

The Cotswold Guardians safeguarding children policy is mandatory for all staff to read and recommended for parents. This policy relates to all students under our care regardless of gender, age, ethnicity, nationality, religion or disability. All children and young people have the right to protection from any kind of abuse and the right to exist in a safe and friendly environment whilst in the care of Cotswold Guardians.

Cotswold cares for students who need to appoint an Educational Guardian because of their age or the wish of their relatives. Cotswold Guardians looks after students studying in boarding schools who may on occasions use homestays.

Cotswold Guardians is committed to the ongoing promise of safeguarding students. To ensure that all staff receive the most up to date information, this policy is reviewed and redistributed annually as standard. Should a significant change take place, the policy is immediately redistributed thereafter.

What is child safeguarding?

“The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully”

Cotswold Guardians aims to provide the highest level of care to students, to support this we enclose the following policies and minimum requirements & a continual membership to AEGIS who accredits our standards.

Emergency response procedure

Cotswold Guardians operates a 24/7 phone line and are contactable by mobile (+44 07733 333914 or landline +44 1285 711789) as required.

Responding to a child making an allegation of abuse

Safeguarding is the responsibility of ALL members of staff & host families. All staff & host families are in a position of trust, and therefore all are required to take a shared responsibility to safeguard children and young people. All staff & host families will be made fully aware of their duties and in safeguarding students and responding to allegations of abuse or neglect.

Any member of staff or host family with an issue or concern relating to child protection, including but not limited to allegations of child abuse, should discuss it immediately with Anne Sharp (Child Protection Officer (CPO)) on 07733 333914. Anyone who hears an allegation of abuse against another member of staff or has concerns about the behaviour of another member of staff, must report the matter immediately to the CPO. At no point should an attempt be made to investigate the situation. This will be undertaken by NSPCC/Social Services and/or the Police as necessary.

All concerns or disclosures of abuse should be acted upon-staff should know the 5 Rs’:

- Recognise signs of vulnerability
- Respond to student concerns
- Record student concerns
- Report student concerns
- Refer student concerns

How to respond to a disclosure

Stay calm. Sometimes issues are raised which, whilst seemingly complex, are generally safeguarding matters and not necessarily a child protection issue. These matters should be responded to by offering a supportive response and where necessary or relevant, refer them to Anne Sharp. When a student self-discloses a matter that constitutes a potential or alleged situation of abuse, the staff member or host family must take the student to a private place within view but out of ear-shot of other people. Promises of confidentiality must not be given. Tell the student that you have a duty to pass on the information, only to those who need to know.

- Listen carefully to what is said
- Do not interview them, but ask what happened, keep questions to a minimum and obtain sufficient facts to understand what is being alleged
- Allow the child to continue at their own pace
- Ask questions for clarification only and always avoid asking leading questions (questions that suggest an answer). Do not make assumptions or offer explanations. Remember that an allegation of child abuse may lead to a criminal investigation, so do not attempt to personally investigate any allegations of abuse
- Reassure the child that they have done the right thing in telling you
- Tell them what you will do next and with whom the information will be shared with

Recording a report

A call must be made to notify the Cotswold Guardians CPO and she will then liaise with the head of pastoral care at the school.

A full incident report must be made as soon as possible detailing the nature of the allegation. Record in writing everything that was said, using the child’s own words. Note place, date, time, and names of persons to whom the information was given.

Do not confront any person against whom an allegation has been made. The CPO will guide you and in dealing with any allegation or suspicion of abuse, and if applicable, report allegations and incidents of abuse to the LADO (Local Area Designated Officer) at the local County Council Children’s Social Services.

Cotswold Guardians recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career. Therefore, those dealing with such allegations within a centre, shall do so with sensitivity and will

act in a careful, measured way and in accordance with our procedures. If you are ever in doubt as to what to do, please consult a member of the Safeguarding Team at Head Office.

Missing Student Policy

The safety of all students is paramount, and it is essential we know where all students are at all times. It is a requirement of the signed terms and conditions that a student staying with a host family should have a mobile phone with them at all times if they are off the host family premises. The host family number should be programmed into their phone. Additionally, the Cotswold Guardians mobile number (07733 333914) should also be in their contacts. Should a student go missing, Cotswold Guardians will take the following steps to ensure their safe return.

When a child is identified as not being at a location they are meant or are expected to be at, the reporting individual must take proactive steps to trace the person's whereabouts prior to contacting the police.

These include:

- Contact the student via their mobile phone
- Contacting the missing individual's school, host family & friends
- Checking social media

Reporting to the Police

The Police will only become involved after all reasonable checks to locate the individual have been carried out. If the child is not located, the reporting individual should contact the Police via 101 to report them as being missing from their address.

The primary function of the Police is to investigate the disappearance and attempt to locate the young person prior to any harm befalling them. Police response and associated actions will be based on a police risk assessment of the incident and knowledge of the individual(s) concerned, which will utilise information from partners and those who know the person.

When a child is found

The attitude of professionals, such as police and social workers, towards a child who has been missing can have a big impact on how they will engage with subsequent investigations and protection planning. However 'streetwise' they may appear, they are children and may be extremely vulnerable to multiple risks. A supportive approach when a child returns, actively listening and responding to their needs, will have a greater chance of preventing the child from going missing again and safeguarding them against other risks.

Actions to be Followed by Staff once the Pupil is Found

- Staff will talk with, take care of and comfort the pupil.
- Staff will speak with the other pupils to ensure that they understand why they should NOT leave without obtaining permission and notifying their Local Guardian.

- The CPO will speak with the parents/agent to report the incident, and then record an account of the incident by writing a letter to the parents.
- The CPO will carry out a full investigation involving, if appropriate, the Police and the appropriate Local Safeguarding Children Board.
- The written report of the incident will record details of time, place, members of staff, the circumstances in which the pupil went missing, an outline of what was understood to have happened, the length of time during which the pupil was missing and an initial explanation of how the incident appeared to have arisen. Written statements may be invited from all.
- Any media questions will be referred to Head Office
- All relevant procedures will be reviewed in the light of the incident.

Complaints Procedure

Since 2004 Cotswold Guardians has prided itself on the quality of the pastoral care provided to its students. Parents & agents are encouraged to be in close liaison with staff about their children's wellbeing irrespective of service level and it is hoped that all can work together for the pupils' benefit. If parents have a complaint, they can expect it to be treated with care and in accordance with this Complaints Procedure.

Our complaints procedure is in three steps and we hope to find a resolution to any complaint at the earliest possible stage.

Step 1 – Informal Resolution

If parents/students have a complaint, they should first contact the head office to find a resolution. In most cases, issues can be resolved quickly, efficiently and to a high standard.

A written record of all complaints will be logged. If the complaint is not resolved in a satisfying manner on an informal basis, please consider step 2

Step 2 – Formal Resolution

If the complaint cannot be resolved on an informal basis, then the parent/student/agent should consider putting their complaint in writing to a Cotswold Guardians Director. Although all complaints should be made in writing, it does not follow that Step 2 is automatically triggered whenever a complaint or concern is expressed in writing. Complaints will normally only progress to Stage 2 after first being considered at the preliminary, informal, stage and only if the complainant wishes to escalate the matter to Stage 2. The Director will decide, after considering the complaint, the appropriate course of action to take.

At this stage, the Director may wish to speak directly via telephone or Skype at a mutually convenient time.

The Director will investigate the complaint personally and impartially. Once all the facts have been established, the Director report findings to the parent/student/agent and take action accordingly to resolve any ongoing issue.

Cotswold Guardians will expect that parents/students/agents give their account of the complaint and Cotswold Guardians will in turn share the findings of the Director. Together between all three parties a resolution will be sought to close the matter to satisfy all parties.

Timeframe for Dealing with Complaints

All complaints received by Cotswold Guardians will be treated seriously and handled sensitively. We will acknowledge complaints as soon as reasonably practicable, normally within five working days. Within that acknowledgement, we will set out how we intend to deal with the complaint and the timeframe within which parents can expect to hear further from us.

Recording Complaints

Following resolution of a complaint, Head Office will keep a written record of all formal complaints, whether they are resolved at the informal step or beyond.

Record keeping is useful for management purposes and to enable any patterns of concern to be monitored. Key information will be included as part of the complaint such as:

- Date when the issue was raised.
- Name of parent.
- Name of pupil.
- Description of the issue.
- Records of all the investigations (if appropriate).
- Witness statements (if appropriate).
- Name of member (s) of staff handling the issue at each stage.
- Copies of all correspondence on the issue (including emails and records of phone conversations).

Cotswold Guardians is mindful of its obligations under the Data Protection Act 1998 (and from May 2018, the General Data Protection Regulation) to keep such information for no longer than is necessary.

Transport Policy

Our transport policy is not designed to make traveling inconvenient or expensive. It is to make sure our students are safeguarded and arrive at their destination safely with minimal risk.

When Cotswold Guardians organises a transfer for students, we will do this using one of our local private hire companies, this is to ensure that drivers are DBS-checked, punctual and presentable.

Students may use public transport if agreed in advance with their parents but please check with Cotswold Guardians before booking tickets as we may be able to suggest the most convenient way or that a taxi would be more convenient.

If students under 16 wishes to travel 'out of area', they must be accompanied by an adult. On a day trip they must return at an appropriate time set by the host family.

If a student is over the age of 16 and wishes to go out of area, they may do so but we will need written permission from agents/parents. This would only be applicable to a day trip and not an overnight stay unless previously agreed with the parent.

Students under the age of 16 may not travel in and around London unless accompanied by an adult (21 years+).

Students are never permitted to stay in University halls of residence.

If a student wishes to stay anywhere except with a Cotswold Guardians host family, we must have the address of where they are staying, contact phone numbers and photo ID of the responsible adult (21 years+) that they will be staying with.

Students must not stay in a hotel/hostel overnight unless they are accompanied by an adult (21 years+) of the same gender.

We must have photographic evidence of ID and age of the adult (21 years+) responsible for the student.

Written parental consent will be required for any of the above.

Cotswold Guardians must receive all relevant documentation and permissions in writing for students wishing to stay anywhere that is not a Cotswold Guardians host family at least 72 hours before departure.

Whistleblowing Policy

Cotswold Guardians requires all staff to uphold the law and place the safety of others at the forefront of their duties. For this reason, we encourage whistleblowing in the following instances:

- someone's health or safety is in danger
- actions that negatively affect the welfare of children (not only Cotswold Guardians students)
- damage to the environment
- a criminal offence
- not obeying the law
- covering up wrongdoing

Where staff have concerns they should aim to report it internally first before using an external 'prescribed person or body'. Making a report to an external person may only be undertaken where the staff member thinks Cotswold Guardians will cover the matter up, would treat them unfairly if they complained or have raised the matter before, but the concern hasn't been dealt with.

Staff members with concerns should follow these steps:

1. Contact a Cotswold Guardians director
2. If the concern involves an immediate threat to a child's safety, the Police should be contacted on 101. If the student is under 16 years old, the Local Authority should be contacted immediately.

If you are not sure who to contact in the above steps, please contact, 'Public Concern At Work' www.pcaw.org.uk – This is a whistleblowing charity to support staff in businesses.

E-Safety Policy & Social Policy

Role of Cotswold Guardians in e-policy: As Cotswold Guardians are acting *in loco parentis*, it is our duty to be aware and involved in all matters relating to a students online-safety. Examples of online dangers that we would like to make students aware of are:

Cyberbullying

Cyberbullying is a form of bullying, and research reveals it has increased to affect 12% of young people in this country.

Childnet's 2016 Cyberbullying Guidance, funded by the Government Equalities Office and European Union, shows schools how to embed cyberbullying in anti-bullying work.

This Guidance is designed to support staff in preventing and responding to cyberbullying. The Guidance comprises of four main sections and although this was commission for schools, it is very much relevant to guardians in supporting students who may be suffering from cyberbullying.

1. Understanding Cyberbullying

<http://www.childnet.com/ufiles/1-Understanding-cyberbullying1.pdf>

2. Preventing Cyberbullying

<http://www.childnet.com/ufiles/2-Preventing-cyberbullying1.pdf>

3. Responding to Cyberbullying

<http://www.childnet.com/ufiles/3-Responding-to-cyberbullying1.pdf>

4. Supporting Staff

<http://www.childnet.com/ufiles/4-Cyberbullying-Supporting-School-Staff.pdf>

If a student approaches a Cotswold Guardians member of staff or we are notified by parents/agents that a student is a victim of cyberbullying. Cotswold Guardians will handle the concern sensitively and speak to the individual through their Local Guardian. The school will also be involved and if necessary the Police and Social Service if a student is under 16 years old.

Sexting

Cotswold Guardians strongly advises that students take caution when taking photos and posting them online. Once posted, you lose control over how they are shared.

COTSWOLD GUARDIANS endorses and advises all staff to read The UK Council for Child Internet Safety publication on Sexting in schools and colleges: Responding to incidents and safeguarding young people.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

Remember, it is illegal to take or share photos of anyone under the age of 18 that is deemed to be explicit. For students, we recommend watching the interactive videos, 'Think you know?':

<https://www.youtube.com/watch?v=TqLFAYeYVbQ>

If you have any concerns about e-safety, please contact our dedicated Child Protection Officer – Anne Sharp.

Anti-Radicalisation Policy

It is essential that staff are aware and can identify students that may be vulnerable to radicalisation and know what to do once they have been identified. Protecting children from the risk of radicalisation should be seen as part of schools' and childcare providers' wider safeguarding duties and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

The general risks affecting children and young people may vary from area to area, and according to their age. Local Guardians are in an important position to identify risks within a given local context. It is important that Cotswold Guardians understand these risks so that we can respond in an appropriate and proportionate way. At the same time Cotswold Guardians should be aware of the increased risk of online radicalisation.

If a member of staff has a concern about a particular pupil they should discuss this with the CPO, and where deemed necessary by a director, with children's social care. In Prevent priority areas, the local authority will have a Prevent lead who can also provide support. Cotswold Guardians may also contact the local police force. This is to gain professional advice if needed.

Safer Recruitment Policy

Job Descriptions

Cotswold Guardians will predominantly recruit from within our professional network. Job descriptions clearly and accurately set out the duties and responsibilities of the job role.

The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job.

References

Two references will be required for every applicant.

Interviews

There will always be a face-to-face interview for short-listed applicants. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the recruiter to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant is a bona fide applicant and can meet the demands and expectations of our services and safeguarding criteria.

Any information in regard to past disciplinary action or allegations, cautions or convictions, will be discussed and considered in the circumstance of the individual case during the interview process.

Offer of Appointment and New Employee Process

The appointment of all new employees is subject to the receipt of a satisfactory DBS Certificate, references, and copies of qualifications and proof of identity. All new employees will receive training before commencing.

DBS (Disclosure and Barring Service) Certificate

It is our policy to undertake a DBS check on all employees on appointment and every three years after.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to children. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at Cotswold Guardians.

Proof of identity, Right to Work in the UK

All applicants will be required to show their identification documentation such as passport, birth certificate, driving licence, etc. with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations.

Staff code of conduct

The relationship between students and staff at Cotswold Guardians is very important. Our Local Guardians and Head Office staff are here to guide and support students through their education and time in the UK. This code of conduct has been created to clarify the professional responsibility of Cotswold Guardians staff, to give a distinction between acceptable behaviour and otherwise and to establish a set of standards that we expect from all those who represent Cotswold Guardians.

Cotswold Guardians acknowledge that along with a duty of care towards students, we hold a duty of care to all staff employed by us.

Any allegations of unprofessional or improper conduct will be investigated fully and impartially.

Equality of opportunity

Cotswold Guardians promotes inclusivity and values diversity. It also seeks to ensure that the work environment for its employees is supportive, and one where individual respect is shown to all. All members of staff and pupils, regardless of their gender, race, ethnic background, culture, (dis)ability, sexual orientation, age, religion, socio-economic status or any other factor will be supported.

Identification

In the interests of security, employees must carry their ID badges whilst visiting School and host families. Each ID badge has a photo and name of the representative.

Language

Being a professional outfit, Cotswold Guardians expects staff to speak with care and consideration both internally and externally. At no point should staff use language that could

- be considered racist, sexist or homophobic
- promote political views or radicalisation
- be deemed as swearing, blasphemous or offensive

Drugs/Alcohol

Cotswold Guardians has a zero-tolerance policy for drugs. Drinking alcohol with students is forbidden and should be limited to times outside of normal duties.

Dress code

Cotswold Guardians does not have a dress code, although staff t-shirts and jumpers can be requested. We ask that if visiting schools, staff dress appropriately.

Photos

Cotswold Guardians will need to receive written confirmation that a student can be included in photos. This will be for marketing purposes only, such as good news stories and pupil achievements. We kindly ask that staff do not post photos of students on their own social media networks.

When in a school, please request permission to take any photos as policies will differ from school to school.

Physical contact with pupils

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Staff should, therefore, use their professional judgement at all times. Staff should not have unnecessary

physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.

Physical contact should never be secretive, for of the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, the Child Protection Officer informed and, a copy placed on the pupil's file.

Physical restraint

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to defuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to Head Office who will decide what to do next.

One to one situations

Staff working in one to one situations with children and young people are more vulnerable to allegations. Staff should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and pupils are met.

Staff should:

- avoid meetings with pupils in remote or secluded areas;
- ensure there is visual access or an open door;
- inform other staff of the meeting beforehand, assessing the need to have them present or close by; and
- always report any concerns to Head Office.

Staff are reminded that it is a criminal offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.

Access to confidential information

No doubt, staff will become aware of confidential information. Individuals should be aware of the need to keep such matters confidential and to respect the proper channels of communication for such information.

Staff members should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear

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need to know. They will also take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.