



SAFEGUARDING POLICY FOR UNDER 18s April 2018

Designated Safeguarding Lead (DSL):
Duygu Cevik, Managing Director/Principal

A1 - Policy Statement Context

This policy document is for all staff at British School of Marketing International (4a Westover Road, Bournemouth, BH1 2BY) relevant to students between the ages of 16 and 17 for our courses offered to “adults” (hereby over 18) at the school premises and in school-provided accommodation (homestay).

A2 - Terminology

All staff under contract with the British School of Marketing International are aged over 18 and are therefore adults.

The terminology used in this policy document outlines *all staff working under contract at the British School of Marketing International* for the purposes of safeguarding and child protection. Safeguarding is hereby defined as *looking after and caring for students on an every-day basis in a way which all staff would look after and care for their own children*. Child protection is hereby defined as *protecting children from direct harmful behaviour in the event of its occurrence*.

The DSL will be ultimately responsible for all aspects of safeguarding, including training of all staff, day-to-day monitoring, records etc.

In case of incidents, the DSL is responsible for reporting the matter to the Local Safeguarding Children Board (LSCB) and its Designated Officer.

The named person for student welfare is **Duygu Cevik (Managing Director / Principal)**,

A3 - Statement

The policy of safeguarding and child protection for students aged 16 to 17 at British School of Marketing International can be summarised as:

The obligation to look after and care for students between the ages of 16 and 17 in way that the staff would treat their own children of a similar age (safeguarding). This extends to protecting students between these ages from direct harmful behaviour which occurs on an incidental basis (child protection).

A4 - Under 18s Entitlement

The policy provides an entitlement to be protected to all students between the ages of 16 and 17 of all races, genders, beliefs, religions and background.

A5 - Adult’s Responsibilities

All staff under contract with British School of Marketing International have an obligation to protect students aged under 18. There must be at all times a strong commitment to safeguarding by being aware, vigilant and knowledgeable in who to report concerns or allegations both within the organisation and externally. It is the organisation’s obligation to provide regular, up-to-date training of best-practice in safeguarding and child protection.

The named person for student welfare is **Duygu Cevik (Managing Director / Principal)**,



A6 - Associated Policies

Related policies which provide further guidance on safeguarding and child protection at the British School of Marketing International can be found in:

- Policy for prevention of extremism, radicalisation and terrorism
- Policy for unsatisfactory student behaviour
- Policy of supervision ratios and specialist qualifications for activities staff
- Policy for dealing with abusive behaviour
- Policy for IT safety

In addition to the above, further reference can be found in the staff and teacher's handbooks.

A7 - Policy Review

The British School of Marketing International carries out audits of internal systems and processes every 6 months. Moreover, every 3 months, the school carries out academic reviews of syllabi and resources. Within each of the above audits, adequate reviews of policies, systems, teaching and academic resources relevant to 16-17 year olds will take place.

A8 - Roles and Responsibilities

The named person for student welfare is **Duygu Cevik (Managing Director / Principal)**, who is ultimately responsible for the delivery of the policies. The named person for academic management is **Nick Fergusson-Wood (Director of Studies)**. In the event of the Managing Director / Principal's absence from the school, the Director of Studies will deputise to ensure the continuous delivery of safeguarding and child protection with the British School of Marketing International.

A9 - U18s Involvement

Students aged between 16-17 will have the same freedom as over 18s to contribute to school processes through first-day surveys, accommodation surveys, last-day surveys and the complaints and suggestions survey.

A10 - Documents / Legal Framework

The guidance followed in writing this policy statement:

- Guide to assist providers in writing a safeguarding policy (C1) – British Council, January 2016 version, retrieved: April 2016.
- NSPCC Guidance on Child sexual Exploitation (<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/what-is-child-sexual-exploitation/>), retrieved April 25- 2016
- NSPCC Guidance on FGM (<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/>), retrieved April 25- 2016
- English UK Advanced Safeguarding for Designated Lead, handouts 1 and 5.

A11 - Policy Availability & Formats

This document is available on the school's website for public viewing.



B1 - Code of Conduct Overview & Principles

All staff and students at British School of Marketing International will be made aware of the need for a Code of Conduct. Central to this is the idea of building trust between students and staff at the school, which is seen as a positive attribute in a multi-cultural language learning environment. It is intended that BSMI will provide a safe and enjoyable learning environment for all students, regardless of age. British School of Marketing International recognises the need to provide an environment which meets the best-possible standards of conduct for all students, which will be driven by the needs of our youngest students.

B2 - Position of Trust

All members of staff will recognise the position of trust, which is an implicit part of their role. This must be displayed through conduct, manner, behaviour and approach towards all students, particularly under 18s.

The Sexual Offences Act 2003 states that it is a criminal offence for a person in a position of trust to engage in sexual activity with an individual aged 16-18 for whom there is a responsibility despite the legal age of consent being 16 years old. For this reason, no staff member of British School of Marketing International may engage in sexual activity with any student at the institution, regardless of age.

B3 - Setting Standards

British School of Marketing International expects its staff to lead by example when representing the school so as to earn the respect of the students. This will be achieved through specific actions such as:

- Reminding staff to be excellent role models
- Encouraging a culture of openness and honesty
- Responding appropriately to any safeguarding or child protection concerns

B4 - Adult – U18 Interaction

Below is a list of specific instructions for interacting with under 18s:

- No physical contact between adults and under 18s unless it is direct action to remove the student from imminent physical danger (e.g. getting hit by a bus)
- Establishing behavioural boundaries
- Giving positive encouragement and praise whilst being measured and appropriate in disciplining bad behaviour
- No socialising with under 18s outside school, including via social media
- No swearing, cursing or blasphemy in front of under 18s
- Appropriate classroom content – No mention of risqué topics which you would expect your children to be exposed to. This includes using activities which are age appropriate
- Setting of clear meeting times and locations for off-site excursions. Checking instructions via instruction checking questions (ICQs)

B5 - Appropriate Appearance

As per British School of marketing International's guidance in the Staff Handbook, teachers are requested to wear formal clothes, including a shirt or blouse with a collar and smart trousers and shoes. No trainers, jeans or t-shirts are allowed.

B6 - Alcohol, Drugs and Smoking

All staff are requested to lead by example during employment with British School of Marketing International. Reference to alcohol, drugs or smoking must be avoided in classroom activities, unless designed for explicit purposes of educating about addictive substances etc.

During break times, staff must smoke in a place where they cannot be seen by under 18s. Staff must not represent the school under the influence of drugs or alcohol.



All students will be given an induction at the start of the course which outline the school rules regarding alcohol, drugs and smoking. Further information can also be found in the Student Handbook.

B7 - IT & Social Networks

British School of Marketing International takes the issue of Internet safeguarding and child protection seriously. All internet searches will be protected with safe-mode filters to mitigate the risk of viewing graphic or inappropriate content online.

In addition, regular monitoring of Internet histories on school computers will mitigate the risk of accessing internet chat-rooms with inappropriate content.

B8 - Accommodation

Students living in homestay accommodation, specific guidance will be given to the members of homestays instructing the correct code of conduct regarding under 18s, and all members will be subjected to DBS checks. The guidance refers specifically to behaviour in communal living areas, including living rooms, bedrooms and bathrooms / shower rooms.

B9 - Transport

For transport to and from the accommodation to the school premises, it is expected that students aged 16-18 will use local public transport without being accompanied by a BSMI representative unless arranged through specific agreement with a parent or educational agent. In this event, BSMI will agree in writing the arrangements of accompanying students on local public transport.

It is assumed that all students will be careful and diligent whilst crossing roads on foot.

B10 - Whistleblowing

In the event of a specific concern regarding a colleague's behaviour towards a student, the person giving the disclosure will not be penalised, and the information will remain confidential.

British School of Marketing International will make efforts at all times to create an environment in which disclosures are encouraged and should be viewed as an opportunity to "do the right thing".

C1 –Overview

C1 - Child Protection Overview

British School of Marketing International will meet its child protection responsibilities by ensuring that every member of staff is aware of his / her obligations and duties in this area. In addition, the institution will make sure that robust and fit-for-purpose systems are in place to deliver child protection.

Recruitment policy and procedure

At British School of Marketing International (BSMI) we believe that all students have a right to live, study, develop and reach their goals in a safe and supportive environment. Therefore we are committed to providing a safe learning environment for all students. We ensure that homestay providers, group leaders and staff have a responsibility to safeguard all students at all times, whether in or out of the school, or at social events organised by the school, or in accommodation provided by the school, irrespective of the age of the students. BSMI will ensure that all staff working onsite and offsite are DBS checked. In case of any delayed DBS checks BSMI will ask prospective employees to complete a DBS declaration form giving information regarding any criminal convictions and information about them being on any barred lists. In addition to this, prospective employees will have to provide BSMI with two references from their most recent employers relating to safeguarding issues. BSMI will not recruit anyone who fails to meet the recruitment procedure.

All members of the school community including staff, home-stay providers, group leaders and parents or legal guardians have an extra Duty of Care for students under 18 in or out of the school, at social events organized by the school or in accommodation provided by the school. In the UK, a student under the age of 18 is legally considered a child.



BSMI will also ensure the student is safe at all times at a homestay provided by the school by ensuring that all household members are DBS checked and present overnight during the stay of a student aged 16 or 17. Group leaders accompanying 16 and 17 year olds will be asked to provide the school with the relevant DBS record from their home country. Alternatively, BSMI will carry out an online DBS check for any group leaders travelling from overseas prior to their arrival.

BSMI's approach to safeguarding

BSMI takes a child-centred and coordinated approach to safeguarding. BSMI believes that

- The welfare of the child and/or vulnerable person is paramount
- All children and/or vulnerable people irrespective of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse
- Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.
- All staff play an important part in the wider safeguarding system for children
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.
- BSMI believe that it is always unacceptable for a child or young person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and young people, by a commitment to practice which protects them.

The purpose of the policy is:

- To provide protection for the children and and/or vulnerable people who study at BSMI or live with a BSMI homestay provider.
- To provide staff, homestay providers and group leaders with guidance on procedures they should adopt in the event that they suspect a child or vulnerable person may be experiencing, or be at risk of, harm.

C2 - Nominated Person

The nominated person who is in charge of child protection is **Duygu Cevik (Managing Director / Principal)**. This person can be contacted via the 24-hour emergency phone (out of office hours) on 07809373696. Alternatively, in the event of her absence, **Paul Fazakarley (Teacher)** will deputise for the role. He can be contacted on 07950055519.

The Managing Director / Principal has done her Advanced Safeguarding training.

Position in Designated Safeguarding Team	Name	Safeguard Training	Contact details
Designated Safeguarding Lead (DSL)	Duygu Cevik Managing Director	Level 3	dc@bsminternational.co.uk
Designated Safeguarding Person (DSP)	Paul Fazakarley Teacher	Level 2	Paul@bsminternational.co.uk

C3 - When Adults Need to Respond

There are a number of scenarios, which warrant a response from an adult:

- If the adult notices a child protection issue themselves
- If the adult is told about a child protection issue from another person (adult or under 18)
- If the adult is told about a child protection issue directly by the under 18.

In each event, there is a formalised procedure to follow which is made available to all members of staff (Staff Handbook).

C4 - Recognising Symptoms of Abuse

British School of Marketing recognises 4 main areas of abuse, which are; physical; sexual; emotional and neglect. Specific guidance will feature in the training provided to all staff.

TYPES	DEFINITION	SIGNS
Emotional	Is when parents/carers or others fail to show their children sufficient love or attention or when they threaten, taunt or belittle them, causing them to become nervous, withdrawn, aggressive, or disturbed in their behaviour.	<ul style="list-style-type: none"> · physical and/or emotional developmental delay · Becoming extremely passive or aggressive · Sudden onset of speech disorders · Overreaction to mistakes, or continual self-depreciation · Neurotic behaviour; e.g. rocking, hair twisting, self-harm · Being scared of particular places or people
Physical	Is when parents/carers or others deliberately inflict injuries on a child or young person, or do not protect their child from being physically harmed by someone else.	<ul style="list-style-type: none"> · unexplained bruises, burns, marks or injuries on areas of the body where accidental injuries are unlikely · wearing clothes to cover injuries, even in hot weather · Being scared of particular places or people · withdrawn behaviour
Sexual	This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.	<ul style="list-style-type: none"> · Behaving in an inappropriate sexual way with objects or classmates · Nightmares, poor sleeping patterns · withdrawn behaviour · Personality changes, seeming insecure · Being scared of particular places or people · Change in eating habits · Physical signs such as unexplained soreness around genitals, sexually transmitted diseases · Becoming secretive
Neglect	Is when a parent/carer fails to meet a child or young person's essential need for food, clothing, shelter or medical care, or when children are left without proper supervision, which leaves them unsafe or unprotected.	<ul style="list-style-type: none"> · Often showing signs of hunger · Poor appearance and personal hygiene; unwashed, hair not brushed · Tiredness, excessive yawning · Might abuse alcohol or other drugs

C5 - A Child Telling an Adult (Disclosure)

Detailed step-by-step guidance is a feature of training for all staff. Each member of staff must be aware that he or she may be the person to whom the under 18 discloses. Therefore, everyone in the organisation must be aware of the procedure and the right way to respond.



C6 - Keeping Records

All records of welfare, safeguarding and child protection are kept strictly confidential and within the BSMI network and accessible only to the Managing Director / Principal and Director of Studies. Records are kept for 3 years, after which time they are destroyed. These records will not be shared unless requested by the Police.

C6 Supervision for student safety

Host families will be made aware of BSMI's safeguarding regarding care of 16 and 17-year olds. All host families will be provided with a code of conduct sheet stating their obligations to the student and to the school. According to the code of conduct, students should arrive at the host family by 10.00pm latest every day. If the student is going to be late they should inform the host family of this. Students travelling late in the evening are advised to take a taxi to their accommodation, unless they are travelling in a group.

All students will receive a Student Handbook outlining what is expected of them. They will be informed the importance of attending lessons on time as well as curfew times for host families.

Students aged 16 and 17 are made aware of UK laws and regulations regarding matters such as alcohol consumption, drugs and curfew times through the Student Learning Agreement form that BSMI will send to their parents / agents prior to their arrival.

BSMI will provide a separate induction to group leaders making sure they fully understand their duty of care regarding under 18s. They will receive clear instruction and will be told what is expected of them. If there are concerns about supervision arrangements during activities and excursions, BSMI will provide supplementary staff to accompany group leaders.

BSMI will schedule activities outside of lesson times and students will be made aware of all risks relating to each activity. Group leaders will be asked to read and understand the risk assessment provided by BSMI relating to that particular activity.

C7 - If an Adult is accused

If an adult is accused of committing a child protection crime, the following procedure will be followed (whether it is physical, sexual, emotional or neglect):

1. Ensure the child is safe, supported and reassured.
2. Inform the DSL immediately.
3. When appropriate, return the child to their normal routine.
4. Ensure a clear written record has been made on the standard form. Signed and dated by the person making the allegation, or the person who heard the allegation from a child.
5. The DSL or alternative senior member of staff must contact the relevant local authorities.

C7 – Accommodation guidance for homestays

BSMI provides under 18 students with only homestay accommodation, where their meals are provided everyday (breakfast and dinner). In homestays students aged 16 and 17 are not allowed to stay in the same house as students aged over 18 years. BSMI ensure all homestay families are aware of their duty of care for under 18s, which means that they need to be always present overnight. All host families will be provided with a code of conduct form which explains their duty of care for under 18s.

C8 – If the DSL is accused

1. Ensure the child is safe, supported and reassured.
2. Inform a senior member of staff immediately.
3. Ensure that another staff member is aware of the private meeting with the student.
4. Ensure a clear written record has been made on the standard form. Signed and dated by the person making the allegation, or the person who heard the allegation from a child.
5. The senior member of staff must contact the relevant local authorities.

C9 – If a Child is accused

If a child is accused of committing a child protection crime against another, British School of Marketing recognises the issue as very serious but more complex than if an adult is accused.

In the event of the disclosure being physical in nature, the following steps will be followed:

1. Protect both of the children (accused and accuser) making sure they are safe and reassured.
2. Gather as much evidence as possible from the accuser (child) about the alleged incident (in private with an accompanying member of staff. Ask open questions – avoid leading yes/no questions. If the child's level of English is low, use the services of a professional translator)
3. Gather as much evidence as possible from the accused (child / children) about the alleged incident (to be done separately / individually i.e. not at the same time as step 1. In the case of many children being accused, each child must be interviewed separately. In private with an accompanying member of staff. Ask open questions – avoid leading yes/no questions. If the child's level of English is low, use the services of a professional translator)
4. Once the incident is recorded and witnesses are questioned, DSL should contact LSCB for further guidance
5. Managing Director / Principal to contact the children's (accuser and accused) parents informing them of the incident
6. Depending on the outcome of stages 3 and 4, the either child / group of children may need to be sent home.
7. Depending on the advice of the LSCB, the accused may need to be suspended from school with immediate effect.

In the event of an over 16 engaging in sexual activity with an under 16, the LSCB will be informed and further guidance will be requested.

Due to the nature of two 16-18 year old engaging in sexual activity, there is no context for abuse of a position of trust. In addition, because of the age of consent being 16 years, it adds a further element of complexity to the situation. Furthermore, it is also important to distinguish between "romance" and sexual abuse in this context. In the event of a claim of sexual abuse, the same procedure as above (1-7) will be followed.

In order to mitigate the risk of abuse occurring by an under 18 on an under 18, all staff are asked to remain vigilant during lessons, activities and excursion. Make a note of any behaviour which you think is necessary and report it to management immediately, where it will be logged in the appropriate records (see the **Keeping Records** section above).

C10 - Child Sexual Exploitation

The following definition has been taken from the NSPCC:

“Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.”

The following guidance on identifying symptoms of CSE has been provided by the NSPCC:

“Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.

Young people who are being sexually exploited may:

- *be involved in abusive relationships, intimidated and fearful of certain people or situations*
- *hang out with groups of older people, or antisocial groups, or with other vulnerable peers*
- *associate with other young people involved in sexual exploitation*
- *get involved in gangs, gang fights, gang membership*



- *have older boyfriends or girlfriends*
- *spend time at places of concern, such as hotels or known brothels*
- *not know where they are, because they have been moved around the country*
- *go missing from home, care or education."*

In order to mitigate the risks of CSE occurring, all staff (academic, non-academic, residence, activities, excursions) must be aware of the conditions which give rise to CSE and the symptoms. We require full vigilance throughout the duration of the under 18's stay, with accurate and timely reporting of any concerns to management.

C11 - Female Genital Mutilation (FGM)

The following definition has been provided by the NSPCC on FGM:

"Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or sunna.

Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence."

In the event of a retrospective admission (a historical claim), BSMI will contact LSCB for further guidance. However, in the event of a prospective admission (i.e. planning to have the procedure in the UK), the LSCB and the Police will be informed immediately. All staff should remain vigilant of any admission and report any information to management immediately.

Training Overview

D1 - Responsibility

The **Managing Director / Principal (Duygu Cevik)** is responsible for ensuring all adults have adequate training for each individual role at British School of Marketing. The levels of all staff are shown below:

All adults / staff - Basic Awareness (Level 1)

Designated staff – Advanced Safeguarding (Level 2)

Designated Safeguarding Lead (DSL) – Advanced Training for DSL (Level 3)

D2 - How Training is Delivered

The first method of delivering the relevant training is by having all staff reading this policy.

Following on from this, all adults / staff will receive Basic Awareness (Level 1) training via online. This will be followed up by having face-to-face training from designated staff as a refresher every 12 months.

Designated staff will receive Advanced Safeguarding training via English UK every 3 years.

E1 - Safer Recruitment Overview

The school recognises the importance of recruiting all staff (academic, support, accommodation hosts, residence staff, group leaders, external support staff) in a way which will lead to the discovery of any previous convictions and ensure that all staff share the spirit of the school's commitment to safeguarding and child protection.

E2 - Recruitment Materials

The typical method of recruiting staff to the school will be via TEFL.com. Due to the absence of any requirement to disclose previous convictions when applying via TEFL.com, British School of Marketing uses a supplementary document (DBS Declaration Form), which is completed during the job / service provision application process.



All staff working with under 18s will require a DBS check prior to the commencement of employment / provision of services. BSMI recognises that, in practice, it is often not possible to receive a response from the DBS enquiry until after the start of a person's employment / provision of services, particularly during busy periods. See section E5 for further guidance.

E3 – Recruitment Stages for All

In addition to the Previous Convictions Disclosure document mentioned in section E2, child protection and safeguarding feature in British School of Marketing International's recruitment process in the interview. The objective of the questioning is to identify whether the candidate possesses the personal qualities required to deliver effective safeguarding and child protection. Typical questions / scenarios may include:

1. You see that an under 18 student who is usually happy and productive (*during lessons / activities / excursions / meal times - as appropriate for the role*) is upset and withdrawn. How would you respond in this situation?
2. You see two under 18 students viewing adult material on a smartphone. How would you respond in this situation?
3. You have reason to believe that one of the under 18 students is under the influence of alcohol or drugs. How would you respond in this situation?
4. You're on an organised excursion to an amusement park. You see one of your under 18 students get into a physical altercation with a member of the public. How would you respond in this situation?

E4 – Applicants Informed

During the staff recruitment process, candidates will be made aware of the need to provide safeguarding and child protection through:

1. The job description, person specification and job advertisement will make it clear that the role includes the provision of care for 16-17 year olds.
2. During the interview process, candidates will be asked to disclose any previous convictions via the DBS Declaration Form which will be given to candidates at interview (see section E2)
3. During the interview, at least one of the questions / scenarios from section E3 will be covered.
4. During the interview process, applicants will be informed of the need to provide a valid DBS check, or be willing to have one carried on their behalf by the school to assess his / her suitability of working with under 18s.

E5 – Applicants Awaiting DBS

In the event of the candidate having an existing DBS check and being registered with the online update service, British School of Marketing International will ask for the candidate's ID number and gain immediate access.

For candidates without an existing DBS check or non-registration of the online update service, a new DBS check will be carried out. The result of the DBS will usually be returned before the commencement of duties under the contract. This is the ideal modus operandi. In case of a delayed DBS BSMI will ask candidates to complete the DBS Declaration Form and refer to 99 DBS check to speed up the process.

However, in unusual circumstances, it may be necessary for the individual to commence duties before the receipt of the DBS check. BSMI recognises this as not best practice, but unavoidable in certain extenuating circumstances. When this is the case, the designated person responsible for safeguarding and child protection (**Duygu Cevik**) will need to confirm that the DBS Declaration Form has been completed. Further, the approval of duties until the receipt of the DBS check must be signed off by the designated person (**Duygu Cevik**) to say that the DBS Declaration Form acts as a statement of suitability to work with under 18s until the receipt of the DBS statement.

E6 – Applicants with a Criminal Record

According to the law, having a criminal record does not automatically disqualify the candidate from working with under 18s. However, British School of Marketing takes a zero-tolerance approach to this issue. *Any member of staff with a previous conviction of bodily harm, abuse, sexual abuse, drugs, theft, possession of a dangerous weapon or fraud is disqualified from employment with BSMI, whether with adults or under 18s. Any member of*



staff with a previous conviction of traffic offences (parking or speeding fines) will be allowed to work with BSMI in a limited capacity, not involving driving students.

E7 – Applicants where Criminal Check is not possible

In the event of a UK citizen returning from overseas and the foreign vetting agency will not disclose due to the fact that the individual is a UK citizen, the information in the DBS check about that individual may not be accurate or up-to-date. In this case, BSMI will ensure the DBS Declaration Form is completed during the interview stage.

In the event of a non-UK citizen being offered employment and the foreign vetting agency will not disclose due to the fact that the request has been made by an overseas institution, extreme diligence will be necessary. This includes making sure the Previous Convictions Disclosure document has been completed, all employment references have been checked, and all qualifications have been verified.

E8 – Recruitment of Homestays

Homestay providers are considered to be staff of British School of Marketing International despite not working in an academic or academic support role. For this reason, full DBS checking will extend to all members of homestay providers.

Family members of homestay hosts will also require DBS clearance in order for the accommodation to be considered appropriate. In order to mitigate the risk of other occupants (other guests) needing DBS checks, BSMI will receive regular communication from the homestay provider about other guests in the home. No under 18 will be placed in accommodation where there is an unchecked guest.

E9 – Single Central Record

All current and prospective staff's records will be kept on a single record which is accessible to the designated managers, which will be achieved through a password-protected, cloud-based system.

The format of each document allows for the recording of individual completed sheets (.pdf) and record-keeping documents (spreadsheet).

E10 – Disqualification by Association

Staff and volunteers can be disqualified from working with under 18s if living at the same address as an individual who is disqualified from working with children. BSMI has no requirement to enforce this as there is no provision for under 18s.

Welfare / Implementing Safeguarding Overview

This section provides guidance on the day-to-day practicalities of providing safeguarding and child protection.

F1 - Use of Risk Assessments

All staff are requested to read all of the school's risk assessments as part of the staff induction process. Once this is done, there is a document requiring a signature stating that all risk assessments have been read.

In light of potential changes to activities and, therefore, different associated risks, regular review of risk assessments will take place by management. The requirement to check each will be cascaded down to staff during meetings.

All homestay providers to have specific risk assessments for the particular accommodation location provided.



F2 - Supervision Ratios

Adequate provision of supervision ratios during on-site and off-site activities will ensure that the ratio is adhered to at all times. By default, group leaders are considered to be allowable as a supervisor of under 18s (i.e. included in the 1:20 ratio as an adequate supervisor). Supervision ratios during non-school times (i.e. in accommodation) will be provided by the homestay provider.

F3 – Missing Students

In the event of an under 18 not attending lessons, the teacher is required to inform management immediately. The teacher is excused from class to pass on the message. The designated individual (**Duygu Cevik**) will make efforts to contact the student by mobile phone.

In the event of an under 18 not attending the pre-arranged meeting point during off-site excursions, a grace period of 10 minutes will be given. After this time, it is necessary to make contact with the student to find out his / her situation. In this case, if the student is one of a number of missing students, the activity staff member will contact the designated individual (**Duygu Cevik**), who will access the students' telephone numbers from the electronic records on the computer system. If there is one student who is missing from the pre-arranged meeting point, activity staff will attempt to get the missing student's mobile phone number from a friend who is present and make contact.

In all cases, students who are not at the pre-arranged meeting point on time must be followed up on, whether as a disciplinary issue or a safeguarding / child protection issue by contacting the designated individual (**Duygu Cevik**).

F4 – Welfare Provision

This section outlines the general ways in which welfare is provided for under 18s at British School of Marketing International. It is categorised into 5 main locations; school premises; excursions; activities; accommodation and travel.

School Premises

In and around the school building, the provision of welfare is maintained by risk assessments. All staff are aware of risk assessments and the need to apply them in order to mitigate risks to improve safety. As mentioned, any lateness or absence of under 18s to lessons will be communicated to management and followed up by the designated person (**Duygu Cevik**).

All students under the age of 18 will receive a welcome induction on arrival which is specific in content for the age group. The **Director of Studies** is responsible for ensuring the delivery of the induction.

Excursions

Students under the age of 18 will have a specific social programme which is appropriate for the age group. This may involve excursions which are included in the adult social programme, excluding excursion such as pub night. The social programme will be created by a member of the academic management team, and it is up to staff who are leading the excursion to ensure the provision of welfare. For any missing students at scheduled meeting points, please see the procedure outlined in section F3.

Activities

Students under the age of 18 will have a specific activities programme which is appropriate for the age group. This may involve activities which are included in the adult social programme (for 16 and 17 year olds), excluding certain activities which are inappropriate for the age group.

Accommodation

As outlined in section E8, all homestay providers will require DBS checks before the provision of accommodation services can begin.



All members of homestay providers will be required to adhere to the risk assessments for their own accommodation. The Accommodation Officer (**Duygu Cevik**) is responsible for ensuring the provision of welfare services and safeguarding at the homestay location in accordance with the risk assessment.

Travel

Travel refers to moving on foot, public transport or private coach / taxi.

When travelling on foot, road crossings will be given particular attention as per the risk assessment. Efforts to mitigate risk will include; crossing only at pedestrianised points (zebra crossings, pelican crossings etc); ensuring that a member of staff oversees the crossing procedure by pressing the button and crossing only when the green man is shown; and ensuring that no students cross the road when traffic is moving. If it is not possible for all students to cross the road in one, staff will wait for a second or third crossing until the group is reunited on the same side of the road.

When travelling by public transport or private coach / taxi, staff will ensure that the safety advice which is provided to all users is adhered to (e.g. using seatbelts, holding on to hand rails, not walking along the aisle whilst coaches or buses are moving).

F5 – First Aid & Medical

The designated person for first aid is the Welfare Manager (**Duygu Cevik**). For all on-site first-aid issues, the designated person will be the go-to authority for any health and safety concerns.

During the student enrolment procedure, prospective students are asked to disclose any allergies, intolerances and any other health concerns which are noteworthy. This information will be cascaded to appropriate staff members during meetings to maintain student welfare.

During excursions, a trained first-aid activity leader will be responsible for the provision of welfare. This person is the go to authority during on-site / off-site excursions, reporting any issues to the Welfare Manager (**Duygu Cevik**).

F6 – Behaviour & Discipline

British School of Marketing International expects the highest standards of behaviour and discipline from students and staff at all times. In order to achieve this, all staff will be provided with a copy of the Staff Handbook, and if for a teaching position, a Teacher's Handbook. Both detail specific guidelines for conduct and manner for employees.

Students will receive an induction on arrival detailing specific expectations in terms of behaviour and discipline through school rules. This will be delivered in clear and accessible English for all language levels. In addition, students will be guided towards sections of the Student Handbook which outline expectations for behaviour and discipline, again focusing on school rules.

All staff are expected to lead by example when representing British School of Marketing International. Specific attention must be given to leading Pub Night excursions, which should be carried out in a civilised and respectable manner (i.e. no more than one or two drinks). All over 18s are advised to approach Pub Night as a chance to enjoy conversation in a traditional English setting and have a drink or two. Absolutely no under 18s on Pub Night excursions.

F7 – Fire Safety

In accordance with UK Health and Safety regulations, testing of fire equipment and fire evacuation procedures will take place at least every 12 months.

Students are made aware of the fire evacuation procedure during arrival inductions. The fire escapes are signposted, the fire assembly procedure is shown, and the fire assembly point is identified.

During an evacuation of the building, teaching staff are requested to account for the students who are in their class by taking a register. Any students who are unaccounted for must be reported immediately to the Fire Officer (**Duygu Cevik**). During the evacuation procedure, staff from the Academic Office will perform a final



sweep of the building by checking classrooms, corridors and toilets to make sure the building has been vacated.

During fire evacuations, all staff and students are asked to leave the building calmly *without taking any personal belongings*.

F8 – Airport Transfers

As mentioned in section F4, the school recognises the importance of providing welfare during transport. This extends to airport transfer travel to and from the airport.

With all enrolments, students are given the emergency telephone contact number to use if there are any difficulties at the border. Once across the border and through immigration and customs, a representative will be waiting in the arrivals lounge to welcome the student. The representative will be identifiable by either holding up a name card of the student or will be wearing school-branded clothing.

For departures of under 18s, once the student has checked in baggage and gone through to the departure lounge (through security), the staff member must wait until the flight has left (i.e. by waiting until the flight no longer appears on the departures screen). After this point, all responsibility for the under 18 has ended.

F9 – E-Safety

Students aged under 18 will be given advice during the arrival induction on how to stay safe online. This will include reminders about not sharing personal data (including photos) with strangers and not believing everything which they read online.

All school computers will have Internet browsers with safe-mode security filters activated, blocking access to inappropriate sites.

Students will be encouraged to disclose any unwanted or inappropriate contact online by fostering a culture of openness and trust between staff and students.

F10 – Radicalisation & Extremism

British School of Marketing International recognises its responsibility to report any suspicious behaviour to Dorset Police immediately. The school's existing policy for the prevention of extremism, radicalisation and terrorism provides specific guidance to staff on how to respond to instances of potential activity.

F11 – Provision for Those More Vulnerable

During the completion of the enrolment form, all students are asked to disclose any other conditions which the school should be aware of. The objective of this is to ascertain any behavioural or cognitive issues which may affect learning or behaviour.

When it is known that an individual or group of individuals has specific physical, cognitive or behavioural needs (i.e. disclosure given), efforts will be made to integrate them into classes unless there is a request to not do so by the individual or the parent. In this event, 1-1, small groups or closed groups will be organised depending on availability.

When it is suspected that an individual or group of individuals has specific physical, cognitive or behavioural needs (i.e. no disclosure given), staff are encouraged to report any concerns directly to the Welfare Manager (**Duygu Cevik**).