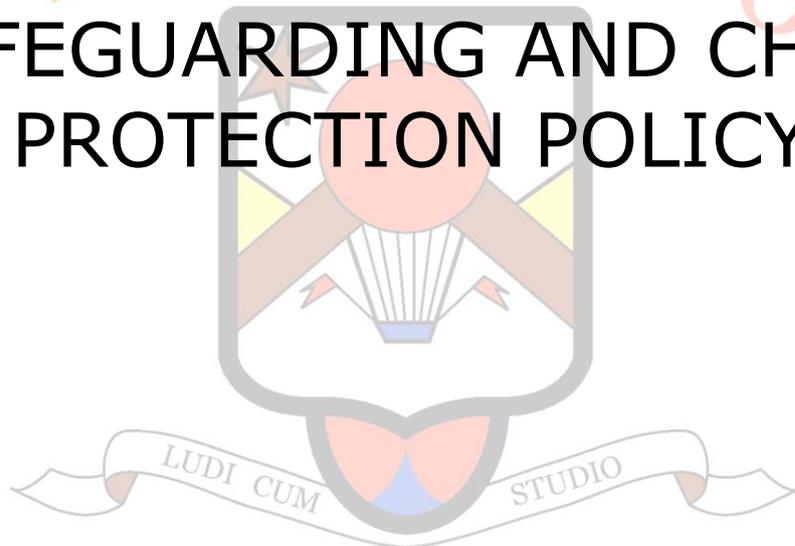


MAGNIFICO TRAVEL LTD SUMMER SCHOOL

SAFEGUARDING AND CHILD
PROTECTION POLICY



Summer Campus

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Magnifico Travel Ltd Summer School

Safeguarding and Child Protection Policy

POLICY STATEMENT

1.1 Context

Magnifico provides English language and leisure programmes for international students from 10 to 17 years of age. Our courses are run on campuses at the University of Leicester (Oadby Student Village) and the University of Reading (Whiteknights Campus), where students are accommodated in single en-suite rooms (and some standard rooms with shared bathrooms at the University of Leicester only) in halls of residence on a full board basis.

For many, this will be their first experience of living away from home and in a foreign country, and given the temporary nature of our summer school set-up and the fact that our courses take place in an adult educational environment, Magnifico is committed to a responsible approach to safeguarding and promoting the welfare of the students in our care.

It is vital to remember that many students when they arrive in the UK find that 'normal' life as they have known it until that moment is turned upside down. They have a lot of adjusting to do and often they do not understand the social or behavioural signals or surroundings. This makes them vulnerable. Teenagers are particularly vulnerable because they think they are grown up, when usually this is not the case.

1.2 Terminology

For the purposes of this policy document, a **student** is defined as a person under the age of 18.

An **adult** is defined as any person of 18 years of age and over, who has substantial and regulated contact working with the students at either of the above-mentioned university campuses, including teachers, activity staff, managers, administrators and ancillary staff.

Safeguarding is:

An umbrella term meaning 'looking after' where all adults have a 'duty of care' to safeguard children appropriately and to shield them from that which is not in their best interests.

Child protection is:

The need to protect children from the risk of significant harm. This may be physical abuse, emotional abuse, sexual abuse or neglect, and the abusers are usually adults, although sometimes they may also be other children.

Designated Safeguarding Lead (DSL) is: *Janet Harfield – Academic Manager*

The person responsible overall for the company's safeguarding policy and the safeguarding training for all adults, and for reporting any Concerns (& Disclosures/Allegations) to the appropriate Local Authorities.

Designated Safeguarding Person (DSP) is: *Leicester Campus - Valentina Stocchi – Centre Manager & Simone Bucci – Activity Manager. Reading Campus – Daniela Galli –Centre Manager, Sarah Nicholson - Academic Centre Manager & Enrico Bernardi – Activity Manager*

A named designated person, who is a point of contact for day-to-day matters on each campus for all students. S/he may be called upon to deliver safeguarding training for all adults to Level 1, and is responsible for keeping records of any Concerns (& Disclosures/Allegations) and reporting the latter to the Designated Safeguarding Lead (DSL).

1.3 Statement of commitment

Magnifico is committed to a practice with procedures where safeguarding the welfare of students in our care is of paramount importance. The company's duty of care to the student is our primary concern and the company accepts its part in recognising its responsibilities. Magnifico maintains a '**it could happen here**' attitude where safeguarding is concerned.

1.4 Entitlement of the Under 18s

All students (children 0-17 years of age) without exception have the right to protection regardless of gender, ethnicity, disability, sexuality or beliefs.

No student must be treated any less favourably than another in being able to access services that meet their particular needs.

All concerns and allegations of abuse will be taken seriously and responded to appropriately.

1.5 What are an adult's responsibilities?

All adults working for Magnifico accept and recognise the company's responsibilities for developing awareness of issues which might put students at risk of harm and that they have a legal 'duty of care'. Adults must be

vigilant and must report any concerns they may have for a student's welfare to a DSP or the DSL.

It is the DSL's responsibility to liaise with and report to the appropriate Local Authorities, eg. Local Safeguarding Children's Board (LSCB), the police, the Prevent coordinator.

All adults are asked to complete an online basic awareness training course. They also receive face-to-face training at their respective levels.

1.6 Associated policies

Included in this document are policies regarding Internet safety, safer recruitment and Prevent.

1.7 Policy review

Magnifico's Safeguarding and Child Protection Policy is reviewed annually by the end of April to include updates following any refresher courses attended by the DSL and before staff contracts are issued. Any updates also take into consideration feedback from the DSPs, staff and students. The review is signed off by the Managing Director.

1.8 Roles and responsibilities

The students are given a Student Handbook, which, as well as providing information about the course in general, alerts the students to the rules and regulations of the campus and what happens if you break them, fire drills, safety on the coaches, talking about problems, safety on the Net and fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. All these issues are highlighted in the induction for the students shortly after their arrival and in a post induction session on the same day, and they are encouraged to discuss and comment on the contents of the Handbook as well as to look out for each other and to report any concerns they may have about other students. The students are informed who they can contact and where those people can be contacted for any problems, concerns or complaints they may have during their stay.

All the students at all times are required to wear a lanyard, which includes a badge with emergency contact numbers. This identifies them clearly to all adults and fellow students on campus, and adults working for Magnifico are expected to challenge any student not wearing their lanyard.

The Designated Safeguarding Lead (DSL) is Janet Harfield, the Academic Manager, who is based at either one of the two campuses, Leicester or Reading. The DSL has received 'Specialist Safeguarding for Designated Lead' training and is responsible overall for the training of staff within the organisation and for reporting any concerns to the appropriate Local Authorities. The DSL runs the training sessions for the DSPs and runs the

Basic Safeguarding training sessions for all other members of staff (or provides the DSPs with the materials to run the Basic Safeguarding training sessions) The DSL can be reached on 0744 830 1320, through the Head Office on 0208 427 9792 and on the Magnifico internal network on 420 or 421.

Magnifico has at least two Designated Safeguarding Persons (DSP) on each of its sites – the Centre Manager, the Activity Manager and/or the Academic Centre Manager. The DSPs meet students on the morning of their first full day on campus and are a point of contact for day-to-day matters throughout the course. Students are shown where they can find the DSPs offices and issued with their mobile telephone numbers. All DSPs have received 'Advanced Safeguarding for Designated Staff' training and they cover each other's absences.

This policy document is available on our website to all staff, agents and group leaders before the beginning of the courses and in printed form both in the Centre Manager's office and the Academic Centre Manager's office. A 'user friendly', shortened version of the policy is sent to all adults via email before the season opens and is provided in printed form on request during the on-site induction before students arrive.

All adults have a legal 'duty of care' to the students attending our courses. There are clear guidelines about raising concerns and who to contact. Magnifico recognizes the importance of providing early help and for this reason communication is of the utmost importance. It is emphasized that all adults must be vigilant and report anything they feel is of concern, no matter how small.

All adults at all times (on and off duty on campus) are required to wear a lanyard, which identifies them as working for Magnifico. Adults are expected to challenge any colleagues or students not wearing their lanyard and, most importantly, to challenge the presence of any other adult in areas where Magnifico is running its courses, who is unknown to the company.

1.9 Involvement of the Under 18s

In end of course feedback, the students are asked to comment on how useful the Student Handbook was and what, if anything, they would change. They are also asked how safe they felt, how confident they were about raising problems and who to talk to and how clear communication was in general between adults and students.

1.10 Legal framework and documents used to write this policy

The Children Act 1989

Duty to safeguard & promote welfare of children Section 17 & Section 47

Local Government Act 2000
together

Sectors in local authorities to work

Children Act 2004 Local Safeguarding Children Boards established

Protection of Freedoms Act 2012 DBS created from CRB & ISA to help safer recruitment

Counter-Terrorism & Security Act 2015 Prevent: duty to counter extremism and radicalisation

Working Together to Safeguard Children, March 2015

What to do if you're worried a child is being abused, March 2015

Information Sharing, March 2015

Keeping Children Safe in Education, September 2018

Working together to Safeguard Children, July 2018

Cyberbullying: Advice for Headteachers and School Staff, November 2014

Care of Under 18s: Guidance for ELT provider, British Council, January 2016

Guide to assisting providers in writing a safeguarding policy, British Council 2016

The Prevent Duty: Departmental advice for schools and childcare providers, June 2015

Improving the Spiritual, Moral, Social and Cultural (SMSC) development of pupils, November 2013

How social media is used to encourage travel to Syria and Iraq – Briefing note for schools

LSCB, Harrow website: <http://www.harrowlscb.co.uk>

English UK handouts and guidelines prepared by Nigel Heritage, Kevin O'Donnell and Jessica Mosley.

1.11 Where the policy is available and in what formats

This policy is available in its full and simplified versions on our website. Printed copies of the full version are available for consultation in the offices of the Centre Manager and the Academic Centre Manager and a copy of the simplified version is sent by email and given out in its printed form to adults, on request.

CODE OF CONDUCT

2.1 Overview and principles

Magnifico aims to safeguard the welfare of all students in its care and to protect them from the risk of significant harm, which includes any form of abuse (physical, emotional or sexual) or neglect. Magnifico is committed to creating a safe environment in all areas of the programme provided where students can feel comfortable and secure and can build bonds of trust with all adults. Whilst the student must always come first, Magnifico also recognises the need to protect both students and adults working for the company from any behaviour or actions which might be misconstrued.

2.2 Position of trust

Staff should be aware that according to the Sexual Offences Act 2003, any person in a position of trust (teacher, activity staff, etc.) who engages in sexual activity of any kind with students under the age of 18 **is breaking the law**, even though the legal age of consent is 16.

Staff should be aware that this is not a matter for disciplinary action only, it is a criminal offence and the appropriate authorities will be involved.

2.3 Setting standards

All adults must be aware of the importance of their role in helping to set standards of conduct in order to promote good relations between themselves and the students. This can be achieved by:

- Always putting the welfare of the student first.
- Treating all students equally with respect and dignity.
- Encouraging and praising students.
- Building balanced relationships based on mutual trust and empowering students to share in decision making.
- Recognising the developmental needs and capacity of students.
- Respecting a student's right to privacy.
- Being an excellent role model

Being a role model means:

- Setting an example, which you would wish others to follow.
- Conducting yourself in a professional manner with maturity and integrity.
- Demonstrating good judgement.
- Dressing smartly and in an appropriate manner both on and off duty.
- Never presenting yourself in a state of undress in front of students.
- Using appropriate language with students and challenging any inappropriate language used by students.
- Not drinking alcohol
- or smoking in the presence of students.
- Not using or condoning the use of addictive substances.
- Not using your mobile phone, other than for the purposes of work, when you are on duty.
- Respecting other people in line with the Equality Act 2010.

2.4 Interaction between adults and Under 18s

All adults must use the following guidelines related to interaction between adults and students both on and off duty:

- Always work in an open environment avoiding private or unobserved situations and encourage open communication.
- Maintain a safe and appropriate distance with students.
- Avoid engaging in rough physical or sexually provocative games, including horseplay.
- Never allow or engage in any form of inappropriate physical contact.
- Never allow students to use inappropriate language unchallenged.
- Never make sexually suggestive comments to a student, even in fun.
- Never do things of a personal nature for students that they can do for themselves.
- Never reduce a child to tears as a form of control.
- Ensure that adults do not enter students' rooms or invite students into their rooms. If it is necessary to do the former, staff should always do so in pairs and knock before entering.
- Not agreeing to meet students outside of working hours.

It should be stressed, particularly in relation to physical contact with the students, that there may be circumstances when adults will need to intervene physically:

- To break up a fight
- To stop them walking in front of a passing car
- To assist with a medical emergency (an epileptic seizure, for example)

2.5 Appropriate appearance

Adults must be aware of the effect their appearance can have on many students, especially those coming from cultural backgrounds where the exposure of certain parts of the body is a sensitive issue. It is hard for the students to respect an adult, if s/he does not present themselves appropriately.

Adults must ensure that their appearance is appropriate both on and off duty:

- Good personal hygiene (regular showers, especially after sports activities, and clean hair)
- Sufficient clothes and footwear to ensure that you always have a clean change
- Avoid clothing that has explicit/offensive language or images
- Avoid plunging necklines, very short skirts or shorts, see-through garments, ripped or torn clothing and a style of dress where underwear is visible.
- Never present yourself in a state of undress in front of the students, not even when the weather is hot when adult males might be tempted to strip to the waist, during the night getting a drink or going to the bathroom, during a fire drill/alarm or for entertainment.

2.6 Alcohol, drugs and smoking

For the students, there is a 'no tolerance' policy to alcohol, drugs and smoking on and off campus. The disciplinary procedures for the non-observance of this rule are set out in the Student and Staff/Group Leader Handbooks.

All adults need to be aware that, with regard to alcohol and smoking, that it is illegal in the UK to sell alcohol/cigarettes to or to purchase alcohol/cigarettes for Under 18s, and that adults seen offering alcohol or cigarettes to students will be subject to the disciplinary procedures set out in the Staff/Group Leader Handbook.

Adults should challenge any attempt by students or other adults to make light of or joke about addictive substances. The approach should be of educating students and making them aware of the risks and dangers.

Adults, on the other hand, who wish to drink alcohol or smoke, may do so only when they are off duty and not in the presence of the students or in areas that students might have access to. The use of addictive substances is absolutely forbidden.

2.7 IT and Social Networks

All campuses have, to a greater or lesser extent, unlimited access to a wi-fi network, and because these campuses are sometimes intended for use by adults, there will not always be filters in place to cover 10 to 17 years-olds. As a consequence, since it would be impractical to deny access altogether (especially considering that some under-18s would be capable of overcoming a relatively simple obstacle like a password) and since the mobile phone is the preferred medium for parents contacting their children, Magnifico promotes a policy of education, limits and sanctions in order to safeguard its students.

Background

- Generally speaking, students are often more comfortable and more 'savvy' with technology than adults.
- Under-18s are more trusting and believe what they read, and this makes them particularly vulnerable.
- Large numbers of under-18s receive unwanted sexual or unpleasant comments via the Internet and text messages.
- There is a vast number of websites offering illegal or inappropriate material such as pornography, promoting self-harm, drinking games, hate sites and many more.

How to safeguard

- **Educate** The DSPs together with other staff members are responsible for highlighting the Safety on the Net section of the Student Handbook

during the induction at the beginning of the course. This includes the following:

- Things online are forever
 - Things online are for the world to see and not just a few friends
 - The police can trace anything online
 - Inappropriate pictures or words sent via a social network or text message are cyber bullying and NOT a joke
 - It is easy to lie online using false words and photos, and many people do
 - Learn how to block people online and report to an adult anyone who sends sexual messages
 - You must be 13 years old to use Facebook
 - Time spent online and playing games online (health issue)
 - Copyright and illegal downloading
- **Set limits** The following rules are in addition to the general rules for the campus, which can be found in the Student Handbook, and are specifically mentioned by the Centre/Academic Centre Manager and other staff members during the induction on the first day of the course:
 - Do not give out any personal information
 - Never open messages from people you do not know
 - Never access illegal or inappropriate sites during the course
 - Never do anything online or on your mobile phone that you wouldn't do face-to-face
 - **Sanctions** These are the same as those mentioned in the Student Handbook for any rule that is broken whilst on the course.

No adult may request or maintain any electronic contact with a student of a non-professional nature either before, during or after a course. Any contact should only be made using a professional email address or website, for example.

Adults may take and share photographs of staff and students, but strictly with the Management Team and for publicity and promotional purposes **only**.

Mobile phone numbers from students will be required during off-campus visits and excursions, but they should not be registered on any adult's personal mobile phone. Instead, a printed list will be provided by the Centre Manager, which should be returned at the end of the day. Social networking on Facebook etc is strictly prohibited.

In any electronic contact with students, adults must pay particular attention to use neutral, un-emotive language that will not be misconstrued. Adults must not exchange any information with a student that they would not be happy to share with the company or the student's parents/group leader/agent.

Electronic contact is defined as the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment, computers, laptops and tablets. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.

2.8 Accommodation

Adults and students are housed in university halls of residence in flats containing between four and ten rooms and a shared kitchen. In order to guarantee cover based on a ratio of 1 adult for every 15 students, adults will be allocated rooms in the same flats as students where there are single ensuite facilities (rooms with private bathrooms). Where there are single standard facilities (rooms with shared bathrooms), adults will be allocated rooms in a separate apartment in the same building, and where necessary, they will keep one student key from each apartment where an adult is not present, in order that they can carry out checks and gain access in case of an emergency. All rooms can be locked from the inside and no key can open the room of another student or adult unless it is a master key. Master keys are held exclusively by the Centre Manager and by members of the local university staff (Accommodation Officer and Housekeeping staff).

Male students and female students are generally housed in separate apartments, except where accompanying group leaders decide otherwise. Group leaders may occupy a room in apartments that have both single ensuite and single standard facilities and use the same student key system described above should they have students in more than one apartment.

Adults should pay particular attention to conduct in the environments of the bedroom and bathroom, where privacy is important. It is suggested that a rota system is established where bathroom facilities are shared that take into consideration mealtimes, lesson and activity times, meetings etc., where punctuality is essential.

Adults should refer to all points covered under the Code of Conduct of this policy document for guidance on how to behave appropriately in the accommodation.

The students also receive guidelines about conduct in the accommodation in the Student Handbook, which includes keeping their room tidy, lights out and noise levels, the use of the kitchen and a dress code.

2.9 Transport

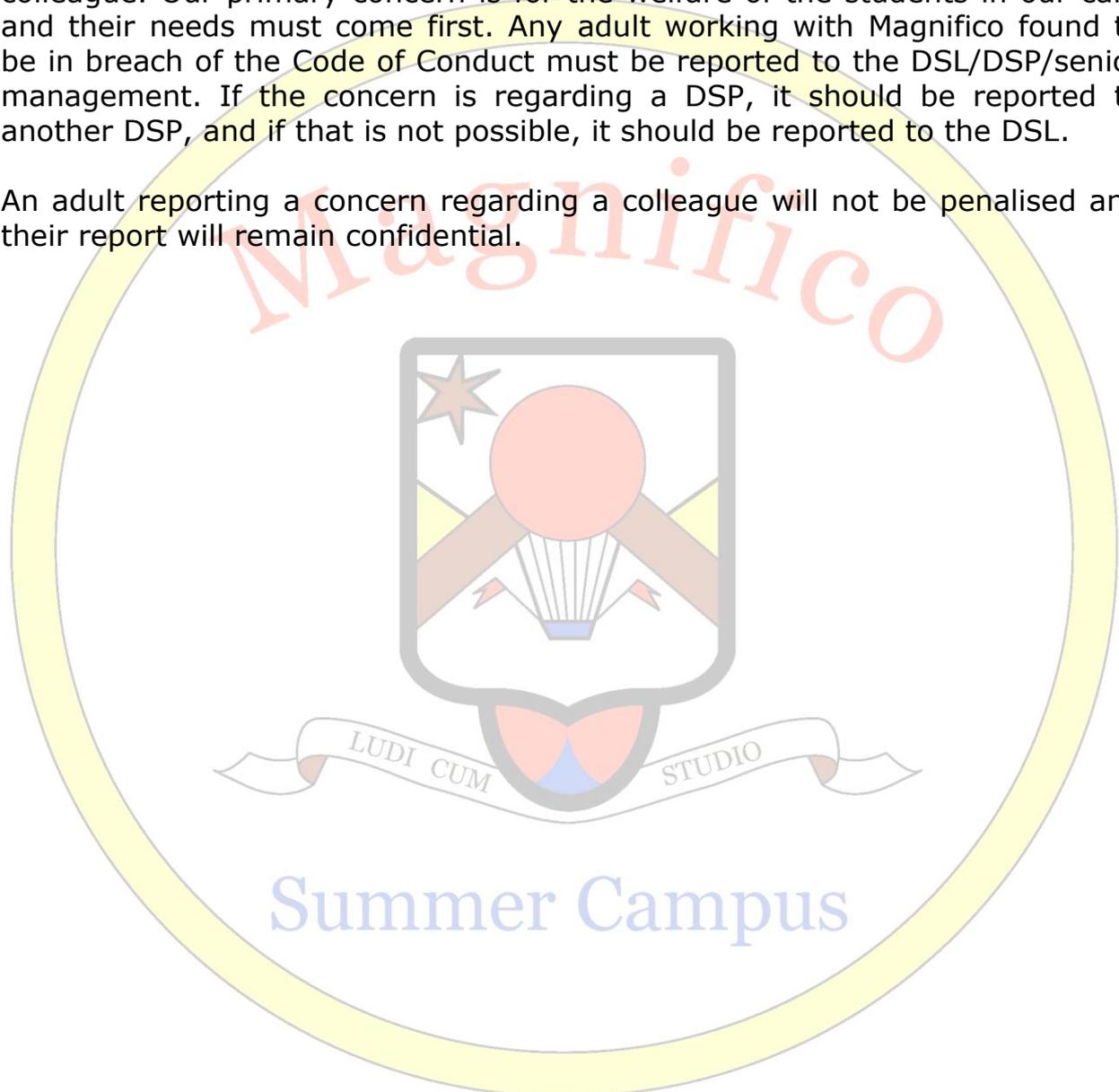
Magnifico uses private coach companies, minibus and taxi services for individual and group airport transfers and excursions, and all their drivers are required to be DBS checked.

As part of the induction on the first day, the Centre Manager/Academic Centre Manager refers to the section of the Student Handbook, which deals with safety on the coach and minibus.

2.10 Whistleblowing

All adults have a legal obligation to inform the DSL/DSP/senior management of any concerns they may have regarding the inappropriate behaviour of a colleague. Our primary concern is for the welfare of the students in our care and their needs must come first. Any adult working with Magnifico found to be in breach of the Code of Conduct must be reported to the DSL/DSP/senior management. If the concern is regarding a DSP, it should be reported to another DSP, and if that is not possible, it should be reported to the DSL.

An adult reporting a concern regarding a colleague will not be penalised and their report will remain confidential.



CHILD PROTECTION

3.1 Overview

Magnifico meets its child protection responsibilities by making sure that all adults are aware of their responsibilities and legal obligations. We have at least two DSPs in all centres and at all times, and a DSL who is present in either of the two centres – Leicester or Reading. Training is provided at the appropriate level for all adults and the DSL attends training sessions given by English UK once a year.

Magnifico makes every effort to ensure that, should either adults or students have concerns, they will be listened to and taken seriously. Policies exist and procedures are in place to assist both adults and students in managing any such concerns.

It is the responsibility of the DSL/DSPs to ensure that information is available to and shared between all those involved in the company and its activities. Some information is confidential and should only be shared on a strictly need-to-know basis.

3.2 Designated Safeguarding Staff

Magnifico has the following nominated adults with designated roles for Safeguarding and Child Protection:

Designated Safeguarding Lead (DSL)
Leicester & Reading centres below: Janet Harfield Academic Manager

Designated Safeguarding Person (DSP)
Head Office, London, Alessandro Cavaliere
Managing Director

Designated Safeguarding Person (DSP)
University of Reading, Daniela Galli Centre Manager
Sarah Nicholson Academic Centre
Manager
Enrico Bernardi Activity Manager

Designated Safeguarding Person (DSP)
University of Leicester, Valentina Stocchi Centre Manager
Simone Bucci Activity Manager

3.3 When adults need to respond

It is vital that all adults are aware of their legal duty of care to safeguarding the students and have a working knowledge of company policy regarding Safeguarding and Child Protection.

What may be a cause for concern

Cases of abuse become apparent in a number of ways and any one of these may lead an adult to have safeguarding concerns about a student:

- A student may tell someone they are being abused.
- Someone may disclose that a student has told them, or they believe a student is being abused or has been abused.
- A student may show signs of physical injury with no satisfactory explanation for its cause.
- A student's behaviour may indicate that it is likely s/he is being abused.
- An adult's behaviour or the way s/he relates to a student may be of concern.

Information for staff

All adults are asked to complete a pre-course online basic safeguarding course and produce a certificate as proof of having done so. They receive a copy of Magnifico's Safeguarding and Child Protection Policy and a copy of the Student Handbook. They also receive face-to-face Basic Safeguarding training during the induction. Training is conducted by the DSL or the DSPs who receive 'Advanced Safeguarding for Designated Staff' training prior to the commencement of the summer courses from the DSL who, in turn, receives 'Specialist Safeguarding for Designated Lead' training from English UK.

As part of this training, adults are made aware of who they need to contact (DSP) to raise a concern and of the need to complete a Concern (& Disclosure/Allegation) Form. Adults are also informed of the sensitivity of any information regarding a concern and of the importance of confidentiality in dealing with any issue surrounding a concern.

Information for students

During the induction on the first day of the course all students receive information about how, and with whom, they can share their concerns, complaints and anxieties. The Student Handbook lists the people students can contact, and where, when and how they can be reached. It is imperative that students understand that Magnifico is ready and willing to listen to any

concerns that they may have, no matter how minor they may consider them to be, and that all concerns are taken seriously.

Managing a concern

All adults must report any concerns they may have for a student's welfare to the DSP. It is the DSP's responsibility to handle concerns and to report to the DSL. No adult should not take any action without first consulting the DSP, except where the student is at immediate risk of harm and has to be kept safe, or where, for example, there is an incident of bullying that leads to physical aggression or a fight breaks out and an adult has to intervene.

Any adult raising a concern with the DSP will be asked to fill in a Concern (& Disclosure/Allegation) Form. The DSP will be available to assist, if necessary. All forms regarding concerns, disclosures and allegations are kept locked in the DSP's office.

Once a concern has been raised, it is the DSP's responsibility to respond. Responses depend on the nature of the concern and are taken forward in the following manner:

- **Investigate**
Gather information in a sensitive manner, avoiding interrogation-style questioning.
- **Record**
Complete a Concern (& Disclosure/Allegation) Form. It is important to record the facts and not opinions.
- **Inform**
Inform, as necessary, the parents, group leader, agent, other DSP, DSL, senior management.
- **Monitor**
Continue to record any developments, as required, until No Further Action (NFA) can be recorded.

3.4 Recognising symptoms of abuse

The factors described below are frequently found in cases of child abuse or neglect. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm;
- Indicates a need for careful assessment and discussion with the DSL;
- May require consultation with and/or referral to the Local Safeguarding Children's Board (LSCB) and / or the police.

The absence of such indicators does not mean that abuse or neglect has not occurred.

Recognising physical abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury;
- Several different explanations provided for an injury;
- Unexplained delay in seeking treatment;
- The parent/s are uninterested or undisturbed by an accident or injury;
- Reluctance to give information or mention previous injuries;
- Wearing clothing that covers injuries, even in hot weather;
- Refusal to undress for sports.

Bruising

Children can have accidental bruising, but the following must be considered as indicators of harm unless there is evidence or an adequate explanation provided. Only a paediatric view around such explanations will be sufficient to dispel concerns listed below:

- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive);
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally;
- Variation in colour possibly indicating injuries caused at different times;
- The outline of an object used (e.g. belt marks, hand prints or a hair brush);
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting;
- Bruising around the face;
- Grasp marks on small children;
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

Bite marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious, e.g:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine);
- Linear burns from hot metal rods or electrical fire elements;
- Burns of uniform depth over a large area;
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks);
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint, and loss of function in the limb or joint.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type;
- There are associated old fractures;
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement;

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising emotional abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical.

The indicators of emotional abuse are often also associated with other forms of abuse. Staff should therefore be aware that emotional abuse might also indicate the presence of other kinds of abuse.

The following may be indicators of emotional abuse:

- Developmental delay, either physical or emotional;
- Abnormal attachment between a child and an adult (e.g. anxious, indiscriminate or no attachment);
- Indiscriminate attachment or failure to attach;
- Aggressive behaviour towards others;
- Passive behaviour towards others;
- Child used as a Scapegoat;
- Frozen watchfulness;
- Low self esteem and lack of confidence;
- Withdrawn or seen as a 'loner' – difficulty relating to others;
- Overreaction to mistakes and continual self-depreciation

- Neurotic behaviour(rocking, hair twisting, self-mutilation)

Recognising sexual abuse

Sexual abuse can be very difficult to recognise and reporting sexual abuse can be an extremely traumatic experience for a child. Therefore, both identification and disclosure rates are deceptively low.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and / or fear.

If a child makes an allegation of sexual abuse, it is very important that they are taken seriously. Allegations can often initially be indirect as the child tests the adult's response. There may be no physical signs and indications are likely to be emotional / behavioural.

Behavioural indicators which may help to identify child sexual abuse include:

- Inappropriate sexual conduct with objects or peers;
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age;
- Continual and inappropriate or excessive masturbation;
- Self-harm (including eating disorder), self-mutilation and suicide attempts;
- Involvement in sexual exploitation or indiscriminate choice of sexual partners;
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties);
- Becoming withdrawn or clingy;
- Mood swings, especially within relatively short periods of time;
- Sudden changes in personality and insecurity;
- Unaccountable fear or dread of certain places or people;
- Becoming secretive.

Physical indicators associated with child sexual abuse include:

- Pain or itching of genital area;
- Blood on underclothes;
- Pregnancy in a child;
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Sex offenders have no common profile, and it is important to avoid attaching any significance to stereotypes around their background or behaviour. While

media interest often focuses on 'stranger danger', research indicates that as much as 80 per cent of sexual offending occurs in the context of a known relationship, either family, acquaintance or colleague.

Recognising neglect

It is rare that an isolated incident will lead to agencies becoming involved with a neglectful family. Evidence of neglect is built up over a period of time. Staff should therefore compile a chronology and discuss concerns with any other agencies which may be involved with the family, to establish whether seemingly minor incidents are in fact part of a wider pattern of neglectful parenting.

Some of the indicators of neglect include:

- Failure by parents or carers to meet essential physical needs (e.g. adequate or appropriate food, clothes, warmth, hygiene and medical or dental care);
- Failure by parents or carers to meet essential emotional needs (e.g. to feel loved and valued, to live in a safe, predictable home environment);
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause;
- Failure of child to grow within normal expected pattern, with accompanying weight loss;
- Alcohol or drug abuse.

Disabled children and young people can be particularly vulnerable to neglect due to the increased level of care they may require.

Although neglect can be perpetrated consciously as an abusive act by a parent, it is rarely an act of deliberate cruelty. Neglect is usually defined as an omission of care by the child's parent, often due to one or more unmet needs of their own. These could include domestic violence, mental health issues, learning disabilities, substance misuse or social isolation/exclusion.

While support and services to these parents are clearly essential, it is crucial to maintain a clear focus on the needs of the child.

3.5 Disclosure by a child and what to do

What should you do if a child comes to you and tells you that they are being abused? It's normal to feel overwhelmed and confused in this situation. Child abuse is a difficult subject that can be hard to accept and even harder to talk about. Children who are abused are often threatened by the perpetrators to keep the abuse a secret, so telling an adult takes a great deal of courage. Children have to struggle with a lot of issues, including the fear that no one will believe them. Care must be taken to remain calm and to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

Receive:

Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.

Accept what is being said without judgement. Take it seriously.

Reassure:

Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously.

Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.

Tell the child that you will need to tell some people, but only those whose job it is to protect children.

Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React

Listen quietly, carefully and patiently. Do not assume anything – don't

speculate or jump to conclusions.

Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions.

Do ask open questions like "Is there anything else that you want to tell me?" Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English.

Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to.

Refer directly to the named DSP/DSL in your organisation.

Do not discuss the case with anyone except the DSP/DSL/senior management.

Record:

Make some very brief notes at the time and write them up in detail as soon as possible. Do not destroy your original notes in case they are required by Court.

Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang.

Record statements and observable things, not your interpretations or assumptions – keep it factual.

The next step is to make sure the student is safe, supported and reassured and this should be carried out with the assistance of the DSP. The DSL should be informed immediately and/or a member of senior management.

The DSL should then do the following:

- Appoint a DSP to support the victim and if/when safe and appropriate return the victim to their normal routine.
- Ensure the DSP advises the victim not to talk about their disclosure with anyone else.
- Ensure the DSP advises any witnesses to the incident not to talk about it.
- Ensure that a complete written record is being kept.
- Contact the LSCB.

The LSCB will tell the DSL what to do next.

The DSL should expect the following:

- **Some action to be taken in agreement with the LSCB:**

- Immediate action to protect the victim.
- When and what to tell the parents/group leaders/agents.
- What to tell the person facing the allegation and if that person should be suspended.

- **The involvement of other agencies:**

- Children's Social Care for the under 18 victim.
- The Local Authority's Designated Officer (DO), but this person mostly deals with internal staffing matters involving local authority staff.
- Police, for both the victim and the accused, if a crime has been committed.
- No involvement from other agencies and the incident is passed back to the school to deal with using their existing (disciplinary) procedures.

- **Variable responses depending on a number of factors:**

- The nature of the allegation made.
- How possible a resolution is.
- Whether the under 18 wishes to press charges against the accused.
- How well the situation is being managed by the school.

3.6 Keeping records

All records, information and confidential notes are kept by the Designated Safeguarding Person (DSP) in separate files in a locked room and/or in secure electronic files. Only the Designated Safeguarding Persons (DSPs) and the Designated Safeguarding Lead (DSL) have access to these files. At the end of the season all DSPs pass on their files to the DSL to be kept at the Head Office in London. Files are kept indefinitely.

3.7 What happens if an adult is accused?

Once a disclosure has been made by a student and recorded, further questioning should be avoided in order not to compromise any eventual official investigations by the local authorities.

The Designated Safeguarding Lead (DSL) and the Designated Safeguarding Person (DSP) will meet at the earliest possible opportunity to consider an appropriate course of action in response to the information revealed by the student and consider any other relevant information.

They will ensure that the student is safe, supported and reassured. If/when it is safe and appropriate, they will try to return the student to their normal routine.

If the allegation refers to the DSL, the DSP should inform a fellow DSP or contact the Managing Director, Alessandro Cavaliere on 07424 631261.

The DSL will decide if it is appropriate to involve other members of the school staff, and also whether to inform the student's group leader, agent and/or parents, but **not** before contacting the LSCB. No decisions will be made on further action without referring to the LSCB.

The LSCB's role is to provide advice and guidance to schools dealing with allegations and, if necessary, to liaise with the police and other agencies and to monitor the progress of cases to ensure they are dealt with quickly and consistently.

During the initial discussion between the DSL and the LSCB, some actions will be agreed:

- Immediate action to protect the student
- When and what parents/group leaders/agents should be told
- What should be said to the adult facing the allegation
- Whether the adult facing the allegation should be suspended

Suspension is not an automatic response and will only be considered where children are at risk of serious harm or the concern is so serious that it would result in immediate dismissal. If the accused is suspended, the reason will be communicated to them within one day.

Magnifico has a duty of care to its employees and will provide adequate support for any adult facing an allegation and provide them with a named contact if they are suspended.

The school has a duty to maintain confidentiality regarding the accused. Until any investigation, either internal or external, has been completed, the identity of the accused will not be released.

If the allegation is unsubstantiated, unfounded or malicious, Magnifico will support the adult on their return to work, especially if they have been suspended.

The DSL will brief the Managing Director on all developments and decisions taken.

3.8 What happens if a child is accused?

Once a disclosure has been made by a student and recorded, further questioning should be avoided in order not to compromise any eventual official investigations by the local authorities.

The Designated Safeguarding Lead (DSL) and the Designated Safeguarding Person (DSP) will meet at the earliest possible opportunity to consider an

appropriate course of action in response to the information revealed by the student and consider any other relevant information.

They will ensure that both the victim and the accused are safe, supported and reassured. (The accused may be a victim themselves.) A DSP will be appointed to each of the students. If/when it is safe and appropriate, the DSPs will try to return the students to their normal routine.

The DSL will decide if it is appropriate to involve other members of the school staff, and also whether to inform the student's group leader, agent and/or parents, but **not** before contacting the LSCB. No decisions will be made on further action without referring to the LSCB.

The LSCB's role is to provide advice and guidance to schools dealing with allegations and, if necessary, to liaise with the police and other agencies and to monitor the progress of cases to ensure they are dealt with quickly and consistently.

During the initial discussion between the DSL and the LSCB, some actions will be agreed:

- Immediate action to protect both the students
- When and what parents/group leaders/agents should be told
- What should be said to the student facing the allegation

The school has a duty to maintain confidentiality regarding the accused. Until any investigation, either internal or external, has been completed, the identity of the accused will not be released.

Depending on the circumstances, the LSCB may decide to hand the case back to the school to be dealt with under their own disciplinary procedures.

If the allegation is unsubstantiated, unfounded or malicious, Magnifico will support the accused student on their return to the programme.

The DSL will brief the Managing Director, Alessandro Cavaliere, on all developments and decisions taken.

3.9 Child Sexual Exploitation (CSE)

The following definition of CSE is that used in the government guidance 'Keeping Children Safe in Education' (July 2015, p.11)

'Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where

sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.'

All staff and other adults need to be vigilant and should report any concerns for a student's safety with regard to CSE to the DSP or DSL.

3.10 Female Genital Mutilation (FGM)

The following definition of CSE is that used in the government guidance 'Keeping Children Safe in Education' (July 2015, p.11)

'Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.'

It is a deeply rooted tradition widely practiced among specific populations in Africa and parts of Asia. Procedures are mostly carried out on young girls sometime between infancy and age 15, and occasionally on adult women.

FGM is believed to be a way of ensuring virginity and chastity. It is used to safeguard girls from sex outside marriage and from having sexual feelings. Although FGM is practiced by secular communities, it is most often claimed to be carried out in accordance with religious beliefs. FGM is not supported by any religious doctrine.

Short-term health problems include severe pain, difficulty passing urine, bleeding, infection and death. For some types of FGM long-term problems include difficulty passing urine and long painful periods. For some types there may be a long scar, which can make sex and childbirth difficult. Recurrent infections can lead to infertility. Women may also feel angry, depressed and suffer from post-traumatic stress disorder.

It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff and other adults need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

3.11 Peer-on-peer abuse

This is a general heading under which come bullying and cyber-bullying, Sexual Violence and Sexual Harassment.

The following definition of Sexual Harassment is that used in the government guidance 'Keeping Children Safe in Education' (2018, p.85).

All staff and other adults need to be vigilant and should report any concerns

for a student's safety with regard to peer-on-peer abuse to the DSP or DSL.

TRAINING

4.1 Training and who is responsible

The DSL, who has undergone 'Specialist Safeguarding for Designated Lead' and 'Advanced Safeguarding for Designated Staff' training at English UK, is responsible for ensuring that all adults working with Magnifico have safeguarding training to the appropriate level. She is the person who liaises with the LSCB, the police and the Prevent contacts in the two local authorities where we run our programmes.

The DSL trains the DSPs (Centre Managers, Academic Manager and Academic Centre Managers) to 'Advanced Safeguarding' level as part of a pre-season induction session. The DSL (and sometimes the DSPs) train all other adults to 'Basic Safeguarding' level as part of an on-site induction session before students arrive.

All adults have access to a complete copy of Magnifico's Safeguarding and Child Protection Policy, and it is available in the offices of the Centre Manager and the Academic Centre Manager.

The DSL takes part annually in refresher courses in 'Advanced Safeguarding for Designated Staff' and 'Specialist Safeguarding for Designated Lead' training sessions specific to the language industry, with English UK.

4.2 Training and how it is delivered

Our main point of reference for all training is our Safeguarding and Child Protection Policy. This is available for consultation to all staff in its complete version in the offices of the Centre Manager and the Academic Centre Manager and on our website. A 'user friendly', shortened version of the policy is sent to staff via email before the season opens and given to staff in printed

form during the on-site induction before students arrive.

Before their arrival on site, all members of staff are asked to complete an online Safeguarding Basic Awareness Course and print out the certificate using the following link:

<https://galleryteachers.com/service/safeguarding-basic-awareness-course/>

The DSL takes part in refresher courses in 'Advanced Safeguarding for Designated Staff' and 'Specialist Safeguarding for Designated Lead' training sessions specific to the language industry, with English UK. These take place every year during the winter.

The DSL trains the DSPs (Centre Managers, Academic Manager and Academic Centre Managers) to 'Advanced Safeguarding' level as part of a face-to-face pre-season induction session held in June. This takes place every year and includes new developments and changes in the law and case studies and scenarios to encourage discussion and raise awareness.

The DSL (or DSPs) train all other members of staff (teachers and activity staff) to 'Basic Safeguarding' level as part of a face-to-face on-site induction session before students arrive. This takes place every year and includes new developments and changes in the law and scenarios to encourage discussion and raise awareness.

SAFER RECRUITMENT

5.1 Commitment to safer recruitment

Magnifico is committed to the safer recruitment of all adults who have significant contact with and are engaged in regulated activity with students under the age of 18. This is coordinated by the Academic Manager, who is assisted by Managing Director and an Activity Manager (Simone Bucci) for the selection of teachers and activity staff, and by the personnel in the offices in Rome for the group leaders. The Academic Manager is responsible for keeping all records regarding recruitment. Safeguarding appears at all stages of the recruitment process and every effort is made to stress the importance of safeguarding the students in our care and the responsibility all adults in the school have for the under 18s attending our courses.

5.2 Recruitment materials

The following statement regarding our commitment to safeguarding appears on our website, where candidates will also find the full version of our Safeguarding and Child Protection Policy:

'Magnifico is committed to a practice with procedures where safeguarding the welfare of students in our care is of paramount importance. The company's duty of care to the student is our primary concern and the company accepts its part in recognising its responsibilities.

All adults working for the company are expected to share this ethos and to actively engage in looking after under 18s safely.'

5.3 Recruitment stages

To ensure that candidates applying for a position with Magnifico are informed about our safeguarding and child protection policies and so that we have a better understanding of their attitude to working with Under 18s, the following procedures are adopted:

- All prospective candidates must submit via email a CV with a covering letter and all gaps in CVs must be explained satisfactorily.
- Applicants will only be selected for interview if they meet all the requirements set out in the advertised positions.
- Candidates invited to interview are sent copies of the contract, the job description, the shortened version of our Safeguarding and Child Protection Policy and (for teachers only) our Mission Statement.
- The interview includes questions regarding safeguarding issues and attitudes to working with Under 18s and candidates are asked to confirm that they are willing to produce an enhanced DBS with checks (or the equivalent).
- Successful candidates are made a provisional offer of work on the condition that we receive proof of their identity, any necessary qualifications, an enhanced DBS with checks (or the equivalent) and that references provided are satisfactory. Magnifico usually makes two reference requests and the referee is asked if s/he has any reason to believe that the employee is unsuitable for work with Under 18s.
- Once on campus, all adults are asked to sign a self-declaration that they have received, read and understood the contract, the job description, the shortened version of the Safeguarding and Child Protection Policy, the Staff Handbook and (for academic staff) the GEC Handbook, and they will be required to affirm that there is no reason why they should not be employed to work with the Under 18s.

5.4 What elements of this policy are candidates informed about?

All adults receive a copy of the shortened version of our Safeguarding and Child Protection Policy and this includes the following points of this document:

- 1.3, 1.4, 1.5, 1.8, and 1.11
- 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, and 2.10
- 3.1, 3.2, 3.3, 3.4, and 3.5

5.5 Candidates awaiting a DBS check

It may happen that an increase in student numbers shortly before the commencement of courses or a member of staff withdrawing at the last

moment requires us to hire an adult whose DBS check has yet to arrive. The following procedures would be applied:

- A Barred List check would be carried out
- That adult would not be allocated accommodation in the same apartment as the students.
- S/he would be supervised at all times.
- S/he would not be left alone with students.
- A risk assessment would be drawn up to cover the period before the DBS check arrives.
- S/he would be required to sign a self-declaration to affirm that there is no reason why they should not be employed to work with the Under 18s.

5.6 Candidates with a criminal record

When a candidate or an existing member of staff's DBS check reveals that that person has a criminal record, this does not mean that the person is automatically considered to be unsuitable to work with Under 18s. The following factors will be taken into consideration:

- The seriousness and nature of the offence(s).
Convictions for sexual, violent or drug offences would be strong indicators that a person is not suitable to work with Under 18s.
- The nature of the appointment.
A person convicted of sexual, violent or drug offences would also give rise to concern, particularly where that person is involved in the care and supervision or teaching of Under 18s.
- The age when the offence was committed.
Offences committed a number of years in the past can be considered to be less relevant, but still, sexual, violent or drug offences would be more likely to give rise to concern than a minor offence committed in an isolated incident.
- The frequency of the offence(s).
A series of offences committed over a period of time would also be a further cause for concern.

An appointment will be arranged with the candidate to discuss their criminal record and to verify its contents. The focus of the meeting will be all of the above-mentioned factors and the candidate's responses will be used to aid the decision making process. The decision to employ the candidate or not will be taken by the Academic Manager (academic staff) and by the Activity Manger - Simone Bucci and the Managing Director (all other staff).

A record of the decision will be made by the Academic Manager, but will not include details of the offences.

5.7 Applicants where a criminal check is not possible

In the case where a British national working overseas has been refused a record check because s/he is a British national, we will request a DBS check in the UK and take additional care to ensure that all other recruitment checks are met: proof of their identity, qualifications and references as well as exploring their employment history.

A record will be kept stating why the check overseas was not possible and what measures were taken to meet all other recruitment checks. The decision to employ the candidate or not will be taken by the Academic Manager (academic staff) and by the Activity Manager - Simone Bucci and the Managing Director (all other staff).

5.8 Central records for recruitment

A single, central record for recruitment is kept by the Academic Manager in the form of a grid where all the required elements are listed against the name of each adult and registered with a date and the name of the person who carried out the check.

WELFARE AND IMPLEMENTING SAFEGUARDING

6.1 Risk assessments

All risk assessments are produced in a standard format so that they can be picked by anyone and read easily. The Managing Director and the Academic Manager (also the DSL) are responsible for detailing them and for passing them on to the Centre Managers (DSPs), the Academic Centre Managers (DSPs) and the Activity Managers. These managers are, in turn, responsible for ensuring that all other adults receive briefings regarding the various risk assessments and that those adults make sure that students are informed of the potential risks involved in every part of the programme.

The briefings for adults may take place during the induction before the courses commence and/or during regular meetings once the programme is running. Special meetings may be called to take adults through the risk assessment for an excursion.

The briefings for students, on the other hand, may take place during their induction, 'in situ' before an activity starts, 'in situ' whenever there is a change of venue, at the beginning of the evening activity the day before an excursion or during a lesson. All managers will be carrying out spot checks regularly and unannounced to make sure this is happening, by attending

lessons, activities and asking the students what they have been told about the risks.

All adults are responsible for informing students of the risks involved in the activities they are running.

The risk assessments, in part also, are put together using suggestions collated from feedback forms from both the adults and the students.

Risk assessments are produced to cover the following areas:

- Excursions and Extra Tours (Reading only)
- Visits to the local town/city centre
- Coach journeys
- Dance
- Drama
- Singing
- Sports activities
- Classrooms
- Accommodation
- Meals and mealtimes
- Crossing the road
- Visiting the on-campus doctor

6.2 Supervision ratios

As published on our website and in our brochure, adult-to-student ratios in the classroom are 1:16 and during all other activities and excursions are 1:15 (students under 12) and 1:20 (students 12 to 17). Adults are employed in sufficient numbers so as to provide cover for time off and sick leave.

Reference to staff-to-student ratios form part of the risk assessment process.

N.B. Accompanying Group Leaders will only be responsible for the students in their group.

6.3 Missing students

Group Leaders and any assigned members of the Activity Staff are responsible for making sure that the students get up in the morning and that they get to breakfast on time. Students not present at breakfast should be accounted for, and if any student is unwell and therefore unable to come to breakfast, the doctor should be called, the Centre Manager and the Academic Centre Manager informed and, where appropriate, breakfast taken to the student concerned.

A register is taken at the beginning of every lesson. Any absentees are

reported to the Academic Centre Manager, who then contacts the missing student's Group Leader or the assigned member of the Activity Staff and the Centre Manager. The missing student is contacted on their mobile telephone to ensure that s/he is safe and well and to establish the reason for their absence and their whereabouts. If s/he does not respond, then two adults are sent to check their room in the accommodation block. If s/he is not present, then the police are contacted.

For all other activities, a register is also taken and any absentees are reported to the Activity Manager or the Centre Manager, who then contacts the missing student's Group Leader or the assigned member of the Activity Staff. The missing student is contacted on their mobile telephone to ensure that s/he is safe and well and to establish the reason for their absence and their whereabouts. If s/he does not respond, then two adults are sent to check their room in the accommodation block. If s/he is not present, then the police are contacted.

During excursions, all adults are issued with a list of contact telephone numbers for the students in their travelling groups. Should a student go missing, that student is contacted on their mobile phone, asked to explain their whereabouts and told to stay where they are. If there are two adults with the group, one will stay with the group while the other goes to find the student. Where there is only one adult, the whole group will necessarily have to go to pick up the missing student. If any adult is unable to find a missing student, then the Centre Manager will be contacted and s/he will decide if it is necessary to contact the police.

Neither the Centre Manager nor the Activity Manager/Academic Centre Manager will be allocated groups during excursions in order that they are free to travel to deal with any emergency situation.

Particular attention will be paid to Unaccompanied Minors (UMs), in all areas of the programme, who have been assigned to a member of the Activity Staff. They are more vulnerable than accompanied students and are uppermost in the minds and considerations of the Management Team as a whole.

If it becomes necessary to contact the police, the DSL must be informed immediately.

Persistent absenteeism is followed up using the sanctions outlined in the Student Handbook.

6.4 Welfare provision

Welfare provision including security, pastoral care, information and leisure activities is met and detailed under the following headings:

- Care of students
- Accommodation
- Leisure opportunities

Care of students

- All campuses have CCTV, 24-hour security and night patrols.
- Night patrols are also carried out by members of the Activity Staff.
- All the students are provided with a lanyard and a badge with an emergency contact number. They are encouraged to attach their room keys and/or swipe cards/fobs to it.
- All adults can be identified by their lanyards and a photo ID card.
- All adults are expected to challenge the presence of any adult not with the company or part of the local staff.

- All adults are responsible for ensuring that students understand how the programme works and what the student's commitment to it is, the importance of a good night's sleep, punctuality, eating properly and telling us if they have any special dietary needs, and of being aware in general of the rules and regulations (and the sanctions if they are broken) set out in the Student Handbook.

- The Centre Manager (DSP) and Academic Centre Manager (DSP) are identified as the people to contact for any personal problems that either students or adults may have. Their photograph and contact details appear on posters in prominent places around the campus.

- A shortened version of our Safeguarding and Child Protection Policy is given to all adults and contains the procedures for dealing with abusive behaviour by adults or students (verbal abuse, harassment, bullying, actual or threatened violence, damage to personal property) or behaviour that may lead to extremist radicalisation. Guidelines for students can be found in the Student Handbook.

- A 24-hour emergency contact number is provided on our website, in our brochure and with enrolment documents for parents and agents.
- The Centre Manager's telephone number is given to students as their 24-hour emergency number.

- All airport transfers are organised by the company and handled and coordinated by a senior member of staff in the London Office. Groups and individuals/unaccompanied minors are met at the airport by a member of staff, who ensures that they are taken to and put on the correct coaches. Magnifico uses private coach companies, minibus and taxi services for individual and group airport transfers and excursions, and all their drivers are required to be DBS checked.
- Approximate arrival times on campus are communicated to the Centre Manager.
- All transfer arrangements and costs are agreed in advance of enrolment.

- Students are provided with information in the Student Handbook on the following:

- Local shops
 - Cash machine
 - What to do with valuables/documents
 - Local places of worship
 - Laundry facilities
- All students must have medical insurance that covers them for the duration of their stay and this guarantees them access to medical and dental treatment through the NHS.

Accommodation

For a description of the types of accommodation provided, the supervision arrangements and the codes of conduct for both adults and students, see 2.8 of this document.

All the accommodation is within a few minutes walk from the facilities the students will be using for the rest of the programme.

All the accommodation is inspected once a year by the company and additionally on arrival on campus by the Centre Manager and his/her team before the students arrive.

The accommodation offers the following features to ensure that the students are housed in a comfortable living environment:

- Halls of residence buildings in a good state of repair and in good decorative order both inside and out.
 - Good standards of cleanliness throughout with a regular cleaning programme known to adults and students.
 - Good-sized bedrooms with natural light, good-sized beds, a desk and chair and hanging and drawer space for clothes.
 - Adequate heating and lighting.
 - Bathroom facilities with showers and hand basins.
 - Duvets and pillows.
 - A change of bed linen and towels once a week.
 - Kitchens where, with adult supervision, light snacks and meals can be prepared and meetings can be arranged.
 - Privacy from members of the opposite sex.
- Feedback will be sought in daily meetings from the group leaders and the assigned members of the Activity Staff regarding accommodation issues that other adults or students may have.
 - If the students have any problems with the accommodation, they know they can contact the Centre Manager (see Student Handbook).
- All the meals provided offer a well-balanced diet, including fresh fruit, vegetables and salads. The catering staff are also able to take into consideration most special dietary requirements.

Leisure opportunities

Sample programmes containing the leisure opportunities are published on our website and in our brochure as a guide to what may, in general terms, be offered as part of the course. The leisure programme is finalised during the induction by the Centre/Activity Manager and the Activity Staff, taking into consideration both the skills of the staff themselves and the need to fulfil obligations the company has regarding specific elements of the programme.

6.5 First aid and medical care

Magnifico has a fully qualified doctor/nurse on call and on campus 24 hours a day. S/he has a visiting room and is able to administer basic care and establish if it is necessary to seek further help at a local hospital. The doctor is provided with a mobile telephone and can be contacted at any time. Students are encouraged to contact their Group Leader or a member of staff, and not the doctor directly, if they think they need medical attention.

Should a student need to visit the doctor he/she is accompanied by an adult member of staff or by the student's group leader. Depending on the student's need for privacy during the visit the adult may or may not enter the examining room with the student (for translation purposes or reassurance); the adult will however remain in the vicinity and check the student's visit went smoothly. Both the on-campus doctor and the adult accompanying the student to his/her surgery are required to record the name of the student, the date and time of all doctors' visits, and sign the record book. One record book is kept in the doctors' surgery and the other is kept locked in the Centre Manager's office. The two books are consulted regularly by the DSL/DSP and compared in order to check for inconsistencies or unusually frequent of doctors' visits.

Before their arrival, students and their parents or guardians are asked to provide details of any medical conditions they may have that may require assistance and if they take any medication on a regular basis.

Magnifico always seeks parental consent before administering any medicine during their child's stay.

A written record is kept of all incidents where the doctor or staff have to intervene.

6.6 Student behaviour and discipline

The Student Handbook includes school rules and sanctions for students.

This Policy and the Staff Handbook include a Code of Conduct and clear systems for responding to situations, who to report to and how to record them for adults.

6.7 Fire safety

During the induction process at the beginning of students' stay, the fire drill procedure is outlined referring to the Student Handbook. All staff and students are informed that unannounced fire drills are possible at least once a week, and where the assembly points are. Fire drills are organised in collaboration with local university staff.

6.8 Airport transfers

Magnifico handles all airport transfers, sending members of the Activity Staff to the airport to meet and greet students and their accompanying adults on arrival and to assist with departures.

Unaccompanied Minors (UM) are assisted by a nominated member of staff both on arrival and departure. This member of staff is responsible for handing over the student(s) on arrival to a second member of staff to be taken by coach to the chosen centre, and during departure to the airport authorities once check in has been completed. The nominated member of staff remains at the airport until the flight has taken off.

6.9 E-safety

The Student Handbook includes guidelines about being safe online and rules about internet use. These include who they should contact if they receive any unwanted contact.

6.10 Radicalisation and Extremism and Prevent Duty

See separate policy document.

6.11 Provision for those more vulnerable

All known vulnerable students are accompanied by adults who are known to the student's family. Concerns for a child's well-being would be raised with home and the authorities should it be necessary, using the procedures mentioned in this policy document.

6.12 Private fostering

This does not apply to Magnifico Travel Ltd, since we do not take students for longer than 27 consecutive nights.

