responsible for implementing them. Curfews will be provided by the organisation responsible for the under-18, and should be age-appropriate. Curfews may be amended by Britannia's DSL if they feel that it is in the best interest of the child in question.
- The main caregiver will always be present overnight, and children under 16 years of age will be accompanied by a responsible adult at all times while at home.
- All under-18s should be provided with a 24-hour contact person outside of the accommodation, who should be acquainted with the under-18 and establish themselves as person of trust.
- In addition to the above, Britannia will provide their own 24-hour contact number to the under-18 (and their parents where possible).
- Homestay hosts will not accommodate adult guests at the same time as under-18s.
- Britannia Student Services will refer to Children's Services any private fostering arrangement.

- **Hostels / Halls of Residence:**

- Under-18s would only be placed in a hostel or hall of residence when travelling in groups.
- Under-18s will be arranged in the accommodation so that the ratio of responsible adults to children (as per section F2) is maintained.
- Under-18s will always be kept separate from adult guests, with the exception of those directly responsible for the group.
- The group organisers are responsible for ensuring that meals are arranged for under-18s staying in these types of accommodation. Britannia can arrange meal packs if requested.
- The group organisers are responsible implementing age-appropriate curfews.

- All under-18s should be provided with a 24-hour contact person outside of the accommodation, who should be acquainted with the under-18 and establish themselves as person of trust.
- In addition to the above, Britannia will provide their own 24-hour contact number to the under-18, their group organisers, and their parents where possible.

C4: Accommodation staff / Homestay hosts

All accommodation staff and homestay hosts involved with the care of under-18s are expected to know and follow the guidelines set out in this Safeguarding Policy document, with particular attention to the Code of Conduct (Section B) and Child Protection guidelines (Section D). Staff and hosts should be prepared to undergo appropriate suitability checks, such as the Disclosure and Barring Service (DBS) check. In the interests of child safety, Britannia operates a zero-tolerance policy with regard to junior safeguarding and any failure to uphold these principles will result in the immediate removal of responsibility for under-18s.

C5: Safer recruitment & training for homestay hosts

In addition to our normal recruitment criteria, homestay hosts applying to accommodate under-18s must undergo the following additional processing:

- **DBS and declaration:** The main caregiver will be required to sign the Junior Safeguard Declaration (as discussed in Section C3), as well as undertaking an enhanced DBS check, prior to accepting under-18s.
- **Proof of Identity:** Hosts will be required to provide suitable proof of their identity.
- **Junior host selection:** Hosts requesting to accommodate under-18s must have previously hosted adult students booked through Britannia for at least 6 weeks with good feedback. These hosts will be assessed for suitability by the DSL before being approved for under-18 guests. This assessment will look for levels of care above and beyond those normally required for adult students.
- **Area risk assessment:** Under-18s are only accommodated in specifically approved areas in London, which meet our requirements for safety and suitability. In addition, the location surrounding each host within an area will be risk-assessed prior to placing any under-18s there. The main focus of area risk assessment is as follows:
 - Is the walk to and from the local station safe?
 - Is there adequate street lighting?
 - Are the surrounding buildings residential, occupied and of a suitable standard of repair?
 - Are there any specific areas of concern (eg., industrial estates, cemeteries, drinking establishments, etc.), and how will these risks be managed?
- **Character reference:** Hosts will be expected to provide two reference, preferably from a professional with good personal knowledge of the host. If possible, hosts should also provide any records of feedback from previous guests.
- **Training:** Hosts will be provided with the Junior Guidelines document, as well as this Junior Safeguarding Policy. Hosts will be provided with a link to online safeguarding information so they fully understand their responsibilities and will be encouraged to call head office with any further questions.
- **Assessments:** Hosts will be reassessed every two years.

D – Child Protection

D1: Overview

Child protection is at the heart of Britannia's Junior Safeguard Policy, and is upheld in the following ways:

- **Creation:** Policies are created in accordance with guidelines from official bodies such as ChildSafe and the British Council, alongside our own experience. Policies are created by the DSL and agreed by all senior management.
- **Review:** Policies are reviewed annually, as stated in Section A.
- **Training:** All staff involved with under-18s will be given a minimum of Basic Awareness Training (Level 1 Safeguarding) and will be expected to read and understand the Junior Safeguard Policy in full. The DSLs will be trained to Level 3 Safeguarding and at least one of the DSL/DSOs will be available to offer guidance to other staff at any time.

D2: Nominated / Designated person/people

Britannia's current DSL is:

- Jools Horton-Lakins (Head of Operations) Email: jools@britanniastudents.com During office hours the DSL can be contacted on +44 (0)20 7436 7738.

Britannia's current DSOs are:

- Rita Fedon (Deputy Operations Manager) Email: rita@britanniastudents.com During office hours the DSL can be contacted on +44 (0)20 7436 7738.
- Sabine Winckler (Homestay Recruitment Manager) Email: sabine@britanniastudents.com During office hours the DSL can be contacted on +44 (0)20 7436 7738.

D3: Learning of a concern, and how to respond

The common methods by which concerns can be raised include the following:

- An under-18 discloses that they are concerned about another under-18
- An under-18 discloses an issue which concerns themselves
- A person outside the company reports a potential issue regarding an under-18
- An under-18 or adult witness behaviour by another adult which raises concern
- An adult recognises non-verbal indications of safeguarding concerns from an under-18 (as referred to in Section D4)

In the event of any concerns being raised:

- If applicable, follow the guidelines outlined in Section D5 (a child telling an adult).
- Contact the DSL/DSO as soon as possible and explain the concerns in detail
- The DSL/DSO will then advise of the next steps

It is important to follow-up on any situation, even after handing it over to the DSL/DSO, and adults should be satisfied that progress is being made in the matter. Should there be any concerns over the manner in which the DSL is handling the case, the following actions can be taken to escalate the matter:

- Report concerns to the second DSO
- Report concerns to the company directors (in accordance with the company's whistle-blowing policy)
- Report concerns to the Local Authority Designated Officer (LADO)

D4: Recognising symptoms of abuse

Abuse is defined as: “any action that intentionally harms or injures another person”.

Legally, abuse falls into four main categories: Physical, Emotional, Neglect and Sexual (PENS).

Some of the signs of abuse are included in the following table, however this information is by no means exhaustive and adults should be vigilant for any behaviour which raises concern.

Physical Abuse	
Definition Hitting; shaking; throwing; poisoning; burning / scalding; drowning; suffocation or otherwise causing physical harm.	Symptoms Unexplained injuries / burns; refusal to discuss injuries; improbable explanations for injuries; untreated injuries or lingering illness; shrinking from physical contact; fear of returning home, undressing or medical help; aggression / bullying; over-compliant behaviour or “watchful” attitude; running away; changes in behaviour without explanation.
Emotional Abuse	
Definition Persistent emotional ill-treatment so as to cause severe and adverse effects on a child’s emotional development.	Symptoms Lack of confidence; child complaining of feeling worthless, inadequate or unloved; suicidal statements; difficulty controlling emotions or outbursts; anxiousness; depression; problems sleeping or eating or changes in regular behaviour; nightmares; self-harm, drugs or alcohol.
Neglect	
Definition Persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of the child’s health or wellbeing. Failure to provide adequate food, clothing or shelter or protect the child from harm.	Symptoms Constant hunger; poor personal hygiene; inappropriate clothing; low self-esteem; poor social relationships; compulsive stealing or scrounging; frequent lateness or non-attendance of classes; untreated medical problems; constant tiredness.
Sexual Abuse	
Definition Involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware or complicit in what is happening. This may involve: physical contact (including penetrative acts); non-penetrative acts such as looking at / producing pornographic material; watching sexual activity; encouraging children to behave in sexually inappropriate ways.	Symptoms Bruises, scratches, burns or bite marks on the body; sexual awareness inappropriate to the child’s age; frequent public masturbation; attempts to teach other children about sexual activity; refusal to stay with a certain person or go to certain places; aggressiveness, anger, anxiety, tearfulness and withdrawal from friends; promiscuity or provocative sexual behaviour; self-injury or self-destructive behaviour or suicide attempts; unexplained gifts or money.
Grooming	
Definition Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked. Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person’s family or friends to make them seem trustworthy or authoritative.	Symptoms Being very secretive about how they’re spending their time, including when online having an older boyfriend or girlfriend having money or new things like clothes and mobile phones that they can’t or won’t explain underage drinking or drug taking spending more or less time online or on their devices being upset, withdrawn or distressed sexualised behaviour, language or an understanding of sex that’s not appropriate for their age spending more time away from home or going missing for periods of time. A child is unlikely to know they’ve been groomed. They might be worried or confused and less likely to speak to an adult they trust.
Up Skirting	
Definition: Up skirting is typically when a photograph is taken under a person’s clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.	Up skirting is now a form of peer-on-peer abuse and It’s a criminal offence

Serious violent crime	
All staff need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime.	<p>Symptoms</p> <p>Being very Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs Increased absence from school Change in friendship/relationships with others/groups Significant decline in performance Signs of self-harm/significant change in wellbeing Signs of assault/unexplained injuries</p>
Child Trafficking	
<p>Definition</p> <p>Trafficking is where children and young people tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children are trafficked for: sexual exploitation, benefit fraud, forced marriage, domestic slavery like cleaning, cooking and childcare, forced labour in factories or agriculture, committing crimes, like begging, theft, working on cannabis farms or moving drugs. Trafficked children experience many types of abuse and neglect. Traffickers use physical, sexual and emotional abuse as a form of control. Children and young people are also likely to be physically and emotionally neglected and may be sexually exploited.</p>	<p>Symptoms.</p> <p>Sometimes children won't understand that what's happening to them is wrong. Or they might be scared to speak out.</p> <p>It may not be obvious that a child has been trafficked but you might notice unusual or unexpected things. They might: spend a lot of time doing household chores, rarely leave their house or have no time for playing, be orphaned or living apart from their family, live in low-standard accommodation, be unsure which country, city or town they're in, can't or are reluctant to share personal information or where they live, not be registered with a school or a GP practice, have no access to their parents or guardians, be seen in inappropriate places like brothels or factories, have money or things you wouldn't expect them to, have injuries from workplace accidents, give a prepared story which is very similar to stories given by other children.</p>
Children absent from education	
	<p>Symptoms.</p> <p>Being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.</p>
Domestic abuse	
	<p>Symptoms.</p> <p>Can be psychological, physical, sexual, financial, or emotional Can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.</p>

D5: Sources of abuse

Abuse commonly occurs within a relationship of trust or responsibility. This could include friends, neighbours, family or household members, teachers, group leaders or other people in a position of trust and/or access. Abusers can be male or female and can include other young people.

D6: Online safety and Cyber bullying

Britannia Student Services is aware that the internet provides individuals access to a wide range of content, some of which may be harmful and that extremists/groomers use the internet to share messages.

Britannia Student Services is aware that individuals have access to unfiltered internet when using their mobile phones or personal devices. Britannia Student Services will alert staff and homestay hosts to the need for vigilance, especially for those students who are under 18, whilst at the same time respecting a student's right to privacy.

Britannia Student Services recognises 'Sexting' and 'Up skirting' as forms of Peer on Peer abuse and this is referenced in the Britannia Student Services Anti-Bullying policy.

D7: (FGM) Female genital mutilation

FGM is a form of harmful child abuse and is not a question of individual preference; it is an illegal practice and therefore should be taken extremely seriously. In the case of alleged or known FGM on a child (u-18 student), the following actions should be taken to escalate the matter:

- 1) Report concerns to the police via the 101 non-emergency number
- 2) Report concerns to the Britannia DSL

D8: An under-18 telling an adult (handling disclosures)

A child who is aware of abuse or is being abused will find it extremely difficult to come forward to an adult, and may fear that no one will believe them. Therefore, it is important to ensure that their concern is taken seriously and made a priority. If an under-18 asks to talk, this should be prioritised over any other matter. If a child is not given the chance to come forward with a disclosure, they may not have another opportunity or may lose the courage to do so.

When handling a disclosure, the following guidelines should be observed:

- **Just listen:** A disclosure is not an investigation. The adult should simply listen and take note of what is being said. It is important to remain calm and to accept what is being said without judgement. It is not up to the adult receiving the disclosure to determine the truth.
- **Reassure:** The child should be reassured that it was right to come forward, and that what they have said has been taken seriously. Acknowledge how difficult it must have been for them to come forward.
- **No Leading Questions:** These must be avoided at all costs. (For example: "So what you're saying is..."; "Does that mean that....?" Or "Did they do/say xxx...?") It is however acceptable to repeat the child's own words back to them for clarification, or to ask open questions (for example: "Is there anything else you would like to tell me?"). Do not assume anything, speculate or jump to conclusions.
- **No Secrets:** The adult should never promise to keep secrets during a disclosure, and should make it clear to the child that they will need to inform the DSL in order to help. However the child can be reassured that the matter will only be shared with people whose job it is to protect children, and will not be made public knowledge.
- **Taking notes:** The adult should not take notes whilst the child is making the disclosure, however they should write an account immediately afterwards. This should be as close to verbatim as possible, making use of the child's exact words. As this could form part of a legal process, paraphrasing or editing should be avoided. Do not destroy original notes as may be needed in court.
- **Date and circumstances:** In addition to the account, the adult should make a note of the date and time of the disclosure, along with a description of the circumstances of how it came about, including how the child appeared.
- **Use body map if appropriate:** If recording physical abuse, the adult should use a body map to indicate the location of marks, including the colour and nature.
- **Escalate to DSL:** The adult must report all of the above to the DSL as soon as possible. The DSL may request further details in writing.
- **Confidentiality:** It is important to keep details of disclosures confidential and share them only with the DSL. If notes are taken, ensure they are kept securely as outlined in Section D.

D9: If an adult is accused

In the event of an adult being accused of abuse or inappropriate behaviour, the DSL is responsible for the following procedure:

- 1) Establish the identity of the accused beyond reasonable doubt, and their relationship to both the accuser and Britannia.
- 2) Make contact with the LADO to seek further guidance, as well as contacting any other external organisations as appropriate.
- 3) If the accused is directly involved with Britannia (eg. a homestay host or member of staff), suspend them from current duties and ban them from all contact with the accuser, pending an investigation. This may include relocating the under-18 if the accused shares the same accommodation.
- 4) If the accused is not directly involved with Britannia (e.g. a group leader or teacher), inform their DSL, or contact an external organisation (e.g. social services, police etc.). Wherever possible, contact should be minimised between the accused and accuser.
- 5) Support the LADO and any external organisations involved in conducting a thorough investigation.
- 6) Clearly inform all relevant parties of the outcome of the investigation, and of any consequential actions taken as a result.
- 7) Ensure that all records of the investigation are up-to-date and held securely in accordance with procedures in Section D6 (keeping records).

D10: If a child is accused

In the event of a child (u-18 student) being accused of abuse or inappropriate behaviour, the DSL is responsible for the following procedure:

- 1) Establish the identity of the accused beyond reasonable doubt, and their relationship to both the accuser and Britannia.
- 2) Make contact with the LADO to seek further guidance, as well as contacting any other external organisations as appropriate.
- 3) If the accused is directly involved with Britannia (e.g. a student placed in a homestay or residence), ban them from all contact with the accuser and relocate the child if the accuser shares the same accommodation.
- 4) If the accused is not directly involved with Britannia (e.g. a friend of a student), inform their DSL, or contact an external organisation (e.g. social services, police etc.). Wherever possible, contact should be minimised between the accused and the accuser.
- 5) Support the LADO and any external organisations involved in conducting a thorough investigation.
- 6) Clearly inform all relevant parties of the outcome of the investigation, and of any consequential actions taken as a result.
- 7) Ensure that all records of the investigation are up-to-date and held securely in accordance with procedures in Section D11 (keeping records).

D11: Keeping records

- Britannia will ensure that all concerns communicated to the DSL will be acknowledged within the same working day.
- Further action will be taken as necessary within one working day, however urgent matters will be handled immediately.
- Records kept will include details of disclosures, all subsequent action taken and decisions made. They will also include details and correspondence of any parties informed. Any allegations which are later found to be false will be clearly marked as such.
- Any records regarding child safety will be held securely on the head office server, in a password-protected folder accessible only by the DSO. Access may be granted to outside agencies where appropriate.
- Records are kept indefinitely, but will be updated as appropriate to show the most recent information.

D12: Communication with parents

Wherever possible, Britannia Student Services will undertake appropriate discussion with parents unless the circumstances preclude this action.

D13: Confidentiality - Inter-Agency working and Information sharing

- Britannia Student Services understands the importance of data sharing between agencies, especially in cases of sexual exploitation, and will work in partnership with local authorities in the best interests of children.
- Information about a student will be disclosed to members of staff on a need to know basis only.
- Data protection and GDPR fears will not stand in the way of information sharing.
- To ensure confidentiality, information will only be shared appropriately.

D14: Supply staff and Contractors

- All concerns, including low level concerns, which are shared about supply staff and contractors should be notified to their employers.

E – Safer Recruitment & Training

E1: Overview

As part of Britannia's commitment to the protection and wellbeing of under-18s, all adults involved with Britannia undergo a thorough process of suitability checking as appropriate to their role and involvement with under-18s. This includes office and residence staff, homestay hosts and external service suppliers (eg. transfer companies and cleaners). This is achieved through documentation-checking, and the interview and referencing process. Britannia Student Services pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' (2019) including:

- Scrutinising applicants, including interview questioning designed to ascertain motive
- Verifying identity
- Obtaining professional and character references
- Checking previous employment history
- Ensuring that a candidate has the health and physical capacity for the job.
- Undertaking appropriate checks through the Disclosure and Barring Service (DBS) prior to employment commencing.

E2: Recruitment materials

All job descriptions contain a statement notifying applicants that they may be required to undergo an enhanced DBS check, depending on their level of contact and responsibility. Applicants may also be required to attend Basic Awareness Safeguarding (Level 1) training or higher, as appropriate. They will also be required to know and uphold the company Junior Safeguarding Policy, which is available on the company website and will be provided to successful applicants along with their offer of employment.

E3: Recruitment stages

During the interview process, applicants are informed about the company's junior safeguarding policy, as well as their responsibility to the safety and wellbeing of under-18s. They will be asked about their attitude to working with under-18s and for any previous examples of their involvement with child safety. The recruitment process will include thorough checking of references, and any gaps in CVs will need to be explained satisfactorily by the applicant.

Homestay hosts electing to accommodate under-18s will be subjected to additional checks as detailed in Section C5, over and above Britannia's normal host recruitment application process. During the assessment process, the additional responsibility for hosting under-18s will be discussed in detail with the host and their attitude to child safeguarding forms an important part of the final decision of whether or not to accept them as a junior host.

Online searches will form part of the application as part of due diligence checks on shortlisted candidates. Appropriate suitability checks (including DBS checking) will be required prior to appointment.

A curriculum vitae (CV) should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment.

E4: Information for Applicants

Any applicants for roles involving responsibility for or substantial access to under 18s will be informed of the following either prior to, or at interview stage:

- All references will be followed up, and Britannia reserves the right to ask for further references if required. Referees will be asked specifically whether there is any reason why the applicant should not be placed in situations where they have responsibility for or access to under-18s.
- Any gaps in CVs will need to be explained adequately by the applicant
- The applicant will be required to provide proof of identity as well as proof of qualifications where applicable
- Appropriate suitability checks (including DBS checking) will be required prior to appointment.
- A curriculum vitae (CV) should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment.
- Online searches will form part of the application as part of due diligence checks on shortlisted candidates.

E5: Applicants awaiting DBS

Britannia operates a no-exceptions policy with regards to suitability checking, applicants will not be allowed access to under-18s until DBS checks have been completed and returned. This would mainly concern homestay hosts but could also apply to office or residence staff if working directly with bookings relating to under-18s.

E6: Applicants with a criminal record

Although an applicant with a criminal record is not automatically considered to be unsuitable for work with under-18s, the safety and wellbeing of children is always the overriding concern when assessing their suitability. The DSL/DSO(s) and company directors will be responsible for the joint suitability assessment of applicants with a criminal record, and may seek guidance from relevant agencies as appropriate. Assessments will focus on the following categories, although these are guidelines only and each applicant would be assessed on an individual basis:

- **Nature and seriousness of offence(s):** Serious convictions for sexual, violent or drug offences would be examples of strong indicators of unsuitability for work with under-18s.
- **Nature of appointment:** The convictions should be compared to the role applied for, and assessed on this basis. For example, driving or drinking offences would be relevant for roles involving the transportation of under-18s.
- **Age of offence(s):** Convictions which occurred many years previously would not hold as much relevance as those that occurred recently, although this would apply less for serious convictions, especially those of a sexual or violent nature. An example could be an isolated dishonesty or traffic offence which occurred when the applicant was young.
- **Frequency of offence(s):** A series of offences over time would be a much stronger indicator of unsuitability than a single isolated incident.

The disclosure will also be discussed with the applicant in order to obtain a full picture of the circumstances surrounding the conviction(s), and judgement will be withheld until all possible information regarding the offence(s) has been gathered.

E7: Abuse of trust

Britannia Student Services will ensure that staff are aware that sexual relationships with students aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of trust).

E8: Training – Responsibility

Britannia will ensure that the DSL is trained to Level 3 Safeguarding standard. The DSL/DSOs are responsible for ensuring that all adults with responsibility for or access to under-18s are trained appropriately.

E9: How training is delivered

- Office and residence staff will receive appropriate Level 1 Safeguarding training from the DSL, as well as being expected to read and understand the Junior Safeguarding Policy. Refresher training will be carried out annually or as needed.
- In addition to this policy, all staff should read and understand Part One of Keeping Children Safe in Education (KCSIE) (2019).
- Whistle blowing procedures will be covered in staff training so that staff know what to do if they have concerns relating to safeguarding practice.
- All staff will be given training to help them understand their Prevent related responsibilities; the issues of radicalisation, how to recognise the signs of vulnerability and/or radicalisation and know how to report their concerns.

E10: Reporting to the DSL

- Britannia Student Services will ensure staff are made aware as part of Induction how to report safeguarding and child protection concerns to the Designated Safeguarding Lead.
- All concerns, including low level concerns, should be reported to the DSL.

F – Support

F1: Staff Support

- Details of the DSL and DSO will be made available in staff areas.
- Britannia Student Services recognises the stressful and traumatic nature of safeguarding and child protection work on staff. Britannia Student Services will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support, as appropriate.

F2: Student Support

Britannia Student Services recognises that:

- High self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect students.
- People who are abused or witness violence may:
 - Find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful.
 - Feel helplessness, humiliation and some sense of self-blame.
- Some people actually adopt abusive behaviours and that appropriate support and intervention may be required.

Therefore:

- Britannia Student Services will ensure students know there are people in the company whom they can contact if they are worried or in difficulty.
- Britannia Student Services will promote a culture where abusive/bullying behaviour is unacceptable.
- The discovery that a young person is using illegal drugs or reported evidence of drug use is not necessarily enough grounds to initiate child protection proceedings. However, Britannia Student Services will consider such action in the following situations:
 - When there is evidence or reasonable cause:
 - to believe the young person's drug misuse may cause him or her to be vulnerable to other abuse such as sexual abuse.
 - to believe the student's drug related behaviour is a result of abusing or endangering pressure or incentives from others, particularly adults.
 - Where the misuse is suspected of being prompted by serious parent/ carer drug misuse.
- Britannia Student Services has a Code of Conduct for students, explained on arrival.

G – Welfare / Implementing Safeguarding

G1: Use of risk assessments

Risk assessments are used in the following areas in order to minimise the risk of harm to under-18s:

- **Host area risk assessment:** As detailed in section C, all homestay hosts applying to accommodate under-18s must undergo an area risk assessment, which is carried out by a trained accommodation assessor. The risk assessment follows a standard questionnaire form and is reviewed by the DSO prior to accepting the host for under-18 bookings. Specific risks will be identified and strategies for their management devised as appropriate. The relevant information will then be passed to the host and added to the host profile. (For example: under-18s must not use the short cut through the park after dark)
- **Criminal record risk assessment:** As detailed in section E, any applicants with disclosures from their DBS check will undergo a risk assessment process to determine whether they will be suitable for roles with access to or responsibility for under-18s. The risk assessment will be carried out by the DSO and DSL, in consultation with the LADO where appropriate. As each assessment will be unique, there is no standard assessment form, however detailed records of the assessment process and final decisions will be kept on the applicant's personnel file, if they are subsequently accepted. Homestay hosts with disclosures from their DBS check will not be allowed to accommodate under-18s.

G2: Supervision ratios

When accepting groups of under-18s into our accommodation, Britannia requires minimum supervision ratios as follows:

- **Homestay accommodation:** 1 responsible adult per 15 children over 12 years of age; 1 responsible adult per 8 children aged 12 or under.
- **Residential accommodation:** 1 responsible adult per 20 children over 12 years of age; 1 responsible adult per 15 children aged 12 or under.

The organisation of these groups will be the responsibility of the agent or school who makes the booking, however we require confirmation of the supervision ratio before confirming the booking, and full details of the group leaders (including their contact details) before the booking commences. Bookings with insufficient supervision ratios will be cancelled unless this is rectified prior to the arrival date.

G3: Students with additional Safeguarding needs

- Students at greater risk will be regularly monitored and appropriate measures put in place to support their needs.
- Britannia Student Services welcomes and will do its best to provide appropriate support to any student with any type of disability and will advise on what level of support is possible before any decision to book accommodation is taken.
- Britannia Student Services does not consider its accommodation an ideal location for wheelchair users. However, Britannia Student Services welcomes wheelchair users if, having been advised as above they still wish to book accommodation.
- The Britannia Student Services booking team will be provided with a detailed list of centres with wheelchair access.

G4: Missing students

Homestay hosts accepting under-18's are expected to actively enforce the curfews given to them for each booking. Should an under-18 fail to return to the host by the agreed curfew time, the following procedure must be initiated:

- 1) If the under-18 is part of a group, the host should contact the group leader to find out if the group has been delayed. If the group leader is not contactable, they should call Britannia's emergency number. In the case of an individual booking, the host should contact Britannia's emergency number to report the under-18 as missing.
- 2) The emergency phone operator will attempt to contact:
 - a. The under-18 directly (where possible)
 - b. The group leader (if applicable)
 - c. The school or organisation responsible for the under-18
 - d. The appointed guardian for the under-18 (if separate to c).

The operator will attempt to establish where the under-18 is, why they have been delayed and what time they will be expected to return home. The operator will then relay this information back to the homestay host.

- 3) If the under-18's whereabouts are still unknown after following the steps above, the DSL should be contacted for further guidance. Normally the DSL will advise moving to stage 4 below:
- 4) The police should be contacted and the under-18 reported as missing. They must be given full details about the child, information about their expected route home, and any other details as requested. If this step has been reached, it is important that the school or organisation responsible for the under-18, as well as their guardian, be made aware of the situation as soon as possible. The parents of the under-18 should also be contacted.
- 5) All parties involved should coordinate fully with the police as directed to ensure the location of the under-18 as quickly as possible.

In the case of an under-18 being reported as missing during the course of their daily activities with the school or organisation responsible for them, Britannia will provide full co-operation with the organisation as necessary to ensure the location of the child as soon as possible.

G5: Preventing radicalisation and extremism

Extremism promotes actions of violence, separation and intolerance of others, by integrating fact with subjective opinion to evoke fear from lack of understanding of others ideas, views and beliefs. Forms of extremism can include extreme views on subjects such as homosexuality and animal welfare, and far right and religious extremism. People of any age, gender or cultural background can be exposed to radicalisation or extremism, and signs can include (but are not limited to):

- Changing attitude or behaviour e.g. isolating themselves or sudden narrow-mindedness toward others
- Failing standard of studies and work
- Forcefully imposing beliefs/opinions onto others
- Justifying opinions that mirror ideological extremist views and/or talking about extremist material
- Evidence of access to online extremist material
- Any student hosted by a host family that displays the above or relatable signs, should contact the Britannia DSL immediately, who will then contact the students' place of study, and any other relevant parties.
- Responsibility for ensuring the PREVENT policy is carried out lies with the Head of Operations and/or Prevent Lead Contact, whose duties are to ensure that the Britannia Student Services and its staff respond to preventing radicalisation on a day-to-day basis.

- Britannia Student Services will promote the core British values of democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs; where possible within its contact with students, through its pastoral care to students and on noticeboards in its own managed accommodation.
- Britannia Student Services will establish communication channels with the local police PREVENT and CHANNEL teams, and up to date information will be shared with all staff.
- The following steps can be taken to help prevent radicalisation and extremism:
 - 1) Promote a safe and supportive home environment, tolerant of different cultures and backgrounds
 - 2) Show sensitivity to international affairs
 - 3) Ensure a concise code of conduct for acceptable/non-acceptable in a fair and friendly manner

G6: Welfare provision

Britannia implements a range of provisions to ensure the safety and welfare of students in the company's care. These are defined as follows:

- **DSL and DSOs:** Britannia appoints at least one DSL and one DSO in order to ensure that at least one is contactable at any time. DSLs are trained to Level 3 Safeguarding standard and are responsible for the creation and review of the company's Junior Safeguarding Policy.
- **24-Hour Emergency Contact Number:** Britannia operates a 24-hour emergency contact number which is given to all under-18s, schools, agents and any other relevant parties. The DSL is also contactable at all times.
- **Junior Homestay Hosts:** Homestay hosts undergo additional processing before being allowed to accommodate under-18s. They are selected particularly for their care and attention to children.
- **Junior Safeguarding Policy:** Britannia has a detailed Junior Safeguard Policy which is reviewed regularly by the DSL. All staff and homestay hosts are expected to read, fully understand and adhere to its contents.
- **Junior Safeguarding Training:** All staff are trained to Level 1 Safeguarding standard, with refresher training annually or as required. DSLs are trained to Level 3 Safeguarding standard. DSOs are trained to Level 2 Safeguarding standard.
- **Safe Recruitment Procedures:** All staff and homestay hosts are recruited specifically with child welfare in mind, as detailed above. Recruitment includes reference and DBS checking prior to appointment.
- **Junior Guidelines:** Specific guidelines documents are given to homestay hosts accommodating under-18s, as well as under-18s themselves, which detail measures which enhance the safety and wellbeing of under-18s.
- **Risk assessment:** Risk assessments are carried out in the areas covered under Section F.
- **Transport:** Additional safeguards are put in place for transporting under-18s, as detailed in Section B.
- **Weekly U18 list:** Britannia Student Services will endeavour to produce a weekly list of all Under 18s and those with increased safeguarding needs, so that all staff are aware of who they are and can report any concerns.

H – Roles and responsibilities

The following section outlines the roles and responsibilities of all Britannia Student Services staff together with role specific responsibilities in relation to this policy.

H1: All Staff

- All staff should be aware of their duties to report and record any safeguarding or child protection concerns they may have in accordance with Britannia Student Services safeguarding and child protection procedures.
- All staff should be made aware of their responsibility to maintain confidentiality.
- All staff need to be aware of the procedures within Britannia Student Services which support safeguarding and child protection as part of the induction process but through ongoing training.
- All staff should understand and accept that they have a duty to model appropriate social behaviours and to ensure that the professional role of trust is not abused.
- All staff should be aware of the need for maintaining appropriate and professional boundaries in their relationships with students as advised within the staff Handbook.
- All staff should follow Britannia Student Services staff code of conduct as set out in the staff handbook and behaviour management policies.
- All staff should read, understand, sign and adhere to Britannia Student Services Safeguarding & Child Protection Policy, and revisit it annually or when significantly amended.
- All staff should attend Safeguarding and Prevent training.
- All staff should promote Britannia Student Services' policies and guidance.
- All staff should know the names of the DSL and DSO and how to contact them.
- All staff should read Part 1 of Keeping Children Safe in Education (2019).
- All staff should know the Britannia Student Services' procedures in order to identify students in need of early intervention/help and take appropriate action where there are concerns for the welfare and protection of children and young people.
- All staff should know what to do if a child tells them he/she is being abused or neglected.
- All staff should know how to manage the need to maintain an appropriate level of confidentiality whilst working with the designated safeguarding lead (DSL) and local authority agencies.
- All staff should know not to promise a child that they will not tell anyone about an allegation- as this may ultimately not be in the best interests of the child.
- All staff should know report concerns about a child immediately to the DSL.
- All staff should know that, if a child is in immediate danger or is at risk of harm, a referral should be made to children's social care or the police immediately.
- All staff should know signs of abuse or neglect, including Peer on Peer abuse.
- All staff should challenge and report radical or extremist views in any context.
- All staff should not allow or condone bullying and that doing so constitutes a failure of our duty of care.
- All staff should know whistleblowing procedures to the senior management team if they have concerns about safeguarding practices.
- If a staff member feels unable to raise an issue with the senior management team or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them such as the NSPCC whistleblowing helpline: 0800 028 0285 Email: help@nspcc.org.uk
- All staff should report to the DSL cases where they discover that an act of FGM appears to have been carried out.
- All staff should report concerns to the Prevent Lead/Channel referral programme if they think a student may be at risk of radicalisation or involvement in terrorism.

- All staff should report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately. Allegations or concerns about colleagues and visitors must be reported directly to the DSL.
- All staff should know that, if a concern relates to DSL it should be reported to the DSO or a senior management member responsible for safeguarding, who will liaise with the Local Authority Designated Officer (LADO) and decide on any action required.

H2: Senior Management

The Senior management team is responsible for the approval of and reviewing the effectiveness of this policy.

The Senior management team will ensure that:

- Britannia Student Services has a safeguarding policy in accordance with relevant legislation and this is reviewed annually.
- Britannia Student Services has procedures for dealing with allegations of abuse against staff.
- Britannia Student Services operates, "safer recruitment" procedures and ensures that appropriate checks are carried out on all new staff.
- Senior members of staff are appointed as the DSL and DSO who have undertaken, as a minimum, Level 3 & Level 2 safeguarding training respectively.
- DSLs & DSOs attend appropriate refresher training every two years.
- A member of the Senior management team is nominated to be responsible for liaising with the local authority and other partner agencies in the event of allegations of abuse being made against the Head of Operations/DSL.
- Regular review of the effectiveness of filters and monitoring systems is done. They should ensure that the leadership team and relevant staff are aware of and understand the systems in place, manage them effectively, and know how to escalate concerns when identified.

H3: Head of Operations

The Head of Operations will:

- Hold overall responsibility for the provision of safeguarding of staff, students and contractors.
- Ensure DSO & DSL training is updated every two years in accordance with government guidance.
- Recognise the importance of the role of the DSL & DSO and ensure s/he has the time and training to undertake her/his duties.
- Ensure the availability of the DSL (or DSO) during office hours for staff to discuss any safeguarding concerns.
- Ensure there are contingency arrangements should the DSL/DSO not be available.
- Ensure that the DSL takes advice from a child protection specialist when managing complex cases.
- Report incidents to the Senior management team, especially cases where a referral is made.
- Ensure the PREVENT policy is carried out by ensuring that staff respond to preventing radicalisation and that staff conduct is consistent with preventing radicalisation and the delivery of an effective policy.

H4: DSL/DSO

The Designated Safeguarding Lead (DSL) is a senior member of staff, who undertakes lead responsibility for safeguarding and child protection.

The Designated Safeguarding Officer (DSO) is a senior member of staff, who undertakes to assist and deputise for the DSL with the provision of safeguarding and child protection within a centre.

Though the DSL can delegate the activities of the DSL to the DSOs, the DSL remains ultimately responsible for safeguarding and child protection.

The DSL has responsibility for:

- Managing referrals to relevant agencies including:
 - **The local authority children's social care** - in cases of suspected abuse
 - **The Channel Programme** - where there is a radicalisation concern
 - **The Disclosure and Barring Service** - in cases where a person is dismissed or left due to risk/harm to a child
 - **The Police** - in cases where a crime may have been committed in relation to safeguarding.
- Undergo Training to ensure they have the knowledge required to execute the role.
- Attending child protection conferences and implement the multiagency child protection plan; and liaise with the Local Authority Designated Officer (LADO) where there are concerns about the conduct or an allegation is made against a member of staff.
- Make themselves readily available to staff to discuss any safeguarding concerns.
- Ensure Britannia Student Services' safeguarding and child protection policies are known, understood and followed.
- Manage safeguarding information through the collection, monitoring, reviewing, safe storage and transfer of safeguarding and child protection files.

A more detailed description of the role of the DSL is explained in more detail in Keeping Children Safe in Education (2019)

H5: Homestay Recruitment Manager

The Homestay Recruitment Manager has responsibility for:

- Ensuring under 18s accommodated by Britannia, are highlighted to all operations staff.
- Ensuring absences and behavioural issues with under 18s are reported to the DSL/DSO immediately and followed up on with place of study/parents/agents.
- Ensuring Safer Recruitment practices are followed in recruitment of Homestay Hosts.
- Ensuring all Homestay Hosts records and checks are completed and up to date.

H6: Homestay hosts

Homestay hosts will:

- Know the names of the DSL and DSO and how to contact them.
- Report to and work with the DSL/DSO regarding safeguarding issues and the welfare of the students residing with them.
- Report issues with under 18s to Britannia Student Services immediately. E.g. illness, absence, breaking of curfew.
- Support Britannia Student Services in promoting good practice and endorse the Safeguarding & Child Protection Policy and other relevant Britannia Student Services policies.

I – Equality legislation

The following section sets out the significance of the Equality Act 2010 to safeguarding.

I1: All Staff

All staff:

- Must not unlawfully discriminate against customers because of their protected characteristics.
- Must consider how they are supporting customers with protected characteristics.
- Must take positive action, where proportionate, to deal with the disadvantages these customers face. For example, by making reasonable adjustments for disabled customers and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

J – Associated policies, documents and links

The following section outlines associated policies, documents and links relating to this safeguarding and child protection policy.

- KCSIE 2023
- Britannia Student Services Staff Handbook
- Aggressive Behaviour Policy
- Equality Policy
- Prevent UK Policy
- Complaints procedure
- Guidelines for Homestays
- Whistleblowing
- Student Guidelines
- Weekly U18s report
- NSPCC whistleblowing helpline: 0800 028 0285 Email: help@nspcc.org.uk
- UK safer Internet Centre: www.saferinternet.org.uk
- Employer Access Team: qts.enquiries@education.gsi.gov.uk
- Safeguarding Children Boards Links: <http://www.safecic.co.uk/your-scb-acpc/55-free-downloads-and-safeguarding-links/61-safeguarding-children-board-links>