



Wiltshire Host Families Ltd
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Safeguarding Policy

(Updated 26 May 2024)

Designated Safeguarding, Welfare and Prevent Lead (DSL): Mrs Gill Brindley

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Deputy Designated Safeguarding, Welfare and Prevent Lead (DDSL): Mrs Jo Cass

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A) Policy Statement

Wiltshire Host Families Ltd provide host family accommodation for a variety of Agents in the UK and abroad including some who are British Council Accredited providers and members of English UK. We maintain that it is unacceptable for a child or young person to experience abuse of any kind and recognise the paramount importance of safeguarding all children and young people (U18's) in our care. We aim to create a safe environment in which children and young people can thrive and adults can work with the security of clear guidance.

We undertake:

- To safeguard the welfare of all children and young people (U18s) who are staying with any of Wiltshire Host Families Ltd hosts, whatever their race, gender or sexual orientation.
- To provide staff, group leaders, hosts and any adults from other organisations with clear guidance on procedures, and appropriate support and training, on how to deal with an allegation of, or concern about, any actual or suspected abuse. This information is in **Guiding Notes** and **Getting Started**.
- To encourage active responsibility amongst U18s to respect each other, look out for each other and raise concerns with adults if necessary.
- To avoid making ourselves vulnerable to suspicion of any form of abuse.

We will seek to safeguard children and young people by:

- Ensuring that Wiltshire Host Families Ltd practises **safer recruitment**
- Ensuring that all adults agree to and adopt a **code of conduct** which includes having read the Safeguarding Policy.
- Ensuring that all U18s agree to and adopt a student **code of conduct**.
- Sharing information and acting promptly and professionally over any concerns.

When will the policy be reviewed?

We are committed to reviewing our policy and good practice annually or whenever an issue arises, to keep it as up to date as possible.

This policy applies to the relationship between students and staff before, during or after a stay.

Terminology

Safeguarding: umbrella term meaning “looking after”

Child Protection: protecting children from direct harmful behaviour.

DBS: Data Barring Service (previously CRB)

- **Child** – person under 18
- **Student** – any person under 18 who a member of staff may come into contact with as a result of their employment in an educational establishment.
- **Social contact** - the exchange of personal information between two or more people.
- **Electronic contact** – 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 and computers. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.

Safer recruitment: recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children.

Prevent: A government strategy to stop people becoming involved in violent extremism and/or supporting terrorism. Wiltshire Host Families Ltd has a duty to have due regard to the need to prevent people from being drawn into terrorism.

Key Individual Roles and Levels of Responsibility

All staff and hosts have responsibility for safeguarding U18s. They have undertaken the minimum of an on-line Basic Awareness Training Safeguarding course. The WHF Safeguarding Lead holds a Level 3 Safeguarding qualification, updated every 2 years minimum and a further qualification in Safer Recruitment.

B) Code of Conduct

All adults and U18s are requested to follow a Wiltshire Host Families Code of Conduct. This is to ensure that everyone has a positive experience within a safe environment based on mutual trust and respect. It is to protect students and adults alike, from any behaviours/actions which might be misconstrued.

Safe Working Practices for Staff and Home Stay Providers

All members of staff and homestay providers should ensure that they avoid making themselves vulnerable to suspicion of any form of abuses by following the guidelines set out in this policy, and procedures set out in the **Guiding Notes** and **Getting Started**. **Hosts should always display the House Rules and Coordinators should ensure the leaders translate on arrival the “Rules for the leader to translate on arrival”.**

Electronic Contact with Children

- Staff must request permission from the Safeguarding Officer for any electronic contact with a student before, during and after the course.
- In any electronic contact with students, staff must pay particular attention to use neutral, un-emotive language that will not be misconstrued.
- Staff must not exchange any information with a student that they would not be happy to share with the child’s parent or carer.
- Staff must avoid the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.
- Staff must not publish photos, videos, or any other information about students except with the express agreement of the employer.

- Staff should be aware that personal information about them may be available in various forms online. Staff should be particularly cautious about their public web profiles and privacy settings.
- Staff should attempt to find ways of setting up and maintaining separate personal and professional electronic profiles.

Appropriate social contact (electronic or otherwise)

- Staff must maintain neutral, friendly relationships with students while avoiding exclusivity or overfamiliarity.
- Staff must resist any attempt by a student to develop an overfamiliar or exclusive social relationship.
- If a student confides sensitive personal information staff have a duty to listen and respond in a professional manner in accordance with organisation guidelines.

Social Networking Sites

- If schools or classes set up social networking forums like Facebook for students, they should be closed groups.
- Staff and students must not share the same social networking group, other than those adults necessary to monitor and administer the group.
- Staff who monitor or administer social networking sites for students should use professional accounts that are as far as possible devoid of personal information.
- Staff must not initiate or agree to friendship requests or similar with students that will result in the sharing of personal information, photos etc.

C) Child Protection

If you are concerned that a student might be at risk or is actually suffering abuse, you should tell the **Coordinator of your group** who will inform the **Group Leader** and **WHF Safeguarding Lead: Mrs Gill Brindley 07726792853**

If there is concern that a student is in immediate danger the following actions will be taken by the DSL or DDSL.

- Contact made with the MASH team on 0300 456108 or email mash@wiltshire.gov.uk
- Consider contacting the police on 999.

Child Abuse is described by the World Health Organisation as: *“all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship or responsibility, trust or power”.*

There are four main categories of abuse as follows:

- Physical: through hitting, shaking, squeezing, kicking, punching etc.
- Sexual: though inappropriate physical contact, the taking of indecent images of children, or the encouragement of sexual activity by children for the purpose of adult gratification.
- Emotional: through persistent lack of affection, unrealistic adult demands, verbal bullying including cyber bullying.
- Neglect: persistent lack of appropriate care of children, including safety, nourishment, warmth, education and medical attention.

Recognising the symptoms of abuse

It can be difficult to identify child abuse as it has various forms. The signs listed in this document are only indicators and many can have reasonable explanations.

Below are some typical indicators to look for:

- Unexplained injuries.
- A child describing an abusive act that has happened to them.
- Another child telling you of their concern about a friend/ fellow student.
- Sexually explicit behaviour in games/ activities.

- Serious distrust of adults.
- Difficulty in making friends/ socialising with other children.
- Eating disorders; obsessive behaviours.
- Self-harming; suicide attempts.

How to respond to concerns

- If you notice any physical or behavioural signs, tell the Coordinator / Designated Safeguarding Officer.
- If you suspect an adult is a threat to a child in some way tell the Coordinator / Designated Safeguarding Officer and continue to monitor the situation (see whistle blowing section).
- If a child/young person makes any comment that gives cause for concern react calmly and act accordingly as outlined below.
- Make a note of what was said and who was present and inform the Designated Safeguarding Officer. He/she will take appropriate action which may involve external agencies and contacting parents/guardians.
- Make sure that the student in question is safe and away from the alleged abuser.

How to react if a child chooses to talk to you

A child may choose any adult to talk to; therefore all adults need to know the right way to respond:

- Stay calm, accessible and receptive.
- Listen, hear and believe.
- Communicate with the child in a way that is appropriate to their age, understanding and preference – this is very important for children whose first language is not English.
- Be aware of the non-verbal messages you are giving.
- Acknowledge their courage and reassure them that they are right to tell.
- Don't probe for more information. Questioning the participant may affect how the participant's disclosure is received at a later date.
- Don't promise confidentiality to keep the information a secret.
- Don't deal with this yourself, act in accordance with the procedure in this policy.
- Keep a written record of the incident, if possible on the "Safeguarding/Welfare incident referral form" (attached in appendix).

Allegations made against staff

Allegations can be made by U18s or other members of staff. Allegations can be made for a number of reasons. Some of the most common are:

- a) Abuse has actually taken place.
- b) Something happens to a student that reminds them of an event that happened in the past – the student is unable to recognize that the situation and the people are different.
- c) Some students know how powerful an allegation can be; if they are angry with you about something they can make an allegation as a way of hitting out.
- d) An allegation can be a way of seeking attention.

An allegation should be reported to the Safeguarding Officer, who will decide whether outside agencies, e.g. the police, the LCSB (Local Child Safeguarding Board) might be involved.

Irrespective of any investigation by social workers or the police, we will follow the appropriate disciplinary procedure: common practice is for the alleged abuser to be suspended from work until the outcome of any investigation is clear.

All incidents should be investigated internally after any external investigation has finished, reviewing organisational practice and putting in place any additional measures to prevent a similar thing happening again.

Keeping Records

An accurate record should be kept and should be signed and dated by the person or people making the statement. The following details should be included:

- Date and time of incident/disclosure.
- Parties involved, including any witnesses to an event.
- What was said or done and by whom.
- Any further action taken by Wiltshire Host Families Ltd to look into the matter.
- Any further action taken.
- Where relevant, the reasons why a decision was taken not to refer those concerns to a statutory agency.
- Any interpretation/inference drawn from what was observed, said or alleged should be clearly recorded as such.
- Name of person reporting on the concern, name and designation of the person to whom the concern was reported, date and time and their contact details.

All this information should be recorded on the Incident/Safeguarding Form held in the Welfare Folder.

All documentation is to be kept secure in the relevant centre within the lockable A4 cabinet, and then forwarded to the Head Office to be kept securely for up to 6 years depending on the severity of the allegation.

D) Training

A senior designated person (currently Gill Brindley) has undertaken appropriate training.

All staff undertake online child protection training (Basic Safeguarding) to ensure that they recognise the symptoms of possible abuse and how they should respond to suspicions of abuse.

Safeguarding is always a topic at Wiltshire Host Families Ltd annual senior staff meeting in December when staff are briefed about recent updates and staff will be given further updates throughout the year as applicable.

E) Safer Recruitment

The application of rigorous procedures for the recruitment of any staff who are likely to come into contact with students can reduce the likelihood of allegations of abuse being made. At Wiltshire Host Families Ltd, the following procedures are followed:

All Coordinators are recruited from experienced host families and are all DBS checked and have completed the basic safeguarding course.

A statement about our commitment to safeguarding appears in our recruitment material.

All potential employees will be interviewed by two qualified senior staff to establish previous experience in working in an environment where there is contact with students and asked about their perceptions of acceptable behaviour.

All staff who will have contact with students will require an Enhanced Disclosure and Barring Service (DBS) Disclosure before they start employment with us. If not, until such time as the DBS is received, they will be closely monitored and not left on their own with U18s. References must also be received before the person starts work.

If an applicant's DBS has a criminal record, their suitability will be judged on a case-by-case basis by at least two people, (based on the criteria provided in "Guidance for ELT providers – FAQ section C5) and the decision recorded.

All original relevant documentation (proof of identity, qualifications) will be seen by the relevant Manager and the Operations Manager, prior to the member of staff commencing employment.

Staff are asked to sign a self-declaration statement confirming that they have no convictions for any offence involving any type of harm to a child or children and should declare anything that may affect their suitability to work with children.

Safer recruitment of Hosts

All hosts will require an enhanced Disclosure and Barring Service (DBS) disclosure before they start hosting with us. All hosts will also require a current gas safe certificate, to have undertaken a fire safety risk assessment, and to display a Fire Plan and House Rules in each student bedroom. All hosts are visited initially to ensure they are suitable and are re-visited every two years. Hosts sign an agreement that they are suitable to host, together with members of the household. Hosts also receive Guiding Notes and a Welcome Pack. The host recruiter talks through all aspects of the stay using the Welcome Pack inserts, including Safeguarding, and the lead host then signs a Homestay Agreement which confirms they have read and will action everything that has been covered including the Wiltshire Host Families Ltd safeguarding policy.

F) Welfare/Implementing Safeguarding

Duty to report:

All members of staff/homestay providers are required to report to the Safeguarding Officer any concern or allegations about Wiltshire Host Families Ltd practices or the behaviour of colleagues which are likely to put children/young people at risk of abuse or other serious harm.

- Staff have a duty to report to the employer any actual or perceived inappropriate development of the relationship between student and staff, electronic or otherwise.
- Any sensitive information communicated by a student to a member of staff, electronic or otherwise, must be reported to the employer.

Failure to comply:

- Non-compliance with the above policy will result in disciplinary procedures.
- Employers have a duty to remove an individual from regulated activity where there is risk of harm to children.
- Employers have a 'duty to refer' to external authorities* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children. (*ISA, police, local child protection authorities).

Abusive Behaviour

Wiltshire Host Families Ltd will not accept any form of abusive behaviour towards our students from other students or adults during the stay. This kind of behaviour may involve (not a comprehensive list):

- **Verbal abuse: name-calling, racist or sexist comments, threatening language.**
- **Physical/sexual abuse: touching, striking, spitting.**
- **Emotional abuse: ostracising, neglecting, humiliating, intimidating.**

The Group Leader & Coordinator will decide what sanctions may be used against the offender e.g. apologies, being moved to another homestay provider, being moved to the adult homestay provider.

All staff have a collective responsibility for ensuring:

*** that abusive behaviour does not go unnoticed * that abusive behaviour is reported promptly.**

If you are not sure whether something you've seen should be dealt with under this heading, please speak to the Coordinator / Safeguarding Officer.

Procedure in the case of a Student abusing another student

In the event of an incident being reported to the Coordinator / Safeguarding Officer, the Coordinator will inform the Group Leader who will take appropriate action to gather any additional information.

The student(s) will then be spoken to by the Group Leader, together with (as necessary) the Coordinator/ Safeguarding Officer. They will be told that they can bring a friend/supporter with them to the meeting.

If the staff involved are content that the incident is not of the most serious sort, and that the student(s) concerned is unlikely to repeat the action, then the student will be given a warning as to his conduct and an appropriate sanction. The student may also be obliged to meet with any other affected student(s) to offer an apology.

Depending on the seriousness of the incident, a letter may be sent both to the agent with whom the student travelled, and to his/her parents/guardians.

In more serious cases of abuse, the student would be returned home at their own expense. In the most serious cases, relevant outside agencies may be involved.

Procedure in the case of an adult abusing a student

The Coordinator will immediately notify the Safeguarding Officer – Gill Brindley (who will liaise with Val Rideout Managing Director and DDSL). All such cases of reported abuse between an adult and a student must be treated as serious and need to be investigated without delay.

Depending on the exact circumstances of the incident, and the role of the staff member, he or she may be temporarily removed from their position.

The Managing Director in consultation with the Safeguarding Officer will decide whether an outside agency needs to be involved at this stage.

If the incident is of a serious nature, the staff member may face summary dismissal. If the incident is of a less serious nature it will be dealt with through Wiltshire Host Families Ltd disciplinary procedures.

Managing Behaviour and Acceptable Restraint

(This has been formulated in accordance with Department for Education – Use of Reasonable Force 2013)

Physical contact with students must be appropriate for the age, understanding and sex of the child and must never threaten or be sexually inappropriate. In some cases physical contact may be appropriate to prevent students from hurting themselves or others, from damaging property or from causing disorder eg:

- To remove disruptive students from the classroom where they have refused to follow an instruction to do so;
- Prevent a student behaving in a way that disrupts a school event or a school trip;
- Prevent a student leaving the classroom where allowing the students to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- Prevent a student from attacking a member of staff or another person, or to stop a fight;
- Restrain a student at risk of harming themselves through physical outburst.

You cannot: Use force as a punishment – it is unlawful to use force as a punishment.

What happens if a student complains if force is used on them?

- All complaints should be thoroughly investigated.
- Where a member of staff has acted within the law – that is, they have used reasonable force in order to prevent injury, damage to property or disorder – this will provide a defence to any criminal prosecution or other civil or public law action.
- Wiltshire host Families Ltd must consider carefully whether the circumstances of the case warrant a person being suspended until the allegation is resolved or whether alternative arrangements are more appropriate.

- If a decision is taken to suspend a member of staff Wiltshire Host Families will ensure that the the member of staff has access to a named contact who can provide support.

Prevent Duty

Wiltshire Host Families Ltd is committed to the government strategy to stop people becoming involved in violent extremism and/or in supporting terrorism. Anyone may be vulnerable to extremist exploitation. Our aim is to provide an environment on our courses where everyone feels safe and supported, and where there is a clear process of referral of concerns for staff, students and homestay providers. We will do this via documents, eg. our codes of conduct (see appendix), appropriate training, and promoting core British values where possible. These are: **democracy, the rule of law, individual liberty, and respectful tolerance of different faiths or beliefs.**

Signs that May Cause Concern

Students talking about exposure to extremist materials or views outside school
 Changes in behaviour, eg becoming isolated
 Fall in standard of work poor attendance, disengagement
 Changes in attitude, eg. intolerant of differences
 Attempts to impose own beliefs
 Use of extremist vocabulary to exclude others or incite violence
 Accessing extremist material online or via social network sites
 Over new religious practices
 Drawing or posters showing extremist ideology/views/symbols
 Students voicing concerns about anyone

How and When to React to Concerns

If you are concerned, contact the Co-ordinator at your centre, or the Safeguarding Officer – Gill Brindley who will liaise with Val Rideout at head office. We will discuss the issue, take advice if necessary, and then make a referral to the relevant authorities if necessary. Please report any concern or incident, however small.

All will be dealt with sensitively and carefully.

Wiltshire Host Families Ltd:

Here, at Wiltshire Host Families, we are like a big family, with one goal in mind - to ensure that the students and teachers that visit us go back with fantastic memories of their "**English Experience**" in **Wiltshire**.

To ensure this happens we have well trained and experienced Administrators and Coordinators.

It is our aim to give the families and leaders all the support they need, with a minimum of fuss, so that everyone has a good time.

If you have any concerns about students, Coordinators or other hosts please get in touch with:

Designated Safeguarding, Welfare and Prevent Lead (DSL): Mrs Gill Brindley

Tel: 07726 792853 Email: Gill.brindley@wiltshirehostfamilies.co.uk

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