

SAFEGUARDING CHILDREN POLICY

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1. SAFEGUARDING STATEMENT AND DEFINITIONS

1.A. CONTEXT

International House Bristol provides teaching, accommodation, welfare and social programme provision to students under 18 in a number of contexts:

<i>PROGRAMME</i>	<i>LOCATION</i>
1. for individual students aged 16 or 17 on 'senior' EFL courses, where most students are aged over 18;	Queen's Avenue and/or Oakfield Road, Bristol
2. for individual students aged 12-17 on 'junior' EFL courses in high season, where teaching, accommodation, welfare and social programme is the responsibility of IH Bristol	Oakfield Road, Bristol
3. for closed groups of students aged 11-17 on 'junior' EFL courses in high season, where teaching, accommodation, welfare and social programme is the responsibility of IH Bristol	Oakfield Road, Bristol
4. one-to-one classes in foreign languages for individual U18s year round	Queens Ave, Bristol or in the student's home
5. on junior courses in high season, where IH Bristol provides only EFL provision, e.g. at Bromsgrove School; here, separate courses are provided for 8-12s and 13-16s	Bromsgrove School, Bromsgrove
6. exam provision for U18s for Cambridge, IELTS and Trinity exams, which may include U18 candidates	Oakfield Rd, Queens Ave, Bristol, Bristol Grammar School and occasionally other external venues

1.B. DEFINITIONS

1. U18/child/children=all people under the age of 18 who use our services/facilities or are present on our sites
2. safeguarding = an umbrella term meaning ensuring the safety and welfare of children
3. child protection = protecting children from direct harmful behaviour
4. DSP = Designated Safeguarding Person, the member of staff who deals with day to day safeguarding matters at the School
5. DSL = Designated Safeguarding Lead = the senior manager who has overall responsibility for safeguarding at the School
6. IHB adults = staff, visitors, interns, volunteers, group leaders, accommodation providers and any other adult who comes into professional contact with IH Bristol U18 students
7. Single Central Record = a central repository of safeguarding related information for IH Bristol adults
8. Children's Social Care = social services for children; will include social workers who specialise in safeguarding/child protection



1.C. STATEMENT

IH Bristol endeavours to provide a secure and friendly environment where all members of the community are respected by others. The school is fully committed to safeguarding the welfare of all children, regardless of gender, ethnicity, nationality, disability, sexual orientation or religion. It recognizes its responsibility to take all reasonable steps to promote safe practice and to protect children from harm and abuse. The school also acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

We implement our safeguarding policy as follows:

- by following safer recruitment procedures to check the suitability of IH adults;
- ensuring that all IH adults understand their legal and moral responsibility to safeguard the welfare of children at IH Bristol;
- having a clear code of conduct in place for all IH adults;
- by providing children with codes of conduct and ensuring they understand what those are;
- by adopting child protection guidelines and accepted procedures;
- by providing appropriate training, guidance and procedures for IH adults to meet the needs of U18 students;
- ensuring children's health and safety whilst on our premises/taking part in school activities;
- by sharing information about any concerns about children's welfare;
- to continually develop awareness of any issues which might harm these children;
- not to make IH Bristol adults unnecessarily vulnerable to suspicion of any form of abuse;
- ensuring that this policy is available to all on our website.

1.D. POLICY REVIEW

IH Bristol is also committed to reviewing this policy and good practice every 12 months.

- Staff will be invited to contribute towards this review. The reviewed policy will then be signed off by the Designated Manager.
- LAST REVIEW: June 2025
- NEXT REVIEW: June 2026

2. KEY PEOPLE FOR SAFEGUARDING CHILDREN

2.A. IH BRISTOL

The Designated Safeguarding Lead (DSL) is Pete Gibson, the School Principal/DOS. Pete can be contacted in office hours on 0117 9090911 or outside school hours via the School emergency phone: 0780 820 8210. Pete's email is pete@ihbristol.com

His role includes:

1. having overall responsibility for safeguarding at the school
2. being involved in safeguarding policy decisions
3. maintaining employee records related to safeguarding
4. taking on the DSP's role in the DSP's absence
5. policy updates and changes in legislation
6. PREVENT Lead for IH Bristol

The Designated Safeguarding Person (**DSP**) is Luqueney Pearson. Luqueney (Lu) can be contacted in office hours on 0117 9090911 or outside school hours via the School emergency phone: 0780 820 8210. Her email is luqueney@ihbristol.com

She is responsible for the following:

1. day-to-day safeguarding matters, e.g. fielding safeguarding questions from staff
2. safeguarding training for staff
3. being the first point of contact for any member of IHB adults with safeguarding concerns or information about a student disclosure
4. policy updates and changes in legislation

In Pete's absence or if he is the subject of a concern/allegation, contact Luqueney at the contact details above.

If, for any reason, it is not appropriate or possible to contact Luqueney or Pete, please contact Val Hennessy, one of the School Directors. She can be contacted on the above numbers. Her email is val@ihbristol.com

2.B. BROMSGROVE SUMMER SCHOOL

- Bromsgrove School have agreed that their Designated Safeguarding Lead (DSL) should be contacted for any disclosures or concerns raised by students or IH Bristol staff.
- The Bromsgrove School DSL is Julia Boonak, Director of Summer School, and she can be contacted on 07745 323 011.

2.C. BRISTOL

Where the Designated Safeguarding Lead decides further action and guidance is necessary:

Local Area Designated Officer (LADO) – for allegations against staff or volunteers working with children or young people, Nicola Laird 0117 9037795, with related website <https://bristolsafeguarding.org/>

For making a referral about a child, see section and procedure: 5.D. MAKING A REFERRAL TO CHILDREN'S SOCIAL CARE

Our main local contact for **Prevent** is 01179 455533 (see Prevent policy on school website)



3. CODE OF CONDUCT FOR IH BRISTOL ADULTS

3.A. RATIONALE

Following a Code of Conduct is important for helping to create a safe school culture, building trust between U18s and adults and for protecting both U18s and adults from behaviour/actions which might be misconstrued.

3.B. KEY PRINCIPLES AND STANDARDS

The welfare of the child is paramount (Children Act 1989). All IHB adults have a duty to keep U18s safe and protect them from physical and emotional harm.

1. IHB adults are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
2. IHB adults should work, and be seen to work, with U18s in an open and transparent way.
3. IHB adults should discuss and/or take advice promptly from their line manager or another senior member of staff over any incident which may give rise to concern.
4. Records should be made of any such incident and of decisions made/further actions agreed.
5. IHB adults should apply the same professional standards to students regardless of gender, ethnicity, nationality, disability, sexual orientation or religion.
6. All IHB adults should know the name of their designated person for child protection and understand their responsibilities to safeguard and protect children and young people. This will be explained in inductions.

3.C. CODE OF CONDUCT SUMMARY

Detailed guidance and procedures for working with U18s are given in the accompanying document, IH Bristol Safeguarding Children Handbook which must be read by IHB adults.

However, key aspects of the Code of Conduct are summarised below as a reminder:

General points

1. IHB adults are in a position of trust and must not use this to intimidate, threaten, coerce or undermine students. Corporal punishment and degrading treatment, e.g. through words or actions, is not acceptable.
2. All personal information about students must be treated in a confidential manner and must never be used for an IHB adult's advantage.
3. All IHB adults are in a position of trust with U18s, so any sexual activity with or in front of U18s, or encouraging U18s to engage in or watch sexual activity, is a criminal offence.
4. IHB adults should ensure they are dressed decently and appropriately and bear in mind that offensive, revealing or provocative clothing could leave them open to criticism or allegation.
5. Giving or receiving gifts can be misinterpreted as a bribe or grooming, so caution should be exercised. Rewards for students should be part of an agreed award system and IHB adults should avoid favouritism, which could be construed as grooming.
6. Infatuations of students towards IHB adults should be handled sensitively and discussed with a senior colleague as soon as possible.

<https://ihbedu.sharepoint.com/sites/IHB-General-Permanentstaffonly/Shared%20Documents/Permanent%20staff%20only/Policies/Safeguarding/IHB%20safeguarding%20children%20policy.doc>



7. Staff should not establish or seek to establish social contact outside the classroom with pupils for the purpose of securing a friendship. Staff should not give personal details to U18 students. Staff should not have contact with U18s online, except through formats which are sanctioned and scrutinised by the School, e.g. emailing homework to a teacher's school email address or responding to a message from an U18 on the School's Facebook page.
8. Any physical contact with U18s should be in response to their age-appropriate needs, appropriate to circumstances and the minimum necessary to meet these needs. This contact is open to scrutiny and justification and must never be secretive.
9. When entering rooms where students may be in a state of undress (e.g. bedrooms), IHB adults should announce their intention to enter (e.g. with a knock, pause and a second knock) and wait to be invited in, except in an emergency.
10. IHB adults should only physically intervene to prevent an U18 from committing a criminal offence, injuring themselves or others or causing damage to property. Excessive force is likely to be a criminal offence.
11. One-to-one situations with U18s may make IHB adults more vulnerable to allegations. IHB adults should therefore avoid unnecessary one-to-one situations. Homestay families should ensure their interactions are appropriate and can be justified.
12. Before transporting students in their own vehicles, all IHB adults must ensure that they have informed their motor insurance company. U18s should wear seatbelts at all times.
13. For out of school activities, IHB staff must assess the risks to U18s before an activity takes place and also ensure that their behaviour remains professional despite the more informal setting.
14. If U18s need to take regular medication, they should have a health care plan agreed between student, parents and the School.
15. If an IHB adult is concerned about the medication a student is taking, this should be discussed with the School as soon as possible.
16. IHB adults should be aware that images of U18s have the potential to be misused for pornographic or grooming purposes. Adults should be clear about the purpose of images taken, be able to justify any images in their possession and ensure that all images are available for scrutiny.
17. Care should be taken when engaging students with sensitive topics. If in doubt, seek the advice of a senior member of staff.
18. Accessing indecent images of children on the internet will, if proven, invariably lead to any IHB adult being barred from work with children and young people.
19. Where the welfare of U18s may be at risk, IHB adults should bring matters of concern to the attention of senior management and if necessary, relevant external agencies. Concerns may include the behaviour of other IHB adults.
20. All IHB adults have a duty to record and report any child protection concerns to the Designated Safeguarding Person.
21. If an incident occurs which may result in an action being misinterpreted and/or an allegation being made against a member of staff, the relevant information should be promptly reported to senior staff.
22. IHB adults should feel able to discuss with senior staff any difficulties or problems in relation to U18 students, so that support can be provided or action taken.
23. IHB adults must not supply alcohol or cigarettes to U18s and must ensure that alcohol/drugs do not compromise their ability to safeguard and care for U18s.
24. Permission must be gained before searching a student, unless there is a serious risk of harm. Consulting the School or police is advised.
25. Curfew times are important and the School must be informed if students fail to meet them.
26. All IHB adults, including host families, must assess relevant risks and levels of supervision required for U18s before giving permission for them to do any activities. Students have to get the School's permission before going on unsupervised trips outside Bristol.
27. Supervision of IT by hosts should be age-appropriate. If hosts have any concerns over students' use of IT, they should contact the School.
28. Hosts should be fully aware of the need to assess the risks of activities and time where students are unsupervised by the School or the hosts.

<https://ihbedu.sharepoint.com/sites/IHB-General-Permanentstaffonly/Shared%20Documents/Permanent%20staff%20only/Policies/Safeguarding/IHB%20safeguarding%20children%20policy.doc>



- 29. Students need to be safeguarded when attending online classes or social programme events.
- 30. IHB adults should be alert to any forms of peer-on-peer abuse, whether physical, verbal or online and challenge inappropriate behaviour.

4. RESPONDING TO BULLYING

4.A. DEFINITION

Bullying, which is defined as wilful and repeated behaviour which has the purpose of making another person unhappy, is not tolerated in any form at IH Bristol.

4.B. IDENTIFYING BULLYING

Bullying can take many different forms: for example, physical, emotional, name-calling, showing a lack of respect for another's property or excluding somebody from a social group. One person 'having a joke' is another person suffering bullying.

Sometimes it is obvious, sometimes it is done subtly and in such a way that children will be worried about telling adults what is happening. For this reason it is vital that adults are vigilant in noticing changes in behaviour of children, particularly if they become withdrawn.

4.C. HOW TO REACT IF YOU SUSPECT BULLYING

- 1. Investigate all reports, however seemingly trivial.
- 2. Ensure that all reports of suspected bullying are logged and that the follow-up is also logged, fully recorded and signed off by the relevant academic manager involved.
- 3. Once it has been established that bullying has taken/is taking place, explain to the person acting unkindly that their actions have been precisely that and tell them the effect it has had on another / others.
- 4. Ask them to consider an appropriate way of putting things right and, if necessary support them in making an apology.
- 5. Ensure that any apology / reconciliation is done with staff present so that it can be accurately recorded.
- 6. Should the incident be more serious, the academic manager should, where possible, speak to the DSP or DSL about the situation and then conduct no-blame meetings with both parties (bully and bullied).

The aim is to clarify the situation through discussion and allow both sides to work out a solution that is satisfactory to them both. This will be recorded by the students' academic manager, who will inform the DSP or DSL and agents / parents / group leaders of both parties what has happened and how it has been resolved.

- 7. If, after this meeting, the bullying continues, then it must be seen as deliberate and require a more serious response. The academic manager will take immediate action to protect the bullied person and begin procedures to restrict the activities of the bully. The DSP/DSL must be informed and decisions will be made which could involve the bully being removed from the site, perhaps to another one. The relevant academic manager will also keep agents / parents / group leaders of both parties fully informed.
- 8. Any further/extreme incidents of bullying by the same person would result in them having to leave the School and/or programme and return home as quickly as possible. This will be managed by the DSL.

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4.D. OTHER FORMS OF PEER-ON-PEER ABUSE

Bullying is one common form of peer-on-peer (child-on-child) abuse, but not the only one. Such abuse can happen in and out of school and online.

Staff need to recognise that it can take different forms:

- abuse in intimate relationships
- violence and threatening violence, including online
- sexual violence and harassment, including sexual comments or jokes
- consensual and non-consensual sharing of nude images
- upskirting
- initiation rituals ('hazing')

Staff should understand the importance of challenging inappropriate behaviour between peers in order to prevent peer-on-peer abuse from being normalised as part of peer/school culture, which can result in students not reporting it. Any concerns should be reported to the safeguarding team.

5. REPORTING CONCERNs AND ALLEGATIONS

5.A. RATIONALE

Because we have a legal and moral duty to protect U18s from harm or abuse, all IHB adults should know about the different forms of abuse, how they can be recognised and how to report any concerns or allegations about safeguarding children.

5.B. TYPES OF ABUSE

The four main categories of abuse are as follows:

Abuse	Brief Description	Signs / things to be aware of
Physical Abuse	Where the victim is caused physical harm	Bruising (especially symmetric) Burns
Sexual abuse	Forcing or enticing a young person to take part in sexual activities. Can happen over the internet.	Inappropriate sexualised play Inappropriate needy attention seeking behaviour High incidence of teen abuse of other teens
Emotional abuse	Making someone feel bad about themselves, often persistently (e.g. bullying)	Aggression or withdrawal (two extremes) in one day Self-harm Anorexia Inappropriate neediness/attention seeking behaviour The abused being wary of help
Neglect	Leaving a child unattended or depriving them of basic needs	Most common away from home Unused to supervision Physical / medical needs ignored

Two more specific forms of abuse, which are now being discussed more openly in the UK, are described below:

Abuse	Brief Description	Signs / things to be aware of
Child Sex Exploitation	Exploitation of under 18s (including 16- and 17-year-olds)	Unexplained gifts Older boyfriends or girlfriends

	where they receive something (gifts, money, drugs, attention) in return for involvement in sexual activity; an imbalance of power, whether because of age, gender, intellect, physical strength or resources, is used to coerce, manipulate or deceive an U18 into performing, or allowing others to perform on them, sexual activities; violence, coercion and intimidation are commonly used.	Missing school or regularly coming home late Associating with bad company Misusing drugs or alcohol
Female Genital Mutilation	The non-medical partial or total removal of external female genital organs, typically done to young girls from African countries.	<p>Disclosure of this happening to the student or a friend It is illegal if done in the UK.</p> <p>It is a legal duty for the professional adult to notify police if FGM has happened in the UK</p>

Other forms of abuse

IHB adults should be aware of the possibility, however unlikely, that U18s who come to IH Bristol may be experiencing specific issues, such as:

- peer-on-peer abuse, including bullying/cyberbullying
- grooming online
- domestic or gang violence
- drug or alcohol abuse
- forced marriage
- gender based violence
- mental health issues
- prostitution
- radicalisation/extremism
- teenage relationship abuse/sexting
- trafficking

Please note: further information on any of the above topics (including child sex exploitation and FGM) can be found on page 9 of 'Keeping children safe in education Part 1 July 2015' available online here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/447596/KCSIE_Part_1_July_2015.pdf

5.C. WHEN DO YOU NEED TO RESPOND?

In any of the following situations you need to tell the DSP / DSL:

Situation 1: if you become aware of anything that concerns you or if someone else tells you about a concern, go to **SECTION 1** below.

Situation 2: if a student tells you directly about their actual abuse or the abuse of someone they know – this is an allegation. Go to **SECTION 2** below.

5.C.1. SECTION 1: CONCERN ABOUT A STUDENT

5.C.1.a. Recognising and raising a concern:

It may be that you or someone else has concerns about a student's well-being, but they have not actually said anything to you. If such a situation arises, you should speak to a Designated Safeguarding Person.

Abuse or neglect can have a damaging effect on a student's health, educational attainment and emotional well-being. If you have been in contact with a student or group of students over many

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weeks, you may see changes in behaviour. Such changes may not necessarily indicate that a student is suffering abuse or neglect. In some cases those changes may be as a result of homesickness, bereavement or symptoms of a hidden disability or undiagnosed medical condition, and the need to distinguish those cases reinforces the need for a careful and thorough assessment of the student and his/her needs when concerns are passed on.

It is important that you do not feel afraid about passing on your concerns. The information may be a small piece in a bigger jigsaw and help to get a better understanding of the student's predicament. Any concerns, however seemingly trivial, should be passed on to the designated person.

It may be that you have a concern which feels very vague and would simply like to discuss your concerns with the DSP. Please feel free to do so.

5.C.1.b. Reporting a concern:

- 1) Fill out a *Concern / Allegation Form* in Appendix 1.
- 2) Report your concern as soon as possible to a DSP.
- 3) The DSP will consider what further action to take but will always report it to the DSL.
- 4) The concern will be recorded by the DSP / DSL, who will decide how to respond and communicate this to you.

5.C.1.c. Whistleblowing

Staff are reminded of their legal duty to report to a DSP or the DSL any concerns they have about

- a) the behaviour of colleagues who may not be following this Policy or the Code of Conduct;
- b) any company practice that seems unsafe and concerns them.

If this happens, the reporting staff member will be supported, the concern sensitively investigated and confidentiality will be maintained wherever possible.

Similarly, if you have concerns about the safety or welfare of a child and feel they are not being acted upon appropriately by the School, you can seek advice at any time from the NSPCC helpline on 0808 800 5000 or by email to help@nspcc.org.uk .

5.C.2. SECTION 2: ALLEGATION OF ABUSE

An allegation is where someone tells you directly that some kind of abuse has happened (sometimes called a 'disclosure').

You may be approached by a student who wants to talk to you about something that has or is happening to them or someone they know. They will tend to choose someone that they trust or know well and this will not always be their class teacher. It may be any member of staff or other adult with whom they have formed a good relationship.

5.C.2.a. Procedure for receiving an allegation

When you are approached by a student who wants to talk to you, you should:

- 1) **listen positively, take their allegation seriously and reassure them.** If you can, try and ensure a degree of privacy, but this may not always be possible. Whilst this might be an alarming situation to find yourself in, it is important not to let the moment pass – for every



student that does finally disclose information, evidence shows that they have usually tried up to 12 times before.

2) **A. Receive:**

- Accept what is said without judgement.
- Stay calm and do not show shock, disbelief or distress.

B. Reassure:

- Reassure the child that they did nothing wrong and that you take what they say seriously.
- Do not make false promises, e.g. that you will keep the abuse a secret or that the police will not be involved. These promises may not be in the best interests of the child.
- Tell the child that you will take action to keep them safe and that you may need to tell some people to do this, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk.

C. React:

- Listen quietly, carefully and patiently. Don't jump to conclusions.
- Don't investigate, interrogate or ask leading questions. These might compromise a future criminal investigation. You can ask, "Is there anything else that you want to tell me?"
- Do not ask the child to repeat what they have told you to another IHB adult.
- Explain to the child what you have to do next and who you have to talk to.
- **Contact the Designated Safeguarding Person or Lead immediately, even out of hours to tell them about the allegation.**
- Do not discuss the case with other staff or share the identity of the student or alleged abuser.

D. Record:

- Make some very brief notes at the time and write them up in the *concern/allegation form* in Appendix 1 as soon as possible.
- Do not destroy your original notes in case they are required by the Court.
- Try to record the words used by the child and how the child appeared to you – be specific.
- Record statements and observable things, not your interpretations or assumptions.

3) What happens next

The DSP/DSL will decide whether to refer the allegation to children's social care. **If you are unable to contact the DSP/DSL or IHB's directors, you may need to refer the allegation to children's social care yourself.** See section on 'Making a referral to children's social care'.

Be aware of your own feelings about abuse and find someone you can share those feelings with once the procedures have been completed (while at the same time maintaining appropriate confidentiality). Dealing with issues of child abuse can be distressing for the adult to whom the abuse is disclosed.

5.C.2.b. Allegations against IHB adults

- the DSP/DSL will discuss the allegation with the School Directors (Val Hennessy and/or Marcel Jansen) and refer the allegation to children's social care and follow their guidance. They should also refer to *Keeping Children Safe in Education (Full version)*

<https://ihbedu.sharepoint.com/sites/IHB-General-Permanentstaffonly/Shared%20Documents/Permanent%20staff%20only/Policies/Safeguarding/IHB%20safeguarding%20children%20policy.doc>



https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/435939/Keeping_children_safe_in_education.pdf, pp.40-50.

- If they advise that IH should investigate the allegation, the IH Bristol grievance and disciplinary procedure will be followed.
- Depending on the situation, the staff member/adult may be suspended during the investigation in line with the IH Bristol grievance and disciplinary procedure.

5.C.2.c. Allegations against another student under 18

If an allegation is made against another U18 IHB student:

- the IHB DSP/L will appoint a suitable member of staff to support the person who has been accused.
- The U18 person's parents (also the group leader & agent if appropriate) will be informed of the allegation and kept informed at every stage of the developing situation
- the DSP/L will follow guidance provided by children's social care
- If other agencies become involved, e.g. police, the under 18 will be accompanied throughout the process by a suitable member of staff
- If other agencies are not involved and IH need to carry out an internal investigation, the under 18 accused will be supported by a suitable member of staff and accompanied by them to any interviews.

5.D. MAKING A REFERRAL TO CHILDREN'S SOCIAL CARE

Who contacts who and when

If, at any time, an IHB adult believes that a child is in immediate danger they should call the police immediately on 999.

If an IHB adult believes that a child is suffering significant harm or is at risk of this, a referral should be made to local authority children's social care. This will normally be made by the DSP or DSL, but can be made by anyone.

The procedure for referral by the IHB DSP or DSL to children's social care

1. The DSP/DSL will gather all available information and fill in the *safeguarding referral form* in Appendix 2.
2. The DSP/DSL will, if possible, discuss the situation with one or both of the School Directors (Val Hennessy or Marcel Jansen) to decide on the actions necessary.
3. During office hours (8.30-5.00 Mon-Fri), The DSP/DSL will contact First Response on 0117 903 6444. First Response is Bristol City Council's child social care advice service, which will give safeguarding/child protection advice and, if necessary, refer the case on to a child social worker. Brief, clear guidance on what situations require which format of reporting (phone, online form, etc) is also given here <https://www.bristol.gov.uk/social-care-health/make-a-referral-to-first-response>
4. Outside office hours and on bank holidays and weekends, the DSP/DSL will contact the Emergency Duty Team on 01454 615 165. This team consists of child social workers experienced in child protection.

6. WELFARE AND IMPLEMENTING SAFEGUARDING POLICIES

6.A. E-SAFETY

<https://ihbedu.sharepoint.com/sites/IHB-General-Permanentstaffonly/Shared%20Documents/Permanent%20staff%20only/Policies/Safeguarding/IHB%20safeguarding%20children%20policy.doc>



1. Staff should be aware that children are at risk of abuse online and that technology is often an element in safeguarding issues, particularly peer-on-peer abuse (see section on bullying for more information on peer-on-peer abuse).
2. Parents/guardians must sign an 'U18s Online Code of Conduct and Information Declaration' before their son/daughter can attend classes online. This form contains measures that teachers and academic managers take to keep students safe online.
3. U18 students sign an IT Agreement during induction. This includes guidance about not accessing inappropriate material, not sharing personal information or images online and not bullying other members of the school. This agreement is displayed next to student computers.
4. The School uses web filter software at our Queens Avenue site to prevent student access to inappropriate material. Attempts to access proscribed sites are monitored through weekly reports.

6.B. ACCOMMODATION

Accommodation managed by the School for U18s is host based. Detailed guidance on the following areas is given in other documents:

health and safety checks on all new host families, including fire alarm/evacuation checks	Homestay Handbook
health and safety checks on existing host families, including annual fire risk assessments and gas safety checks	Homestay Handbook
appropriate conduct/supervision for homestay hosts hosting U18s	Safeguarding children handbook
Unsupervised trips for U18s	Parental agreement under-18 students, student handbooks, parental permission form for unsupervised trips
conduct and rules for U18 students	parental agreement under-18 students, student handbooks
PREVENT guidance	Homestay Handbook
Fostering regulations	Safeguarding children handbook

6.C. RISK ASSESSMENTS

1. Risk assessments are reviewed every two years for both Oakfield Road and Queens Avenue buildings.
2. Risk assessments are carried out for general Health and Safety on all social programme events organised by IH Bristol. Additional risks are assessed for U18s if they are on these events.
3. Group leaders planning their own social programme trips are offered IH Bristol's risk assessments and the advice of the School's Social Programme Co-ordinator to help them assess for themselves the risks they may encounter in a UK context.

6.D. SUPERVISION AND RATIOS

At school

Lessons and social programme events: classroom teachers/staff are responsible for supervising all U18 students. If a student is ill or behaves inappropriately, their Academic Manager will supervise them, or if they are unable, another member of staff, e.g. reception staff at Oakfield Road.



Break times: the level of supervision is age-appropriate. At Oakfield Road, junior students are only allowed to leave school premises in the mid-morning break when accompanied by an IHB adult. For the lunchtime break from 12.35 to 1.30, Queen's Avenue junior students are allowed to go out, but are instructed to stay in pairs and in the vicinity of the school.

Social programme events

To maintain a safe supervision ratio for social programme events, we consider each event and each group of students individually, taking into account the nature of the activity and the age, gender, language level and needs of the students, in line with the level of risk identified in the risk assessment. Whilst age-based guidelines can be helpful, the specific needs of each group are constantly assessed and considered.

For social programme activites, IH Bristol observes the following ratios:

- 1 adult for every 15-20 students aged 11 to 17
- 1 adult for every 10-15 students aged 8 to 10

The School is aware that dangerous activities such as surfing may require more adults in order to supervise U18s safely and these are risk-assessed individually.

Only students aged 16+ are routinely allowed to have unsupervised time on social programme events; younger students may have continual/partial adult supervision, depending on individual circumstances, which are evaluated in risk assessments. At the start of trips, U18 students are made aware of key contact phone numbers they can use if necessary.

Unsupervised trips for U18s

U18s are not allowed to go on unsupervised trips outside Bristol without the permission of both the parents/guardians and the School.

The procedure for obtaining permission is as follows:

1. Parents/guardians email the completed 'unsupervised trips for U18s form' to the School.
2. The School carries out a risk assessment of the trip's suitability.
3. The School advises the student, the host and parents/guardians about whether it thinks the trip is appropriate/safe.

Travelling as unaccompanied Minors

1. If students are travelling as unaccompanied minors, the parents have to supply the name and ID/contact details of the person meeting the child at the airport to the airline company. As soon as this is known by the School (typically supplied by our taxi company) a few days beforehand, it is passed on to the parents/agent.
2. Taxi drivers going to the airport to meet a minor are given an unaccompanied minor letter of authorisation, which includes their name, and will have an appropriate ID card as a means of identification.
3. The taxi company will inform the School via the emergency phone at the time about any minor who fails to arrive as expected and the School will then confirm that the student is safe and being supervised appropriately.
4. If there are any serious issues, contact is made with a senior member of staff to decide on further action.

One-to-one lessons in the student's home



Very occasionally, IHB Language teachers may teach U18 students at home. In these cases, parents/ guardians are required to be present in the home and available for the duration of the visit.

6.E. MISSING STUDENTS

Absence from class

In accordance with our school absence policy, if U18s are late for a class, they must enter the class immediately rather than waiting for the mid-lesson break.

All teachers, regardless of the site, are required to take the register at the start of their classes and inform reception/Academic Managers after 10 minutes if U18s are absent.

1. For students studying at Oakfield Road or Queens Avenue, reception will phone the student/group leader/host within 20 minutes to find out where the student is and the reason for their absence. This information is recorded. If a student cannot be located, the U18 absence procedure is followed.
2. For students studying at Bromsgrove School, academic managers must immediately inform the pastoral staff of these schools of a student's absence. The responsibility for locating the student then passes to these pastoral staff.

Class non-attendance rates are monitored through a weekly report for adult courses and by a daily tour of the classes by the Academic Manager at Queen's Avenue.

Absence from host

Hosts are instructed to phone students and then the school during working hours and the emergency phone outside school hours if students are not present when expected, especially after evening curfew. If a student cannot be located, the U18 absence procedure is followed.

From social programme events

U18s on trips are given clear information about who to phone if they are lost and U18s on junior events normally carry school ID lanyards. If a student cannot be located, the U18 absence procedure is followed.

6.F. TRANSPORT

1. The School requires all contracted transport companies to confirm in writing that their drivers are DBS checked.
2. Procedures for transporting U18s in staff and host vehicles are detailed in the Safeguarding children handbook.

6.G. WELFARE PROVISION

Junior courses

1. U18 students on junior courses are encouraged to look after each other and to pass on concerns to staff. Students studying on the School's sites are made aware of these things through their first day induction, the junior student handbook, posters and class welfare tutorials with teachers every Friday lunchtime.
2. Teachers of all junior programmes are in daily contact with each other and their Academic Manager within a shared staffroom and discuss concerns about individuals informally. More formal discussions about welfare and safeguarding take place at weekly teacher meetings. In addition, at Oakfield Road, summer junior programme teachers



conduct daily meetings to discuss social programme arrangements, including welfare and safeguarding.

U18s on adult courses

1. The Accommodation and Welfare Officer introduces herself during student induction and U18 students are reminded in the adult student handbook about who they can contact to discuss issues and worries.
2. All students are invited to a new students' tutorial at the end of their first week, where they discuss any academic and welfare/accommodation issues they may have with a teacher and the Accommodation and Welfare Officer.
3. Every four weeks, students have academic tutorials with a class teacher and in the case of U18s, there is also a welfare tutorial, in which students have the chance to discuss any issues and worries they may have.

U18 students studying on one of the School's sites can give feedback through their group leaders, through direct contact with Academic Managers and through feedback forms at the end of their programmes.

6.H. INVOLVEMENT OF STUDENTS OVER 18

We remind our adult students that there may be U18 students on adult courses and, as such, they may require additional support. We therefore encourage adult students to pass on any concerns they have about U18s to staff.

6.I. FIRE SAFETY

Fire drills should be carried out at both School sites twice a year and the alarms are tested regularly. Fire action signs are displayed in every classroom and students are shown fire exits as part of their induction. In addition, some members of staff have received fire marshall training.

6.J. FIRST AID, MEDICAL CONDITIONS AND DISABILITIES

1. All students are required to give the School information about medical conditions and/or disabilities on application. This information is passed on to the School Principal, who draws up an appropriate care plan for the U18 student with their parents and, where appropriate, the family's own medical practitioners. This plan is agreed upon with the relevant host, relevant staff and the student's parents/guardians before the student's arrival.
2. Untrained IHB adults are not allowed to administer any prescribed medicine to any student without the prior agreement of parents and, where necessary, medical professionals. Any prescribed medicines kept by the School for students will be kept in a secure place.
3. Any U18s needing medical attention will be accompanied by a responsible IHB adult.
4. First aid is available at reception in both schools, where first aid kits and accident books are also kept. Seven members of staff are currently first aid trained.

6.K. UNDER-18 BEHAVIOUR MANAGEMENT

<https://ihbedu.sharepoint.com/sites/IHB-General-Permanentstaffonly/Shared%20Documents/Permanent%20staff%20only/Policies/Safeguarding/IHB%20safeguarding%20children%20policy.doc>



1. Before making a booking for an U18 student, the following information is sent out to parents: standards of acceptable behaviour, Abusive Behaviour policy, a summary of UK law and rules for students in order to stay safe. Once a booking is made, parents are required to sign a parental agreement to show that both they and their child accept the rules stated.
2. In the induction for all students on their first day, the students read the School's acceptable behaviour policy, which specifies what behaviour is inappropriate and possible consequences for students. They also read the School's Abusive Behaviour policy and what actions the School will take if they do not follow the policy.
3. Teachers receive guidelines on classroom management and the rewards/sanctions systems in place at particular centres in their induction. Academic Managers usually do early observations of teachers on summer programmes in order to give teachers early feedback and support on classroom management.
4. Positive reinforcement of good behaviour works well to control the students in most cases and staff encourage students to co-operate and be responsible. Prizes can be awarded for the person in each class who has made the most effort and at Bromsgrove, specific reward systems are used effectively for 8-12 year-olds.
5. An observation/incident book is used during summer programmes to record any notable behaviour issues or incidents and each entry is read and discussed with the teacher by an Academic Manager. The Academic Manager may report/discuss serious or persistent problems with students/pastoral staff/group leaders/agents/parents as appropriate and suitable sanctions agreed upon and implemented. Expulsion from the course is a rare and last resort, but students are made aware that this possibility exists. Any decision to expel a student is only taken after discussion with the IH Bristol Principal and/or Director.

6.L. SAFER RECRUITMENT, DBS CHECKS AND TRAINING

International House Bristol is aware of its responsibilities for safer recruitment and training. We will ensure the following:

1. All job advertisements/interview invitations will notify prospective candidates that we only employ people who have an enhanced DBS check for the Child Workforce and 3 satisfactory references. All candidates will be sent an email copy of the School safeguarding children policy document as part of their contract offer, which they must reply to say they have read and understood.
2. We will ask appropriate safeguarding-related questions at the interview stage. This applies to new host interviews as well as those for staff.
3. We ask referees to comment on any disciplinary issues or allegations made against the candidate in relation to the safety and welfare of students.
4. In the event of a prospective employee having a criminal record that is disclosed on the DBS check, this will be discussed with the prospective employee. Verification must be made that the information contained does indeed relate to the person concerned. The discussion will also aid the decision-making process and should focus on the seriousness and nature of the offences, the nature of the appointment, age of offence and any concealment of offences at the application process. Based upon the findings of this discussion, a decision and rationale will be formed by the DSL and DSP and, where appropriate, school directors, on the suitability of the prospective employee with the DSL having the final say. The rationale and decision will be recorded.
5. For applicants where a DBS check has not been possible e.g. for overseas employees, and for applicants who have lived abroad for one year or more in one country in the last three years, we will endeavour to obtain a police check. This is also true for all our group leaders accompanying students on our programmes. We will refer to the following government advice on these:
 - a. <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>
 - b. and the British Council spreadsheet for applicants obtaining checks:
<https://www.britishcouncil.org/education/accreditation/information-centres/care-children>



6. Disqualification by association will not apply to us as we will not accept students under the age of eight on any of our programmes.
7. All pre-appointment checks of newly appointed staff will be kept on a single Central Register.
8. We run all new members of staff through an enhanced DBS check if they have substantial access to U18s. These staff members will have their DBS checks updated every three years where they are in continuous employment with the school.
9. DBS requirements for new temporary/returning staff will be considered on a case-by-case basis, but, typically, staff with DBS checks more than three years old will be required to update them.
10. New members of staff who commence employment prior to the DBS check being received and cleared will need to delay start date in working in regulated activity with U18s. Private language schools are unable to access the Barred list anymore.
11. New staff members who work with U18s will also be checked against the prohibited list. (For hosts, in cases where they confirm have worked in primary/secondary education.)
12. We will train up all members of staff to Basic Awareness Safeguarding Training (formerly Level 1) in safeguarding and child protection during their induction period and will ensure that this training is renewed periodically.
13. We will ensure that Designated Safeguarding Staff are trained in Advanced Safeguarding for Designated Staff (formerly Level 2/3) and that this training is renewed periodically.

Training provision at IH Bristol

Training event	Recipients	How often
basic safeguarding online	temporary staff; permanent staff with occasional access to U18s; from Sep 2016, all host families with U18 students	every two years
basic safeguarding face-to-face course (in-house)	permanent staff with regular access to U18s	every two years
advanced safeguarding face-to-face courses	DSP	every two years
specialist safeguarding face-to-face courses	DSL	every two years
Safer recruitment	staff in key recruitment positions	every two years
read safeguarding policy and safeguarding children handbook (with follow-up quiz for staff)	all staff, group leaders, accommodation providers	every year

Group leaders

Group leaders are expected to comply with the principles given in the IH Bristol safeguarding policy and handbook. Therefore, before arrival, the IH Bristol employee who is negotiating the contract with the group/agent must send group leaders copies of the safeguarding policy and safeguarding children handbook.

Group leaders bringing U18s to either of our School sites are required to read these and complete a short quiz on key points. As part of their induction at IH Bristol, the quiz and safeguarding in general is discussed with the DSL or DSP. Group leaders must also read and sign the IH Bristol Group Leader contract.

6.M. RADICALISATION AND EXTREMISM : 'PREVENT'

Please refer to IH Bristol's PREVENT policy and PREVENT risk assessment for further information.

<https://ihbedu.sharepoint.com/sites/IHB-General-Permanentstaffonly/Shared%20Documents/Permanent%20staff%20only/Policies/Safeguarding/IHB%20safeguarding%20children%20policy.doc>



6.N. PROVISION FOR STUDENTS' UNSUPERVISED TIME

The main risks for students in unsupervised time have been assessed in the document 'U18 unsupervised time provision detailed' and this is used as a training/review tool for managers of academic and social programmes. A summary of this document, which is named 'U18 unsupervised time provision summary', is available on the school website and in the IHB Safeguarding Children Handbook.

7.A. APPENDIX 1

Safeguarding concern/allegation form (to be given to IHB's DSP/DSL)

Please see procedure in the policy document and complete if you have a safeguarding concern/allegation to report. You must complete the boxes in bold; the other information can be filed in by the School Designated Safeguarding Person later if you do not know.

Student's first name	
Student's family name	
Student's gender	
Student's date of birth	
Student's age	
Student's nationality	
Individual student or group name:	
Full name of person with concern	
Role of person with concern	
Contact details of person with concern	
Date (and time) concern noted	
Location where concern noted	
Concern (please provide as much detail as possible)	
N.B. If reporting a disclosure/allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more if needed.	
Student's views (if known)	
Suggested follow-up/advice to be given to student, if applicable	
Date and time form completed:	
Signature of person with concern:	

Response to Concern: follow up action by Designated Safeguarding Person

Date DSP informed:	
Discussed with:	
Parents/group leader/agent/homestay/others informed?	

Response	By whom (full name)	When (Date & Time)



7.B. APPENDIX 2

Safeguarding referral form (to be sent to children's social care)



Section A: referrer's details

Referrer's full name, role and contact details	
------------------------------------------------	--

Section B: details of student requiring safeguarding

First name	
Family name	
Date of birth	
Age	
Gender	
Nationality	
Any disability/medical condition?	
Home address	
Parents' names	
Is student known to be at risk?	

PLEASE FILL IN EITHER SECTION C *OR* SECTION D AND THEN SIGN AT THE END

Section C: referring a concern

Full name, role and contact details of person with concern	
Role of person with concern	
Date (and time) concern noted	
Location where concern noted	
Concern (please provide as much detail as possible)	
N.B. If reporting a disclosure/allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more if needed.	
Student's views (if known)	
Suggested follow-up/advice to be given to student, if applicable	

P.T.O.

<https://ihbedu.sharepoint.com/sites/IHB-General-Permanentstaffonly/Shared%20Documents/Permanent%20staff%20only/Policies/Safeguarding/IHB%20safeguarding%20children%20policy.doc>



Safeguarding referral form continued

Section D: referring an allegation

Details of any other adult or student involved in allegation

First name	
Family name	
Date of birth	
Age	
Gender	
Nationality	
Any disability?	
Role/connection with school	
Home address	
Parents' names (if under 18)	

Details of alleged incident

Date and time of alleged incident	
Location of alleged incident	
Details of alleged incident	
Names of potential witnesses and relationship to student requiring safeguarding	
Any other information?	
Allegation category (e.g. physical/sexual)	
Was technology involved? If yes, what type?	

Section E: signature of referrer

Signed (by person submitting referral)	
Date & time (form submitted)	

7.C. ASSOCIATED POLICIES AND LITERATURE

IH Bristol documents

1. Safeguarding children handbook
2. Homestay Handbook
3. IT Agreement for students under 18
4. Student handbook for adult courses
5. Student handbook for junior courses
6. PREVENT policy and risk assessment
7. Recruitment policy
8. Host recruitment procedure
9. Teaching policies in teacher handbook: section on behaviour management
10. Parental agreement under-18 students
11. Parental permission form for unsupervised trips
12. Emergency procedure for social programme
13. Emergency phone procedure
14. Absence procedure
15. Grievance and disciplinary procedure
16. Group Leader Agreement
17. U18 student information on IHB website (including up-to-date safeguarding policy)
18. U18s Online Code of Conduct and Information Declaration
19. U18 unsupervised time provision - detailed and summary

7.D. FURTHER INFORMATION

For more information please refer to:

1. Keeping children safe in education 2021 (September 2021 – Part one)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014058/KCSIE_2021_Part_One_September.pdf
2. Keeping Children Safe in Education (September 2021 Full version)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf
3. NSPCC website
<http://www.nspcc.org.uk/>
4. Child Law Advice service, operated by Coram Children's Legal Centre – it provides legal advice for parents
<http://childlawadvice.org.uk/>
The helpline number is 0300 330 5485
5. Education resources for mental wellbeing
<https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview>

7.E. POLICY REVISION RECORD

Date	Section	Revision
21/06/16	7.D.	Additional helpline added
21/06/16	6.L. SAFER RECRUITMENT, DBS CHECKS AND TRAINING	New points 8 and 9 added
12/06/18	3.C. CODE OF CONDUCT	Points 24 to 28 added to include extra

<https://ihbedu.sharepoint.com/sites/IHB-General-Permanentstaffonly/Shared%20Documents/Permanent%20staff%20only/Policies/Safeguarding/IHB%20safeguarding%20children%20policy.doc>



	SUMMARY	guidance for homestay families
26/06/19	2.B KEY PEOPLE FOR SAFEGUARDING CHILDREN	Section 2B on Southampton summer programme removed
January 2022	4.RESPONDING TO BULLYING	Section 4D added to summarise other forms of peer-on-peer abuse
January 2022	6.A. E-SAFETY	Update on 'U18s Online Code of Conduct and Information Declaration'
January 2022	6.N. PROVISION FOR STUDENTS' UNSUPERVISED TIME	Details of provision documents added
January 2022	2A. KEY PEOPLE FOR SAFEGUARDING CHILDREN at IH Bristol	Change of DSP staff recorded
January 2022	3.C. CODE OF CONDUCT SUMMARY	Additional points added to reflect changes in Safeguarding Children Handbook
January 2022	2.C. BRISTOL	Added LADO contact back in, plus PREVENT local number
Nov 2023	1.A Context	Updated all sections to reflect: Oakfield Road is normally EFL Juniors site, Queens Avenue EFL Adults site
Nov 2023	1.A (4) Deleted 'one-to-one classes in foreign languages for individual U18s year-round' – we no longer run FL Classes	Deleted
Nov 2023	2.C. BRISTOL	Added reference to main Bristol Safeguarding website https://bristolsafeguarding.org/
Nov 2023	6.B. ACCOMMODATION	All references to 'host family' updated to 'host' or 'homestay' as appropriate. IH Bristol hosts include families, but not exclusively, so this is a misleading term.
Nov 2023	6.D. SUPERVISION AND RATIOS	Reference to Oakfield Road, not Queens Avenue updated; break times updated to current lesson and break times
June 2024	All references to DSP named member of staff	From Marie Hill to Luqueney Pearson.
June 2025	Page 2, 1.A Context	updated to show new minimum age for open junior courses '12 years'