

1. Introduction

At Churchill House, the safety and wellbeing of all students is our highest priority. We recognise our duty of care to safeguard and promote the welfare of every child and young person who attends our school — whether for a short summer course or as part of our year-round provision in Ramsgate. We are committed to providing a safe and supportive environment in which all students, particularly those under the age of 18, can learn, thrive, and develop with confidence.

This policy and procedure apply to both:

- **Churchill House Summer Centres** (summer centres offering English courses to students from across the world in residential and homestay settings)
- **Churchill House Main School in Ramsgate** (our year-round school offering English courses to students from across the world in residential and homestay settings)

It outlines both our **safeguarding policy** (the principles and commitments that guide our actions) and our **safeguarding procedures** (the specific steps staff must follow to protect children from harm). While the settings vary in terms of structure and supervision, this is a unified policy that reflects our shared values, responsibilities, and legal obligations.

This version replaces all earlier safeguarding documents used at the Churchill House Main School in Ramsgate and aligns the Main School's practice with the more robust and comprehensive procedures in place at our Summer Centres. It has been updated in accordance with statutory guidance including *Keeping Children Safe in Education (2024)*, *Working Together to Safeguard Children (2018, updated 2023)*, and the British Council's Accreditation UK criteria.

All staff and adults working with children at Churchill House are expected to familiarise themselves with this policy, follow the procedures outlined here, and contribute to creating a culture of vigilance, safety, and trust.

2. Safeguarding Policy Statement and Principles

Churchill House is committed to creating and maintaining a safe and inclusive environment where all students are protected from harm, treated with respect, and supported in their learning and personal development. This commitment applies equally to our residential summer centres and to the Ramsgate main school, where we welcome young learners year-round.

Safeguarding is not simply a matter of compliance — it is central to the ethos of Churchill House. We believe that all children and young people, regardless of gender, age, ability, race, religion, sexual orientation, or background, have the right to feel safe and be protected from abuse, neglect, and exploitation.

We recognise that safeguarding includes:

- Protecting children from maltreatment
- Preventing the impairment of their health or development
- Ensuring children grow up in safe and effective care
- Taking action to enable all children to have the best possible outcomes

At Churchill House, this means:

- Being proactive in identifying and responding to concerns
- Embedding safeguarding into all aspects of our work, from teaching to transfers
- Providing staff with the training, tools, and support they need to safeguard effectively
- Ensuring clear, accessible reporting procedures for all students and staff
- Working in partnership with parents, agents, group leaders, social services, and other external agencies

This policy reflects our belief that safeguarding is **everyone's responsibility**, and that effective protection comes from vigilance, clear procedures, and a culture of care.

3. Roles and Responsibilities

Safeguarding is a shared responsibility, and all adults working at Churchill House have a duty to safeguard and promote the welfare of children and young people. However, specific roles carry defined responsibilities, and it is essential that all staff understand who is accountable for what, and how to report concerns.

The **Designated Safeguarding Leads (DSLs)** have overall responsibility for safeguarding and child protection across Churchill House. They ensure that procedures are followed, concerns are responded to appropriately, and staff receive training and support. There is one central DSL for the summer centres and a separate DSL for the Ramsgate main school, both of whom are supported by trained Deputy DSLs.

Each **Summer Centre** also has a senior member of staff (usually the Centre Manager) who acts as the **Designated Staff Member for Safeguarding**. This person is responsible for managing safeguarding issues on site, supporting staff, and escalating concerns to the central DSL when necessary.

In the **Main School (Ramsgate)**, In the Main School (Ramsgate), The DSL and assistant DSL's are appointed to oversee the day to day wellbeing and safeguarding of junior students and Young Adults aged 16–17. They are responsible for monitoring attendance, responding to lateness or absence, conducting welfare interviews, and maintaining contact with host families and Group Leaders.

All **teachers, activity leaders, administrative staff, and homestay hosts** are responsible for familiarising themselves with the safeguarding policy, completing training, and following procedures consistently. Anyone who has a concern about a child — no matter how minor it may seem — must report it immediately.








Group Leaders accompanying students from overseas are also expected to take a safeguarding role. They must have been vetted and cleared in their home countries, attend Churchill House briefings on arrival, and work cooperatively with staff to ensure the safety of their students.



Safeguarding concerns can arise in any area of our work — in classrooms, accommodation, activities, or travel. It is essential that everyone at Churchill House knows who to speak to, what to do, and understands that **doing nothing is never an option**.

Safeguarding Contacts (2025–2026)



Designated Safeguarding Leads (DSLs)

- **Summer Centres DSL:**
Kash Izydorczyk
 07419 373940
 welfare@churchillhouse.co.uk
- **Deputy DSL (Summer Centres):**
Sarah Adjani
 07419 373918
 sara@churchillhouse.co.uk
- **Main School ((Non-Summer groups)) DSL:**
Sue Thompson
 07388 62547
 susanthompson@churchillhouse.co.uk
- **Deputy DSL (Non-Summer groups) :**
Daniyah Munir
 07368432765

Churchill House Director

- **Rex Stickland**
 rex@churchillhouse.co.uk

External Contact – Kent Local Authority Designated Officer (LADO)

- **Children’s Safeguarding Team (East Kent)**
 03000 410888
 kentchildrenslado@kent.gov.uk

4. Safeguarding Training and Safer Recruitment

Churchill House is committed to ensuring that all staff and adults working with under-18s are properly trained, thoroughly vetted, and fully aware of their safeguarding responsibilities. Creating a safe environment begins with recruiting safely and continues through regular training, monitoring, and support.

All members of staff—whether full-time, part-time, seasonal, or returning—must complete safeguarding training appropriate to their role. This includes:

- Basic safeguarding and child protection awareness
- Identifying signs of abuse, neglect, or exploitation
- Understanding how to respond to disclosures and concerns
- Familiarity with our reporting procedures and safeguarding structure

This training is updated annually and delivered through a combination of online modules and in-person briefings at the start of each course or contract. Refresher training is required before staff return for a subsequent summer or term. In Ramsgate, staff training is conducted termly and recorded.

Safer recruitment procedures are followed rigorously. All applicants must:

- Complete a **suitability declaration**
- Provide a detailed CV accounting for all employment gaps
- Undergo appropriate **Disclosure and Barring Service (DBS)** checks or international equivalents
- Provide two recent references, at least one from a previous child-related employer
- Participate in interviews that include safeguarding-related questions

All appointments are conditional on satisfactory references and checks. Staff whose roles bring them into contact with under-18s may not begin work until their DBS clearance or police check has been verified. In the rare case where a check is delayed, a risk assessment and supervision plan must be put in place and documented.

Homestay hosts in Ramsgate are also subject to annual safeguarding procedures, including:

- Completion of a **Children's Act declaration form**
- A current enhanced DBS check for all adult residents
- Safeguarding briefings and updates, delivered in person or online








Group Leaders provided by agents are expected to have been vetted in their country of origin. They receive safeguarding training on arrival and are expected to work under Churchill House supervision at all times.

Taxi drivers and external contractors who may transport or interact with junior students must also undergo safeguarding checks and receive clear written instructions about their responsibilities.

Churchill House recognises that safeguarding begins at the point of recruitment. We are committed to making recruitment decisions based not only on skills and experience, but also on a clear demonstration of values, professionalism, and suitability to work with children.

Safer Recruitment Summary Checklist

All adults working with under-18s must:

-  Sign a Children's Act declaration
-  Provide a **CV with full work history** and no unexplained gaps
-  Undergo a **DBS or international police check**
-  Submit **two references**, including one from recent child-related employment
-  Complete **safeguarding and prevent training** before starting work
-  Be supervised if starting work before DBS clearance (only in exceptional cases with risk assessment)
-  Adhere to the **Staff Code of Conduct** and safeguarding principles at all times

5. Recognising and Responding to Concerns

All adults working with children at Churchill House have a duty to remain vigilant to signs that a student may be at risk of harm. Concerns may relate to a child's behaviour, appearance, emotional state, verbal disclosure, or to something observed or reported.

These concerns may arise during lessons, activities, accommodation, transfers, or general interactions.

Safeguarding concerns may stem from:

- Changes in mood or behaviour
- Unexplained injuries or physical marks
- Excessive tiredness or listlessness
- Withdrawal, anxiety, or unusual emotional responses
- Flirtatious or sexually inappropriate behaviour
- Fearful reactions to specific adults or locations
- Reluctance to return to a host family or accommodation
- Comments made by the child, their peers, or other adults
- Secretive or inappropriate use of technology or mobile phones

The concern may not appear serious in isolation but may form part of a wider picture. Therefore, **no concern is too small to report**. It is not the responsibility of staff to investigate — only to report and record.

If a staff member has any concern about a student, they must:

1. Report the concern **immediately** to the Designated Staff member or DSL.
2. Record the concern **clearly and factually**, using the Child Protection Report Form.
3. Include as much detail as possible: names, times, locations, exact wording of disclosures, observed behaviours, and any action taken.
4. **Do not share information** with others except on a strict need-to-know basis.

Staff must also be aware that concerns may arise outside of Churchill House's direct environment — for example, related to abuse occurring at home or in the student's country of origin. Even in these cases, the same reporting procedures must be followed.

If a child is in **immediate danger**, the first priority is to ensure their safety. The DSL (or Deputy) will then decide on further action, which may include contacting the **Local Authority Designated Officer (LADO)**, **Children's Social Care**, or the **police**, depending on the nature of the concern.

Churchill House maintains an ethos of "**It could happen here**" — meaning staff are expected to act on instinct, observation, and concern, not to dismiss doubts or wait for proof. Delaying action or failing to report may place a child at further risk.

6. Responding to Disclosures from Students

A disclosure is when a child or young person tells a member of staff that they are experiencing, or have experienced, harm. This may relate to abuse, neglect, exploitation, bullying, or other safeguarding concerns. Disclosures can be made verbally, in writing, or even through non-verbal cues such as behaviour, drawings, or gestures. Every disclosure must be taken seriously, handled sensitively, and acted upon immediately.

When a student makes a disclosure, the role of the staff member is **to listen and reassure, not to investigate**. The priority is to protect the child, preserve their trust, and ensure the information reaches the Designated Staff or DSL without delay.

Staff must:

- Listen calmly and give the student your full attention.
- Allow them to speak in their own words, at their own pace.
- Avoid interrupting, except to clarify meaning.
- Reassure them that they have done the right thing in telling you.
- Be honest about the fact that you cannot keep the information a secret — explain that you must share it with those who can help.
- Ask only open questions if you need to clarify something (e.g. “Tell me what happened” or “Can you explain what you mean by...?”). Avoid leading questions or suggesting answers.
- Note both **what is said** and **how it is said**, including the student’s emotional state, behaviour, and any visible injuries.
- Make a factual written record as soon as possible using the **Child Protection Report Form**. Include the date, time, and place of the conversation, and any witnesses present. Do not ask the child to make a written statement themselves.
- Sign and date your report, and hand it directly to the Designated Staff or DSL.

Staff must not:

- Promise absolute confidentiality.
- Make assumptions or speculate about the truth of the disclosure.
- Ask the student to repeat their account multiple times.
- Investigate or confront anyone named in the disclosure.
- Express personal shock, anger, or disbelief in a way that may unsettle the child.

Once the DSL has received the disclosure, they will decide on the appropriate next steps. This may involve contacting the Local Authority Designated Officer (LADO), Children’s Social Care, or the police. The DSL will also ensure that all safeguarding records are kept securely and confidentially.

Staff should remember that **their role is to protect and pass on**, not to judge or resolve the situation themselves. Even if a student later withdraws their disclosure, the concern must still be recorded and referred in line with this policy.

DOs and DON'Ts for Handling Disclosures

DO	DON'T
Stay calm and approachable	Promise confidentiality
Let the student speak in their own words	Interrupt or rush them
Reassure them they did the right thing	Show shock, anger, or disbelief
Use open questions for clarification	Ask leading or “why” questions
Make clear, factual notes promptly	Make assumptions or speculate
Record exact words where possible	Ask the child to write their own statement
Report immediately to the DSL or Designated Staff	Delay reporting until later
Follow up to ensure concern is recorded	Confront or question the alleged perpetrator

7. Managing Allegations

An allegation is defined as any claim or suspicion that an adult working at Churchill House — including staff, homestay hosts, Group Leaders, contractors, or volunteers — has

behaved in a way that has harmed, or may have harmed, a child; committed a criminal offence against or related to a child; or behaved in a way that indicates they may pose a risk to children. Allegations may also include inappropriate behaviour towards students aged 18 or over if such behaviour raises concerns about their suitability to work with under-18s.

All allegations must be taken seriously and acted upon without delay. This includes concerns raised about behaviour in the workplace, in accommodation, during activities, on excursions, online, or outside of Churchill House activities if the individual's actions could impact their suitability to work with children.

Immediate actions for staff receiving an allegation:

- Ensure the child is safe from harm. If immediate danger is suspected, contact emergency services without delay.
- Report the allegation immediately to the DSL or Designated Staff member.
- If the allegation is against the DSL, report directly to the Director (Rex Stickland) or, if necessary, the Local Authority Designated Officer (LADO).
- Record the details on a Child Protection Report Form, noting dates, times, witnesses, and exact words where possible.
- Maintain confidentiality and do not discuss the matter with other staff unless instructed by the DSL.

Actions taken by the DSL:

The DSL will assess the information promptly, consult with senior management where appropriate, and contact the Local Authority Designated Officer (LADO) within **24 hours** for guidance. Written confirmation of any telephone referral must follow. The LADO will advise whether the allegation meets the threshold for statutory intervention and will coordinate any further action.

Where the allegation involves a criminal offence, the DSL will work in cooperation with the police and social services. No internal investigation will begin until authorised by these agencies.

During investigations:

- The staff member or adult concerned may be suspended if their continued presence poses a risk to students or could compromise the investigation. Suspension is a neutral act and does not imply guilt.
- In residential summer centres, alternative accommodation may be arranged during suspension.
- At the main school, suspended staff may be asked not to attend the premises pending investigation.
- All actions, communications, and decisions must be documented.

Churchill House also recognises the importance of managing **low-level concerns** — behaviours that do not meet the threshold for referral to the LADO but could indicate a pattern of conduct that requires monitoring. These will be recorded by the DSL and addressed through supervision, training, or disciplinary action as appropriate.

The welfare of the child is always the primary concern, and all parties will be treated with fairness and respect during the process. No attempt will be made to influence witnesses or alter evidence, and all procedures will follow statutory guidance and Accreditation UK requirements.

8. Safer Working Practices for Staff

Churchill House expects all adults working with students to maintain the highest standards of professional and personal conduct. These standards protect students from harm and staff from situations that could lead to false allegations or misunderstandings. All staff must be aware of the boundaries of appropriate behaviour and follow these guidelines at all times.

Staff should avoid placing themselves in situations where they could be alone with a student and out of view of others. Where one-to-one contact is necessary, it should be conducted in an open or visible space, or with the door open. Staff must not engage in physical contact with students unless it is to prevent harm, provide first aid, or offer appropriate comfort, and in such cases must follow the guidance in **Section 9: Physical Contact**.



8.1 Whistleblowing Policy

Churchill House encourages all staff to speak up if they have concerns about the safety or wellbeing of a student, or about the conduct of another adult. Whistleblowing is the act of reporting suspected wrongdoing within the organisation, and it is an important safeguard for children.

Staff who raise a concern in good faith will not be penalised or suffer any negative consequences. All whistleblowing reports will be treated confidentially, although the information may need to be shared with relevant authorities if required.

If a staff member feels unable to raise a concern with their line manager or Designated Staff member, they should report directly to the DSL. If the concern involves the DSL, the matter should be reported to the Director or to the Local Authority Designated Officer (LADO).

External whistleblowing advice can be sought from:

- **NSPCC Whistleblowing Advice Line:** 0800 028 0285 /  help@nspcc.org.uk
- **Ofsted Whistleblowing Hotline:** 0300 123 3155 /  whistleblowing@ofsted.gov.uk

8.2 Good Practice

Good practice helps maintain a safe and respectful environment for students and staff. Examples include:

- Treating all students equally, with dignity and respect.
- Acting as a positive role model in words, appearance, and behaviour.
- Giving constructive feedback rather than criticism.
- Following all safeguarding procedures and reporting concerns promptly.
- Maintaining professional boundaries, both in person and online.
- Being aware of cultural sensitivities and adapting behaviour accordingly.

- Using only company-approved channels for contacting students, and only for school-related purposes.
- Ensuring that accommodation and activities are supervised to agreed ratios.

8.3 Unacceptable Behaviour

The following conduct is prohibited and may lead to disciplinary action or dismissal:

- Endangering a student through action or inaction.
- Engaging in rough, physical, or sexually provocative games.
- Using inappropriate, sexual, or suggestive language, even as a joke.
- Entering student bedrooms or private areas without a clear and justified reason, and without another responsible adult present.
- Taking a student to the toilet without another responsible adult supervising.
- Showing favouritism or forming inappropriate personal relationships with students.
- Accepting or ignoring inappropriate language or behaviour from students.
- Allowing personal life to overlap with professional duties (e.g. inviting students into personal accommodation or sharing personal contact details).
- Communicating with students via personal email, phone, or social media before, during, or after their course.
- Consuming alcohol or being under the influence of alcohol or drugs while on duty, or drinking/smoking in front of students.
- Wearing provocative or revealing clothing during work hours.

By following these safer working practices, staff help create an environment in which students feel secure and respected, and in which safeguarding responsibilities are consistently met.

9. Physical Contact with Children

Churchill House policy is to avoid unnecessary physical contact with students wherever possible. However, we recognise that in the course of our work there will be occasions when some contact is unavoidable. This may be to provide reassurance, demonstrate a

skill, administer first aid, or prevent harm. In all cases, physical contact must be appropriate, limited to what is necessary, and carried out in a way that minimises the risk of misunderstanding or discomfort.

The circumstances where physical contact may be appropriate can be grouped under **Positive Touch**, **Negative Intervention**, and **First Aid**. Staff must be aware that perceptions of physical contact can vary across cultures, and even when intended kindly, it may be misinterpreted.

9.1 General Principles

When physical contact is necessary:

1. **Never touch a student in private** — ensure another member of staff, Group Leader, or responsible adult is present.
2. If contact occurs in a small or enclosed space (e.g. entering a student's bedroom to respond to distress), always **leave the door fully open**.
3. Limit contact to what is strictly necessary for the situation.
4. **Ask permission** where possible (e.g. "Would you like a hug?") and respect the student's response.
5. Avoid physical contact with students who are upset unless you are sure it will be welcome and appropriate.
6. Record any significant incident of physical contact in writing and pass it to the DSL.

9.2 Positive Touch

Positive touch is limited, appropriate contact for reassurance, guidance, or safety.

Examples include:

- Guiding a student's arm just above the elbow when moving them to safety.
- A brief side hug to comfort a distressed younger child (never "front-to-front").
- Adjusting a student's posture in a sports or activity demonstration, with consent.
- High-fives or handshakes as encouragement or congratulations.

Where possible, **positive touch should be avoided** if other, non-contact means of reassurance are available.

9.3 Negative Intervention

Negative intervention means the use of reasonable force to:

- Prevent injury to the student or others
- Stop a fight or restrain dangerous behaviour
- Protect property from serious damage

This should only be used as a **last resort** after de-escalation attempts have failed. If negative intervention is necessary:

- Call another member of staff to assist and witness.
- Use the minimum force required for the shortest time necessary.
- Complete a written report immediately, including any injury sustained.
- Inform the DSL at once.

9.4 First Aid

First aid should ideally be administered by a trained first aider. Physical contact during first aid must:

- Be appropriate for the treatment needed.
- Be carried out openly, ideally with another adult present.
- Be explained to the student before proceeding.
- Be avoided if the student can treat the injury themselves under guidance.

• 10. Taking Photographs of Students

Churchill House recognises that photographs and video can be a valuable record of school life, student achievement, and activities. However, such images must be taken and used



responsibly to protect the privacy, dignity, and safety of students — particularly those under 18 — and to comply with safeguarding and data protection requirements.

Staff must not take photographs or video of students using their own personal devices. All images must be captured using **school-owned equipment** wherever possible, and remain the intellectual property of Churchill House. Any exception (for example, a student requesting a group photo using their own phone) must be appropriate, supervised, and in line with the permissions granted by the student and their parent/guardian.

Photographs of students may be taken for the following purposes:

Marketing and promotional material (print and digital)

Academic and project work

Activity records and certificates

Internal displays or school yearbooks

In all cases, the following rules apply:

Parental or guardian consent must be obtained before using any student's image for promotional or public purposes.

Images should be taken in **public or supervised areas** with other adults present.

Students and staff must be appropriately dressed. Swimwear, nightwear, or other revealing clothing is not acceptable for photography.

Images must not portray students in a way that could cause embarrassment, distress, or misrepresentation.

Avoid taking or storing large numbers of images unnecessarily, and delete any unneeded files promptly from devices and storage systems.

- Where staff are photographed with students (e.g. during group activities or excursions), they must ensure that the location, posture, and context of the image could not be misinterpreted. A safe approach is to ensure photographs are taken in open, visible environments, ideally with multiple people in the frame.

- Some students may have restrictions on their images being used due to safeguarding concerns or personal preference. A list of these students will be maintained by the DSL or Centre Manager and must be respected by all staff.

11. Electronic Contact between Staff and Students

Churchill House prohibits unnecessary or inappropriate electronic communication between staff and students in order to maintain professional boundaries and safeguard all parties. This applies before, during, and after a student's course, regardless of whether they are under or over 18 at the time of contact.

Staff must not:

- Initiate or continue direct contact with students via personal email, mobile phone, or social media platforms such as Instagram, Facebook, Snapchat, TikTok, or WhatsApp.
- Share personal contact details with students.
- "Friend" or "follow" students on social media accounts, or accept requests from them, before, during, or after their time at Churchill House.
- Engage in private messaging or online interaction that is not directly related to the student's education or welfare during their course.

Where electronic contact is necessary for operational reasons (for example, confirming a meeting time for a school activity, or sending an urgent message about a change to the day's programme), it must:

- Be conducted through **school-approved communication channels** (e.g. a school email address or school-managed messaging system).
- Be professional, brief, and limited to essential information.
- Be logged or otherwise recorded, so it is transparent to managers.
- Where possible, include the student's Group Leader, parent/guardian, or another staff member in the communication.

Students may contact staff through official school communication systems for educational or welfare purposes only. Any attempt by a student to engage in personal

conversation outside of the school context must be politely redirected and reported to the DSL.

Staff must remain aware that electronic communication — including messages, images, and videos — can be easily misinterpreted or shared outside the original context. Even well-intentioned exchanges can be misunderstood and potentially damage the reputation of both the staff member and the school.

Any breach of this policy will be treated seriously and may result in disciplinary action, up to and including dismissal, and possible referral to statutory agencies where safeguarding concerns are involved.

12. Recruitment

Churchill House is committed to recruiting staff, homestay hosts, and contractors who share our safeguarding values and who are demonstrably suitable to work with children and young people. Safer recruitment is a core part of our safeguarding culture and ensures that all reasonable steps are taken to deter, identify, and reject individuals who may pose a risk to students.

All recruitment processes — whether for permanent, temporary, or seasonal roles — follow safer recruitment principles in line with the *Keeping Children Safe in Education (2024)* guidance, the British Council's Accreditation UK criteria, and Young Learners English UK (YLEUK) standards.

Our safer recruitment process includes:

- Clear safeguarding commitment in all job advertisements and role descriptions.
- A detailed application form or CV requiring a full employment history and explanations for any gaps.
- Structured interviews including safeguarding and child protection questions relevant to the role.
- At least two satisfactory references, including one from the most recent employer in a role involving work with children (where applicable). References must confirm the candidate's suitability to work with under-18s.

- An enhanced **Disclosure and Barring Service (DBS)** check for all UK-based staff and homestay hosts, with checks renewed on a rolling basis for long-term staff. For overseas applicants, a police check or equivalent from the country of residence is required.
- A **Children's Act declaration** confirming the applicant is not barred from working with children.
- Verification of identity and the right to work in the UK.
- Training in safeguarding and child protection to be completed before starting work.

Staff and hosts may not begin unsupervised work with under-18s until all checks have been completed. In exceptional cases where a DBS or police check is pending, a formal risk assessment will be carried out, and the individual will be subject to constant supervision until clearance is confirmed.

Homestay Recruitment (Ramsgate):

- Annual renewal of the Children's Act declaration.
- DBS checks for all adults (18+) in the household.
- References from previous hosting experience or other relevant child-related roles.
- Host family safeguarding briefings and periodic home visits to ensure ongoing compliance.

Group Leaders provided by agents:

- Agents must provide written confirmation that all accompanying Group Leaders are suitable to work with children and have been vetted in their home country.
- Group Leaders receive safeguarding guidance on arrival and must work under Churchill House's supervision and policies at all times.

Contractors and service providers:

- Contractors such as taxi drivers, activity providers, or maintenance staff who have unsupervised access to juniors must have the appropriate safeguarding checks and licensing in place.
- All contractors are given clear written guidance on expected conduct around children.

Churchill House views safeguarding as a non-negotiable part of recruitment. No appointment will be confirmed until we are satisfied that the individual has met our suitability criteria.

13. 'Prevent'

Churchill House is committed to fulfilling its duties under the UK Government's *Prevent* strategy, which forms part of the national counter-terrorism framework. The purpose of *Prevent* is to safeguard individuals from being drawn into terrorism or extremism, in the same way that we safeguard them from other forms of harm.

We recognise that children and young people may be vulnerable to extremist messages or influence, both in person and online. Exposure to such ideas can lead to social isolation, radicalisation, and, in extreme cases, involvement in criminal or terrorist activity. Staff, therefore, have a duty to be vigilant to the risks and to take action where there are concerns.

Our approach to Prevent includes:

- Incorporating *Prevent* awareness into staff safeguarding training for both summer and year-round operations.
- Ensuring that all staff complete the government's online *Prevent* training module before starting work.
- Promoting an inclusive environment where diversity is respected and discriminatory or intolerant behaviour is challenged.
- Teaching students about tolerance, respect, and critical thinking, both within and outside the classroom.
- Monitoring IT systems and ensuring venue firewalls block access to extremist material online.
- Having clear procedures for responding to concerns about radicalisation.

Identifying Prevent concerns:

Signs that a young person may be vulnerable to radicalisation include:

- Expressing extremist views, verbally or online.
- Displaying intolerance towards people from different backgrounds or beliefs.

- Becoming socially isolated or withdrawing from peers.
- Possessing or seeking extremist literature or online content.
- Sudden changes in appearance, behaviour, or friendship groups linked to extremist ideology.

These signs do not necessarily mean that a young person is at risk, but they may warrant further consideration.

Reporting Prevent concerns:

If a staff member has any concern about a student or adult in relation to radicalisation or extremism:

1. Report the concern immediately to the DSL or Designated Staff member.
2. Record the concern factually, including exact words or behaviours observed.
3. The DSL will assess the concern and, if necessary, contact the *Prevent* team or the police for advice.
4. Any referral to external agencies will be documented and followed up.

At Churchill House, our Prevent duty is not about imposing restrictions on freedom of expression; it is about safeguarding students from harm and supporting them to make informed, safe choices in an open and respectful environment.

14. Welfare

14.1 Risk Assessments

Risk assessment is a fundamental part of Churchill House's approach to safeguarding. It ensures that activities, accommodation, supervision, and travel are planned with student safety in mind, and that potential hazards are identified and controlled.

Summer Centres

Generic Risk Assessments (GRAs) are provided to Centre Managers before staff induction. These include:

- **General and Supervision Risk Assessments (GSRA)** — covering all supervision needs in different areas of the site.

- **Task/Activity-specific GRAs** — covering the main risks, control measures, and emergency plans for sports, excursions, and other events.

Centre Managers, with the support of their management team, adapt these risk assessments to the specific site and programme before the start of each season. The outcomes of these assessments inform supervision plans, staff deployment, and student briefings. All staff read and sign relevant risk assessments before taking part in activities, and any updates are communicated promptly.

Ramsgate Main School

Risk assessments for the main school cover both year-round and seasonal activity programmes. These are reviewed at least termly, or sooner if there are significant changes to venues, activities, or student demographics.

Areas assessed include:

- Classroom and school building safety
- Homestay accommodation checks
- Local excursions and cultural visits
- Transport and transfers

General Requirements (all sites):

- All completed risk assessments are stored securely and are available for inspection by management, Accreditation UK inspectors, or local authorities.
- Staff must familiarise themselves with relevant risk assessments before each activity or duty.
- Supervisors are responsible for ensuring that control measures are followed during activities.
- Risk assessments are living documents and must be updated when circumstances change.

4.2 Missing Students

The safety of our students is our highest priority, and Churchill House has clear procedures for responding quickly and effectively if a student is reported missing.

A student may be considered missing if:

- They fail to attend class, an activity, or a meeting point at the agreed time.
- They do not return to their homestay or residential accommodation by curfew.
- They cannot be located during a headcount, roll call, or supervision check.

Immediate Actions (all sites):

1. Confirm with staff and peers when the student was last seen.
2. Search the immediate area thoroughly, including toilets, common rooms, and nearby outdoor spaces.
3. Contact the student's mobile phone if available.
4. Notify the Centre Manager (summer) or Leader (Ramsgate) immediately, and inform the DSL if there are any safeguarding concerns.
5. If the student is not found quickly, escalate to the Director or senior management, and inform the police without delay.

Summer Centres:

- Activity Leaders or Teachers report to the Centre Manager, who coordinates the search.
- Group Leaders are informed and assist in checking accommodation, activity locations, and common areas.
- All searches and communications are logged, and the student's emergency contact is informed once the situation is confirmed.

Ramsgate Main School:

- The Leader checks the host family to see if the student has returned home unexpectedly.
- If absent from class, teachers notify the Leader immediately after registration.
- If absent from homestay overnight without explanation, the Leader contacts the DSL and police immediately.

If the student is found, their welfare is checked and the reason for their absence is established. Any safeguarding concerns arising from the incident will be followed up by the DSL.

14.3 Welfare Provision

Churchill House is committed to ensuring that all students feel safe, welcome, and supported throughout their time with us. Welfare provision is tailored to the age, needs, and circumstances of our students, whether they are in a residential summer centre or living with a homestay during the school year.

Summer Centres:

- Supervision ratios are normally 1:10–1:15 for students aged 10–17, with additional supervision for higher-risk activities.
- All centres have a dedicated Student Liaison Officer (or similar role) responsible for day-to-day welfare support and acting as a first point of contact for students.
- Induction sessions cover safety, behaviour expectations, emergency contacts, and local area information.
- Regular staff briefings ensure all welfare updates are shared promptly.

Ramsgate Main School:

- Host families are the primary carers for juniors outside class time and are provided with student timetables, emergency contacts, and welfare guidelines.
- Curfew times are enforced: 10:00 PM for ages 12–15, 11:00 PM for ages 16–17 (or earlier in winter months).
- The Leader conducts weekly check-ins with junior students to monitor their wellbeing.
- Any welfare issues are recorded and referred to the DSL as necessary.

General Provision (all sites):

- Clearly displayed contact details for the DSL, Leader, and emergency services.
- Trained first aiders available at all times.
- Access to medical support, including arrangements for accompanying students to medical appointments.
- Support for homesickness, cultural adjustment, and integration into school life.
- A culture where students know they can approach any staff member with a concern.

Welfare is a shared responsibility — all staff are expected to take an active role in promoting a positive, inclusive, and safe environment for every student.

15. Child Sexual Exploitation (CSE) and Female Genital Mutilation (FGM)

15.1 Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of sexual abuse where children and young people are manipulated or coerced into sexual activity in exchange for something they need or want (such as gifts, money, or affection), or as part of grooming for abuse. It can occur in person or online, and may involve physical contact or the sharing of sexual images.

CSE often involves an imbalance of power between the perpetrator and the child, and the child may not recognise that they are being exploited. Warning signs can include:

- Sudden changes in behaviour, appearance, or self-esteem.
- Having unexplained gifts, money, or possessions.
- Associating with older individuals or those known to be involved in exploitation.
- Secretive or unusual use of phones or the internet.
- Absences from school or activities without good reason.

Staff responsibilities:

If a member of staff suspects CSE, they must report it immediately to the DSL, providing as much detail as possible. The DSL will assess the concern and contact Children's Social Care and/or the police as required. All cases of suspected CSE will be treated as a safeguarding priority.

15.2 Female Genital Mutilation (FGM)

FGM is a procedure involving the partial or total removal of external female genitalia for non-medical reasons. It is illegal in the UK, a form of child abuse, and can have severe

long-term physical and psychological effects. FGM is more common in some cultures but is never acceptable and has no health benefits.

Mandatory Reporting Duty:

All staff have a duty to be alert to the risk of FGM and to respond appropriately. In addition, under the *Serious Crime Act 2015*, any **teacher** who discovers (through disclosure or observation) that an act of FGM appears to have been carried out on a girl under 18 must report it personally to the police. This legal duty cannot be passed to the DSL, although the DSL must also be informed.

Warning signs can include:

- A family arranging a long holiday to a country known to practise FGM.
- A student talking about a “special procedure” or celebration.
- Difficulty walking, sitting, or standing after a school break.
- Reluctance to attend medical appointments or PE lessons.

Staff responsibilities:

- If a student is at immediate risk, contact the police at once (dial 999) and inform the DSL.
- If you believe FGM has already been carried out, contact the police and the DSL without delay.
- Record all details factually, including any words used by the student.

16. Online Safety

Churchill House recognises that the internet and digital technology are an integral part of young people’s lives and can be valuable for learning, communication, and recreation. However, they also present significant safeguarding risks, including exposure to inappropriate content, cyberbullying, grooming, radicalisation, and the sharing of sexual or harmful images.

Our aim is to ensure that all students use technology safely and responsibly, and that staff are aware of their role in promoting and protecting online safety.

16.1 School Responsibility

- Ensure that IT systems, Wi-Fi, and internet access in school and residential centres are filtered to block harmful or inappropriate content.
- Monitor online activity where possible without infringing on privacy, to identify safeguarding risks.
- Include online safety awareness posters and information, covering topics such as respectful communication.
- Promote respectful and responsible online behaviour.
- Respond swiftly to any concerns raised about online interactions, whether these occur on school devices or students' personal devices during their time with us.

16.2 Staff Responsibility

- Follow the restrictions set out in **Section 11: Electronic Contact between Staff and Students** — personal devices must not be used for communicating with students.
- Never share personal contact details, social media accounts, or private images with students.
- Challenge and report any observed or reported incidents of cyberbullying, inappropriate messaging, or harmful content.
- Ensure any school-owned devices in their care are used for appropriate purposes only.
- Report all online safety concerns to the DSL, including issues that occur outside school hours if they involve students.

16.3 Student Responsibility

Students are expected to:

- Use school technology for appropriate purposes only.
- Follow guidance given in online safety briefings.
- Avoid sharing personal contact information or passwords.
- Treat others with respect in all online communications.
- Report any online behaviour that makes them feel uncomfortable, upset, or unsafe to a member of staff immediately.

16.4 Responding to Incidents

If staff suspect that a student is at risk through online activity:

1. Secure the device or evidence if appropriate, without viewing or forwarding illegal content.
2. Report the concern to the DSL immediately.
3. The DSL will assess the risk and, if necessary, involve parents/guardians, the police, or relevant agencies.
4. All actions and decisions will be documented.

Churchill House takes online safety seriously as part of our wider safeguarding responsibilities. We aim to give young people the skills and confidence to navigate the digital world safely while ensuring robust measures are in place to protect them from harm.

17. Record Keeping

Effective record keeping is essential to safeguarding. Accurate, timely, and secure documentation ensures that concerns are tracked, patterns of behaviour are identified, and information is available for future reference if needed.

17.1 Principles

- All safeguarding concerns, disclosures, and incidents must be recorded **as soon as possible** after they occur, using the official **Child Protection Report Form**.
- Records must be **factual, clear, and concise**, avoiding speculation or personal opinion.
- Where possible, records should include the child's own words and a description of their behaviour or appearance.
- Dates, times, locations, and the names of all people involved must be included.
- All reports must be signed and dated by the person making the record.

17.2 Storage and Access

- All safeguarding records are held securely by the DSL and stored in a locked cabinet or secure electronic system with restricted access.
- No copies should be kept by individual staff members.
- Access to safeguarding records is strictly limited to the DSL, Deputy DSLs, and senior managers with a direct need to know.
- Information is shared only in line with safeguarding protocols and data protection law.

17.3 Transfer and Retention

- When a student leaves Churchill House and there are safeguarding records, these will be transferred securely to their next educational provider or relevant authority.
- Records will be retained for a minimum period in accordance with legal and statutory guidance, after which they will be securely destroyed.
- Transfer of records will be confirmed in writing and tracked for audit purposes.

17.4 Body Maps

- Body maps must be used to record the location, size, and appearance of any physical injuries, and should be dated and signed.
- Body maps are stored securely with the related safeguarding concern report.

Churchill House is committed to ensuring that safeguarding records are treated with the same seriousness as the safeguarding concerns themselves — maintaining accuracy, security, and confidentiality at all times.

18. Monitoring and Review

Churchill House is committed to regularly reviewing and improving its safeguarding policy and procedures to ensure they remain effective, relevant, and in line with statutory requirements, British Council Accreditation UK criteria, and best practice in the ELT sector.

This policy will be reviewed annually, or sooner if:

- There is a significant change to legislation or statutory guidance.
- An internal review, inspection, or safeguarding incident identifies areas for improvement.
- Feedback from staff, students, homestay hosts, parents, or Group Leaders indicates a need for revision.

The review process will be led by the DSLs in consultation with the Director, Centre Managers (summer), and the DSL and Deputy DSL(Ramsgate). It will take into account:

- Changes to *Keeping Children Safe in Education (KCSIE)*, *Working Together to Safeguard Children*, and other relevant national guidance.
- Lessons learned from safeguarding cases or near misses.
- Recommendations from inspections, audits, or external agencies.
- Suggestions and feedback from training sessions, staff meetings, and student feedback systems.



Any changes to the policy will be communicated promptly to all staff, homestay hosts, and relevant contractors, and updated versions will be made available in staff handbooks, online portals, and shared folders.

Related Documents

This policy should be read alongside:

- Staff Handbook (Main School and Summer Centres)
- Host Family Handbook
- Student Handbook
- Group Leader Handbook
- Child Protection Report Form
- Lost Student and Major Incident Procedures
- Centre-specific Risk Assessments and Emergency Plans

Approved by:

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Date Approved: 15/08/2025

Next Review Date: April 2026



CHURCHILL HOUSE
