



Safeguarding Children and Child Protection Policy, including other related Duty of Care Policies, regarding students ages up to 17 years on our Residential English Language Courses at Hurst

July 2018

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Safeguarding Children & Child Protection Policy

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Statement

These Policies regard those connected to the Manor Courses English Language School and specifically 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, religion, sexual orientation and other forms of identity 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 enroll on a private one-to-one Tuition Course are adult 'students' and are not covered in the Policies as 'students'.

Adherence to these Policies is obligatory for all staff and groups leaders and to act upon. Hurst College personnel, and sub-contracted service providers such as taxi/coach companies, activity session leaders and tour guides, can find these Policies on our website 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.

- **'Children/Child/U18'**: defined as a **person under 18 years of age**, by the Children's Act 1989
- **'Staff'**: referred to throughout the Policies includes groups leaders (GL). All staff are in the law 'adults'. They are in a **Position of Trust**.
- **'Employees'**: referred to throughout the Policies does not include groups leaders (GL) because they do not work under UK employment law guidelines.
- **'MC'**: in these Policies refers to actions taken by the company, Manor Courses, at management level.
- **'LM'**: in these Policies refers to actions taken by the Line Manager of the relevant department, often staff request authorisation of their LM or will report incidents to their LM.

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 these Policies:
 - 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
 - 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 safeguarding systems are in place for the well-being of U18s
 - having clear procedures in place if things do go wrong
- MC 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 Policies includes group leaders (GL). Essentially, all staff should act as role models. All staff are in the law 'adults'.
- 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, 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 –
 - 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.
 - We, alongside the DSP (the Welfare Manager, Shirley Mawer), are responsible for keeping written records of concerns about staff.

Training

- Group leaders receive the Policies only.
- All other staff are trained during the induction to provide a caring, positive safe and stimulating environment.
- Returning staff who worked in 2016 underwent online training provided by <http://www.safeguardingchildren.co.uk/learning-improvement/nyscb-basic-awareness-elearning>
- Returning staff who worked in 2017 underwent, and new staff who work in 2018, or worked with MC previous to 2016, will undergo online training provided by <http://www.schoolsandagents.com/Pages/en/blog.aspx?article=Gallery%20Teachers%20presents%20the%20Safeguarding%20Basic%20Awareness%20course>
- Su Barnard and Shirley Mawer provide brief face-to-face training during the Induction Course. Only staff not employed/trained in 2016 or 2017 may be obliged to attend.
- Our WHC (Welfare & House Coordinators) and/or Nick Barnard and Jon Barnard facilitate a session for further discussion on the Policies 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 Policies

- 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 Policies are distributed to all staff in the Induction Course and to all Group Leaders upon arrival.
- A PDF of the Policies is available on the website for parents and agents to read.
- There are various versions of these Policies, adapted for: parents only; group leaders only; staff only; and one version for all of the above.

Review of the Policies

- The Policies 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 May 2018.
- With each new student arrival or enrolment, parts of the Policies 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.

**Implementing
the Safeguarding Children Policy at Hurst College**

The following are the procedures staff, students and others connected to the work of Manor Courses will adopt when safeguarding those in its care.

MC will ensure ways of **building trust** between students and staff, children and adults, and create a safe school culture and environment.

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

Abuse includes 4 areas: **physical, sexual, emotional and neglect**.

Protecting Students and supporting them throughout

We recognise that:

- that a student, who is harmed, injured, neglected or abused, or witnesses any of them or any violence, may develop **negative emotions**. We believe we have the means to support them.
- 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.
- all matters relating to student protection are **confidential**.
- 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 will:

- respond if they suspect, see anything themselves, or if they hear anything.

Together we will:

- 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 will:

- 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

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**Guidance regarding
Allegations at Hurst College**

Allegations against students - allegations that have been made by other students or staff or others (about abuse by students)

- 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 manage a number of issues, including the fear that no one will believe them or that the problem will get worse after the accusation.
- 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 LSBBC.
- The Anti-Bullying Policy procedures (when a student accuses a bully of one or more different kinds of abuse) may differ very slightly from below, especially at the reporting stages. See the section later.

Handling a Disclosure - from a student (about abuse by an staff, other 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):

Staff will:

- **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, su@manorcourses.co.uk

Stages of investigation – by MC (these stages will now begin with the DSL or DSP):

MC will:

- **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.

Allegations against Staff – allegations that have been made by Students or other Staff (about abuse by 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 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).
- Note that although this Policy refers to group leaders, they are not employed by MC and thus staff discipline procedures do not exist.

Whistle-blowing (confidential reporting)

- During Induction 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.

**Further Notes regarding
Allegations at Hurst College**

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 at least 1 year. In some cases these will be kept for much longer, for example to help in re-employment decisions, professional references for ex-staff, and for parents to follow-up on in the future.
- The DSL decides if or when these records are to be passed to any external agencies (eg. LSBC).

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.

Related Policies for MC at Hurst College not found within these Policies

- Other Policies that share common ground with safeguarding and Child Protection include:
- For students:
 - Rules and Discipline
 - Attendance & Absences Policy & Procedures, and Free-time & Register Procedures
- For staff (not group leaders), found in the Staff Handbook 2018, but not in this document:
 - Alcohol, Smoking & Illegal Substances Policy
 - Diversity Policy
 - Staff Disciplinary Procedures
- For staff (not group leaders) not found in the Staff Handbook:
 - Health and Safety Policy (covers First Aid, Fire, Excursions)
 - Student Data Protection
 - IT Acceptable Usage Policy
 - Safer Recruitment Policy

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.
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**Guidance regarding
Staff Code of Conduct at Hurst College**

The below references to staff include group leaders.

Background to our Staff Code of 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.

MC 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 2 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 therefore required 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.
- *maintain* appropriate professional boundaries and avoid behaviour which might be misinterpreted by others.
- *report and record* any incident with this potential.
- *avoid* any conduct which would lead any reasonable person to question their suitability, motivation and intentions.
- *work* in an open and transparent way.
- *demonstrate* integrity, maturity and good judgement in their behaviour at all times.
- *apply* the same professional standards 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).

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**Guidance regarding
Staff Code of Conduct
in specific scenarios at Hurst College**

Infatuations & Sexual Contact

Occasionally, a student may develop an infatuation with a staff member.

These staff will:

- o *deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned;*
- o *be aware that such infatuations carry a high risk of words or actions being misinterpreted;*
- o *therefore make every effort to ensure that their own behaviour is above reproach; and to avoid any hurt, distress or embarrassment;*
- o *report any issues to their line manager.*
- 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 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 will:

- *be aware that consistently conferring inappropriate special attention and favour upon a student might give rise to concerns about their behaviour.*
- *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.*
- *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.

- o 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.
- o It should take place in a safe and open environment that is easily observed by others and last for the minimum time necessary.
- o Not all students feel comfortable about physical contact.
- o Therefore, although MC accept that different cultures and group leaders have different views on physical contact, staff must be aware of this Code of Conduct.
- o One important principle of this Policy is awareness of other people's interpretations of what they see or hear.

Staff will:

- o *not make the assumption that it is acceptable practice to use touch as a means of communication. seek permission from a student before physical contact is made.*

- *be aware of cultural or religious views about touching and always be sensitive to issues of gender.*
- *explain to a student the reason why contact is necessary. never touch a student in a way which may be considered indecent or indulge in 'horseplay'.*
- *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.*

Physical Intervention and Control and Restraint

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*
- *use minimum force for the shortest period necessary*
- *and are empowered to use reasonable force to prevent students from hurting themselves or others, from damaging property, or from causing disorder*

Staff will:

- *report such events to a line manager*
- *not use physical force or intervention as a form of punishment*
- *not use it for prolonged periods, regularly or let it become the norm*
- *not sustain injuries to a student*

Behaviour Management

As above, MC believe 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 will:

- *not use any form of degrading treatment to punish students.*
- *not use corporal punishment.*
- *not use sarcasm, demeaning or insensitive comments.*
- *not use isolation/seclusion unless it is in the best interest of the student or others.*
- *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 will:

- *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 will:

- *ensure that another staff is aware of the action being taken,*
- *explain to the student what is happening,*
- *report and record it.*

Privacy and one-to-one situations

- 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, except as **coaching** according to the schedule given by the Directors, at an agreed location.
- 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.
- 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.

Staff will:

- avoid intrusive behaviour and should announce their intention to enter or be present.
- 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.

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, welfare, mental health, SEND etc. 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 will also read our Student Data Protection Policy.

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**Guidance for Staff Code of Conduct at Hurst College
regarding safer conduct, duty of care & professional boundaries**

The below references to staff include group leaders.

Standards

Contracted staff/employees will refer to their Staff Handbook and Contract.

Group leaders will refer to their Group Leader Handbook.

Together, staff will help MC:

- develop an open, honest and supportive culture,
- with clear boundaries,
- resulting in 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 are 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 / Code of Conduct

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 student/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 also 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.

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

Regarding Adult < > Adult interaction, or Adult behaviour in the vicinity of students, or performance of duties, and other actions (at work or outside of work, eg. while at Hurst or on Excursions/ at Airports)

- *Swearing or using inappropriate language to or in front of students.*
- *Smoking/vaping or drinking alcohol while on duty or in the vicinity of students.*
- *Taking drugs.*
- *Performing poorly due to prior drinking or other abuse.*
- *Having negative effects on colleagues by late night disturbance or noise while under the influence of alcohol.*
- *Making suggestive remarks or gestures towards students, or colleagues while students are present.*
- *Socialising with colleagues during working hours.*
- *Making or receiving personal calls during contact time with students.*
- *Mixing your personal life with your professional role at work.*
- *Pursuing personal relationships with students or their guardians, or becoming involved in their personal affairs.*
- *Failing to report any health and safety concerns (see section 35, on Health & Safety).*
- *Listening to music/headphones while on duty.*
- *Failing to report 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.*
- *Not reporting staff's own actions in relation to any student Discipline.*
- *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 around the house by the Supervisor.*

Regarding Adult < > Child interaction

- *Shouting at students (except in situations of extreme danger).*
- *Swearing or using inappropriate language with students.*
- *Being aggressive towards students.*
- *Threatening or frightening a student.*
- *Forcing a student to do something they do not want to do.*
- *Ignoring a student.*
- *Having negative effects on students by late night disturbance or noise while under the influence of alcohol.*
- *Ridiculing, making fun or bullying.*
- *Making suggestive remarks or gestures towards students.*
- *Touching anyone inappropriately.*
- *Communicating via phone (except on excursions or in instances of absence from registrations) or email/text/internet or other social media or online game with any student.*
- *Taking photos/videos of students without the Directors' consent or the students' knowledge and permission.*
- *Allowing their web profiles to be seen by students.*

- *Uploading photos/videos of, or distributing information about students.*
- *Taking students in private vehicles without authorisation from the Directors.*
- *Allowing a student's swearing and threatening/abusive language, attitudes or behaviour to go unchallenged.*
- *Using other languages in conversations with an exclusive nationality group of students (other than emergency or necessary translations).*
- *Discussing personal life and anything deemed to be inappropriate with students.*
- *Failing to recognise that different cultures have different attitudes to boundaries, personal space and sensitive topics.*
- *Punishing students outside of our stipulated Discipline Procedures and methods.*
- *Being alone with just one student (unless unavoidable); this is not only for the student's protection but also the staff member's.*
- *In situations where physical contact is unavoidable (greetings, hugging, kissing etc.), ensure this is unreciprocated and occurs in public places.*
- *Using the same bathroom / toilet facilities as students, when at Hurst.*
- *Failing to acknowledge 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.*

Reporting

- Staff may feel the **need to do some of the above** in order to **carry out their duties** effectively.
If they do so, they must **report** the incident to the Directors or Line Manager as soon as possible.
Staff must also report any incidents of a student **misunderstanding** or **misinterpreting** them.
- All **accusations** made about staff 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 Procedures as detailed in section 32. Records of this may be passed on to the relevant external bodies.
- Staff have a duty to **report** any **allegation or suspicion** of inappropriate contact with children to the Directors or a Line Manager. **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.
- Staff who **witness** any of the above actions may report example incidences to their Line Managers or the Directors, but witnesses to serious breaches of the Code of Conduct, or clear incidences of inappropriate behaviour or abuse between students and staff must be reported to the Directors (Designated Safeguarding Person or Lead) only.

Giving Rewards, Gifts & Favouritism at Hurst College
Policy

This does not refer to group leaders.

Rewards

- The giving of gifts or rewards to students must only be done as part of this Policy, for either supporting positive behaviour or recognising particular achievements.

Meal Passes

- Line managers are responsible for distributing meal passes daily to teachers and house managers.
- These can be given for good performance or behaviour in the class/house or for outstanding effort/results.
- Students return their pass to an activity leader in the meal queue and go straight to the front.
- Activity leaders return them to their line managers and in turn they are returned to the office.

House Points

- House managers may give these for positive behaviour.
- Activity leaders count the number of students per house that have participated in their organised activities, to generate more house points.
- These points add up at the end of the week to count toward the 'house cup'.

Giving gifts

- We acknowledge that there are occasions when staff wish to give a student a gift. This is only acceptable where the staff has first discussed it with the line manager.
- Any gifts should be given openly and not be based on favouritism. Staff need to be aware however, that the giving of gifts can be misinterpreted by others.

Fairness and favouritism

- Staff should exercise care when selecting students for specific activities or privileges to avoid perceptions of favouritism or unfairness, and be transparent and subject to scrutiny.

Receiving gifts

- There are occasions when students (or their parents/guardians) wish to pass small tokens of appreciation to staff and this is acceptable.
- However, it is unacceptable to receive gifts on a regular basis or of any significant value.

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Abusive Behaviour, Discrimination, Harassment, Bullying at Hurst College
(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 Behaviour, including verbal abuse, harassment, bullying, actual or threatened violence or damage to property.

The below references to staff include group leaders.

Statement

- MC 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, culture, 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.

A bully is a person who habitually seeks to harm or intimidate somebody they think is vulnerable.

Bullying can include when a person intends to do the below:

- **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, communication 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
- **Homophobic** - because of, or focusing 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, they 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.

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) If possible, a reconciliation will be attempted between the students.
- 5) This restorative practice aims to resolve issues by encouraging the one harmed to convey the impact of the harm on the 'bully'.
- 6) In serious cases, we will consider sending the student home.
- 7) 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.
- 8) 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.
- Furthermore, MC and staff will make all attempts to:
 - o Prevent stereotyping
 - o Facilitate students to understand the cultural backgrounds of other students
 - o Emphasis the shared values of the community at Hurst
 - o Ensure all parts of the houses and other toilets are safe and accessible
 - o Challenge discrimination and prejudices
 - o Respond quickly to unkind behaviour and building tensions

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Social contact with Students at Hurst College
Code of Conduct

Definitions of terms used in this section:

- 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, SMS, other text format communication, instant messages, email, social network site/groups, blogs, sharing photos/videos, voice message, other apps on mobile phones or devices.
- This applies to the relationship between students and staff before, during or after a course.

Staff working with children will not (without lawful purpose/reason):

- establish or seek to establish social contact with under 18s/students during or after the course.
- give personal email addresses or personal phone numbers to students under 18.
- communicate via email, text, phone, social network site/groups, blogs, web pages or message services with under 18s.
- post photos or videos of students under 18 on any social networking site/groups.
- distribute (by any means) images or information about students of any age.

Appropriate social contact (electronic or otherwise):

Staff will:

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

Duty to report:

- Staff have a duty to report to MC 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, will be reported to the employer.

Failure to comply:

- Non-compliance with these Policies will result in disciplinary procedures.
- MC have a duty to remove staff from regulated activity where there is risk of harm to children.
- MC 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. (* police, local child protection authorities).

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Online-Safety Policy at Hurst College,
Staff Electronic Communication and Staff Social Media Usage
Policy at Hurst College

(see also Data Protection Policy, and Staff IT Acceptable Usage Policy)

All residents at Hurst are kept safe online by Hurst College filters and security systems. Any breach of the below Policies may lead to disciplinary action being taken against staff. Staff should also read the IT Acceptable Usage Policy. This refers to before, during and after the Course, and thus not only the period of the Contract or at Hurst College.

Staff Personal use of social media or other public access websites

Staff will:

- not identify themselves as employees of MC in their personal web space. This is to prevent information on these sites from being linked with the school.
- not edit open access online encyclopedias such as *Wikipedia* in a personal capacity at work.
- not use or publish MC logos on personal web space.
- be aware that their personal web profiles can be viewed by anyone and therefore should be especially cautious about their public web profiles and privacy settings.
- ensure that they set the privacy levels of their personal sites as strictly as they can and to opt out of public listings on social networking site/groups.

Staff Professional use of social media on behalf of MC

Staff will:

- obtain approval for creation of site/groups for work purposes from the line manager.
- make the purpose clear for using student information on behalf of MC, as part of our Policy.
- consider if any student information used is relevant, necessary and not excessive to its purpose.
- provide a strong pedagogical or business reason for creating sites/groups to communicate with students or to enable students to communicate with one another.
- consider the purposes for using social media and whether the overall investment is likely to be worthwhile for achieving the proposed pedagogical outcome, prior to creating a site/group.
- have a careful exit strategy and a clear plan from the outset about how long the site/group will last.
- not neglect it, creating a potential risk to the school and students.
- be alert to the risks to which young people can be exposed. Young people's technical knowledge may far exceed their social skills and awareness.
- stay within the law and be aware that child protection, privacy, data protection, libel, defamation, harassment and copyright law may apply to the content of social media.
- respect their audience and be sensitive in the tone of language used and when discussing topics that others may find controversial or objectionable.
- will not express personal opinions on official MC site/groups.

Parents'/Students' consent/agreement

- Although MC does not agree with students aged under 16 using social media, we do ask all parents of any aged student for their consent to their child to use (ie. 'friend' or 'follow' us on) social media.

- parents/guardians are sent a Consent Form in June, before their child arrives at Hurst. We collate their consent responses.
- Group leaders are asked to read this Policy, and are given a Consent Form upon arrival, to sign on behalf of the students in their care. We collate their consent responses.
- Students, parents/guardians and agents can advise the Directors if they disagree with this Policy or want to change their consent response.

Staff contact with students on social media or similar

Staff will:

- not have contact through any personal social media with any student.
- seek approval of the line manager if staff wish to communicate with students through social media or to enable students to keep in touch with one another.
- decline 'friend requests' from students they receive in their personal social media accounts.
- will exercise his/her professional judgement and be aware that such contact could be misconstrued, if a student seeks to establish contact.
- not contact any students by personal social media site/groups, on leaving MC service.

Staff social networking and online gaming site/groups with Students:

- MC has a Facebook 'friend' account, which is a closed group, and a business profile.
- If classes/houses set up social network groups like Facebook for students they will be closed groups.
- Staff and students will not share the same social networking or gaming group, other than those adults necessary to monitor and administer the group.
- Staff who monitor or administer social networking site/groups for students should use professional accounts that are as far as possible devoid of personal information.
- Staff will not initiate or agree to 'friendship' requests or similar with students that will result in the sharing of personal information, photos, status updates, etc.

Staff Electronic contact with Students:

This includes, but is not limited to: SMS, other text format, email, phone, voice message, other apps on mobile phones or devices.

Lawful purposes include: on excursions, for any classwork projects, to complete attendance registers.

Staff will:

- request permission from the LM for any electronic contact with a student before, during or after a course.
- will pay particular attention to use neutral, language that will not be misconstrued.
- not exchange any information with a student that they would not be happy to share with the child's parent/guardian.
- 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.
- not publish photos, videos or any other information about students, except with the agreement of the LM.
- be aware that personal information about them may be available in various forms online.
- be cautious about their public web profiles and privacy settings.

Official MC Social Media Policy

Platforms

- MC have chosen 3 major platforms for their social media presence.
- Reasons for these choices is their international universality and availability in different languages, plus:
 - *Twitter for its ability to transmit brief messages; Instagram for its emphasis on visual images; Facebook (a Business 'page') for its wide range of applications.*
- All of these enable users to comment on or share or repost our content, exposing our users to content not created by MC.

Purpose

- The purposes and proposed objectives include:
 - *instant communication with current audience; share events and announcements; celebrate the achievements of students; promote to potential parents/agents; engage with student and parent/agent community; share resources and advice; exposure to authentic English and language learning opportunities.*

Audience

- Our proposed audience is wide-ranging and includes:
 - *children, parents, staff, group leaders, and other industry professionals (schools, staff). It also includes ex-staff, ex-students etc.*
- We attempt to limit our audience to known people only.
- Adults using these sites cannot be vetted, but followers will generally be parents, staff, group leaders or representatives of other schools.

Content

- We endeavor to keep content relevant and suitable.
- We are aware that children may post sensitive information about themselves that can be seen by adults or other children. They may treat online 'friends' as real friends, be targets for 'grooming' or become victims of cyber bullying.
- We will intervene if children or adults disclose information or display behaviour or are exposed to information or behaviour that raises safeguarding concerns. We endeavor to avoid exposing vulnerable people to harm.
- We ensure our profiles and content stay within the law and are aware that child protection, privacy, data protection, libel, defamation, harassment and copyright law may apply to the content.
- We will respect our audience and be sensitive to the tone of language we use and that is used by others, and to the topics discussed/shared, that others may find objectionable or controversial.

Moderation, security

- We maintain our accounts at a strong privacy setting to prevent breaches of confidentiality.
- Users can be identified, and thus we get Consent from themselves, and sometimes from their parents/guardians or their group leader.
- Moderation is the responsibility of the Directors but may be designated to Line Managers and Front Office Managers.
- At least 2 Administrators so that there is balance and so that somebody is available to intervene in the case of contents raising child safeguarding concerns, or comments/posts likely to cause offence.
- Behaviour likely to cause extreme offence, eg. homophobic or racist insults, or likely to put a student at harm of risk, or illegal content or behaviour, will never be tolerated. They will be removed as soon as is possible.

Photographs & Videos of Children
(Usage, Storage, Retention)
Policy at Hurst College
(part of our Student Data Protection Policy)

This policy does not refer to photos/videos that students take or use/share/upload. There are guidelines about students taking photos/videos of staff in the previous section. When students take photos/videos of staff, staff will **ensure that other students are included** in the photos/videos and that the **location and activity is clear** and cannot be misinterpreted.

Purpose

MC take photos/videos of students during the summer courses, which are sometimes used for **promotional, records of work and archive purposes**. Sometimes photos/videos are used to **promote** the upcoming activity programme to students while at Hurst.

These photos may be used by MC:

- **digitally**, publically as posts/shares/updates on our **Blog, Facebook profile/page, our website, Twitter, Instagram, or other social media accounts**, or internally/privately in the closed environment at Hurst, on TV screens;
- in **print**, publically in our promotional **brochure, student handbook and training materials**, or internally/privately in the closed environment at Hurst, on posters, projects, or classwork.

They may also appear:

- **digitally**, publically in any social media posts/profiles of our **agents or industry bodies** that we are a member of;
- in **print**, publically in any brochures/magazines/catalogues/posters of any of our agents or industry bodies that we are a member of.

Types of image that MC take and use

- action shots during activities
- students in front of landmarks on excursions
- images of the campus and its daily routines
- class projects, class newsletters
- group class shots
- students receiving certificates

Official photographers, official use

- 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. Public shares/uploads are usually at 10.30pm so that they do not interfere with organised activities, lessons and registrations. Students can immediately contact MC to ask for deletion if they want.

- This photographer may also lead activities where using a camera is part of the task. S/he will check if any students have refused consent, and will avoid their images being taken.

Other staff taking photos/videos

All staff that take photos/videos of students will **refrain** from taking photos/videos of individual students that are **not in a group**, unless there is a **clear purpose** that has been **authorised** by the Directors and the student.

Staff will:

- *not take photos/videos in one-to-one situations; photos/videos which show a single student with no surrounding context; photos/videos in secret.*
- *not publish photos/videos; share any photos/videos with third parties (other than the Directors).*
- *remain sensitive to any student who appears uncomfortable,*
- *recognise the potential for such activities to raise concerns or lead to misunderstandings.*
- *get agreement from the student before a photo/video is taken.*
- *give them to the directors, who then will ask the staff member to delete the photos.*
This will include class projects, classwork etc.
- Staff are permitted to take appropriate photos/videos in context when they are: supervising Excursions; leading Activities; teaching their Lessons.
- The ADOS may take group photos at the end of the week to put as a memory students' folders.
- If group leaders take photos of students not in their group, they must ask permission of them.

Parents'/Students' consent/agreement

- parents/guardians are informed of this in their Terms & Conditions, and are sent a Consent Form in June, before their child arrives at Hurst. We collate their consent responses.
- Group leaders are informed of this in their GL Handbook and asked to read this Policy, and are given a Consent Form upon arrival, to sign on behalf of the students in their care. We collate their consent responses.
- Students themselves are given abridged Consent Questions as part of their weekly Questionnaires or Check-in procedures. Students will be asked during Orientations if they agree to be photographed. They can choose 'no'.
- Students, parents/guardians and agents can advise the Directors if they disagree with this Policy or want to change their consent response.
- Students should also tell the photographer if they do not agree. The photographer will identify them and avoid taking their picture.
- They can also request this of any staff they want to talk to, or email the Directors.
- If students see a published (shared, uploaded) digital photo/video of themselves they do not like, they can inform the directors by email, and we will delete it.
- This may not be possible with printed photos.
- In cases where students are required to take photos/videos of fellow students as part of a project in Lessons/Activities, consent will be asked of participants by the staff responsible.

Rights

- In addition to the above, students and parents/guardians have the rights to access and amend their data.
- In line with this, they can request us to stop using a photo/video, ask for a copy for their own usage, or amend any information associated with it.

Retention, storage, security

- MC collect all photos/videos taken by our official photographers and any others taken by staff, and store them on the Directors' MC computer hard drives.
- Periods for retention are included in our Data Protection Policy. This was updated 25th May 2018.
- Consent and Privacy Notices were also updated then.

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**Suitability Checks for
Residential Staff and other Adults at Hurst College –
DBS (Disclosure and Barring Service) Police & Criminal Record Checks
(part of our Safer Recruitment Policy)**

One objective of MC 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 MC 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, MC 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. We document what action has been taken to obtain a check and if and why this has not been possible.

New candidates

(UK citizens/residents):

We will accept a DBS/CRB **supplied from a previous position/employer** if it is within 3 years. Candidates enrolled on the 'Update' service for DBS will be checked for updated status.

Those who are currently **resident in UK**, and who cannot supply a copy of a previous CRB/DBS from within the **last 3 years** or international equivalent from where they have recently lived, will be checked on the UK DBS by MC.

In such cases, before the Induction (when contracts begin) we apply for a DBS '**Enhanced**' **Disclosure**. Staff will be advised on what supporting identification, documents and which previous addresses they will need to supply.

In the period before the result is returned, staff will be monitored during their Night House Duties by Security.

In cases of an inability to submit a UK DBS application or get similar from abroad, **references** from a professional relationship will be required, and all reference details provided on the Application Form will be followed up.

(non-UK citizens/residents):

For **non-residents or non-citizens** of UK, we will advise them on how to apply for a local police check in their current location during the recruitment stage. These are often called 'certificates of good conduct' and are often available from the **police or ministry of justice**.

We will accept one if it is within 3 years.

These should also be professionally **translated** and both the original copy and the translation supplied to MC by scans in advance of summer. Certain languages may not need to be translated, MC Directors or LM (if they can demonstrate they are a proficient speaker and they're not a personal friend of the applicant) can translate some themselves, and will let staff know if they do not need translations. These generally include Spanish, Italian, French, Portuguese, Japanese, Slovakian, and Greek.

In place of a local check abroad (eg. for countries where no police check was possible), **references** from a professional relationship will be required, and all reference details provided on the Application Form will be followed up. References will be checked that the

relationship referred to in the form was recent, and that 1 of the references is professional. In such cases, staff will be monitored more closely.

Staff with QTS (Qualified Teacher Status for UK based teachers)

We ask for Teacher Reference Numbers, which are checked by email with the Employer Access Team.

Returnee staff:

'Returning' Staff usually have been checked or have supplied a copy of one, and have undergone monitoring in previous contracts. However, if the check is more than 3 years old, a new DBS will be applied for.

If they are currently abroad, we will advise on applying for a local one. In place of a local check abroad, or the inability to submit a UK DBS, references from a professional relationship will be required, and at least 1 of the reference details provided on the Application Form will be followed up.

References:

In addition, **references** will be gained for all 'new' and 'returning' Staff. In most cases only 1 is required for returnee staff, from a recent employer if possible.

Referees will be asked specifically whether there is any reason that the candidate should not be employed in situations where they have responsibility for persons under 18.

References are usually sent by email. In cases where references are completed and returned from personal email accounts, we endeavour to make sure they are signed or posted. These are accepted if they are additional to at least 1 reference from an official/professional email account that comes from a company or an official institution (eg. educational or government) email address, in UK or abroad. If no official/professional email can be supplied, and no replies have signatures or come in the post, at least 1 of the senders by personal email account will be phoned for verification.

Declarations:

Furthermore, all Staff will be asked to sign a **declaration** that they believe themselves to **be fit for working with children**, during the Induction.

Supervision/Monitoring staff without checks:

The Directors will use their discretion to allow Staff to begin work under the MC staff **supervision/monitoring systems** (eg. through LM observations, duty checklists and evening Security Team patrols) for Staff who are either:

- *pending result of a DBS check, or*
- *with a check that is more than 3 years old, or*
- *without any check carried out.*

Due to the time it takes to get replies from DBS, some staff are requested to start their working duties before a clear police check or criminal record check has been confirmed. These are exceptional and justifiable circumstances.

Normally the final application is submitted before Induction if original copies of ID have been seen live on Skype (or equivalent), but staff normally start working, with access to children, as soon as Induction ends.

Other circumstances include when a police check was not possible from the most recent country of residence.

Another circumstance is staff that have a UK or international check slightly older than 3 years, but have worked for MC in the past and have recent references.

The above 3 circumstances are risk assessed and a decision is made by the Recruitment Officer, which is seconded by Recruitment Coordinator (Su Barnard, also 1 of the DSL). It is considered good practice that Staff are subject to such supervision, and we have identified below what this supervision involves. All Staff undergo this, but those without checks are explicitly identified to their LM or Security.

Policy:

Our Safer Recruitment Policy is kept in the Office for viewing. It is part of our wider Safeguarding Children Policy.

Staff may request a copy from the Directors if they wish to see it or receive an email copy. Further information also details what we demand of our Group Leaders and any adult students staying or studying with MC 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.

Sub-contracted external (third party) Staff:

Transfer companies and suppliers are asked to confirm by email that they (drivers, horse riding school, activity instructors etc.) all have recent **police/criminal records checks**.

They will receive this Policy by email.

Such instructors or taxi drivers have varying degrees of unsupervised access to children both in transit or whilst doing activities on campus.

When an instructor is taking a session at least one of our staff members is present too.

Supervision and Monitoring of Staff at Hurst College

Working at MC 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 MC is fulfilling our health & safety and child protection/safeguarding obligations.

Observations will be done both in accordance with a set observation schedule, and 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:

- AM **spot monitor** all AL **unannounced** to ensure Meal Supervision are being **conducted appropriately**. Support, feedback and advice will be given to individual staff if needed, and general feedback will be given to the Team.
- WHC **spot monitor** all HM **unannounced** to ensure House Duties are being **conducted appropriately**. Support, feedback and advice will be given to individual staff if needed, and general feedback will be given to the Team.
- ADOS **spot monitor** every class daily to **routinely check** absences and ensure Lessons are being **conducted appropriately**.
- Security Team **spot monitor** every house every evening to **routinely view** House Duties by all staff.

- In the above 4 instances, Security and LM will have information about **which staff have had recent police/criminal checks**, and who have **not had any such check** carried out yet.
- Any staff behaviour identified as **inappropriate** will be immediately notified to the Directors, and investigated.

- DOS **observes** EFL Lessons by new Teachers (or those returnees not observed in recent years) – **organised** official observations with written and oral feedback given to individual staff to allow both parties to discuss the observation in detail.
- ADOS (and sometimes the Course Director) observe EFL Lessons – **short ('buzz') observations** of each Teacher. General team feedback will be given. There will be some **warning** of which days these take place, but no preparation is necessary by Teachers.
- AM **observes** Activity Sessions by new Leaders – short but **formal** observations. With written and oral feedback given to individual staff to allow both parties to discuss the observation in detail
- WHC **observes** House Duties by new House Managers – short but **formal** observations. With written and oral feedback given to individual staff to allow both parties to discuss the observation in detail

- Staff **fill-in** Checklists for the following duties: Excursions, House Duties, Campus Patrol, Meal Supervision and Orientations. These are monitored for Staff diligence and any comments.

- Staff **complete** Files for: EFL Lesson content, Activity session records, Excursions and House Duties.
- 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.
- Directors/LM **hold regular staff meetings** with staff to discuss issues, schedules, operating procedures and staff concerns. Staff attendance and any responses are monitored.

- Electronic records are kept by Hurst of which adult/staff **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 for students because there are no swipe codes.
- 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.

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 monitored by Security during Night House Duties, and names are taken so that Security can pay extra attention to those without checks.

Un-checked HM, who have more unsupervised access than other staff, are always paired with a second HM who has had a police/criminal check.

Staff with no checks are placed in an adult/staff-only houses, and therefore not accommodated with children.

LM and Security keep all information about staff with or without checks confidential.

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'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 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 acceptable 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 2017 throughout summer, included in the 'Explore' or 'Communication' syllabus: 3 scheduled lessons on either UK or/and students' culture/country; 1 functional lesson 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 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 The 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 Policies (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 Policies:
 - 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 Policies:
 - 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.
- Some **parents** (of individual students) receive the Student Handbook digitally by email.

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)

- 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.
- 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

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

Policy preparation and review

Policy prepared by Jon Barnard after consultation with Nick Barnard and Su Barnard on 25/6/18.

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

- 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.
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Campus Supervision in afternoons & evenings at Hurst College during 'Restricted' Free-Time Sessions

Staff codes referred to in the below:

AM = Activity Managers

LM = Line Managers

AL = Activity Leaders

ET = English Teachers

WM = Welfare Manager

ADOS = Director of Studies, also includes DOS

FA = First Aiders

WHC = Welfare & House Coordinators

HM = House Managers

MC GL = MC Group Leaders (Assistant House Managers)

GL = Group Leaders

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

'Organised' Activity Sessions & 'Restricted' Free-Time Sessions - 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. Note, MC do not use the term 'Restricted' with the students. We refer to it simply as Free-Time in their Handbook and rules, posters etc.

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 Sessions?

- 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 (after the first 45 minutes).

How is it 'restricted'?

- They **register** for having this option. We know who has chosen this.
- It is **limited** to one full session per day.

- It is only available for **older** students, above 13 years old.
- If younger students, below 12, want the option, they must be **supervised** by a Group Leader.
- 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 enroll 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**:

- **must join** 2 organised Activities per day.
- **can have** 1 Free-Time session per day.
- **can leave** the Activities early (after the first 45 minutes).
- 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.
- But they can do leave or chose not to join if they **stay with** their Group Leader.

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, students:
 - o *chose* Free-Time but changed their plans,
 - o *finished* a shorter activity session (eg. 45minute swimming session),
 - o *had* health/emotional issues, *were with* a First Aider or other staff *dealing with other* issues (eg. discipline, welfare concerns),
 - o *needed to return* to their house, to *get suitable* equipment/clothes,
 - o *met* their Group Leader, *contacted* their parents, 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:
 - o do *not like* the activity, *cannot* do the activity,
 - o do *not have the suitable* equipment/clothes,
 - o *feel ill*, need to see the First Aider,
 - o *need the toilets* (many facilities do not have attached toilets), *need* a drink, food or medicine,
 - o *need to return* to their house, *meet* their Group Leaders, *contact* their parents 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 Sessions

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.

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Provision and Levels of Care for the 'Organised' Activity Sessions

MC have sufficient supervision for each activity session. 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.

The below levels are during weeks 1-4.

Organised and supervised activity sessions

All sessions have report sheets with checklists and instructions:

- 10 AL plus 2 LM supervise activities during activity sessions in the **afternoons**
 - 6 AL, plus 2 LM, and 4 ET or HM supervise activities during activity sessions in the **evenings**
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Provision and Levels of Care for the Periods of Free-Time – both 'Restricted' Free-Time Sessions and when there are no Lessons/Activity Sessions (eg. Meal times)

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

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. 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 or less are in use, the number of staff on duty in houses drops according).

Free-Time – periods when there are no lessons/sessions

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

- Houses are either locked or supervised by 1 staff
- 4 AL supervise **dining room** at meals
- 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)
- 1 of the above on **overnight** duty in each **house**
- 1 HM or MC GL **patrol** quad, garden, road crossings, internet room, class block during breaks, meals, and in other gaps
- **Security** patrols campus after final activities finish

'Restricted' Free-Time - as alternative to Activity sessions

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**
- **Security** patrols campus from 9.30pm
- 1 HM or MC GL **patrol** quad, gardens, fields, road crossings, internet room, class block

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Other Safety measures

During Lessons, Activities, House Meetings, Orientations

- There are individual Risk Assessments for each activity offered, 1 for the classroom block when in use by teachers during lesson times, and just beforehand and afterwards.
- Risk Assessment for each different house cover the periods of meetings and orientations.
- All of these events have attendance registers.
- Fire drills only take place in houses for every student.
- Fire drills in classrooms take place during summer, but not all students may be present.
- All classrooms and corridors are sign-posted.
- First aiders and Group Leaders check up on any absent students and care for them if they are ill.
- Fire drills do not take place in activities, but Activity Leaders show assembly points to all students on their initial campus tour.
- All indoor activity facilities have sign posts.
- First Aiders are always available to attend to emergencies during activity sessions.

During Assembly, Presentation, Meals, Breaks, Registrations

- All of these events are supervised, sometimes remotely, or only upon entrance to the event. Staff are always present.
- Of these events, only meals have attendance registers.
- Fire drills do not take place for any of these events.
- Fire exits are signposted in the dining room and chapel.
- The campus is patrolled for most of the period that meals and breaks take place, it includes the classroom block, main building and gardens.
- The campus map shows which areas students should not enter.
- Houses are generally locked, or codes blocked, when supervisors are not on-duty in houses.
- Before a house duty shift ends, and an unsupervised period begins, the duty checklist requires staff to ensure all students have vacated the house.

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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. 9.45-10am and 11.45am-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 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 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 wristbands 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 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.

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Off-Campus Supervision
(During Free-Time on Excursion)

Our **ratio of supervisors** (staff and Group Leaders) to students complies with HM Government (DfES) recommended ratios for parts of the day (walking between coach drop-offs and site-seeing spots & town centres) but older (aged 13+) students are given free-time for shopping without an adult.

Supervisors are provided, once at the destination (apart from free-time for 13+), at the ratio **1:8 for 8-12yrs** and **1:15 for 13-17yrs**.

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. Some extra excursions may be organised for students aged 15 and older.
- **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

Other safety measures

- All students *must wear* **lanyards and maps** around their necks while at the destination.
 - Our more detailed Excursion Safety Policy states the **ratios**, the provision made for **coach safety and supervision**, and **students' coach rules**. Notices are displayed in each house.
 - During **Orientation and Campus Tours** students are *given advice* on **crossing campus roads**.
 - Students *can find* information about **UK traffic, road crossings and safety precautions** in the **office**.
 - Our regular contracted **coach companies** *undergo* their own coach **safety checks**.
-

Rules & Discipline

MC has **40 golden rules** to help limit students endangering themselves and each other, the college and scheduled programme. We start by making it clear what is expected. This benefits the whole community. These boundaries are there to keep all students and staff safe.

Rules & Conduct

All students must read, understand and follow these rules.

They must use a dictionary if they do not understand.

Translations or English handouts are provided at Check-in. Translations are available. It is also the responsibility of the Parent / Guardian or Agent / Group Leader to show each student the rules in: traditional Chinese, simplified Chinese, French, Italian, Portuguese, Spanish, Polish, Russian, Turkish, Arabic, and Japanese.

Students are given these rules again at house meetings and via lessons which focus on life at Hurst.

Empowering students

Students must always be informed in advance of the rules guiding their behaviour.

MC do this in the following ways:

- **Published** rules - the rules are presented in a student handbook, on posters and handouts.
- **Translations** - rules are translated into 10 common languages, and given out at check-in.
- **Welcome Assembly** – some basic rules are presented verbally.
- **Orientations** - staff help explain and ensure all students comprehend the house and campus safety rules.
- At the start of **Excursions** - staff explain specific rules for the day.
- At the start of **Lessons** - staff explain specific rules for their classroom.
- At the start of an **Activity** - staff explain the specific rules of the game/activity.
- Outlined on the **website** and in the **Terms & Conditions** for Parents.

Empowering staff

All staff *must* take the responsibility of keeping a **watchful eye** on students at all times when they are **on duty**, and **report** any questionable behaviour or breaking of rules to the Office.

Whenever a student breaks a rule, staff should **inform** them what they have done wrong. This is not always possible or necessary.

If possible or necessary, when encountering misbehaviour, staff *should tell* the student **what rule** that has been broken.

If staff have the printout, student handbook or poster handy, staff *should point to the rule* that has been broken.

If staff feel students' behaviour has not violated any of the following rules, they *should consult* the Directors before reprimanding a student.

Then this information should be **recorded** on a Duty Checklist or **passed on** to a Line Manager, the Directors or Security, or the students' Group Leader, identifying:

- *the student, and nationality and (if applicable) his/her group,*
- *along with the time and location,*
- *and the fact the student was informed of their misconduct, and any response they made.*

8 Safety Rules

Please help us – Respect all students and staff. Staff = your supervisors, teachers, leaders, house staff, directors, first aiders, security.

We will help you – The Directors are always in the office. We can need help if do not understand.

Students **must** ...

1. Students must **go to** all lessons, registrations, activities and meetings early. (Use an alarm).
2. Students must **carry** the identity card.
3. Students must **stay** in the central campus area on the map.
4. Students must **cross** the roads carefully. (Use the 2 safe crossing places).

Students must **not** ...

1. Students must not **have or use** alcohol, tobacco, E-cigarettes or drugs.
2. Students must not **damage or take** other students' or college property.
3. Students must not **fight, threaten violence, bully or say bad words** to other students.
4. Students must not **enter** classrooms or activity areas without a staff.

8 House Rules

Please help us – The campus map shows red lines. Please do not enter the red areas.

We will help you – You can get permission to leave the college if a visitor collects you.

Students **must** ...

1. Students must **register** your name when staff ask.
2. Students must **listen** to staff. (Be quiet when they speak).
3. Students must **keep** the room, house and college clean, safe and calm.
4. Students must **keep** money and valuables safe. (Use the office bank or lock it in your suitcase).

Students must **not** ...

1. Students must not **damage or play** with fire alarms and fire detectors.
2. Students must not **leave** the house after 10pm. (Do not escape).
3. Students must not **enter** another student's bedroom. (Ask their permission).
4. Students must not **enter** houses of the opposite gender. (No boys can enter girl houses and no girls can enter in boy houses).

8 Excursion Rules

Please help us – Please listen to the staff about meeting times and places.

We will help you - You will stay with your group and staff. But if you are 13 or older you can have some free-time

Students **must** ...

1. Students must **wear** the information card with map around your neck.
2. Students must **stay** in groups of minimum 3 students all the time. (Never be alone).
3. Students must **be careful** of strangers.

4. Students must **be careful** at road crossings. (First stop, look right and left, listen, look again. Then you can cross).

Students must **not**...

1. Students must not **be late** for meeting the group.
2. Students must not **go off** the area on the map.
3. Students must not **leave** the staff if you are 12 years old or younger.
4. Students must not **buy** alcohol, tobacco, E-cigarettes, drugs, DVDs or games with age restrictions.

8 Activity & Free-time Rules

Please help us – If you are 13 or older and do not want to join an activity, you have only 1 session to relax per day. If you are 12 or younger you must join activities.

We will help you - Staff will explain the rules of each activity at the start of each session.

Students **must** ...

1. Students must **register** your name with your Group Leader.
2. Students must **choose and tell** your Group Leader your activity or free-time choice. (Get permission from a Group Leader if you choose free-time).
3. Students must **register again** with the staff for the activity you join or with the staff for free-time.
4. Students who do not join an activity must **choose** to go to A) house, B) shop/office, C) internet/activity centre, D) gardens, E) watch activities.

Students must **not**...

1. Students must not **leave** the meeting point before you register your name.
2. Students must not **misbehave or disturb** other students or the staff.
3. Students must not **finish** an activity early before you tell the staff your name.
4. Students must not **relax** for 2 or 3 free-time sessions in 1 day.

8 Lesson Rules

Please help us – Please use every opportunity to speak English.

We will help you - Teachers will explain the rules of each class at the start of the course.

Students **must** ...

1. Students must **attend** every lesson.
2. Students must **tell** staff if you cannot go to lessons.
3. Students must **turn off** phones or **give** them to the teacher.
4. Students must **behave** in the class building before, during and after lessons.

Students must **not**...

1. Students must not **use** your first language. (You can use it only for translations or emergencies).
2. Students must not **be late** for the start of lessons.
3. Students must not **leave** the classroom. (You can leave only for toilet or emergencies).
4. Students must not **disturb** other students from learning.

Student Discipline

The Directors have the right to discipline students found breaking the Rules or seriously disrupting the harmonious running of the Summer School, as defined in the following ways. Causing or intending to cause damage to:

- students' own personal health, the mental and physical health and safety or property of fellow students, MC property, *Hurst College* property, the MC schedule, or MC staff carrying out their duties.

The Directors will judge whether damage is considered to be 'deliberate' or 'accidental' upon viewing and investigating it.

The Directors' Role

Staff must not discipline children (except minor classroom issues). When staff must inform students of their unacceptable behaviour, they must inform the student what they have done wrong, and ensure the students understand. The Directors and Welfare Manager are the only people responsible for administering 'punishments', and it is dealt with in an Office 'consultation room' with more than 1 adult/staff present, and perhaps another student to accompany the 'culprit'. Sometimes authorisation is given to Line Managers to take on this role. The punishment will depend on the seriousness of the behaviour.

Here are some punishments the Directors may use:

- Ask the student to help a member of staff
- Take away free time (ie: students miss one or more activity session/s)
- Change the student's bedroom or residential house
- Withhold the student's Attendance Certificate
- Contact the parents/guardian or agency
- Ask parents/guardian or agency to pay for damages
- Contact the police
- Send (expel, repatriate) the student home

Serious offences - MC reserve the right to send home (without either a verbal or written warning) any student that:

- Disrupts the harmonious running of the summer school;
- Continues to break our rules;
- Commits a serious offence (includes violence, harm, sexual offences, theft, smoking in boarding houses, possession, purchase or consumption of alcohol or illegal drugs);
- Breaks a UK law, committed a crime or involved the Police;
- Damages property willfully;
- Is violent to other students;
- Bullies other students.

Serious punishments - MC will:

- Investigate the circumstances;
- Make arrangements for the student to go somewhere else or be collected;
- Try to rearrange the student's flight to an earlier departure;
- Request the parents / Agent to pay the cost or request them to reimburse the company for the cost;
- Inform parents/guardians of the new flight details;
- Ask the GL to escort student to the airport.

Damage - our advice to parents/agents/students:

- All damage should be reported to the Directors as soon as possible.
- MC will charge students for wilful damage.
- MC will not charge or penalise students for accidental damage.

Other punishments may be dealt with by the Directors, and on the recommendation of a parent or Group Leader, depending on the actions of the student. Here are some other specific scenarios

- Anonymous vandalism/theft of MC /Hurst College/staff/students' property or accidental damage:
At evening register, duty staff will offer the chance for students to confess or admit any knowledge. If nobody confesses/admits, all residents (of the house of the victim, suspect or damage) may miss an Activity Session.
This measure is intended to put pressure on the perpetrator, but may not be successful. Students are recommended to confess any accidents. Once the student is identified s/he may be asked to write a report. Anonymous reports and confessions are also encouraged by staff.
- Residential discipline problems, and lateness:
In-house discipline is not carried out by the duty staff. Children's welfare must always be respected, so it is recommended that staff phone/contact the Directors immediately. Security may be called for assistance, but punishments are not dealt by them. Students are dealt with in the office.
- Classroom discipline problems, and lateness:
Classroom discipline may be carried out by the respective teacher. Children's welfare must always be respected, so only minor 'constructive' 'punishments' may be given by the teacher, eg. 'yellow cards' and 'red cards', and these may continue until the negative action stops. The aim is to create a positive scenario for the entire class out of the negative behaviour, wherever possible. If the behaviour continues to cause problems, it must be brought to the A/DOS/Director's attention, and students will be dealt with in the office during or after lesson time.
- Setting off fire alarms:
This is difficult to judge whether wilful or accidental and we will take advice from the Hurst College Fire Officer. If watching CCTV is not possible, an investigation will begin into who is responsible and why.
- Breaking UK laws:
We reserve the right to expel (or repatriate) the student. They may be repatriated under certain conditions, assuming presence of parent/guardian at home. The police may get involved and may advise us.

Discipline is always dealt with in line with our Child Protection & Safeguarding Children, and Data Protection Policies and procedures, where investigations are carried out to assess different versions of events.

MC prefers not to use empty threats as punishments that cannot actually be carried out. MC does not believe in punishing a group in place of the perpetrator, unless there is good reason and the punishment has been authorised by the relevant Line Manager.