



## SAFEGUARDING POLICY

*“Children are best protected when professionals are clear about what is required of them individually, and how they need to work together.”*

(Working Together to Safeguard Children 2015/18)

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### 1. Policy Review and Availability

This policy is part of a broader suite of welfare policies and was written by Tim Scott in June 2019 and reviewed in January 2020 by Tim Scott and Charlotte Briggs. It has been updated in August 2021 by Charlotte Briggs to reflect the addition of online courses and the September 2020 update of KCSIE. It has been reviewed by Peter Etherton (in March 2023) to update our school location for summer 2023.

Feedback is collected from staff and students during and following the courses, are discussed amongst Directors and then amended, updated or improved as necessary. As a minimum, this policy will be reviewed on an annual basis and following any changes in legislation or a significant safeguarding event at one of our centres.

This policy is available on our website. The other elements of our welfare policies are available upon request.

**Date of Next Full Review:** To be completed by 30<sup>th</sup> April 2023

## 2. Context

Etherton Education will operate at Blundell's School, Tiverton during the summer August 2023. Students come for courses of 2 to 4 weeks. All students are accommodated in on-site boarding houses at each of our centres. Exceptionally we may have a group from a particular school or organisation and on very rare occasions we may arrange for students to stay in suitable vetted home-stay accommodation.

The courses running in 2023 are:

Location	Course	Ages	Length
Blundell's School	Junior Academic Course	10-12	4 weeks
	Pre-GCSE Course	13-15	
	Pre-A-Level / Pre-IB Course	15-17	

Etherton Education has previously run summer courses in Wellington School, Lord Wandsworth College, Dean Close School and Badminton School, and may operate in other schools in future years. Variables such as location, campus layout, type of course, age of students will inevitably result in differing operational procedures, but the principles laid out in this document apply wherever we operate. Details of local arrangements, including contact details appear in Appendix E.

### Statutory Framework

To safeguard and promote the welfare of children, Etherton Education will act in accordance with the relevant legislation and guidance including the following:

- The Children Act 1989 and 2004
- United Convention of the Rights of the Child 1991
- Data Protection Act
- Safeguarding Vulnerable Groups Act 2006
- The Education Act 2002 (Section 175/157) which outlines that Local Authorities and School Governing Bodies have a responsibility to "ensure that their functions relating to the conduct of school are exercised with a view to safeguarding and promoting the welfare of children who are its students"
- Keeping Children Safe in Education (DfE, September 2020)
- The Counter Terrorism and Security Act 2015 (PREVENT duty)
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Sexual violence and sexual harassment between children in schools and colleges; DfE May 2018.
- Guidance produced by The British Council and English UK

Each of Etherton Education's centres will follow the procedures for protecting children from abuse outlined by the relevant local Safeguarding Partnership.

## 3. General Statement and Aims

Etherton Education aims to ensure that all students have a positive and enjoyable experience in a safe and student-centred environment. The welfare and interests of students are top priority in all circumstances. There is a distinction between safeguarding, which is everybody's responsibility, and child protection.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing impairment of children and young people's welfare, health or development
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. In addition, Etherton Education also recognises that it has a responsibility to provide a safe working environment for staff and to protect them from unfounded allegations of abuse.

Etherton Education fully recognises and accepts its responsibilities and duty of care towards young people and vulnerable adults - regardless of age, disability, gender, racial heritage, socio-economic background, religious belief, sexual orientation or identity - for safeguarding against abuse and promoting student welfare in all of its centres. This is also the inescapable, personal and professional responsibility of all staff working for and on behalf of Etherton Education. It also recognises its duty to ensure that relevant checks are carried out on individuals who work with students and/or vulnerable adults.

Staff and students know about these policies and procedures through recruitment, induction and training procedures and also through posters and the handbooks issued to them. Failure to comply with the policies and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from Etherton Education and reporting to official agencies.

#### **4. Safeguarding Structure, Responsibilities and Training**

This Child Protection and Safeguarding Policy applies to anyone working for or on behalf of Etherton Education as we all have a responsibility to promote the welfare of all children and young people under the age of 18 years and keep them safe. Those working with children are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and develop a culture where *Safeguarding is everyone's responsibility*.

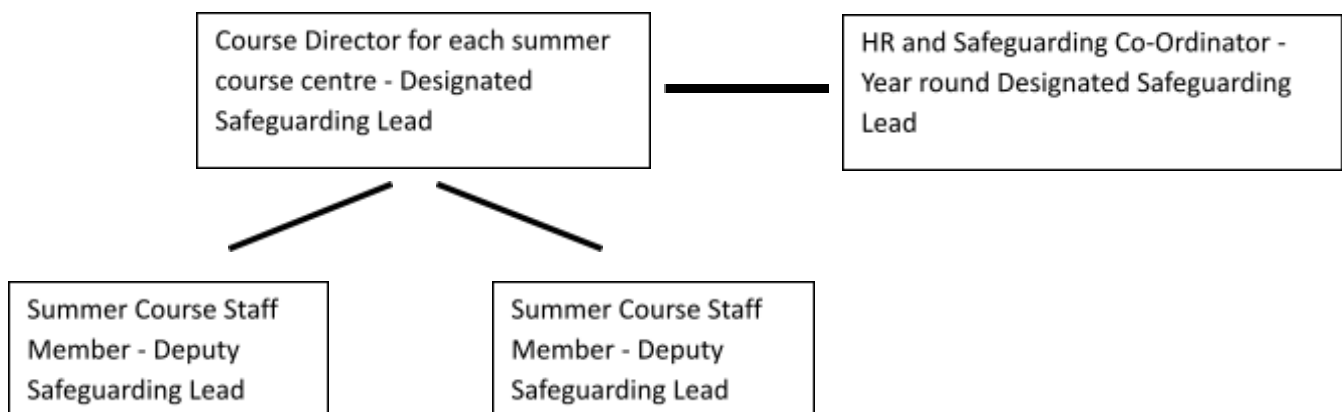
##### **Adult Responsibilities**

All adults working with students for and on behalf of Etherton Education are expected to:

- understand, support, follow and implement the Safeguarding and Welfare Policy;
- have completed Level 1 training
- have read Part 1 and Annex A of Keeping Children Safe in Education. This statutory guidance is available online. It is essential that all staff have access to this document, which provides further information on:
  - children missing from education;
  - child sexual exploitation;
  - honour based violence;

FGM mandatory reporting duty;  
 forced marriage;  
 preventing radicalisation;  
 harmful Sexual Behaviour;  
 peer on Peer abuse.  
 know who the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead are as well as all relevant outside agencies;  
 understand the rights and feelings of all students;  
 report any child protection issues to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead ;  
 always discuss or record, in writing, any misunderstanding, accidents or threats with either the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead or the Course Director;  
 be professional at all times, following the Staff Code of Conduct.

### Safeguarding Structure



#### 4.1 Summer Schools Director (SSD)

The Summer Schools Director, Peter Etherton, is the Director who has strategic oversight of all centres and recruitment of staff. He is assisted in this by other Course Directors and the HR and Safeguarding Co-Ordinator.

The Summer Schools Director is responsible for ensuring that the DSL and his or her deputy have suitable safeguarding training; there are risk assessments for all activities organised by Etherton Education that take place away from the school sites. This includes ensuring that any off-site providers have undertaken appropriate DBS checks for their staff that will have contact with students from Etherton Education; He will notify the DBS and/or any other designated authority as soon as possible when the services of a person are discontinued because he/she was considered unsuitable to work in regulated activity

As part of an annual review, the Summer Schools Director will judge the efficiency by which procedures have been implemented. Any deficiencies in Safeguarding arrangements will be remedied without delay. .

#### HR and Safeguarding Co-Ordinator

The HR and Safeguarding Co-Ordinator, based at Etherton Education's Head Offices at Marlands, will work closely with the Summer Schools Director and will undertake Specialist Safeguarding for Designated Lead (formally Level 3) and Safer Recruitment training every two years, and will work with a nominated Course Director to create a Safeguarding team. They will create and review the Safeguarding Policy and structures, liaising closely with Course Directors during the summer months.

The Safeguarding team will

- Ensure that the policy and guidelines are in place and that the role of the Designated Safeguarding Lead (DSL) is implemented
- ensure that Etherton Education's Safer Recruitment Policy is fit for purpose and regularly reviewed;
- ensure the Single Central Record is maintained accurately and safe recruitment procedures are upheld;
- that the Safeguarding and Welfare policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of Etherton Education in this.
- monitor staff safeguarding training;
- handle any allegations made against a centre's Course Director or Designated Safeguarding Lead.

#### **4.3 Course Director (CD)**

At each centre there is a Course Director, assisted by a Deputy Course Director and an Office Manager, responsible for the efficient and successful running of the centre. S/he will coordinate the work of teachers, pastoral staff, student hosts and liaise with the host institution. The Course Director will usually be qualified to TEFLq level and will, usually, be the Designated Safeguarding Lead.

#### **4.4 The Designated Safeguarding Lead (DSL) and the Deputy Designated Safeguarding Lead (DDSL)**

Etherton Education will ensure that it designates as DSL an appropriately senior member of staff to take lead responsibility for safeguarding in each centre. Usually this is the Course Director. This person will have the status, knowledge Specialist Safeguarding for Designated Lead (formally Level 3) and authority within the provision to carry out the duties of the post including committing resources and where appropriate, supporting and directing other staff.

The Deputy Designated Safeguarding Lead helps lead and co-ordinate safeguarding practice for students and vulnerable adults at a centre and will deputise for the Designated Safeguarding Lead when necessary. This person will have had at least Advanced Safeguarding for Designated Staff (formally Level 2).

During the daytime the DSL or a deputy will be available at the centre for staff or other professionals to discuss any safeguarding concerns. The Course Director/DSL or a member of staff at Marlands is available out of hours to ensure contact if needed.

#### **Responsibility of the Designated Safeguarding Lead (DSL) and Deputy DSL (DDSL) when supporting or deputising for the Designated Lead**

Manage and deliver the staff safeguarding briefings and ensure all new staff receive induction on child protection procedures, thereby ensuring each member of staff has access to and understands Etherton Education's Safeguarding and Welfare policy and procedures;

Work with relevant staff in the centre to ensure the site is safe and secure and that risk assessments are maintained, completed and implemented;

- recognise how to identify signs of abuse and know which outside agency to contact in the event of a safeguarding matter coming to his/her attention;
- act as a source of support, advice and expertise to staff on matters of safety and safeguarding when deciding whether to make a referral by liaising with relevant agencies such as the Local Authority Children's Services (Safeguarding and Specialist Services) and/or Police (cases where a crime may have been committed) or to the Channel programme where there is a radicalisation concern;
- liaise with the Summer Schools' Director and the HR and Safeguarding Co-Ordinator to inform them of any specific issues - especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations or Section 42 where adults are concerned;
- ensure recording child safeguarding and child protection files are correctly drawn up with effective chronologies and regularly reviewed to scrutinise any patterns or drift/outstanding actions;
- take responsibility for procedures and referrals, ensuring that appropriate information is available at the time of referral and that the referral is confirmed in writing under confidential cover and act as a focal point for liaison with authorised agencies;
- monitor and evaluate the effectiveness of the Course's Safeguarding and Welfare policy.

## 5. Code of Conduct

The Staff Code of Conduct outlines how all staff at Etherton Education are expected to behave, including any group leaders. It is included in the staff handbooks for teachers and Student Hosts.

Cordial relations between teaching staff and students are at the heart of a safe, happy and thriving summer course. At the same time, in the interests of all parties, professional boundaries must be observed on all occasions. Staff are advised to maintain an attitude of *'it could happen here'* where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and maintain a culture where *Safeguarding is everyone's responsibility*.

Our Code of Conduct:

- assists staff working with students and young people in working safely and responsibly and monitors their own standards and practice;
- sets clear expectations of behaviour and codes of practice relevant to the role;
- gives a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken.

Since Etherton Education began taking Online Courses a specific Code of Conduct has been created for the Online Course.

### **1 Position of Trust**

All people working with students or young people are in positions of trust. Therefore, all staff should be aware that a relationship between a member of staff and a child or young person cannot be a relationship between equals as there is potential for exploitation and harm of vulnerable young people and adults.

Where a person aged 18 or over is in a specified position of trust with a child aged under 18, it is an offence for that person to engage in sexual activity of any sort (even touching, kissing etc.) with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity (Sexual Offences Act 2003).

This applies to all staff, teachers, Student Hosts, group leaders and drivers etc. who are in contact with under-18s.

## **2 Setting Standards**

To secure an environment in which everyone is able to flourish, Etherton Education promotes inclusivity and values diversity.

All staff should be a good role model by treating students in a humane and understanding way through establishing practices in their lessons, clubs, boarding houses, etc. which promote mutual respect between all people present and minimise the likelihood of abuse. This includes informing students that tolerance and respect for other students and adults is expected at all times.

Irrespective of job title, all staff should be polite, helpful and professional towards each other, even on occasions when there may be differences of opinion or challenge. They should follow all reasonable rules and instructions given by those supervising or managing their activities and/or work.

## **3 Interaction with Students and Under 18's**

All students and young people have a right to be treated with respect and dignity even if they display difficult or challenging behaviour. We do this through adopting a positive approach.

Key elements of this are

- setting clear expectations of good behaviour from the outset and adopting a consistent, firm and fair approach to discipline as set down in our behaviour policy;
- recognising, praising, and rewarding achievement and good behaviour and attempting to praise and reward three times more often than criticising and punishing;
- explaining why an action is wrong or unacceptable thereby separating the person from the action

All staff should be approachable and available to pupils as much as they can whilst also maintaining authority and a proper professional distance.

It is important to establish clear guidelines and parameters in discussions with students on sensitive matters. Staff should listen to what students have to say and be prepared to set aside time for this if necessary. A member of staff should never promise absolute confidentiality to a student however, as there may be occasions when information must be passed on.

Individual or small group tutorials should be carried out in an open manner and in places that are frequently passed by other people or in a room with a door open.

Meeting a student for social purposes – beyond events organised by the school – is inappropriate. This includes contact via social media, staff should not accept friend or follow requests for Facebook, Instagram, Twitter etc.

Physical contact should take place only when it is necessary and with consent where possible in such situations as:

- during certain activities such as sports or drama, for example to demonstrate or assist,
- for restraint and physical intervention in order to prevent immediate harm,
- for medical treatment and first aid.

Staff should never:

- use physical force as a means of punishment and discipline;
- touch a child in a way which may be considered indecent.

Please note that all discussion of politics should be avoided. Do not criticise the leaders, laws or actions of any country, whatever your personal feelings. Do not allow students to raise political issues. Do not use the course to put forward your own political or religious views. This is a potentially dangerous area and any infringement of this rule could affect our students and our company's reputation. We will therefore regard any infringement of this rule as potential gross misconduct.

Staff should be sensitive about passing negative or unfavourable opinions about a student's choice of next school. If there is a genuine concern about a student's next school, this should be passed to the Course Director.

#### **4 Attendance and Timekeeping**

All staff are expected to be punctual. Should a member of staff need to be absent they should ask their Course Director in advance. If they are unwell or expect to be late for any reason, they should phone the Course Director or Office Manager at the earliest opportunity.

#### **5 Appropriate Appearance**

Staff should dress in ways which are appropriate to their professional role with students. Student Hosts should wear the company t-shirts provided. Protective clothing should be worn in laboratories and in other necessary situations.

Staff and students should wear clothing that:

- is culturally sensitive and does not distract or cause embarrassment;
- cannot be viewed as offensive, revealing or sexually provocative;
- cannot be considered discriminatory (for example, through the attitude expressed on a printed slogan).

All staff must wear an Etherton Education identification lanyard or badge and carry their access pass if relevant.

#### **6 Alcohol, Drugs, Smoking and Gambling**

Smoking, including vaping, is banned across our school campuses.

Staff must not drink alcohol during the normal school working day nor should they drink alcohol with students outside of these hours. Staff may drink in moderation during approved occasions, such as Formal Dinners.

Staff should not take non-medically prescribed drugs.



Under no circumstances should staff buy tobacco or vaping products, alcohol, or illegal substances for students. To do so is likely to be regarded as gross misconduct resulting in dismissal.

Gambling activities must not be conducted on school premises, although the Course Director may allow some discretion in relation to small raffles for charitable purposes.

## **7 Use of Technology, Photography and Social Media**

All staff should adhere to the ICT Acceptable Usage Policy and promote students' safe and respectful behaviour online.

Professional boundaries should be maintained by staff while communicating with each other and with students. This includes the use of technology such as mobile phones, text messaging, e-mails, social media, digital cameras, videos, webcams, websites and blogs. Staff should ensure that all communications are transparent and open to scrutiny.

Photographs will only be taken of students with their parents' permission (provided in writing via a consent form) and also with the student's agreement. Staff should not use their own phone or camera to take photographs of students without permission from the Course Director. Staff must not store images or videos of students on their personal equipment.

## **8 Accommodation**

In students' dormitories and bathrooms, staff should ensure that their behaviour is appropriate and respectful. They should follow the guidance provided in the Boarding and Student Host Handbooks.

Students should not visit staff accommodation.

## **9 Transport**

When using taxi/coach companies, we require written confirmation that they use drivers who have been properly DBS checked.

Staff should not transport students in their own vehicles, except when they have agreed to do so for such things as taking students to medical appointments. Staff doing this should be over 25, should have held a full driving licence for over two years and should not have more than 6 points on their licence. The car should be comprehensively insured and the insurance company aware of this type of usage. The car should be clean and in a roadworthy condition. The student should sit in the back of the vehicle. Ideally there should also be a non-driving adult escort.

## **10 Favouritism and Gifts**

In order to promote good relations between staff and students, staff should not have favourites. If staff have favourites, others feel left out; it also betrays a lack of professionalism which may be perceived as 'grooming'. Staff should therefore not give gifts to students (unless these are inexpensive rewards that are part of usual classroom procedure – stickers, for example).

Staff should not accept gifts from parents or students unless they are inexpensive tokens. These should be declared to the Course Director who should also be consulted if staff are unclear about what might be acceptable.

## **11 Whistleblowing**

No member of the staff will suffer detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the confidential reporting procedures.

If the member of staff reporting suspicions remains unsatisfied by a decision not to act by the Course Director and/or the Designated Safeguarding Lead, he or she may, as a responsible citizen, report concerns directly to the relevant authorities. (See Whistleblowing Policy).

The NSPCC whistleblowing helpline is available for those who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285, or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Staff can also contact the Safeguarding Children Partnership which is local to their course if they have concerns about a child and/or concerns about a response by Designated staff. (Safeguarding Children Partnerships replaced Local Authority Safeguarding Children Boards in 2019)

## **12 Allegations against a Member of Staff**

An allegation is any information which indicates that a member of staff/volunteer may have:

- behaved in a way that has, or may have harmed a child;
- possibly committed a criminal offence against/related to a child;
- behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children.

This applies to any child the member of staff/volunteer has contact with, in their personal, professional or community life.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or education setting's safeguarding arrangements.

If staff members have concerns about another staff member then this should be referred to the DSL. Where there are concerns about the DSL or Course Director, these should be referred to the HR and Safeguarding Co-Ordinator.

## **13 Use of Etherton Education equipment for non-work purposes.**

Etherton Education will allow employees reasonable use of its equipment and facilities, provided authorisation has been obtained from the Course Director, that the use does not interfere or conflict with the work of Etherton Education, and that any costs are met by the individual.

Employees may use School telephone facilities to make occasional private calls for essential or emergency matters. Private international calls are not permitted without prior authorisation by the Course Director.

## **14 Conduct outside Work**

Etherton Education does not seek to dictate how employees conduct themselves in their personal lives outside of work. However, conduct by employees that may jeopardise Etherton Education's

reputation or work will be dealt with through its disciplinary procedures. In particular, a member of staff accused of a criminal offence is expected to inform Etherton Education at the earliest opportunity and failure to do so may be a disciplinary offence.

### **Etherton Online Code of Conduct**

As well as a specific Staff Code of Conduct for Online courses, students are also asked to sign to say that they agree to a Student Code of Conduct, plus there is additional guidance for parents. The Student and Staff Codes of Conduct can be found in the Appendices.

## **6. Implementing Safeguarding**

### **6.1 Risk Assessments**

A risk assessment must be carried out prior to any planned or organised activity that is being co-ordinated specifically for under 18s, including all external trips and activities.

It is the responsibility of the Course Director to ensure that all appropriate risk assessments are in place for any activity, event or trip. The person organising the activity, event or trip must ensure that the students and those supervising them are thoroughly briefed to ensure the safety of all participants. A copy of all risk assessments should be kept in each centre's summer school office. This should include necessary contact details of those organising the activity or trip.

### **6.2 Levels/ratios of Supervision**

#### **Classrooms/Lessons**

Our maximum class size is 1:16.

#### **Sporting Activities**

In sporting activities the safety of the students and staff is paramount. In sports such as soccer, touch rugby, hockey, tennis etc. students are supervised with a ratio of no more than 1:20.

To be safe and effective in potentially more dangerous activities such as trampolining, fencing, archery etc. we maintain a ratio of 1:12 .

#### **Swimming**

Students may not use a swimming pool unless a qualified lifeguard is present in addition to other responsible adults. A person may not swim in the pool on his/her own. Etherton Education employs qualified lifeguards as and when required. Again ratios of 1:20 would be regarded as the maximum. On trips to the seaside, a lifeguard is taken if there is the possibility of students being allowed to swim in the sea.

#### **External Trips**

On our external trips we always have a ratio of at least 1:10. Each trip will be led by a senior member of staff.

#### **Sunday Clubs**

These are all small-group activities where the ration will not be in excess of 1:20.

### **Mixed Groups**

Where there are activities or trips involving groups which include a mixture of boys and girls, we ensure that both genders are represented in those who are supervising and/or leading.

### **Supervised and Unsupervised Time**

As also specified in our Consent Form, students will have the following supervised and unsupervised time:

- Students aged 7-10 will always be supervised at all times
- Students aged 10-14 will always be supervised on trips and in towns
- Students aged 11-17 will have limited unsupervised time on the school campus in specified areas
- Students aged 15-17 will have limited unsupervised time for shopping in groups of three or more, in specified areas on trips and in local shops

### **Boarding House Accommodation**

Students stay in boarding houses at each of our centres. We always have at least two members of staff on duty in each boarding house. As a minimum, we maintain a ratio of 1:20 for 12-17 year olds and 1:15 for students aged under 12.

### **6.3 Missing Students**

During the day, all staff should immediately report any student's absence to the Office Manager in the first instance. If they do not know the student's whereabouts they should immediately inform the Course Director or the Assistant Course Director. An unexplained absence may arise when a student does not attend lessons, meals, games or Activities.

If a student is missing after the teaching day during a time when house staff are in charge, there is a step-by-step procedure to be followed and documented. This is in the Boarding Handbook.

### **6.4 Complaints**

Where a student has a complaint about some aspect of their course with Etherton Education, we encourage them to raise this through the Complaints Procedure.

This is as it appears in the Student Handbook:

*As a student with Etherton Education you can expect action if you are not satisfied with the teaching or any other service we provide.*

*We think that reasonable complaints are a good thing as they can help us to improve what we do.*

#### **What you should do**

*If you are not satisfied with something to do with your course, please let us know. The sooner you do this, the earlier we can take action to sort out any difficulties you have.*

*You can do this by speaking to your house person, your teachers, the student hosts or the administrative staff in the Etherton Education office.*

*You don't have to be on your own when you do this. Do bring a friend to help you to explain your problem, someone to support you.*

*You may find it easier to write down what you want to say beforehand. This will save time and make it easier for you and also for us.*

#### **What we will do.**

*We will listen respectfully to your concerns and may ask some questions so that we understand why you are not happy.*

*We will write down what you tell us. Then we will try to solve the problem. In most cases the problem can be solved quickly and easily.*

*In those cases where the problem is more difficult, we will tell the Course Director of your concerns and he or she may want to talk to you as well. Again, you can bring your friend to help you with this interview.*

*It is not easy to solve big problems immediately, so we may need time to do this. We may need to speak to your parents, guardian or the school you will be going to after the course here. We may need to speak to other students and adults.*

*We will try to keep you fully informed about how we are dealing with your complaint. You can come to the Etherton Education office at any time to ask about what is happening.*

***What will happen eventually.***

*The problem will be solved. If it was a small problem, nothing more will need to be done.*

*If it was a big problem, we will write an account of the steps we have taken to resolve it.*

***What happens if you are still not happy.***

*You may wish to talk to your parent or guardian about this. They can contact Mr Etherton and he will try to sort out the problem. If you are still not happy after that, your parents or guardian may wish to contact The British Council. This is what they say:*

*If you have made your complaint to the centre and it has not been resolved, please send us:*

- *a written complaint from the student (or parent/ guardian in the case of a child). If it is not in English, it must have at least the main points translated into English.*
- *details of how the student/ parent/ agent (acting for the student) has already tried to resolve the problem with the centre directly. If so, we also require the response he or she has received.*

*Post or email your complaints to: British Council, Accreditation Unit, Bridgewater House, 58 Whitworth Street, Manchester M1 6BB, UK, [accreditation.unit@britishcouncil.org](mailto:accreditation.unit@britishcouncil.org)*

## **6.5 Accommodation**

Our students stay in boarding accommodation which is organised in single sex houses. Only in exceptional circumstances students may stay in Homestay Accommodation. Care is taken to ensure that students are lodged with other students of similar age. The students are supervised by dedicated house staff.

### **Homestay**

In exceptional cases we have students in Homestay Accommodation. Where this is the case the prospective host (main carer) and all other residents aged 16 or over will be DBS checked. Two references will also be requested. They are informed in writing that these checks will be required. In homestay accommodation, consideration is given to the age and sex of the students and the structure of the host family.

Guidance is given to ensure that matters of privacy and dignity are fully understood by host families and boarding staff.

If parents/agents organise private accommodation for under-18s, Etherton Education reserves the right not to agree to this if the location or premises are unsuitable

If parents of students request that their child has time away from the course either in the day or overnight (for example to make arrangements or preparations for future schools, see family etc) then Etherton Education will ensure that there is specific parental consent. Etherton Education will insist on being provided with details of where the student is staying, with whom and their contact details.

## **6.6 First Aid and Medical**

At the point of enrollment, all parents/guardians must provide full and accurate medical information including any conditions that the student may have and all medications that are taken. They must also sign the consent form to consent to permission for emergency medical treatment to be given.

On arrival, through the Induction process, it is explained to students that they are not able to self-medicate. They must hand in medication to the designated member of staff at each site.

All staff are expected to complete online first aid training. In addition, Etherton Education arranges for some staff to have further and more detailed appropriate training. Each centre will have lists of more highly trained staff displayed on staff and office notice boards and circulated to staff in various ways including via email and displayed on notice boards. In each centre there will be staff competent to issue basic medicine such as paracetamol.

During office hours there are 1<sup>st</sup> Aid trained staff to assist ill or injured staff and students and to arrange for medical treatment if necessary. After office hours, students can contact their houseparent or house tutor if they feel ill and can be transported to the local hospital if it is felt necessary.

In each centre, the office has a list of all students and any health issues. Adult leaders of trips must make themselves aware of these issues when organizing trips.

There are first-aid packs available in each office and there will be one of these on each bus on day trips. A member of the Office staff in each school has the responsibility of keeping them stocked.

If an accident happens the member of staff present has to make a decision whether to call for assistance. If the student has any pre-existing health conditions the staff member must inform any paramedics or emergency doctors of these and medications being taken. If the student has to attend hospital any medications that they are taking should also be taken with them.

Details of all accidents/incidents and near-misses must be recorded in the Accident Book and the Daily Log Book at each centre.

### **Illness**

Students who are unwell and therefore staying in bed during lesson times will be monitored during the day to check on their condition and to make sure they are taking the relevant medicine and/or are having meals and regular drinks/fluids.

If staff are concerned about a student's illness they should contact the NHS 111 service for advice in the first instance. If a student needs to attend a GP or the hospital they should be accompanied by a member of staff in a taxi.

Details of a student's illness should be recorded and this should be placed in the student's file.

## **6.7 Behaviour and Discipline**

We are committed to the establishment and maintenance of good behaviour through adopting a positive approach.

Key elements of this are:

- setting clear expectations of good behaviour from the outset and adopting a consistent, firm and fair approach to discipline
- recognising, praising, and rewarding achievement and good behaviour and attempting to

- praise and reward three times more often than criticising and punishing
- explaining why an action is wrong or unacceptable thereby separating the student from the behaviour or action

All staff have the responsibility to help maintain discipline around the school.

### **Course rules for students**

Staff should be familiar with these rules and report any student who breaks the rules to the Course Director.

*Etherton Education Ltd reserves the right to refuse or remove any student from the course who is disruptive through unacceptable behaviour or who breaks the course Rules. Fees will not be refunded.*

1. *All students will be subject to the Course Rules. In particular, they will be expected to attend all meals, tuition, and arranged activities and excursions.*
2. *Students will be responsible for keeping their own rooms tidy.*
3. *All damage to property, equipment and rooms will be charged to the students.*
4. *Consumption of alcohol by students is not permitted. (Note: it is against the law in Britain for persons under the age of 18 to purchase alcohol and most shops will not sell alcohol to people who seem to be under 21 and in some cases under 25). Alcohol must not be brought to the School premises by students of any age.*
5. *Drug-taking or suspicion of drug-taking of any kind may result in immediate dismissal.*
6. *Smoking is not permitted in school premises at any time. The law in the UK forbids smoking in all buildings throughout the country.*
7. *Girls and boys may not enter each other's houses or bedrooms or other designated areas.*
8. *Students will be required to be in their rooms and to maintain silence/be quiet at certain times prescribed.*
9. *Bullying will not be tolerated and may, at the discretion of the Course Director, result in dismissal from the course.*
10. *Students will be expected to show courtesy to all course staff and domestic staff, and to behave in a civilized and respectful manner off and on the campus.*
11. *Students will abide by the Acceptable Usage Policy for computers and mobile phone and will not be permitted to play computer and video games during this course, except with the permission of the Director and at certain specified times.*

*Students breaking any of the rules of the course may be dismissed within 24 hours at their own expense and without refund.*

Parents accept these terms before their son/daughter is accepted onto the course.

There is a list of school rules in the **Students Handbook and on the Etherton Education website.**

### **Rewards and sanctions**

Possible Rewards include:

- praise – privately given or at an assembly
- a commendation/small reward
- informing the Director who may write to the student's parents, guardians or agents.

Possible Sanctions are:

- mild or moderate verbal reprimand or warning
- students may be sent to sit outside the room.
- students may be sent to explain their behaviour to the Director.
- students may be asked to do extra (but productive) work.

- students may miss sport, social activities, clubs or trips.
- the Director may write to the student's parents, guardians or agents.
- the student may be suspended or expelled from the course.

Boot camp style physical punishments must not be used. Likewise, unproductive sanctions – such as lines and the use of educational activities, such as essay writing – should also not be used. Sanctions where necessary should be used in a proportionate fashion that 'fits the crime'. The chart below is intended to provide helpful guidance



## Levels of Intervention

	BEHAVIOUR	POSSIBLE RESPONSE
1 Student Host/ Teacher	<ul style="list-style-type: none"> <li>Generally low level poor behaviour around school or in class</li> <li>Lateness, failure to bring correct books or equipment, no prep</li> <li>Silly, anti social behaviour in the house areas, classroom etc.</li> </ul>	<ul style="list-style-type: none"> <li>Reprimand; warning of impact on grades</li> <li>Temporary removal from lesson/activity</li> <li>The teacher should consider other ways in which to encourage good behaviour such as a seating plan for students or giving certain pupils positive attention when they come in to the lesson; the teacher should seek assistance from senior colleagues.</li> </ul>
2 Teacher/House Staff	<ul style="list-style-type: none"> <li>Persistent low level behaviour (as described above)</li> <li>A significantly disruptive or anti social act such as rudeness, swearing</li> <li>Abuse of facilities/ICT suite etc.</li> </ul>	<ul style="list-style-type: none"> <li>Teacher reports L2 to School Office. (Deputy Director; House Staff informed).</li> <li>Three L2s in a week reported to Deputy Director/Office Manager within a week will result in a detention or loss of privileges/breaktime</li> </ul>
3 Course Director Or Deputy Course Director	<ul style="list-style-type: none"> <li>Failure to attend lessons</li> <li>Persistent significantly disruptive behaviour (as described above)</li> <li>a serious breach of school rules e.g. fighting, assault, rudeness to staff, vandalism, bullying, racist behaviour, theft</li> </ul>	<ul style="list-style-type: none"> <li>Reported to House Staff with referral to Course Director or his Deputy</li> <li>Pupil is interviewed by Course Director or his Deputy</li> <li>Telephone call to guardian and details of sanction to parents with copy on file from Summer Schools Director</li> <li>Pupil placed on report</li> <li>Written warning as to further conduct (Summer Schools' Director informed/consulted)</li> <li>Involvement with Pastoral staff to draw up an Individual Behaviour Plan</li> </ul>
4 Course Director	<ul style="list-style-type: none"> <li>Continued significantly disruptive behaviour</li> <li>Extremely serious conduct such as violent/dangerous conduct, consumption of alcohol, smoking, selling or using illegal drugs, systematic theft, persistent bullying, criminal offences</li> </ul>	<ul style="list-style-type: none"> <li>Reported to Course Director</li> <li>Pupil is formally interviewed by Course Director</li> <li>Internal exclusion from classes/activities</li> <li>Guardian interview with Course Director or Summer Schools' Director</li> <li>Formal contract. Guardian informed of the terms of this, understanding that a further offence will result in suspension or exclusion from the course</li> <li>Suspension/withdrawal/exclusion from the course</li> </ul>
5 Summer Schools' Director	<ul style="list-style-type: none"> <li>Extremely serious conduct such as violent/dangerous conduct, consumption of alcohol, smoking, selling or using illegal drugs, systematic theft, persistent bullying, criminal offences, sexually inappropriate conduct</li> </ul>	<ul style="list-style-type: none"> <li>Pupil is formally interviewed by Course Director</li> <li>Course Director reports to Summer Schools' Director</li> <li>Guardian interview with Course Director or Summer Schools' Director</li> <li>Suspension/withdrawal/exclusion from the course</li> </ul>

## **6.8 Fire Safety**

Working in liaison with the host schools, Etherton Education ensures that risks from fire are identified and that arrangements are in place to control those risks. It also complies with its duties under the Regulatory Reform (Fire Safety) Order 2005 and other education specific guidance. Through regular fire drills and the house system, students and staff are taught what action to take in an emergency. All fire drills are recorded.

## **6.9 Airport Transfers**

To ensure that students arrive at school and also leave safely, Etherton Education arranges airport transfers at the beginning and end of courses from and to the main London airports Heathrow and Gatwick, and some regional airports such as Bristol. Usually this is by coach or minibus, driven by DBS checked staff. Staff, including student hosts, are given training in ensuring that students are looked after and assisted.

If a student needs to travel to and from an airport at any other time, Etherton Education liaises with parents and/or guardians to ensure safe transport. Any vehicles arranged by Etherton Education to transport a student will have drivers who have been appropriately DBS checked.

In the case of flights being delayed, staff will either wait for or with the student to ensure their safety. Staff at the airport will liaise with the relevant Course Director so that they are aware and so that the staff member and student (if applicable) is able to return to the course safely.

## **6.10 Tier 4 Compliance**

Etherton Education has appropriate protocols to ensure that Tier 4 compliance is maintained for both students and partner schools where appropriate.

## **6.11 Parental Consent**

Etherton Education provides clear information about its courses and how the welfare of students is promoted. It does this through its publicity materials and website. Its agreements with parents and representatives obtain necessary consents, for example for medical treatment.

## **6.12 Emergencies and Emergency Contacts for Children**

Etherton Education has a set of protocols and guidance for staff so that they can respond calmly and effectively in emergencies. There is a lockdown procedure should there need arise.

Keeping Children Safe in Education (2018) says that provisions should have at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at the home. Etherton Education will endeavour to maintain at least two contact numbers for every child on roll.

## **6.13 Provision for More Vulnerable Students**

Etherton Education is aware that some students, including disabled students and young people or those from ethnic minority communities, can be particularly vulnerable to abuse and accepts the responsibility to take reasonable and appropriate steps to ensure their welfare, subject to the school accepting the enrolment. This might include a greater availability of mentoring and support.

## **6.14 Mental and Emotional Health of Children**

It is widely recognised that a child's emotional health and wellbeing influences their cognitive development and learning as well as their physical and social health and their mental wellbeing in adulthood. Etherton Education will offer clear support and guidance for Children.

### **6.15 Private Fostering**

Where private fostering takes place (students aged under 16 and living with a family that is not his/her immediate family for more than 27 nights) Etherton Education will liaise with the local authority six weeks prior to the arrangement starting or as soon as identified.

### **6.16 Corporal Punishment**

Corporal punishment or the threat of corporal punishment is forbidden and will never be deemed acceptable by Etherton Education.

### **6.17 Contextual Safeguarding**

Risk assessments, ensuring appropriate supervision and the issuing of emergency contact details, together with many of the actions outlined above, are some of the ways in which students are safeguarded off campus.

## **7. Safer Recruitment**

Etherton Education pays due regard to its legal obligations in respect to the recruitment and selection of staff. Its primary aims are to safeguard the young people in its care and to recruit and retain staff of the highest professional standards in all sections of the workforce.

Any advertisement makes clear Etherton Education's commitment to safeguarding and promoting the welfare of children and expects that applicants will actively share in this. Etherton Education will ensure that there are appropriate staff with safer recruitment training for interviews and that safer recruitment practices are always followed.

All staff who work in "regulated activity" with students will be subject to a DBS check and encouraged to register with the Update Service. If applicants are already registered then they are asked to show their original certificate and their status is checked. Occasionally a delay in receiving a DBS check means that a member of staff is able to begin employment, but under appropriate supervision and with risk assessed safeguards in place. If applicants have lived and/or worked abroad they must provide police checks from that country.

All applicants must provide two satisfactory references. Referees are asked about the suitability of the applicant to work with children and young people.

We will maintain a **single central record** to ensure all statutory requirements.

## **8. Site Safety and Health and Safety**

Etherton Education is committed to maintaining a safe and healthy working environment for all staff, students and visitors. All activities at the four summer school campuses will be conducted within the framework of relevant health and safety legislation and all staff and students will be encouraged to follow the best working practices at all times. To achieve this commitment, Etherton Education expects the co-operation of all staff, students and visitors.

Attention will be given to the provision of:

- a safe and healthy working environment.
- the positive well-being of all staff and pupils.
- safe premises, equipment and work practices.
- adequate information, instruction, training and supervision on health and safety issues to all staff and pupils.

### **Responsibilities**

The Course Directors have responsibility for implementing and monitoring this Health and Safety Policy through:

- Providing guidance, training and support on Health and Safety requirements and best practice at Induction and throughout the course.
- Providing help and support for all staff and students
- Promoting and co-ordinating health and safety through planning and implementing good practice, training programmes and appropriate procedures.
- Ensuring that all significant risks are assessed in writing (Risk Assessments) and that appropriate control measures are identified and implemented.
- Liaising with the host school and being aware of their Health and Safety policies and procedures

All Staff are responsible for:

- looking after their own health, safety and welfare and that of others who may be affected by their acts or omissions.
- familiarising and following the agreed health and safety practices and procedures including procedures for Fire Drills, First Aid and Lockdown.
- familiarising themselves, following and being aware of risk assessments and process which will affect their role and responsibility.
- maintaining suitable/reasonable physical boundaries and barriers such as fencing, gates and locks on doors.
- directly supervising children at all times, ensuring they remain on the premises and are never permitted to enter hazardous or insecure sections/areas;
- taking all reasonable steps to monitor contractors, visitors and volunteers using the premises, requiring them to report to the provision office and alerting them to the setting's Safeguarding expectations and protocols, as well as advising them of the name of the DSL and Deputy DSLs.

All students are responsible for:

- Looking after their own health, safety and welfare and that of others who may be affected by what they have or have not done.
- Following the health and safety procedures that they have been made aware of in every environment they find themselves in.
- Taking part in activities using the correct equipment and protective equipment as supplied to them.

## **9. E-Safety**

Safeguarding students in both the real and virtual world is everyone's responsibility and all staff should be aware of this policy and how to respond to safety incidents.

The schools' information technology resources, including email and Internet access, are provided for educational purposes. Students and staff must therefore

- **Sign an Acceptable Usage agreement**
- **Respect and protect the privacy of others.** This means using only assigned accounts. They should not view, use, or copy passwords, data, or networks to which they are not authorized, nor should they distribute private information about others or themselves. Filming of lessons or sections of lessons is only permitted with the express permission of the teacher.
- **Respect and protect the integrity, availability, and security of all electronic resources by** observing all network security practices, as posted and reporting security risks or violations to a teacher or network administrator. They should not destroy or damage data, networks, or other resources that do not belong to them
- **Respect and protect the intellectual property of others.** This means they should not infringe copyrights (no making illegal copies of music, games, or movies) or plagiarize.
- **Respect and practice the principles of community.** They should communicate only in ways that are kind and respectful. Threatening or discomfoting material such as spam, chain letters, indecent images or other mass unsolicited mailings, should be reported to a teacher. Staff and students should not intentionally access, transmit, copy, or create material that violates the school's code of conduct or is illegal - such as messages that are pornographic, threatening, rude, discriminatory, or meant to harass. **Staff are not permitted to accept 'friend' requests on social networking sites such as Facebook, nor are they allowed to make 'friend' requests to current students.**

Students are taught about being safe online through IT lessons, assemblies and through the pastoral system. They are encouraged to tell adults if they receive any unwanted contact online or via text.

### 9.1 Cyber-bullying

There are particular features of cyber-bullying that differ from other forms of bullying which need to be recognised and taken into account when determining how to respond effectively. The key differences are:

- **Impact** — the scale and scope of cyber-bullying can be greater than other forms of bullying.
- **Targets and perpetrators** — the people involved may have a different profile to traditional bullies and their targets.
- **Location** — cyber-bullying can take place at any time or place.
- **Anonymity** — the person being bullied will not always know who is attacking them.
- **Motivation** — some pupils may not be aware that what they are doing is bullying.
- **Evidence** — unlike other forms of bullying, the target of the bullying will have evidence of its occurrence.

**Sexting** is a growing problem amongst young people. It is the act of sending sexually explicit messages or photos electronically, primarily between mobile phones. Those involved may face charges of producing, possessing, and/or distributing child pornography.

#### What to do in the event of discovery of illegal material

- Seek immediate and specific advice from the DSL or DDSL who will consult with the ICT co-ordinator, the Course Director and, if necessary, the Police.
- Prevent any further physical access to the device until the correct advice is gained.
- Unless absolutely necessary, **DO NOT** remove the power from a working PC and definitely **DO NOT** start a PC if it is already turned off.

The ICT co-ordinator, network manager or Course Director should not attempt to conduct an investigation of their own or bring in an outside expert to do so as this may compromise the evidence if a legal case were to result. In some cases this may constitute a criminal offence in itself.

### **Sanctions**

The sanctions applied range from a verbal warning or a ban on use of the School's computer network to a temporary or permanent exclusion from the course, depending on the gravity of the offence and the pupil's previous record with reference to bullying/cyber-bullying.

In the most severe cases, it can result in criminal prosecution.

## **10. Bullying and Abusive Behaviour**

Etherton Education's summer courses have high academic, cultural and social aims and staff should ensure that inappropriate behaviours are not tolerated. These include harassment, bullying, actual or threatened violence, damage to personal property, verbal or other abuse based on racial, sexual or religious differences and behaviour that may lead to extremist radicalisation.

All instances of such behaviour will be thoroughly investigated and dealt with according to our welfare policies.

Bullying of any kind is unacceptable and will always be taken seriously and acted upon. Further information is available in our policy for Dealing with Abusive Behaviour

## **11. Extremism and Radicalisation (Prevent)**

**Radicalisation and Extremism** is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups. Keeping children safe from these risks is a safeguarding matter and should be approached in the same way as safeguarding children from other risks. Children should be protected from messages of all violent extremism.

"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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas" (HM Government Prevent Strategy 2011).

Prevent is one part of the United Kingdom's counter-terrorism strategy (CONTEST) and aims to stop people from being exposed to extreme ideologies and becoming radicalised.

The CONTEST strategy is divided up into four priority objectives:

- Pursue – stop terrorist attacks
- Prepare – where we cannot stop an attack, mitigate its impact
- Protect – strengthen overall protection against terrorist attacks
- Prevent – stop people becoming terrorists and supporting violent extremism

It is an approach that involves many agencies and communities, to safeguard people who may be at risk of radicalisation. Since the publication of the Prevent Strategy, there has been an awareness of

the specific need to safeguard children, young people and families from violent extremism. There have been attempts to radicalise vulnerable children and young people to develop extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

To report concerns, contact the Regional Police Prevent Team:

- Phone: 01179 455 536
- Email: [channelsw@avonandsomerset.pnn.police.uk](mailto:channelsw@avonandsomerset.pnn.police.uk)
- SWCPP (Safeguarding Children and Young people against Radicalisation and Violent Extremism):  
[http://www.proceduresonline.com/swcpp/somerset/p\\_sg\\_ch\\_extremism.html?zoom\\_highlight=prevent](http://www.proceduresonline.com/swcpp/somerset/p_sg_ch_extremism.html?zoom_highlight=prevent)
- Revised Prevent Duty guidance for England and Wales:  
<https://www.gov.uk/government/publications/prevent-duty-guidance>

Etherton Education regularly reviews and updates its Prevent Risk Assessment and Action Plan.

## **12. Child Protection**

Child Protection is an aspect of Safeguarding which refers distinctly to children at risk of harm and is the responsibility of all adults.

If an adult has a concern about a student's welfare or safety - whether this is as a result of noticing something or being told by another person, or a disclosure by an under 18 - this must be reported to the centre's Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. If this is a serious concern – where a student is in danger of harm or abuse – this must be reported without delay and the adult must ensure the student's safety until this happens.

The main forms of abuse are identified in Appendix A of this policy, with information about Specific abuse and vulnerability concerns in Appendix B.

Appendix C is a proforma for recording concerns.

Contact Details are listed in Appendix E. This includes 24/7 contacts.

### **12.1 Dealing with a disclosure**

All staff should be aware that any student may be subject to grooming and abuse. They should also be aware that certain students are likely to be more vulnerable. These include those with SEND (Special Educational Needs), low self-esteem and those who have experienced abuse in the past. If a child discloses that he or she has been abused in some way, the member of staff or volunteer should:

- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the child to talk freely;
- reassure the child, but not make promises which it might not be possible to keep;
- never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child;
- reassure him or her that what has happened is not his or her fault;
- stress that it was the right thing to tell;

- listen, only asking questions when necessary to clarify;
- explain what has to be done next and who has to be told;
- make a written record (see Record Keeping);
- pass the information to the Designated Safeguarding Lead or Deputy Safeguarding Lead **without delay**.

It is, of course, vital that the child is kept safe, and so the member of staff must make sure that suitable arrangements for this are in place.

Dealing with a disclosure from a child, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the Designated Safeguarding Lead.

### **12.2 Record Keeping**

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss these with the designated safeguarding lead.

When a child has made a disclosure, the member of staff/volunteer should:

- Record as soon as possible after the conversation. Use the record of concern sheet wherever possible. (pro-forma available)
- Do not destroy the original notes in case they are needed by a court
- Record the date, time, witness, place and any noticeable non-verbal behaviour and the words used by the child
- Indicate the position of any injuries
- Record statements and observations rather than interpretations or assumptions
- Agree and record actions and outcomes

All records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Student Information) (England) Regulations 2005.

If a student who is/or has been the subject of a child protection plan changes provision, the Designated Safeguarding Lead will inform the social worker responsible for the case and transfer the appropriate records to the Designated Safeguarding Lead at the receiving provision in a secure manner, and separate from the child's academic file.

### **12.3 Confidentiality**

Safeguarding and protecting children raises issues of confidentiality that must be clearly understood by all staff/volunteers in education. Staff/volunteers who receive information about children and their families during their work should share that information only within appropriate professional contexts.

### **12.4 Procedure**

If a member of staff is concerned about a child he or she must inform the Designated Senior Lead. The Designated Safeguarding Lead will decide whether the concerns should be referred to the Police or Children's Services. If it is decided to make a request for involvement to Children's Services this



will be discussed with the parents/guardian, unless to do so would place the child at further risk of harm.

While it is the DSL's role to make a request for involvement, any staff member can make a referral to Children's Services. If a child is in immediate danger or is at risk of harm (e.g. concern that a family might have plans to carry out Female Genital Mutilation or it is suspected that a child might be in danger of becoming enslaved), a referral should be made to Children's Services and/or the Police immediately. Where referrals are not made by the DSL, the DSL must be informed as soon as possible.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations.

### **12.5 Allegations involving staff/volunteers**

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Designated Safeguarding Lead or Deputy Safeguarding Lead.

The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The DSL will assess whether it is necessary to refer the concern to the Local Authority Designated Officer. Contact should always be made with the Local Authority Designated Officer without delay if the allegation meets any of the three criteria that indicates that a member of staff/volunteer may have:

- behaved in a way that has, or may have harmed a child;
- possibly committed a criminal offence against/related to a child;
- behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children.

If it is decided that the allegation meets the threshold for safeguarding, this will take place in accordance with Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures. The Course Director should as soon as possible, (following briefing from the Local Authority Designated Officer) inform the subject of the allegation.

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handled according to Etherton Education's internal procedures.

If the allegation concerns the Centre Director or the DSL, this should be reported to the HR Co-Ordinator.

## Appendix A: Types of Abuse

**A1 Physical abuse** is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts. It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, and slapped or having objects thrown at them. 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 (FI). There's no excuse for physically abusing a child. It causes serious, and often long-lasting, harm – and in severe cases, death.

**A2 Neglect** is the ongoing failure to meet a child's basic needs and is 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. A child who's neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death.

**A3 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 understand that what's happening to them is abuse. They may not even understand that it's wrong.

**A4 Emotional abuse** is the ongoing emotional maltreatment of a child. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. Children who are emotionally abused are often suffering another type of abuse or neglect at the same time – but this isn't always the case

## **Appendix B: Specific abuse and vulnerability concerns.**

These are taken from Keeping Children Safe in Education 2020 and are listed in alphabetical order.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children missing from education**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NCCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;

- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

### **Child Sexual Exploitation (CSE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

### **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>103</sup> should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

## **Domestic abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

## **Operation Encompass**

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

## **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation.

### **So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### **Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### **FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care

professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: *Mandatory reporting of female genital mutilation procedural information*.

Teachers *must* personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>105</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: *FGM Fact Sheet*.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk).

### **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’ safeguarding approach.

- *Extremism* is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- *Radicalisation* refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- *Terrorism* is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must

be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

### **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

### **Additional support**

The department of Education has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are



robust, informed and with good intention.

- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals. The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

### **Peer on peer/ child on child abuse**

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

### **Sexual violence and sexual harassment between children in schools and colleges**

#### **Context**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### **What is sexual violence and sexual harassment?**

#### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

#### **Sexual harassment**

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;

- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and
- upskirting.

### **Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

### **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

## CHILD PROTECTION RECORD – Report of a Concern

<b>Date of incident:</b>	
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<b>Name of referrer:</b>		<b>Role of referrer:</b>	
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<b>Child name:</b>		<b>Year Group / class:</b>	
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<b>Details of concern:</b>	<i>(Use body map if appropriate – and use initials for other children / young people involved, unless there is a specific need to name them in full)</i>

<b>Reported to:</b>		<b>Role of person reported to:</b>	
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<b>Signed:</b>	
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<b>Date:</b>	
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## DSL/DDSL Response Proforma

<b>Action taken:</b>		<b>Advice sought:</b> <i>(from whom and what was advice given)</i>	
<b>Concern / referral discussed with parent / carer?</b>		<i>If not, state reasons why – if yes, note discussion with parent</i>	
<b>Referral made:</b>		<i>If not, state reasons why – if yes, record to whom and any action agreed</i>	
<b>Feedback to referring member of staff:</b>			<b>By whom</b>
<b>Response to / action taken with pupil:</b>			<b>By whom</b>
<b>Name and contact number of key workers:</b>			
<b>Name and contact details of GP:</b>			
<b>Other notes / information / concerns:</b>          <b>Any other action required:</b>			

## Appendix D: ICT Acceptable Usage Policy

Staff should

- not give their personal contact details to students or young people,
- only make contact with students for professional reasons when necessary,
- recognise that text messaging is usually not an appropriate way to respond to a child,
- not use internet or web-based communication channels to send personal messages to a child/young person,
- not use a social network site to complain or criticise colleagues/the school/a child etc.

Etherton Education equipment and systems, must not be used:

- For any form of harassment of individuals, including of colleagues, clients and third parties;
- To download, access, record and/or store material that could be considered racist, sexist, homophobic or likely to be in contravention of or likely to be in contravention of discrimination, bullying or harassment legislation;
- To access adult, or pornographic, material;
- Unreasonably or excessively for personal purposes.

Etherton Education reserves the right to view all material (including electronic mails of a personal nature) stored in its computer system.

While Etherton Education respects an individual's right to a private life, the company must also ensure that confidentiality and its reputation are protected. For this reason, staff using social networking sites are required:

- Not to post entries that are publicly accessible, which contain negative references to the company, its staff, business activities, clients or products;
- To ensure they do not conduct themselves in a way that is detrimental to the organisation;
- To take care not to allow their interaction on these websites to damage working relationships between members of staff and our clients or third parties.

Further to this, staff must not 'add' as friends or communicate with summer school students or clients via social networking sites. Not only is this unprofessional, it may expose staff to claims of inappropriate conduct or relations.

## Appendix E: Student code of Conduct for Etherton Online Staff and Students

### Etherton Online Code of Conduct Staff 2023

This is a specific Code of Conduct for Etherton Online with rules set out to ensure the safety of both the students and staff. You should also read the Code of Conduct for Students, and the Advice for Parents and Carers.

- Staff should make sure that when they log onto Etherton Online they keep their personal information safe, including passwords. They should also ensure that any sensitive documents are closed and check browser bookmarks and open tabs before sharing screens.
- Staff should only use the Etherton Online platform to communicate with the students during lessons and activities. Video conferencing will be used for live lessons and online chat messaging can also be used to communicate in written form. Staff will not send emails or use any form of social media to communicate with students.
- Staff will not have any contact with students via personal email or social media after the course has finished. If a student does attempt to contact a staff member, the email or message should be sent to the Online Admin Office immediately. The Admin Officer or Course Director will decide how to proceed with the correspondence. This could include contacting the staff member. All subsequent correspondence will go via official Etherton email addresses only.
- Staff will ensure that the environment in which they conduct live lessons looks professional and is appropriate, i.e. no inappropriate pictures, photos, books etc in the background. Staff should also be mindful of what personal possessions and photographs are on display and think about whether they are happy for students and their parents or carers to see them. For example, if there are photos of family in the background it could lead to questions from students, and staff should consider if they are happy for this, and consider how they will deal with them.
- Staff should be appropriately and professionally dressed during any video interactions with students. Work attire should be the same as in a classroom or during a physical Etherton activity.
- Staff may be frustrated at times by technical matters. However, please try to maintain a cheerful and positive attitude towards the situation, lest your frustration affects the attitudes of the students towards the course.
- Staff should start their lessons by setting out what they expect in terms of behaviour, e.g., how they may signal that they have a question, and whether they should mute their microphones (it is possible to enforce this by using the mute-all button) and turn on or off their webcam at the start of each session. Our expectation is that students must switch on their cameras and show their full faces.

- Staff should be aware that senior staff may check into any live lesson at any time to ensure the safety of staff and students. They will not interfere with the lesson, but ensure that all behaviour is appropriate and no-one has been able to access the platform that should not have.
- Staff should be punctual in beginning any live lessons. If they are unwell or unable to take the lesson for any reason they should inform the Course Director as soon as possible.
- All lessons are recorded, so students should be reminded that this is the case. Any recorded sessions will not be distributed to third parties outside Etherton Education and will only be stored in and made accessible with a two/three year maximum. Exceptions can be made if explicit permission is given by all who appear in the recording.
- If staff have any concerns that students are behaving inappropriately online, for example by sending unkind, abusive or inappropriate messages etc., they should report this to the Admin Office or Course Director immediately. It is better if any discipline issues are dealt with by our other staff (e.g., by writing to parents), and not by the teacher during the lesson.
- Please note that all discussion of politics must be avoided. Do not criticise the leaders, laws or actions of any country, whatever your personal feelings. Do not allow students to raise political issues. Do not use this platform to put forward your own political or religious views. This is a dangerous area and any infringement of this rule could affect our company's reputation and access online. We will therefore regard any infringement of this rule as potential gross misconduct.

Updated 5 March 2023

Peter Etherton



## **Code of Conduct for Etherton Online Students 2023**

When I join an Etherton Online course I will follow these rules. The rules will help me and the other students and staff, to be safe and happy.

- When I log onto Etherton Online I will keep my personal information safe. I will not give my passwords or my contact details to other people.
- When the online lesson starts I will make sure that I am ready to take part. This means that:
  - ✓ I will be somewhere quiet without lots of noise.
  - ✓ I will not be using social media, playing games, or using the computer/laptop for any other purposes.
  - ✓ I am dressed for a school lesson.
  - ✓ I have the equipment that I need.
  - ✓ I will speak English all the time.
  - ✓ I will switch on my video and microphone.
  - ✓ I will mute (switch off) my microphone when the teacher asks me to do so.
- I understand that my parents can look at the lessons or the work that I am doing in order to help keep me safe.
- I will only use the Etherton Online platform to communicate with the teachers, staff and students. This can be via video or online messaging.
- I will do my best to talk to the teacher and other students in English.
- I will not send messages to staff or students that are unkind or rude. I will be kind and friendly to the other students and teachers.
- If somebody sends me a message that is unkind or makes me feel unhappy I will tell a member of staff.
- I will not record any of the lessons or activities, or take photos or share images of anybody else unless they give me permission to do so.

***Students breaking the code of conduct may be suspended from continuing with the online course without refund.***

Signed by the **student**:

I have discussed the Code of Conduct with my parent/legally appointed guardian and I understand how I must conduct myself online during the course.

Signature: \_\_\_\_\_ Print your name: \_\_\_\_\_ Date: \_\_\_\_\_

**Parents hereby accept that these terms and conditions may be revised from time to time at the entire discretion of Etherton Education Ltd. All dealings with Etherton Education Ltd., including the offer and acceptance of places and the continuing presence of a student on an Etherton Education Ltd. course, will be on the Terms and Conditions as from time to time apply.**

This contract is made with Etherton Education Ltd. and is governed exclusively by English law.

**05 March 2023  
Etherton Education Ltd.**

**Appendix F: 2019 Etherton Education Telephone Numbers - to be updated annually when course locations confirmed**

Marlands Office – 8am to 4pm, year round Monday to Friday +44 (0)1823 672388

Emergency 24-hour mobile: 07767 365 735 (This will only be operational from 5<sup>th</sup> August 2023 to 5<sup>th</sup> September 2023, during our summer courses.)

Travel Mobile, LONDON HEATHROW 6.00am – 9.00pm, published arrival & departure days only  
TO COME

Travel Mobile, LONDON GATWICK 6.00am – 9.00pm, published arrival & departure days only  
TO COME

Please note, all mobile phones listed above are for PHONE CALLS ONLY. There will be no response to text messages / WhatsApp on these numbers.

**Local Children Safeguarding Boards**

[ Devon information: to come ]