

**MC Safeguarding Children Policy at Hurst College**  
**including Child Protection and other related policies**

**for students ages up to 17 years old**  
**on our Residential English Language Courses**

**July 2016**

**Includes:**

- Statement,
- Implementing the Safeguarding Children Policy,
- Child Protection – Staff Code of Conduct,
- Guidance for Staff Safer Conduct, Duty of Care & Professional Boundaries,
- Rewards, Gifts, Favouritism,
- Abusive Behaviour, Discrimination, Bullying (by Staff or Students) Policy,
- Photographs & Videos of Children Policy,
- E-Safety & Staff Social Media Policy,
- Social Contact with Students Policy,
- Suitability Checks for Residential Staff and other Adults (part of Safer Recruitment Policy),
- Supervision and Monitoring of Staff at Hurst,
- MC ‘Prevent Policy’ at Hurst College,
- Campus Safety, Supervision During Free-time and Attendance Policy at Hurst College and off-campus,
- Registrations and Attendance,
- Rules & Discipline

## **MC Policies Statement**

This policy regards students enrolled on our Residential English Language Course. These students are all children, accommodated in boarding houses at Hurst College, West Sussex. They are all covered, regardless of race, gender, nationality and religion, and are entitled to protection. Students who join a UK Tour before/after the Course are not covered for the period they are not at Hurst College. Parents who enrol on a private One-to-one Tuition Course are adult 'students' and are not covered in the Policy as 'students'.

This policy is obligatory for all staff and groups leaders to read. Hurst College personnel, and sub-contracted service providers such as taxi/coach companies, activity session leaders and tour guides, can find this policy on our website [www.manorcourses.co.uk](http://www.manorcourses.co.uk). Some parts are more relevant to staff and group leaders that have access to children throughout the Course than to sub-contracted personnel.

### **Terminology**

- **Safeguarding:** is the action we take to promote the welfare of children and protect them from harm. It means caring for children appropriately and protecting them from that which is not in their best interests; as such, it includes health and safety, child protection and pastoral care. Connected to safeguarding is the phrase 'Duty of Care'; there is a legal responsibility that adults who work with children as professionals or volunteers have a duty to look after them properly; children depend on adults for their safety and well-being.
- **Child protection:** means protecting children from abuse. The definition of abuse commonly used by the World Health Organisation: *'Child abuse' or 'maltreatment' constitutes 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 of responsibility, trust or power.'* Abuse is also defined by inflicting harm or by failing to act to prevent harm.
- **U18:** refers to people under the age of 18.
- **Laws and government documents: a number of key related legislation and key publications**, alongside guidance from English UK and Young Learners English UK, were used to help write this policy:
  - The Children Act 1989 - Duty to safeguard & promote welfare of children
  - Local Government Act 2000 - Sectors in local authorities to work together
  - 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

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- Keeping Children Safe in Education (May 2016) – Statutory guidance for schools and colleges

### Introduction

- Safeguarding is about:
  - building and not compromising relationships of trust between U18s and adults
  - ensuring appropriately safe systems are in place for the well-being of U18s
  - having clear procedures in place if things do go wrong
- Manor Courses takes very seriously our commitment to the provision of a safe and stimulating environment that is responsive to the needs of young students (aged under 18).
- We therefore take seriously the responsibility to safeguard and promote the welfare of students, and work to ensure adequate arrangements to identify, assess, and support any student who is suffering harm, distress, neglect, abuse or injury.
- We recognise that all adults, including temporary staff and non-Manor Courses employees, have a full and active part to play in protecting our students from harm, and that the student's welfare is our paramount concern.

### Roles

- Staff referred to throughout the policy includes groups leaders. Essentially, all staff should act as role models.
- All staff are obliged to abide by our Policy. A child may choose any adult to talk to.
- Everyone needs to have a good understanding of and a positive attitude to safeguarding.
- There is strong leadership from the top to ensure that safeguarding is properly embedded.
- 2 DSLs (Designated Safeguarding Leads) -
  - The Managing Director, Nick Barnard, and the Logistics Manager, Su Barnard.
  - We have a male and a female DSL.
  - One or the other can be contacted 24hrs 7 days a week while at Hurst, either in person at the office, by phone 07973 131982 (Nick), 07703 345977 (Su) or by email: [info@manorcourses.co.uk](mailto:info@manorcourses.co.uk), [su@manorcourses.co.uk](mailto:su@manorcourses.co.uk)
- 1 DPS (Designated Safeguarding Person) –
  - The Welfare Manager, Shirley Mawer.
- Our 2 DSLs and DPS are responsible for: keeping written records of concerns about a student (even if there is no need to make an immediate external referral); ensuring that all such records are kept confidentially and securely; organising student protection awareness training and guidance for staff at induction.
- Our DSLs are responsible for communication with external bodies (eg. police, NSPPC or LSCB, the Local Safeguarding Children Board).
- Our DSLs ensure they have appropriate Level 3 Safeguarding training and can deliver the relevant parts to our staff during Induction, with our DSP.
- Our Recruitment Officer –

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- The Course Director, Jon Barnard.
- Supported by DSL, Su Barnard (also the Recruitment Coordinator).
- Ensures that our selection and recruitment of staff meet the requirements as set down in 'Safer Selection & Recruitment' guidance.
- We carefully select our staff and undertake references and collect police & criminal checks to help ensure that employees are suitable to work with young students.
- He alongside the DSP (the Welfare Manager, Shirley Mawer) is responsible for keeping written records of concerns about staff.

## **Training**

- Group leaders receive the policy only.
- All other staff are trained during the induction to provide a caring, positive safe and stimulating environment.
- They undergo online training provided by <http://www.safeguardingchildren.co.uk/learning-improvement/nyscb-basic-awareness-elearning>
- Su Barnard and Shirley Mawer provide face-to-face training during the Induction Course.
- Nick Barnard and Jon Barnard facilitate a session for further discussion on the policy and professional boundaries during the Induction.
- Line Managers are responsible for monitoring the performance of staff members in their team.

## **Availability and Delivery of the Policy**

- Jon Barnard (Recruitment Officer) is responsible for distributing all digital and paper versions of all Policies, the Staff Handbook, and all recruitment materials.
- Paper copies of the Policy are distributed to all staff in the Induction Course and to all Group Leaders upon arrival.
- PDF of the Policy is available on the website for parents and agents to read.

## **Review of the Policy**

- The Policy is renewed annually in May every year by Jon Barnard (Recruitment Officer) and is signed off by Su Barnard (Designated Safeguarding Lead) in June every year.
- This version has been updated since Staff Handbooks were published and distributed in April 2016.
- With each new student arrival or enrolment, parts of the Policy may undergo review to accommodate the needs of particularly vulnerable students. Raised awareness of specific areas may become necessary during the summer school period.
- It will also change in light of new legislation. However, this version carries minimal reference to updated guidance/legislation on 'female genital mutilation' and 'child sexual exploitation'.
- We welcome feedback from all parties to inform our annual review.

**MC Policies**  
**Implementing the Safeguarding Children Policy**

Manor Courses intend to build trust between students and staff, children and adults, and create a safe school culture.

Remember, a child may choose any adult to talk to. This Policy is to protect both staff and students.

Remember, abuse includes 4 areas: physical, sexual, emotional and neglect.

**Protecting Students and supporting them throughout**

- We recognise that a student, who is harmed, injured, neglected or abused, or witnesses any of them or any violence, may develop negative emotions, and we believe we have the means to support them.
- We recognise some children have more complex support needs, caused by a range of factors, e.g. disability, health or development being impaired, poor home or social environment, family issues, parent/guardian issues.
- We recognise that all matters relating to student protection are confidential.
- We recognise that our staff play a significant part in the prevention of harm to our students by providing students with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- To do this, staff need to respond if they see anything themselves, and also if they hear anything.
- We therefore: establish and maintain an ethos where students feel secure and are encouraged to talk and are always listened to; ensure that all students know there is an adult in the school whom they can approach if they are worried or in difficulty.
- To maintain this ethos, staff need to remain consistent and positive, be transparent in their discipline, use praise, listen, and grade the language they use.
- After their return home we will support all students by providing continuing support, by ensuring that appropriate information and records are forwarded confidentially to the student's parent/agent.

**Allegations**

- Allegations are taken to mean information which indicates that either an adult or another child may have:
  - behaved in a way that has or may have harmed a child
  - possibly committed a criminal offence against or related to a child
  - behaved towards a child in such a way that indicates s/he would pose a risk of harm to children

**Allegations against Students made by other Students or Staff**

- Students are encouraged to report any behaviour that makes them uncomfortable or upset.
- A student who is abused or threatened may be pressured by the perpetrator to keep the abuse a secret. Telling a member of staff will take a great amount of courage. Children have to grapple with a lot of issues, including the fear that no one will believe them or that the problem will get worse after the accusation.

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- Our Rules and Discipline Procedures (in the Student Handbook) state how a student may be reprimanded, but depending on the seriousness of the accusation; the investigation stages may be quite different.
- The DSL will decide when to inform any external agencies, eg. the LSBC.
- The Anti-Bullying Policy procedures (when a student accuses a bully) may differ very slightly from the below, especially at the reporting stages.

### **Handling a Disclosure from a Student (about abuse by an adult or child)**

- A child may choose any adult who they want to talk to. This guidance is for all staff who encounter a student that wants to talk. Staff must remain calm and show support to the student throughout the disclosure phase. The following guidelines will help lessen the risk of causing more traumas to the child and/or compromising an investigation during the disclosure phase.

#### **Initial procedures by staff (not DSL or DSP):**

- **Receive:** *Listen* to what they are saying without displaying shock or disbelief or denial. 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.
- **Reassure:** *Reassure* the child that they did nothing wrong and that you take what is said seriously. *Do not make* promises that you can't be sure to keep, e.g. "everything will be all right now". *Do not promise* confidentiality or agree to keep secrets. You have a duty to report your concerns. *Tell* the child that you will need to tell the Directors. *Acknowledge* how difficult it must have been to talk.
- **React:** *Listen* carefully and patiently. *Do not assume* anything, and *do not speculate or jump* to conclusions. *Do not investigate, interrogate or decide* if the child is telling the truth. *Remember* that an allegation may lead to a criminal investigation, so *do not do anything* that may jeopardise a police investigation. Let the child explain to you in his/her own words what happened, so *do not ask* leading questions. *Ask* open questions like "Is there anything else that you want to tell me?" *Communicate* with the child in an appropriate way to their age and language ability. *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 *refer* directly to the Directors/Managers, specifically Nick, Su or Shirley (child protection designated person). *Do not discuss* the case with anyone outside the Directors (child protection team).
- **Record:** *Make* some very brief notes at the time as soon as possible and *write* them up in detail later. *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. *Record* statements and observable things, not your interpretations or assumptions – keep it factual. Sign this record. Hand it to DSP or a DSL in person, confidentially or by email to either DSL: [nick@manorcourses.co.uk](mailto:nick@manorcourses.co.uk), [su@manorcourses.co.uk](mailto:su@manorcourses.co.uk)

#### **Stages of investigation (these stages will now begin with the DSL or DSP):**

- **investigate** sensitively to gather more information
- **record and** get signatures from initial reporter; and keep securely
- **inform** group leader / parents / agent prior to any action
- **monitor** as required until No Further Action can be recorded.

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### **Supporting Staff who become involved in the report/disclosure stages**

- We recognise that staff who have become involved with a student who has suffered any form of harm, or appears to be likely to suffer harm, may find the situation upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the Welfare Manager and to seek further support as appropriate.

### **Allegations against Staff made by Students or other Staff**

- It is recognised that in this area of work tensions and misunderstandings can occur. Allegations may be malicious or misplaced. They may arise from differing perceptions of the same event, but are inevitably distressing and difficult for all concerned.
- We understand that a student may make an allegation against a member of staff. All school staff should take care not to place themselves in a vulnerable position with a student. It is always advisable for lessons or activities with individual students to be conducted in view of other adults; however we recognise that this is not always possible. Equally, it must be recognised that some allegations will be genuine.
- All accusations made and incidents that occur will be taken seriously and a thorough investigation carried out. In cases where a staff member is found to be in breach of this Safeguarding Children & Child Protection policy we will follow disciplinary and grievance procedures as detailed in the staff handbook and will involve external agencies (eg. police, LSCB).

### **Whistle-blowing (confidential reporting)**

- During Induction all staff are made aware of their legal obligation to report concerns about: the management of student protection; the attitude or actions of colleagues and seniors; instances of colleagues and seniors not following the Code of Conduct (see later).
- Whistle blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Staff who use our whistle-blowing procedure will have their employment rights protected.
- Staff are requested to come to the Office to report their concerns to the Designated Safeguarding Person or Leads.
- We will listen and follow-up these concerns. Staff are requested not to discuss these concerns with colleagues.
- We will maintain confidentiality and support the reporting staff.
- We will not penalise staff for any reporting.

### **Record keeping**

- During the summer school period, concerns records/reports of staff and students are kept in a lockable office.
- The Directors and Welfare Manager (ie. DSLs, plus DSP) are the only staff with access to them.
- They are kept for 1 year.

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- The DSL decides if or when these records are to be passed to any external agencies (eg. LSBC).

### **Students' Awareness**

- Students are not fully aware of our Policies, though parents, agents and Group Leaders can read our Policies.
- However, they are told to report any behaviour that makes them uncomfortable or upset. In the daily Night House Meetings, and weekly Orientations, they are reminded to speak to any adult if they have problems. In their Student Handbook they're told to speak to Shirley (Welfare Manager, and DSP) or a House Manager if they are sad or unhappy about anything, and to come to the office if any bullying happens to them. This allows them to choose whether they prefer to confide in a female or not, or somebody they see regularly or not.

### **Associated Policies for MC at Hurst College**

- Other Policies that share common ground with safeguarding and Child Protection include:
- For students:
  - Rules and Discipline for Students - on handouts (translated into 10 languages) and throughout their Student Handbook, as well as in Staff Handbook and GL Handbook
  - Student Absences Policy & Procedures, and Free-time & Registers Procedures (for Students) – found in Staff Handbook and GL Handbook
- For staff, not group leaders, found in the Staff Handbook 2016:
  - Alcohol, Smoking & Illegal Substances Policy
  - Staff Disciplinary Procedures
  - Guidance for Safer Conduct & Professional Boundaries (also found in this Policy in updated version)
  - Supervision & Monitoring of Staff (also found in this Policy in updated version)
  - Safer Recruitment Suitability Checks (Police and Criminal Records Checks) Policy (also found in this Policy in updated version)
- For staff, not group leaders, not found in the Staff Handbook:
  - Health and Safety Policy (covers First Aid, Fire, Excursions) - abridged booklet given to staff at induction, full version kept in the office
  - Data Protection
  - IT Acceptable Usage Policy
  - Safer Recruitment Policy



## **MC Policies**

### **Child Protection – Staff Code of Conduct**

The below references to staff include group leaders.

#### **Guidance on Staff Conduct**

We endeavour to:

- keep students safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided;
  - assist staff to work safely and responsibly and to monitor their own standards and practice;
  - support managers in setting clear expectations of behaviour;
  - give a clear message that unlawful or unsafe behaviour is unacceptable and that disciplinary or legal action may be taken;
  - support safer recruitment practice;
  - minimise the risk of misplaced or malicious allegations made against staff;
  - reduce the incidence of positions of trust being abused or misused.
- 
- Manor Courses ensure that all staff who work with our students are competent, confident and safe to do so. Before placing them in a position of trust they undergo a 3 day induction.
  - However, we recognise that policy documents, handbooks and induction guidance cannot cover all eventualities. Company guidance cannot provide a complete checklist of what is, or is not inappropriate behaviour for adults in all circumstances. Furthermore there may be circumstances in which staff have to make decisions or take action in the best interests of the student which could contravene any guidance given. Staff are expected to make judgements about their behaviour in order to secure the best interests and welfare of the students. Such judgements, in these circumstances, should always be shared with a line manager.
  - Staff should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential. Staff should avoid any conduct which would lead any reasonable person to question their suitability, motivation and intentions, and must work in an open and transparent way. Behaviour at all times should demonstrate integrity, maturity and good judgement.
  - The same professional standards should always be applied in any context regardless of students' culture, disability, gender, language, racial origin, religious belief and/or sexual identity. The same standards should apply whether working on-campus or off-campus (where the setting may appear to staff and students less formal than the normal workplace).

#### **Infatuations & Sexual Contact**

- Occasionally, a student may develop an infatuation with a staff member. These staff should: deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned; be aware that such infatuations carry a high risk of words or actions being misinterpreted; therefore make every effort to ensure that their own behaviour is above reproach; and to avoid any hurt, distress or embarrassment.
- Intimate or sexual relationships between students and staff will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way

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which might lead to a sexual relationship is also unacceptable. Any sexual activity may be regarded as a criminal offence and will always be a matter for disciplinary action.

- Students and young people are protected by specific legal provisions regardless of whether the person consents or not. The sexual activity referred to does not just involve physical contact. It may also include non-contact activities, such as causing students to engage in or watch sexual activity.
- Staff should be aware that consistently conferring inappropriate special attention and favour upon a student might give rise to concerns about their behaviour.
- Staff should not have any form of communication with a student which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.
- Staff must not make sexual remarks to, or about, a student or discuss their own sexual relationships with or in the presence of students.

### **Physical Contact**

- There are occasions when it is entirely appropriate for staff to have some physical contact in ways which are appropriate to their professional role and responsibilities. Sports or dance activities may involve some physical contact, eg. to demonstrate technique or a particular piece of equipment, to adjust posture, or to support a student so they can perform safely without injury. It should take place in a safe and open environment that is easily observed by others and last for the minimum time necessary. Always explain to a student the reason why contact is necessary.
- Not all students feel comfortable about physical contact, and staff should not make the assumption that it is acceptable practice to use touch as a means of communication. Permission should be sought from a student before physical contact is made.
- Staff must be aware of cultural or religious views about touching and always be sensitive to issues of gender.
- Staff must never touch a student in a way which may be considered indecent or indulge in 'horseplay'.
- Staff should be aware that even well intentioned physical contact may be misconstrued by the student, an observer or by anyone to whom this action is described. Staff must be prepared to report and explain actions and accept that all physical contact be open to scrutiny.
- Therefore, although Manor Courses accept that different cultures and group leaders have different views of physical contact, that they be aware of this Code of Conduct. One important principle of this policy is awareness of other people's interpretations of what they see or hear.

### **Physical Intervention and Control**

- We acknowledge that the decision whether or not to intervene physically is down to professional judgement of the staff member concerned and should always depend on the individual circumstances. There are circumstances in which staff working with students displaying extreme behaviours can legitimately intervene by using either non-restrictive or restrictive physical interventions if they have failed to defuse situations any other way.
- Staff may use physical intervention as a last resort, and are empowered to use reasonable force to prevent students from hurting themselves or others, from

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damaging property, or from causing disorder, by using minimum force for the shortest period necessary. Such events should be reported to a line manager.

- Under no circumstances should physical force or intervention be used as a form of punishment.

### **Behaviour Management**

- Staff should not use any form of degrading treatment to punish students. Sarcasm, demeaning or insensitive comments are not acceptable. The use of corporal punishment is not acceptable.
- The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behaviour management strategies have failed.
- Staff must report any situation where a student becomes distressed or angry to a line manager.

### **First aid, Comforting and Caring**

- There are occasions when a distressed student needs comfort and reassurance and this may involve physical contact. Staff should use their professional judgement to comfort or reassure a student in an age-appropriate way whilst maintaining clear professional boundaries.
- When administering first aid or medication, wherever possible, staff should ensure that another staff is aware of the action being taken, explain to the student what is happening, and report and record it.

### **Privacy and One-to-one Situations**

- In houses when on duty staff must be aware of students' rights to privacy in their bedroom and showers. Due to health and safety considerations there may sometimes be a need for staff to be present during these situations. But they should avoid intrusive behaviour and should announce their intention to enter or be present.
- Staff should avoid carrying out any duty in a remote or secluded area where there is a student present, though this may be unavoidable, and may indeed be necessary to ensure safety.
- One-to-one English tuition is only permitted according to the schedule given by the Directors, at an agreed location. Activities (sport, art etc.) should never take place one-to-one.
- If any staff member has to transport a student by private transport they must consider safety and always report it to a line manager as soon as possible before or after.

### **Confidential and Sensitive Data about Students**

- Emergency Contact details for each student are collected at Check-in or in Orientations, once a week, for the company to use in cases of emergency. This information should be handed at the Office to the Welfare and House Coordinator, who will store this confidentially on behalf of the Directors.
- Sensitive medical data will be shared between First Aiders and the Directors, and may be passed to the relevant staff responsible for supervising the specific student.
- Staff must also read our Data Protection Policy.

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### **Guidance for Staff Safer Conduct, Duty of Care & Professional Boundaries**

The below references to staff include group leaders.

#### **Standards**

Contracted staff should refer to their Staff Handbook and to their Contract and group leaders should refer to their Group Leader Handbook.

Staff can help MC develop an open, honest and supportive culture with clear boundaries, a 'safer school' culture - safer for students and for staff.

#### **Staff can also help students in the following ways:**

- help students understand, use graded and appropriate language to their age and language ability
- assist them to make sensible decisions
- set safe and clear boundaries
- respond and react, don't ignore
- listen, be interested and get to know the under 18s and what they're doing
- be responsible and a good role model
- be approachable
- show that you care, even when that means saying 'No' to an under 18
- be alert; notice things, especially things that don't seem quite right
- have effective communication systems amongst all the adults so that information that matters is easily received and then shared with those who need to know.
- contribute to a culture of safety for under 18s throughout the organisation.

#### **Duty of Care**

As a staff member working with students under 18 years of age, there exists a professional/legal duty of care and trust between staff/adult and students/child.

This relationship must not, under any circumstances, be abused in any way.

Professional Boundaries not only extend to how we act and respond to the needs of those in our care, but also to how we, as individuals, work together to show professionalism, commitment, legal duty, obligation and responsibility to the summer school.

Because all staff are working in a residential environment, Professional Boundaries are not just about adult < > child conduct or child < > adult (ie. staff to student, student to staff) interaction, but refer to adult < > adult (ie. between colleagues) interaction.

This Code of Conduct is important to protect staff by ensuring they avoid getting into compromising situations where misunderstandings or malice put them at risk. Breaking this position of trust is breaking the employment contract and in some instances is also breaking the law. For example, any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law (even if the age of consent is 16) according to the Sexual Offences Act 2003.

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**The following are some examples of breaches of boundaries, some more obvious than others, that may result in investigations being carried out and reports made - but it is by no way an exhaustive list:**

### **Regarding Adult < > Child interaction**

- Shouting at a student or students (except in situations of extreme danger).
- Physical contact (except when used to prevent harm).
- Ridiculing or bullying students.
- Making suggestive remarks or gestures towards students, or colleagues while students are present.
- Being aggressive towards students.
- Threatening or frightening a student.
- Forcing a student to do something they do not want to do.
- Ignoring a student.
- Touching anyone (staff or students) inappropriately or touching another adult in the vicinity of students.
- Pursuing personal relationships with students (or guardians), or becoming involved in their personal affairs.
- Allowing their web profiles to be seen by students, or uploading photos of, or distributing info about students.
- Taking photos of students without authorisation from the directors or the students, and for uses other than school purposes.
- Taking students in private vehicles without authorisation.
- Being alone with just one student - this is not only for the student's protection but also the staff member's.
- Allowing a student's abusive or threatening language, behaviour or attitudes to go unchallenged.
- Using students' native languages in conversations with an exclusive nationality group of students.
- Not recognising that different cultures have different attitudes to boundaries, personal space & sensitive topics.
- In situations where physical contact with a student is unavoidable (greetings, goodbyes, hugging, kissing etc.), ensure this is unreciprocated and occurs in public places.
- Communicating via phone/email/text/internet/online-gaming with any student.

### **Regarding Adult < > Adult interaction, or Adult behaviour in the vicinity of students, and other actions at work or outside of work while at Hurst or on Excursions/ at Airports**

- Swearing in the vicinity of students.
- Smoking or drinking alcohol while on duty or in the vicinity of students.
- Taking drugs during the contract of employment.
- Making suggestive remarks or gestures towards colleagues while students are present.
- Socialising during working hours.

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- Having negative effects on students by late night disturbance or noise while under the influence of alcohol.
- Making or receiving personal calls/text messages while on duty.
- Listening to headphones while on duty.
- Mixing personal life with professional role at work.
- Failing to report any health and safety concerns.
- Entering another residential house where they are not living – they must first contact and ask the present Supervisor (a House Manager, Leader or Teacher) for permission. This is essential during periods that students are out of lessons, but during lessons permission is not required. Entrance must be recorded on a register or by swipe codes. Staff of the opposite sex must be accompanied round the house by the Supervisor.
- Not reporting anything suspicious between students and staff.
- Allowing ill-feeling between staff to be witnessed by students.
- Discussing personal life and anything deemed to be inappropriate in the vicinity of students.
- Using the same bathroom / toilet facilities as students, when at Hurst.
- Not acknowledging the effect their appearance may have on students or that it may be hard for some students to respect them/their role if they do not present appropriately.

Scenarios and examples of appropriate and inappropriate behaviour are discussed in the Induction. Staff should never do anything they do not want others to see.

### **Reporting**

- Staff may feel the need to do some of the above action, thereby contravening the above Code of Conduct, in order to carry out their duties effectively. If so, they must report the incident and their actions to the Directors (Designated Safeguarding Person or Lead) or Line Manager as soon as possible. Staff must also report any incidents of a student misunderstanding or misinterpreting their actions.
- Staff have a duty to report any allegation or suspicion of inappropriate contact with students to the Directors (Designated Safeguarding Person or Lead). Staff who witness any of the above actions may report incidences to their Line Managers or the Directors, but witnesses to incidences of inappropriate behaviour between students and staff must be reported to the Directors (Designated Safeguarding Person or Lead) only.
- All accusations made and incidents that occur will be taken seriously and a thorough investigation carried out. In cases where a staff member is found to be in breach of our Safeguarding Children & Child Protection policy we will follow disciplinary and grievance procedures as detailed in the staff handbook. Records of this may be passed on to the relevant external bodies.

**Abusive Behaviour, Discrimination, Bullying (by Staff or Students) Policy**

Students are given information about the Rules and how they will be disciplined if they are found to be guilty of Abusive Behavior, including verbal abuse, harassment, bullying, actual or threatened violence or damage to property.

The below references to staff include group leaders.

**Statement**

- Manor Courses is committed to providing a caring, friendly and safe environment for all of our students so they can learn in a relaxed and secure atmosphere.
- We welcome students from all backgrounds and will not permit discrimination by students or staff on the grounds of religion, gender, sexual orientation, or ethnicity. In addition, even greater sensitivity will be shown to students who are from territories currently in the midst of internal or international conflict.
- We expect students to be accepting and tolerant of a range of views, lifestyles, religions, and to acknowledge that people think differently and believe different things. Staff are expected to report any incidences where students' beliefs hurt or denigrate those with other beliefs.
- Bullying and discrimination of any kind is unacceptable at our summer school. If any incidents of bullying or discrimination occur, all students should be able to report knowing that incidents will be dealt with promptly and effectively. This means that anyone who knows that this is happening is expected to tell a member of staff immediately.

**Anti-Bullying Policy & Procedures**

**Objectives of this Policy**

- All the staff, group leaders, parents/guardians and students should have an understanding of what bullying is.
- All the staff, group leaders, parents/guardians and students should know what they should do if bullying arises, and is reported, and should be assured that they will be supported when bullying is reported.
- Students who are bullying need to learn different ways of behaving.

**What Is Bullying?**

Bullying is aggressive behaviour with the intention of hurting another person. Bullying results in pain and distress to the victim. Bullying can be:

- **Emotional** - being unfriendly, tormenting (e.g. hiding things that belong to another student, using threatening gestures)
- **Silent** - ignoring or excluding a person by trying to stop them joining a group or activity of any kind
- **Physical** - pushing, kicking, hitting, punching or any aggressive behaviour towards another person
- **Racial** - racial comments, graffiti, or gestures that make fun of another person's ethnic background, appearance, religion, way of speaking or any other characteristic
- **Sexual** - unwanted physical contact, sexually abusive comments

## **MC Policies**

- **Homophobic** - because of, or focussing on the issue of sexuality
- **Verbal** - name-calling, sarcasm, spreading rumours, teasing
- **Cyber** - All areas of internet, such as email & internet chat room misuse; Mobile threats by text messaging & calls; Misuse of associated technology, i.e. camera & video facilities

Certain students are more vulnerable, e.g. those with physical disabilities, or those requiring more help with personal care; or students coming from difficult home situations. Extra attention should be paid to these students.

### **Signs and Symptoms**

A child may indicate by signs or behaviour that he or she is being bullied. It is important that the staff are aware of these signs and that they should report any suspicions to the Welfare Manager and/ or the Directors if a student:

- is frightened of walking anywhere on campus
- changes their usual routine
- begins to miss classes
- becomes withdrawn anxious, lacking in confidence, or stammering
- expresses unbearable unhappiness
- cries themselves to sleep at night or has nightmares
- feels ill in the morning
- does poorly in class
- has clothes torn
- has possessions which are damaged or " go missing"
- starts stealing money (to pay bully)
- is continually losing money
- has unexplained cuts or bruises
- becomes aggressive, disruptive or unreasonable
- is bullying other children
- stops eating
- is frightened to say what's wrong
- gives improbable excuses for any of the above

These signs and behaviours could indicate other problems, but bullying should be considered a possibility and should be investigated

### **Procedures**

1. Report possible bullying incidents to the Welfare Manager and Directors.
2. The Welfare Manager will speak with and support the victim. In cases of possible bullying, she will look into and record the incident.
3. The bullying behaviour will be investigated and the bullying stopped immediately.
4. An attempt will be made to help the bully (bullies) change their behaviour.
5. In serious cases group leaders/ agents/ parents will be informed.
6. A warning letter will be issued to the bully.
7. If necessary and appropriate, police will be consulted.
8. Relevant staff will be informed.



## **MC Policies**

### **Outcomes**

- 1) The Welfare Manager and /or the Director/s will support the victim, who will explain what has happened.
- 2) The Welfare Manager and/or the Director/s will then speak to the bully. He/ she will give an account of what has happened.
- 3) The bully will be asked to genuinely apologise.
- 4) A reconciliation will be attempted between the students.
- 5) In serious cases, we will consider sending the student home.
- 6) When the case has been investigated and dealt with, the student/s will be monitored to ensure that bullying does not take place again. The bully may be asked to sign a behaviour contract.
- 7) Other consequences may take place, according to our Rules and Discipline Procedures.

### **Prevention**

- To prevent bullying and to support our students having a positive experience, we have a set of college rules that encourage respect for all other people and their belongings.
- The timetable and registrations are organised so that we are aware where our students are at all times.
- We encourage students to come and see the Welfare Manager or any adult, if someone is behaving badly towards them or if they are feeling unhappy in any way.
- We give all our students a Student Handbook and rule sheet with this information in it.
- House Managers make sure they understand these rules during house meetings.

**MC Policies**  
**Photographs & Videos of Children Policy**

Manor Courses take photos/videos of students during the summer courses, which are sometimes used for promotional and archive purposes. These photos may be used on our Blog, Facebook page, our website, or other social media. Sometimes photos/videos are used to promote the upcoming activity programme to students while at Hurst, and they may also appear in print in our promotional brochure, student handbook and training materials.

**Official photographers**

- We have a number of designated official photographers.
- The company collects all the photos/videos taken by our official photographer and any other photos/videos taken by staff, on the Manor Courses computer hard drive.
- The Directors make the decisions of which photos/videos to keep for future promotional and archive purposes, and which ones to delete.
- The official photographers will carry identification and be introduced to the students at the welcome assembly.
- When possible they will notify students that he is taking photos/videos.
- They will notify students when photos/videos are likely to be uploaded or posted (or re-posted, shared) to a blog, Facebook, Instagram, Twitter etc.

**Other staff taking photos/videos**

- Any other staff must not take photos/videos in one-to-one situations; photos/videos which show a single student with no surrounding context; photos/videos in secret.
- They must not publish photos/videos; share any photos/videos with third parties (other than the Directors).
- They must remain sensitive to any student who appears uncomfortable, and should recognise the potential for such activities to raise concerns or lead to misunderstandings.
- They must get agreement from the student before a photo/video is taken.
- Staff are permitted to take appropriate photos/videos in context when they are: supervising Excursions; leading Activities; teaching their Lessons.
- Any members of staff that have taken photos/videos are asked to give them to the directors, who then ask the staff member to delete the photos.
- If group leaders take photos of students not in their group, they must ask permission of them.

**Students' agreement**

- Students, parents/guardians and agents can advise the Directors if they disagree with this policy.
- Students will be asked during Orientations if they agree to be photographed. They can choose 'no'.
- They should also tell the photographer if they do not agree. The photographer will identify them and avoid taking their picture.
- If students see a published photo/video of themselves they do not like, they can inform the directors by email, and we might delete it.

## **MC Policies**

### **Suitability Checks for Residential Staff and other Adults (part of our Safer Recruitment Policy)**

One objective of Manor Courses is to ensure the personal safety of all children using the facilities and resources at HURST COLLEGE, through actively promoting awareness, good practice and sound procedures. Our aim is to ensure, as much as possible, that anyone who seeks to work with or gain access to children through Manor Courses is safe to do so. Our selection and recruitment procedures meet the requirements as set down in 'Safer Recruitment Guidance' from various charitable, childcare and educational, and government bodies. In accordance with advice on safeguarding children, Manor Courses ask Staff to complete forms to check for any police records. These are kept on a Single Central Record. Then we implement a number of additional ways of checking the suitability of staff once at Hurst.

#### **Group Leaders:**

Group leaders have unsupervised access to children both in their group, and also those in their house.

Agents are asked to confirm by email that their leaders all have recent **police/criminal records checks**. Furthermore, when group leaders arrive at Hurst they sign **declarations**, as above.

For those group leaders that cannot or did not get a police check, or the agent cannot confirm this, MC will house them in a separate staff only accommodation. The above **monitoring** by Security will not be necessary, although leaders should only go into houses they do not live in when accompanied by the person on duty there.

They receive this Policy upon check-in.

#### **Supervision and Monitoring of Staff at Hurst**

Working at Manor Courses is considered a 'regulated activity', a term used to describe roles where a suitability check is required by law. Our jobs involve responsibility for and substantial access to under 18s.

All staff will be observed/monitored carrying out their duties to ensure that Manor Courses is fulfilling our health & safety and child protection/safeguarding obligations. Observations will be done in accordance with a set observation schedule, or randomly as required, with the aim of fostering a professional and responsible approach to working in a residential school. Some ways in which we do this:

- Security Team observe evening House Duties by all staff. Records of names of staff on duty are cross-referenced with a list of staff that do not have a check.
- Directors/Line Managers hold regular staff meetings with staff to discuss issues, schedules, operating procedures and staff concerns about welfare, safeguarding, and 'prevent'.
- Activity and /or Welfare Line Managers spot monitor all staff to ensure House Duties and Meal Supervision are being conducted appropriately.

## MC Policies

- Welfare Line Managers observe evening House Duties by all staff. Support, feedback and advice will be given to individual staff if needed by Welfare Line Managers. This is also part of our CPD offering.
- DOS observes EFL Lessons – official observations with written and oral feedback given to individual teacher after each lesson to allow both parties to discuss the observation in detail. ADOSs (and sometimes the Course Director) observe EFL Lessons – short ('buzz') observations of each Teacher. General team feedback will be given after each session. This is also part of our CPD offering.
- Activity Manager/s observes Activity Sessions – short informal observations. General team or individual feedback will be given if needed. This is also part of our CPD offering.
- Staff fill-in Checklists for the following duties: Excursions, House Duties, Campus Patrols, Meal Duties, Orientations.
- Staff complete and keep Record Files for: EFL Lesson content, Activity session records.
- Electronic records are kept by Hurst of who enters/exits the houses via swipe codes that allow entrance to locked doors, for most houses. Sign-in/out sheets or digital registers are used in houses where there are no electronic records because there are no swipe codes.
- We encourage staff to report any incidents of inappropriate staff behaviour, however slight it may be. Reports can be made anonymously or in person and any information given will be treated in the strictest of confidence.
- Staff are not monitored formally on Excursions, but staff are obliged to write comments in their Checklist of instances or concerns, which the Directors follow-up on later if needed.
- Sub-contracted providers (driver, instructors) have limited access to children, and are not monitored in the above ways.

Because some staff may not have a police/criminal check undertaken, or may be waiting for clearance to come through when their contract begins, unsupervised access to students is further monitored by Security during Night House Duties, and names are taken so that Security can pay extra attention to those without checks. Un-checked House Managers, who have more unsupervised access than other staff, are always paired with a second House Manager who has had a police/criminal check.

**MC Policies**  
**MC 'Prevent Policy' at Hurst College**

**Statement**

MC understands its responsibilities under the Counter Terrorism & Security Act 2015 to reduce the likelihood of people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways shown below, after setting the context. Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism.

**Context**

- MC accepts students aged 8-17 throughout July-August and from many different countries around the world.
- In its busiest weeks we may have 350 students, 60 staff and work with 30 group leaders.
- MC has always promoted a multi-cultural environment where respect for and tolerance of others beliefs is required.
- Hurst is located in the small countryside town of Hurstpierpoint, West Sussex, with a predominantly Caucasian local population.

**Leadership**

- Responsibility for ensuring Prevent Duty lies with the lead person, Su Barnard (Director).
- Responsibility for the Prevent risk assessment / action plan lies with Nick Barnard (Director).
- Their duties are to ensure delivery of an effective risk assessment / action plan and Policy as outlined here.
- Responsibility for passing the Policies to all staff and group leaders lies with Jon Barnard (Director).
- Due to the size of MC, the lead person duties are shared between Su Barnard and Nick Barnard and in practical situations with Shirley Mawer (Welfare Manager).
- Line Managers of each department are responsible for guiding staff if they have queries about when, who, how and why to pass information on.

**Risk Assessment of current situation and Action Plan for future**

- A risk assessment / action plan shows what is already being done and what still needs to be done; it will be reviewed and updated at least annually and as and when necessary in light of developing circumstances.

**Working with local partners**

- Su Barnard has contact with the local police/local authority Prevent coordinator to understand their role and the support available (e.g. via the Channel process).
- MC have links with other similar organisations, via Su Barnard in the Sussex Safeguarding Yahoo Forum of ELT schools.
- MC will share information with all local organisations as appropriate.

**Understanding terminology**

We ask all staff and group leaders to understand the following terms and definitions. We ask all students to be tolerant and respectful. The '4 core British values' do not appear in the Student Handbook, but they may be covered in the syllabus culture lessons.

Definitions:

- **Radicalisation** = the act or process of making a person more radical or favouring of

## MC Policies

extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

- **Extremism** = holding extreme political or religious views which may deny right to any group or individual.
- **Extremism** can refer to a range of views, e.g. racism, homophobia, right-wing ideology, religious extremism.
- **Extremism** can be expressed in vocal or active opposition to core British values.
- **Core British values** - including:
  - (i) democracy,
  - (ii) the rule of law,
  - (iii) individual liberty
  - (iv) respectful tolerance of different faiths or beliefs.

These are referred to as the 'values of the summer school international environment' in the student handbook.

### Understanding risk of extremism

- Staff, students and group leaders may arrive at school already holding extremist views.
- Or, whilst part of the school, they may be influenced by a range of factors: eg. global events, peer pressure, media, family views, extremist materials online, friends or relatives being harmed, social networks.
- People who are vulnerable are more likely to be influenced.
- Their vulnerability could stem from a range of causes: eg. loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime or discrimination, bereavement.

### Counteracting risks

- MC *promote* a safe and supportive international environment via clear expectations of accepted behaviours and those that will not be tolerated.
- Students *receive* this information: written in the Student Handbook; presented in Welcome Assembly, discussed and comprehension checked in house orientations weekly; discussed and comprehension checked in lessons twice in the syllabus during summer. Some students receive written translations in some languages.
- MC *exemplify* core British values: via the MC rules in the above mentioned Handbook and translated documents given to students; notices around school; via lessons incorporating UK laws, MC rules and British values within lessons on culture/traditions in the syllabus (in 2016 throughout summer: 3 scheduled lessons on UK and students' culture/country; 2 functional Language lessons on safety and rules; weekly topical Communication lessons on 'facts, fiction & beliefs' and 'in the news & the world today').
- This approach *educates* about life and society in UK, which may or may not be different to other countries. MC also *give* a voice to all students to talk about their countries in the lessons.
- All staff *should challenge* radical or extremist views in any context. This should be done as an immediate response, by the staff referring to the international environment of MC, and the tolerance that is expected; then informing students of the consequences of breaking rules; then reporting concerns.
- All staff *should get to know* students, their activity preferences and friendship groups. Through knowing students well, staff *can spot* changes in behaviour. Therefore staff *should notice* any signs of radical or extremist behaviour.
- All staff should *follow guidance* on how to communicate with children of different

## MC Policies

languages and cultures and do so within professional boundaries, so they should *challenge* behaviour and extreme views calmly and neutrally.

- All staff *will support* any students identified as vulnerable.
- Hurst *operate* (strong) filters on IT equipment and accessing extremist / terrorist websites / uses of social networks to exchange extremist / terrorist views.
- MC *will react* when world or local events cause upset and the likelihood of conflicting feelings being expressed. Su Barnard and Nick Barnard take initiative in these situations.

### Training – staff and group leaders

- Staff complete generic online training, provided by Education and Training Foundation, during induction.
- **Staff** receive this Policy and face to face training in induction to ensure they understand this policy:
  - i) context and expectations of Prevent (above).
  - ii) their duty to implement the policy (above).
  - iii) understand terminology and risks associated (above).
  - iv) ways MC counteract the risks (above).
  - v) how to identify and support vulnerable students (below).
  - vii) know the lead Prevent person and procedures for communicating concerns (below).
  - viii) know the importance of their own behaviour and professionalism in (a) being exemplars of British values and (b) not expounding their personal views to students on sensitive matters (Professional Boundaries).
- **Group leaders** receive Group Leader Handbooks and are made aware of key parts of the policy:
  - a) understanding terminology.
  - b) importance of maintaining a supportive and tolerant society within school.
  - c) what core British values are and why they are considered important.
  - e) that they must report any concerns / incidents and procedure for that.

### Information – students and parents

- **Students** receive Student Handbooks and Lessons, and via posters and the Welcome Assembly, are made aware of key parts of the policy:
  - a) importance of maintaining a supportive and tolerant society within school. Prevent is not mentioned by name, but alongside many rules, students are asked ‘please do not show extreme attitudes or behaviour’.
  - b) what core British values are and why they are considered important. These are referred to as values of the summer school international environment.
  - c) that they must report any concerns / incidents. They are always told to speak to Shirley for a range of concerns.

#### **Our International Summer School Atmosphere**

MC has many rules to keep you safe and comfortable. We help you express yourself in English and help you understand the global community we have at Hurst. Please value the rules we have created for you and the democracy you will find while in UK this summer. Please respect the safety and liberties of all students. Please tolerate and respect different cultures, faiths, beliefs and opinions. Please do not show extreme attitudes or behaviour.

If you have any problems, please report to Shirley or the Directors in the Office, we will keep it confidential. If we have any problems about your behaviour or attitude, we will talk to you.

### Signs that may cause concern

- The following may or may not be the result or cause of extreme behaviours and attitudes:
- Students talking about exposure to extremist materials or views outside school
  - Changes in behaviour (e.g. becoming isolated)
  - Changes in attitude (e.g. intolerant of differences)

## MC Policies

- Poor attendance
- Fall in standard of work, disengagement
- Asking questions about certain topics (e.g. connected to extremism)
- Offering opinions that appear to have come from extremist ideologies
- Attempts to impose own views / beliefs on others
- Use of extremist vocabulary to exclude others or incite violence
- Accessing extremist material online or via social network sites
- Ownership of images showing extremist ideology / views / symbols

Any concerns relating to a **person under 18** are also **safeguarding** issues and should be dealt with by Su Barnard and Shirley Mawer, and where necessary, the LSCB contacted.

### **How and when to react to concerns**

- Su Barnard is the Prevent lead, and Shirley is the Welfare Manager. Together they will coordinate a time and place to speak to the student or concerned person.
- Staff should contact them in person in the office to maintain confidentiality, or Email [su@manorcourses.co.uk](mailto:su@manorcourses.co.uk) .
- As part of our 'whistle-blowing' approach, MC assure confidentiality for people reporting concerns, and reassure all parties they will be dealt with sensitively and carefully.

### **Sussex Police Prevent Team:**

Telephone 101 | Ext. 531355

Email: [prevent@sussex.pnn.police.uk](mailto:prevent@sussex.pnn.police.uk)

### **Local Channel Panel Chairs For West Sussex:**

Beverly Knight

Better Communities, WSCC

Telephone 0330 222 4223 | Mobile 0789 458 9071

Email: [beverly.knight@westsussex.gov.uk](mailto:beverly.knight@westsussex.gov.uk)

### **Policy preparation and review**

Policy prepared by Jon Barnard after consultation with Nick Barnard and Su Barnard on 20/6/16.

Policy will be reviewed after 12 months or earlier if there are changes in relevant legislation or in response to any significant incidents or changes in circumstances.

### **Other practicalities - MC and Staff Commitment to our 'International Summer School Atmosphere' as mentioned in our Student Handbook, and to the 'Prevent Strategy'**

#### **Government**

- The 'Counter-Terrorism and Security Act 2015' places a statutory obligation on all schools such as MC to 'have due regard to the need to prevent people from being drawn into terrorism'.
- 'Prevent' is a UK Government initiative to reduce the risk of radicalisation, and to identify and safeguard the vulnerable.
- It is aimed at identifying and preventing potential extremism. This applies to any extremism: eg. promoting radical views; terrorism; racism; homophobia; right-wing ideology; sexual exploitation.
- It inherently involves upholding 'British Values': ie. democracy; the rule of law; individual liberty; mutual respect and tolerance of different faiths and beliefs.
- Updated government guidance documents for Further Education came into effect on 18 September 2015.



## MC Policies

[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799\\_Revised\\_Prevent\\_Duty\\_Guidance\\_England\\_Wales\\_V2-Interactive.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)

### MC

- MC believes its own values and ethos closely match the above. All staff are expected to exemplify these.
- However, we cannot expect all students to immediately have the same levels of openness to these values, or the same range of pre-Summer School life experiences. Thus, we must lead by example.

### Staff

- Some examples of ways of doing this in Lessons, Activities and during House or any other meetings: eg. negotiating agreed rules for certain activities, giving students a voice or a vote; enforcing rules transparently; discussing topics as they arise, only in situations when privacy or confidentiality is not warranted; demonstrating how to cooperate in a global and culturally mixed community.
- Especially during Lessons, ET should encourage 'critical thinking'. When students are relying on other sources of information (especially online) ET should encourage students to consider who is writing and why.
- As well as expecting students to speak and to practise communication, staff must also teach students to listen, and therefore to accept other views/opinions.
- All staff must recognise that if one student has offended another, the staff are there to maintain some balance to their voices; the student may not have intended to offend.
- Like any instance of rules being broken, staff must judge when and how to react, and how this could affect the other student members/participants who are not involved. As per the 'Professional Boundaries' section 28 of the Staff Handbook, staff must always remain calm and reasonable.
- As well as recording concerns, staff must also record in their Duty Checklists or Lesson Contents Forms and incidence of having dealt with any abusive behaviour or attitude.
- Likewise, staff must record any opportunity they have had to promote the core 'British values', which can be done via discussions, posters, student project work etc.
- All staff must *refer* to section 37 of the Staff Handbook 'Rules & Disciplinary Procedures for Students', although it is the general and does not make reference to these specific obligations above.

### Hurst

- Hurst College also meets its responsibilities, part of which are to block certain website and phone applications. Unblocking of these can be requested by staff and students at the Office.

## MC Policies

### Campus Safety, Supervision During Free-time and Attendance Policy at Hurst College

Staff codes referred to in the below:

AM = Activity Managers

AL = Activity Leaders

WM = Welfare Manager

FA = First Aiders

HM = House Managers

GL = Group Leaders

LM = Line Managers

ET = English Teachers

ADOS = Director of Studies, also includes DOS

WHC = Welfare & House Coordinators

MC GL = MC Group Leaders (Assistant House Managers)

The codes are used in the singular form (without 's'), but do refer to the plural (ie. AL refers to all ALs).

### Summary for Parents/Guardians and Agents in our Terms and Conditions

#### Safety and security note about our **Activities** sessions:

- Students *must register* their name with their group before each afternoon and evening session – this is *compulsory*. They *must register* their *name* again at each activity they join.
- Students aged 13 years and older *should join* an organised Activity and *stay* for the full session – this is *optional*. They *can have* restricted Free-Time if they choose not to join or stay with the Activity Staff.
- Students aged 12 years and younger *must join* an organised Activity and *stay* for the full session with the Activity Staff until the end – this is *compulsory*.
- Students who do not have a group leader from their country/agent register with MC Group Leaders, who are Assistant House Managers.

#### Safety and security note about our **Welfare** systems:

- There will be short periods when students are not supervised (between Lessons and Activity sessions, and before or after they finish their meals).

#### Safety and security note about our **Excursions**:

- The excursions' focus is on tourism and leisure, seeing culture and relaxing. Students can go shopping.
- Staff give students unsupervised Free-Time for shopping in approximately 1 hour periods. They give students rules to follow and ID, maps and phone numbers to carry. Staff show them on a map where they can find a staff member waiting for them if they have problems.
- Students aged 12 years and younger do not get unsupervised Free-Time for shopping. Staff will stay with them.

**MC Policies**  
**Supervision During Free-time at Hurst College**

**Guidance / Boundaries for Students**

**'Organised' Activity Sessions & 'Restricted' Free-Time - Policy & Procedures**

*Parents / Guardians / Agents / Group Leaders who disagree with any of the below must inform the Directors in writing, for example, if they want a student to join an 'organised' Activity in all sessions, or if they want a student to have more 'restricted' Free-Time.*

**What are 'Organised' Activity sessions?**

- Activity Staff lead and supervise sessions during the afternoons and evenings.
- Times: 3.15-4.45pm, 5.30-7.00pm, 8.15-9.45pm.
- These include sports, art, crafts, drama, music and dance.
- Students aged 13 years and older **can leave** the session early.
- Students aged 12 years and younger **cannot leave** the session early.

**What is 'Restricted' Free-Time?**

- This is only for students aged 13 years and older.
- These students **can choose** Free-Time when they choose not to join an Activity.
- 1 full session per day is the maximum.
- But they also **can have** Free-Time when they leave an Activity early.

**How is it 'restricted' and organised?**

- Students **can only**: go to the activity centre, internet room, shop, office, house, gardens, or watch organised Activities.
- They **cannot go off-campus**. The map shows the areas that are restricted.
- House Managers patrol the campus, gardens, fields, and supervise every house, every afternoon and evening. A professional Security guard patrols the campus during the evenings and nights.

**Registering students' names and Activity choice**

- **Registering their name and Activity is compulsory for all students.**
- Students **must meet** in the Quad / Garden 15 minutes before Activities begin.
- Times: 3.00pm, 5.15pm, 8.00pm.
- Students **must register their name and age** with their Group Leader (or individual students who enrol directly, with the MC Group Leader, who are identified in the Student Handbook).
- And when they register their name they **also must tell their choice** of Activity to the Group Leader.
- Students go to the Activity Staff and they **must register their name and age** again with the Activity Staff.

**Joining Activities**

**Students aged 13 years and older:**

## MC Policies

- **must join** 2 organised Activities per day.
- **can have** 1 Free-Time session per day.
- **can leave** the Activities early.
- On Excursion days there is only 1 session, in the evening. They **can have** Free-Time.

Students aged **12 years and younger**:

- **must join** an organised Activity every session.
- **must stay** for the full session.
- **cannot leave** the Activities early.

### Joining an Activity late

Students aged **13 years and older ONLY**:

- Students **can join** an Activity late.
- They **must tell** the Activity Staff their name.
- Reasons for this include: they chose Free-Time but changed their plans, have *finished* another activity session early, *needed to return* to their house, to *get suitable* equipment/clothes, to *meet* their Group Leader, to *contact* their parents, to see the First Aider etc.

### Staying until the end or leaving an Activity early

Students aged **13 years and older ONLY**:

- Students **can leave** their Activity early, after the first 45 minutes.
- They **must tell the** Activity Staff their name.
- Then they **can have** Free-Time, following the guidelines above.
- Reasons for this include: they do *not like* the activity, *cannot* do the activity, do *not have the suitable* equipment/clothes, the weather has *changed*, or they *need* food/drink/medicine, *need to return* to their house, to *meet* their Group Leader, to *contact* their parents, to see the First Aider etc.
- This is restricted. They **can only**: go to the activity centre, internet room, shop, office, house or gardens, or watch the organised Activities.

Students aged **12 years and younger**:

- Students **cannot leave** an Activity early.
- They **must stay** until the end of the Activity session.
- They **cannot choose** any unsupervised restricted Free-Time.
- We encourage them to take part in the full Activity programme.

### Choosing 'restricted' Free-Time

Students aged **13 years and older ONLY**:

- Students **can choose** 1 Free-Time session each day as their choice of Activity.
- They **must register their name** again with House Managers/Staff when they start Free-Time and leave the registration point (Quad / Garden).
- There is an identified 'Gateway to Free-Time' which they must exit through.

Students aged **12 years and younger**:

- Students **cannot take** any Free-Time.
- Group Leaders must supervise students in their group who want/need Free-Time.

## **MC Policies**

### **MC Provision and Levels of Care During Activity Sessions**

MC have sufficient supervision during activity sessions. Safety and security arrangements are made clear in duty checklists and risk assessments. Below are our Levels of Care and measures taken to reduce risks, according to Staff Handbooks and duty rotas/checklists.

The below levels are during weeks 1-4.

#### **Organised and supervised activity sessions**

All sessions have report sheets with checklists and instructions:

- 13 AL plus 2 LM supervise activities during activity sessions in the **afternoons**
- 7 AL and 4 HM supervise activities during activity sessions in the **evenings**
- 2 LM and 1 Security patrol activity areas in the **evenings**

### **MC Provision and Levels of Care During Free-Time**

MC have sufficient supervision at all times, including 'restricted' Free-Time, during activity sessions (as an alternative to an 'organised' activity), and Free-Time between lessons/activities, during breaks, and before/after meals. Students of any age could be 'free' during certain parts of the day. Safety and security arrangements are made clear in duty checklists and risk assessments. Below are our Levels of Care and measures taken to reduce risks, according to Staff Handbooks and duty rotas/checklists. They do not simply depend on staff presence or staff duties, but depend on the boundaries we set and the help we give students to understand these.

The below levels/ratios are during weeks 1-4, or when 6 boarding houses are in use (when 5 houses are in use, the number of staff on duty in houses drops according).

#### **Free-Time when there are no lessons**

All duties have checklists except FA/Security, who record only when there are incidences.

- 4 AL supervise **dining room** at meals
- 12 AL supervise activities during **activity sessions** in the afternoons
- 6 AL and 4 HM supervise activities during **activity sessions** in the evenings
- 1 Activity LM and 1 Security **patrol activity areas** in the evenings
- 6 HM on duty in **houses** in when there are no lessons and during all other gaps - from 8.30am, 1.30 and 7.30pm and during AM and PM break
- These 6 HM also keep an eye on **areas of campus outside their house**, and remind students of safety or report any concerns, according to short shifts outlined on checklist:
  - Martlet HM to keep an eye on safe road crossing outside house;
  - St John HM to keep eye on fields behind the house;
  - Shield HM to keep eye on cloisters;
  - Red X HM to keep eye on car park;
  - Eagle HM to keep eye on area behind astro-turf and the woods;
  - Pelican HM to keep eye on safe road crossing outside house
- 6 ET cover the **house** shifts that HM cannot do
- 6 ET and 6 AL work alongside 6 HM from 10pm onwards in **houses**, ie. 3 staff per house, with FA and Security available until bedtime (11.30pm)

## MC Policies

- 1 of the above on **overnight** duty in each **house**
- 2 HM or MC GL **patrol** quad, garden, road crossings, internet room, class block during breaks, meals, in other gaps, and during activity sessions

### **'Restricted' Free-Time as alternative to activity**

These duties have a checklist.

- For students aged **13 and over** only
- GL must supervise any **under 13s** in their group that want Free-Time
- 6 HM on duty in **houses**, as above
- 2 HM or MC GL **patrol** quad, gardens, fields, road crossings, internet room, class block:
  - are identified by hi-viz jackets
  - are usually the same staff who registered students out of the quad for their free-time
  - follow set campus patrol route with a route map
  - have sit-down locations / periods where they can watch the students from
  - record the time they pass each landmark/area
  - sign it at end, and file it at office
  - carry an iPad to register/check any students they find
  - complete notes about any incidents etc. on their checklist

**MC Policies**  
**Supervision During Free-Time off-campus**

**Guidance / Boundaries for Students**

**Off-Campus**

Students only leave campus –

- **On excursions** - students are accompanied by staff but will be given unsupervised Free-Time for shopping of approximately 1 hour periods, a maximum of 3 times per trip. Students aged 12 years and younger will not be given unsupervised Free-Time. They will stay with MC Staff. If Parents / Guardians Agents / Group Leaders disagree with this policy they must inform the Directors in writing.
- **During a normal day** - only if the Directors have permission from Parents / Guardian / Agents / Group Leaders in writing and only for a special occasion/reason. In circumstances when a student goes to the doctor with MC Staff, we will not request permission.
- **Overnight** - only if the Directors have permission from Parents / Guardian in writing and only for a special occasion/reason. In emergencies when a student stays at hospital with MC Staff, we will not request permission.

**MC Provision and Levels of Care**

**Free-Time on an excursion**

Before and during Free-Time, for students aged 13 or older:

These duties have a checklist.

- Duty staff are designated according to group size. Staff duties and student guidelines include:
  - Registers are taken with names and ages of students
  - Lanyards, maps must be carried by students, and must be visible
  - Staff are accountable, with checklists and strict rules for 1 hour free time, 3 periods max
  - Return to meeting point arrangements are acknowledged by each student writing the arranged return time on the register next to name
  - Comprehension and instruction checks are carried out by staff, as per training in induction
  - FA are accountable, with checklists for their role at traffic crossings, meeting points
  - Group Leaders are requested to stay with students aged 12 or younger
  - Extra MC staff are provided for groups which consist of 12 years and younger students, to enable 1 staff to always stay with the group
  - Rules about what they must and must not do are provided in the Student Handbook, and in some translations
  - Guidelines are also given in their handouts, via house meetings the night before, and via lessons which focus on pre-excursion tasks
  - Advice/rules given about what they should do after/before site-seeing on lanyards handouts: You are allowed to... / we recommend you....
    - Have a drink/snack in a café; Sit in a parks/beach
    - Go to the shops, buy souvenirs/clothes/toys/snacks;
    - Do more site seeing; take photos

**MC Policies**  
**Registrations and Attendance at Hurst College**

**Attendance & Absences in Lessons - Policy & Procedures**

- Students must attend every Lesson. Students must be punctual and arrive on time.
- ET check attendance in every class (2 times day, or 3 times when there is lesson 3).
- ET report absences 5 minutes after each Lesson has begun.
- If a student is not in class, their name is written on an 'Absence Form'.
- ADOS collects and bring the 'Forms' to the office at approx. 10am and 12pm (or 2.30pm when we have lesson 3).
- GL and the FA visit the office twice daily, at the time above.
- If they find any 'Forms' GL and the FA check the students' house/room.
- If the student is ill, the FA must assess their health. Records are kept on the 'Form' and in the medical folder.
- If a student is asleep and avoiding class, they are sent to class. Records are kept on the 'Form'.
- If a student arrives at Lessons *later* than 5 minutes s/he will already be considered *absent*.
- Every student that is *late* or *absent* is recorded. Lateness/absence is also reported in their Progress Report.

**Attendance & Absences in Houses - Policy & Procedures**

- HM check their iPad or paper register every time a student enters or leaves house in afternoon/evening or during meals/breaks.
- HM sit near the entrance of house on duty. When they patrol the house, the register is left at the door for students to sign themselves in and out.
- At approx. 10.10pm every night HM take the house register.
- HM give out any 'Night Notes' with messages from the office to students at this house meeting.
- If a student does not attend, and they are not in the house, the Security or the HM of others houses is contacted. If their presence is unknown and they cannot be found in another house or building, Security will patrol and check the campus. If the student is missing for an excessive amount of time the Directors, Security and Safeguarding Lead will make a decision about what action to take.
- Students who want to go to bed before registration must let the duty staff know, and the staff can read any notes/messages for the meeting to them before they sleep at their chosen time.

**Attendance & Absences at Activity Registrations in the Quad (Meeting Point) - Policy & Procedures**

- All groups have a clear gathering point, shown to them or their GL after the Assembly.
- GL (and MC GL) wait in the Quad for the students to gather.
- Students register their name and age on the paper register; Registers are kept in the office between registrations.
- GL ask and log their choice of activity/Free-Time.
- GL distribute stickers/tokens for any Free-Time (for students aged 13 and older only).
- If MC individual students do not come to register, MC GL can call their mobile via the iPad Skype. Other GL are responsible for recording and enforcing the rules on their students who do not attend registers.
- After registration, students join their chosen activity or queue up at the Free-Time gate.
- AL keep registers of the attendees at their session, and log any students who leave early or join late.
- HM keep registers of the students who chose Free-Time.