Sapphire Education Safeguarding Policy

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Introduction

Sapphire Education is committed to safeguarding and promoting the welfare of all students under the age of 18. This policy sets out how we create a safe, supportive and well-managed environment for students during our residential academic courses.
The policy explains staff responsibilities, reporting procedures, safer recruitment, professional boundaries, student welfare, supervision arrangements and how concerns should be handled. It applies before, during and after a course and must be followed by all Sapphire staff, suppliers, guest speakers, university partners and any adults working with Sapphire students.
All staff have a responsibility to act promptly, professionally and in the best interests of the student. Safeguarding concerns must never be ignored or handled alone. Concerns should be reported through the correct Sapphire safeguarding channels so that appropriate action can be taken.

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Section Overview

A. Policy Statement
Sets out Sapphire Education's safeguarding commitment, key definitions, review process and safeguarding roles, including the DSL, DDSL, Course Director, Welfare & Experience Manager, Director of Studies, Enrichment Manager and all staff responsibilities.

B. Code of Conduct
Explains expectations around professional conduct, adult/student interaction, electronic contact, social media, online safety, data protection, transport, whistleblowing and low-level concerns.

C. Child Protection
Explains how to recognise and respond to safeguarding concerns, including abuse, bullying, child-on-child abuse, harmful sexual behaviour, FGM, trafficking, vulnerable students and disclosures.

D. Training
Outlines Sapphire's safeguarding training expectations, including training for the DSL, DDSL, Welfare & Experience Manager and all staff working with students.

E. Safer Recruitment
Explains Sapphire's safer recruitment procedures, including interviews, references, DBS checks, right-to-work checks, staff declarations and checks for external providers, guest speakers and academic partners.

F. Welfare and Implementing Safeguarding
Covers risk assessments, duty to report, abusive behaviour, procedures for allegations, supervision, student absences, acceptable restraint, fire safety and Prevent responsibilities.

A) Policy Statement

Sapphire Education is an accredited provider of English language and activity courses, as well as online courses, and is a member of English UK and of its special interest group for young learners. We maintain that it is unacceptable for a child or young person to experience abuse of any kind and recognise the paramount importance of safeguarding all children and young people (U18s) in our care. We aim to create a safe environment in which children and young people can thrive and adults can work with the security of clear guidance.

We undertake:

- To safeguard the welfare of all children and young people (U18s) who are enrolled on any of Sapphire's courses, whatever their nationality, race, gender, or sexual orientation.
- To provide staff, suppliers, guest speakers, university partners and any adults working with Sapphire students with clear guidance on procedures, and appropriate support and training, on how to deal with an allegation of, or concern about, any actual or suspected abuse.
- To encourage active responsibility amongst U18s to respect each other, look out for each other and raise concerns with adults if necessary.
- To raise awareness of mental health issues and offer support to students and staff where appropriate.
- To avoid making ourselves vulnerable to suspicion of any form of abuse.

We will seek to safeguard children and young people by:

- Ensuring that Sapphire practises safer recruitment and appropriate suitability checks for all staff and external providers working with students.
- Ensuring that all adults agree to and adopt a Code of Conduct which includes having read the Safeguarding Policy (see attached).
- Ensuring that all U18s agree to and adopt a student Code of Conduct (see attached).
- Sharing information and acting promptly and professionally over any concerns.

When will the policy be reviewed?

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

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

Terminology

Safeguarding: Umbrella term meaning "looking after"
Child Protection: Protecting children from direct harmful behaviour
DBS: Disclosure and Barring Service (previously CRB)
Child: Person under 18
Student: Any person under 18 who a member of staff may come into contact with as a result of their employment in an educational establishment.
Social contact: The exchange of personal information between two or more people.
Electronic contact: The communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment and computers. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.
Safer recruitment: Recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children.
Prevent: A government strategy to stop people becoming involved in violent extremism and/or supporting terrorism. Sapphire has a duty to have due regard to the need to prevent people from being drawn into terrorism.

Key Individual Roles and Levels of Responsibility

All staff have responsibility for safeguarding U18s on Sapphire courses. They have undertaken the online British Council Accreditation UK Safeguarding Training. However, there is also a named Welfare and Communications Manager in each Sapphire summer centre who has undertaken Advanced Training for Designated Staff (Formerly Level 2)

- **Andrew McPhee, Head of Partnerships**
  - Designated Safeguarding Lead (DSL) and Prevent Lead
  - Head of Sapphire Welfare team. Has undertaken Specialist Safeguarding for Designated Leads in ELT (formerly Level 3)
  - Based in Bath

- **Kera Gustafson, Head of Academic Excellence**

- Deputy Designated Safeguarding Lead (DDSL) and Deputy Prevent Lead
- Member of Sapphire Welfare team
- Based in Bath Head Office (Peripatetic role in summer)
- Has undertaken updated training: Specialist safeguarding for designated lead in ELT (formerly Level 3) February 2025 (Expires Feb 2027)
- FAA Level 2 First Aid for Mental Health (RQF) May 2023

Course Director

The Course Director has overall responsibility for the day-to-day operation of the centre, including student welfare, staff management, programme delivery and safeguarding oversight. The Course Director works closely with the Welfare & Experience Manager and safeguarding team to ensure student safety and wellbeing throughout the programme.

Welfare & Experience Manager

The Welfare & Experience Manager is the primary on-site contact for student welfare matters. Responsibilities include student welfare and pastoral care, welfare incident reporting, student wellbeing support, safeguarding referrals and liaison with the safeguarding team.

Director of Studies

The Director of Studies supports safeguarding through regular contact with students and academic staff. They are responsible for reporting any welfare or safeguarding concerns identified through lessons, tutorials or academic interactions.

Enrichment Manager

The Enrichment Manager supports safeguarding through the supervision of activities, excursions and social events. They are responsible for reporting any welfare or safeguarding concerns identified during enrichment activities and excursions.

All Staff

All staff share responsibility for safeguarding and promoting the welfare of students. Staff must report concerns immediately, follow Sapphire safeguarding procedures and maintain appropriate professional boundaries.

Documents used to write the policy

Information has been taken from the English UK guide to writing a safeguarding policy; "Keeping Children Safe in Education 2022 (DoE); "Working Together to Safeguard Children" (HMG edited February 2024); "Information Sharing Advice for Practitioners"; "Sexual Violence and Sexual Harassment Between Children in Schools"; "Sharing Nudes and Semi Nudes Advice for Education Settings updated March 2024"; "When to Call the Police Guidance for Schools and Colleges"; and the following legal acts have been considered: Children Act 1989; Sexual Offences Act 2003; The Prevent Duty for schools and childcare providers; UK Law regarding seatbelts for under 12s; "Recommended adult to child ratios for working with children" (NSPCC) November 2019; "Every Child Matters" (HMG); Children and Social Work Act 2017; "Keeping Children Safe in Education (DfE); Sexual Offences Act 2003. "Keeping Children Safe in Education 2025. "After school clubs, community activities and tuition updated September 2023"

B) Code of Conduct

All adults and U18s are requested to follow an Sapphire Code of Conduct. This is to ensure that everyone has a positive experience within a safe environment based on mutual trust and respect. It is to protect students and adults alike, from any behaviours/actions which might be misconstrued. The Sexual Offences Act 2003 states that 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 though the legal age of consent is 16). We expect our staff to help set standards by being excellent role models. Online teaching can feel more personal, so it is important that all are aware of the Codes of Conduct and appropriate use of IT; Please refer to the Staff and Student Codes of Conduct, which provide guidance on professional conduct, safeguarding responsibilities and appropriate boundaries. **[Policies Link]**

Electronic Contact with Children

- Any communication with students outside approved Sapphire Education channels must be authorised in advance by Sapphire Education.
- In any electronic contact with students' staff must pay particular attention to use neutral, un-emotive language that will not be misconstrued.
- Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.

- Staff must avoid the exchange of personal information, personal photos, virtual gifts, or the use of any application that suggests or encourages the sharing of personal feelings.
- Staff must not publish photos, videos, or any other information about students except with the express agreement of the employer.
- Staff should be aware that personal information about them may be available in various forms online. Staff should be particularly cautious about their public web profiles and privacy settings.
- Staff should attempt to find ways of setting up and maintaining separate personal and professional electronic profiles.
- Staff should remain in control of online lessons, using a secure school account and inviting students to the lesson. They should also be the last to leave the lesson.

Appropriate social contact (electronic or otherwise)

- Staff must maintain neutral, friendly relationships with students while avoiding exclusivity or overfamiliarity.
- Staff must resist any attempt by a student to develop an overfamiliar or exclusive social relationship.
- If a student shares sensitive personal information, staff have a duty to listen, respond professionally and follow Sapphire Education safeguarding and welfare procedures where appropriate.

Social Networking Sites

If Sapphire Education establishes online communities or communication platforms for students:

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

Online Safety

- Sapphire will take all appropriate steps to safeguard and promote the welfare of children and provide them with a safe environment in which to learn by doing all

they reasonably can to limit children's exposure to the online risks from the school or college's IT system.

- Sapphire will check that, where possible, appropriate filtering and monitoring systems are in place and regularly review their effectiveness.
- They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

Data Protection

Sapphire Education takes data protection and privacy seriously and is committed to keeping personal information secure. Please refer to the Sapphire Education Privacy Policy available on the company website.

Transport

Sapphire Education uses approved transport providers for airport transfers, excursions and programme-related travel. All transport arrangements are risk assessed where appropriate and students are provided with clear instructions regarding travel arrangements, meeting points and supervision expectations. Students may occasionally travel independently where authorised by Sapphire Education and appropriate safeguards have been put in place.

Whistleblowing

Staff have a legal obligation to inform management of any concerns about colleagues not following the Code of Conduct. Staff who report this will not be penalised and their report will remain confidential. Staff can refer to our QR code for Safeguarding and reporting.

Reporting Low-Level Concerns

A low-level concern is where something happens which makes you uncomfortable or strikes you as odd behaviour. If there is any doubt that the behaviour meets the threshold of harm, then please treat as a safeguarding concern and follow the

procedure discussed in this Low-Level Concerns policy which all staff have access to via the policies document.

C) Child Protection

Reporting Safeguarding Concerns

If a member of staff has a concern that a student may be at risk of harm or experiencing abuse, they must report this immediately to the Welfare & Experience Manager.
If the Welfare & Experience Manager is unavailable, concerns should be reported directly to the Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Lead (DDSL) or Course Director. All safeguarding concerns should be treated seriously and reported without delay.

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

There are four main categories of abuse as follows:

- Physical: Through hitting, shaking, squeezing, kicking, punching etc.
- Sexual: Through inappropriate physical contact, the taking of indecent images of children, or the encouragement of sexual activity by children for the purpose of adult gratification. This is often done over a period when an adult gains the trust of a child. This is known as "grooming."
- Emotional (or psychological or mental): Through persistent lack of affection, unrealistic adult demands, verbal bullying including cyber bullying.
- Neglect: Persistent lack of appropriate care of children, including safety, nourishment, warmth, education, and medical attention.

Other types of abuse

Abuse does not always fit into just one of the four main types; for example, sexual abuse will usually include elements of emotional abuse. As well as the four main

categories, there are other types of abuse. Apart from bullying, staff are less likely to encounter some of these, but they also need to be aware of them.

Bullying and Cyber-bullying - In some countries, bullying is not always identified as a form of abuse, and some examples of bullying are accepted as part of 'growing up' or one child 'just having a joke' at the expense of another. However, in the UK bullying is not acceptable.
Bullying is the deliberate and repeated act of hurting somebody or making them unhappy. The bully is 'stronger' in some way than the person who is bullied. It can take many forms, including physical and emotional abuse.

Bullying includes:

- Physical harm or threats of harm
- Calling somebody insulting names, making fun of them, racist or sexual harassment
- Cyber: Sending repeated and unkind comments via email, text, or social networking sites. Cyber bullying can be very powerful because it can continue 24x7 and be anonymous. Staff need to be aware of this on particular during online teaching.

Signs of bullying

The child:

- becomes unhappy and withdrawn
- looks sad or upset when reading an online message
- is apart and alone from others, particularly if they had previously belonged to a group
- is often absent or doesn't pay attention in lessons
- avoids certain people or doesn't want to spend time with them

Child Sexual Exploitation (CSE) - A form of sexual abuse where a child is forced by an adult to take part in sexual activity in return for something the child needs.
This can start with the adult showing interest and giving time or friendly affection which then progresses to gifts, money, alcohol, drugs or giving the child a special status. The adult abuser has a kind of power over the child and at some point, will only continue giving in return for sexual activity. In extreme examples, the sexual exploitation is carried out by a gang of adults, so the child is involved in multiple sexual activities.

Signs of child sexual exploitation (CSE)

The child:

- has a much older boy-/girlfriend
- appears with unexplained gifts
- is often absent from lessons
- shows other signs like sexual abuse

Child Trafficking - This is where children are taken from home, moved, or transported and then exploited, forced to work, or sold for sexual exploitation or benefit fraud. Trafficked children experience multiple forms of abuse and neglect. Physical, sexual, and emotional violence are often used to control victims of trafficking. Children are also likely to be physically and emotionally neglected.
Study travel could be used to obtain a visa to bring a child into the country. Language centres protect children by making sure that study is the real reason for their travel and ensuring they attend their classes.

Signs of child trafficking

The child:

- spends a lot of time doing household chores
- rarely leaves their house, has no freedom of movement and no time for playing
- lives in substandard accommodation
- isn't sure which country, city, or town they're in
- is unable or reluctant to give details of accommodation or personal details
- has no access to their parents or guardians
- is seen in inappropriate places
- possesses unaccounted for money or goods

Female Genital Mutilation (FGM)

This is when a girl's external genitals are cut or changed and there is no medical reason for it. It is illegal if done in the UK or if a UK child is taken outside the UK to have it done. It can cause severe pain and long-lasting harm.

Signs of Female Genital Mutilation (FGM)

The child:

- has a long absence from the course, followed by unusual behaviour
- has difficulty walking, standing, or sitting
- is withdrawn, anxious or depressed
- asks for help without being explicit

In the UK, any cases of FGM must be reported to the police.

Harmful Sexual Behaviour (HSB)

Children and young people typically display a range of sexualised behaviours as they grow up. However, some may display problematic or abusive sexualised behaviour. This is harmful to the children who display it, as well as the people it's directed towards.

Child-on-child abuse

- Abuse is not only done by adults against children. Under 18s, notably teens, abuse their peers
- Gang violence, gender-based violence – particularly against girls, hate and revenge crimes, bullying in all its forms are often done by children to each other.
- Sending Nudes (previously called sexting) is illegal, and children must be made aware of this.
- Upskirting is also illegal, and children must be made aware of this.
- Staff will be trained to understand child on child abuse; how it may manifest itself and signs to notice/look for.

Teenage relationship abuse

- Typically starts with two teens in a consensual close relationship.
- However, if one is very needy and the other starts to dominate and manipulate their needy partner, it becomes an abusive relationship
- Signs may be repeated insults/put downs, stopping partner from seeing friends/family, checking partner all the time (texts/social media), forced sexual activity, physical violence, taking money, controlling what partner wears.
- The dominant partner uses threats, humiliation and intimidation to harm or 'punish' the other one.

The following types of abuse are less relevant to our students/staff, but further information can be found on the NSPCC Website https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

- Criminal Exploitation and Gangs

- Domestic Abuse
- Grooming
- Non-Recent Abuse
- Online Abuse

Recognising the symptoms of abuse

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

- Unexplained injuries
- A child describing an abusive act that has happened to them
- Another child telling you of their concern about a friend/ fellow student
- Sexually explicit behaviour in games/ activities
- Serious distrust of adults
- Difficulty in making friends/ socialising with other children.
- Eating disorders; obsessive behaviours
- Self-harming; suicide attempts

How to respond to concerns

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

Importance of early help

- Staff are in a good position, seeing students regularly and building strong relationships with them, to notice signs of a safeguarding concern at an early stage.

- Staff have a responsibility to notice when early help might be necessary, identifying emerging problems, and sharing concerns with the Designated Safeguarding team who can follow up.
- Early help in many cases leads to positive outcomes from potentially harmful situations.
- Early help is particularly important for vulnerable students
- Early identification and support can often prevent issues from escalating. Sapphire Education encourages all staff to share concerns, however small, so that appropriate support can be provided at the earliest opportunity.

How to react if a child chooses to talk to you

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

- Stay calm, accessible, and receptive.
- Listen, hear, and believe.
- Communicate with the child in a way that is appropriate to their age, understanding and preference – this is very important for children whose first language is not English.
- Be aware of the non-verbal messages you are giving.
- Acknowledge their courage and reassure them that they are right to tell.
- Don't probe for more information. Questioning the participant may affect how the participant's disclosure is received later.
- Don't promise to keep the information secret or confidential. You can say that the information will be handled sensitively and only shared with those who need to know.
- Don't deal with this yourself, act in accordance with the procedure in this policy.
- Keep a written record of the incident; record the concern using Sapphire Education's safeguarding and welfare reporting process. QR codes and reporting links will be provided to all staff during induction.
- Make sure you inform the appropriate person (a member of the welfare team, Welfare and Communications Manager in summer, or DSL/DDSL.) as well as keeping a written record.

Vulnerable Children

Staff have a responsibility to be aware of groups of children who could be vulnerable, and to help identify individuals. Some vulnerable groups include:

I. Children with Special Educational Needs and Disability (SEND)
II. Children with existing emotional/behavioural/mental health difficulties

III. Children from homes with ongoing domestic violence or alcohol/drug misuse
IV. International students studying away from home for the first time.

LGBTQ+ Children

- Sapphire also recognises the importance of providing LGBTQ+ children with a safe space for them to speak or share their concerns with a member of staff

D) Training

The Safeguarding Lead (DSL) and Designated Safeguarding Lead (DDSL) have undertaken Specialist Safeguarding (formerly Level 3.)

All staff undertake the online British Council Accreditation UK Safeguarding Training to ensure that they recognise the symptoms of abuse and how they should respond to suspicions of abuse. On completion, they must send Sapphire the safeguarding certificate they receive in their British Council Accreditation UK portal.

The Welfare & Experience Manager receives additional safeguarding training due to their role as the primary on-site welfare lead.

Safeguarding forms part of staff induction and is regularly reinforced throughout the programme.

All staff are made aware of:

- Sapphire safeguarding procedures
- Reporting mechanisms
- Low-level concerns procedures
- Whistleblowing procedures
- Prevent responsibilities
- Professional boundaries and codes of conduct

Safeguarding is reviewed annually and forms part of staff briefings and programme preparation.

E) Safer Recruitment

It is a criminal offence for any person who is barred from working with children to attempt to apply to be a staff member at Sapphire.

The application of rigorous procedures for the recruitment of any staff who are likely to encounter students can reduce the likelihood of allegations of abuse being made. At Sapphire, the following procedures are followed:

All new staff are requested to send an up-to-date CV which asks for details of their previous employment, which forms part of their application. They are required to complete a personnel form and referee request form which asks for the names of two relevant referees, one of which must be from their previous employer; these are sent together with the conditional contract. Sapphire follows up with both references. All gaps in CVs are questioned during interview.

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

All staff are interviewed by appropriately trained members of the Sapphire Education management team. Interview questions are designed to assess suitability to work with students as well as role-specific competence. Management staff, who are new to us, attend two interviews.

All staff working directly with students will be subject to appropriate safeguarding checks, including Enhanced DBS checks where required, references, right-to-work checks and verification of qualifications where appropriate, before they start employment with us. If not, until such time as the DBS is received, they will wear a different coloured lanyard and will be regularly monitored. Two professional references will be sought, ideally one from their most recent employer. If the staff member has worked in a state school, a prohibited list check will also be done.

If it is a returning staff member from the previous summer or short stay, and if the DBS is not on the update service, a Barred List check will be performed and a reference from

the most recent employer will be requested. For staff members who live overseas, they will be required to provide a Police Check certificate each year they work with us.

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

Employees recruited from abroad will provide a Police Check or Certificate of Good Conduct from the foreign country where they reside, if they have lived there for six months or longer. If that's not the case, they will need to obtain a new DBS certificate.

All original relevant documentation (proof of identity, right to work, and qualifications) will be seen by the Office Administrator during induction and prior to the member of staff commencing employment.

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

External Providers, Guest Speakers & Academic Partners

Sapphire Education may engage external providers, guest speakers, university partners and specialist suppliers to contribute to programme delivery.
Where individuals will have direct contact with students aged under 18, Sapphire Education will obtain appropriate safeguarding assurances before the programme begins.
This may include:

- Supplier Declaration Forms
- Higher Education Institution Declaration Forms
- Confirmation of recruitment and suitability checks
- DBS checks where applicable
- Safeguarding training records
- References
- Confirmation of legal right to work in the United Kingdom

All external providers are expected to comply with Sapphire Education safeguarding and welfare procedures whilst engaged on the programme.

Safeguarding Records from External Organisations

Sapphire Education may request safeguarding assurances from organisations providing staff, speakers, tutors or specialist services.

Where appropriate, Sapphire Education may request confirmation of recruitment checks, suitability checks, safeguarding training or other safeguarding documentation before individuals begin working with students.

Single Central Record

Sapphire Education maintains a Single Central Record to ensure that all necessary recruitment, safeguarding and suitability checks have been completed for staff and other adults working directly with students.

F) Welfare/Implementing Safeguarding

Risk Assessments

Risk assessments are produced for all centres, and all members of staff will be asked to sign them, using a QR code. They cover both on campus and off campus situations including excursions. They are conveyed to students during their induction session and reiterated frequently if they have a daily impact, e.g. crossing of roads, keeping together in groups on excursions, etc.

Duty to report

All members of staff are required to report any concern or allegations about Sapphire practices or the behaviour of colleagues which are likely to put children/young people at risk of abuse or other serious harm.

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

  Reporting takes places using an electronic form. This will be shared with staff during induction.

Failure to comply

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

Abusive Behaviour

Sapphire Education will not accept any form of abusive behaviour towards our students from other students or adults on the course. This kind of behaviour may involve (not a comprehensive list):

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

The sanctions that may be used include the offender:

- Being asked to make an apology
- Doing some community work (e.g. tidy up mess around the college)
- Being taken out of class and given some supervised work to do
- Not being allowed to leave the college
- Missing activities and excursions
- Being sent home
- Being referred to another agency

All staff have a collective responsibility for ensuring:

- that abusive behaviour does not go unnoticed

- that abusive behaviour is reported promptly

If staff are unsure whether a concern falls under this section, they should speak to the Welfare & Experience Manager, Course Director, DSL or DDSL.

Procedure in the case of an under 18 abusing another under 18

In the event of an incident being reported, the student concerned will usually be asked to go to the office where they will remain while the appropriate person (Welfare and Experience Manager/DSL/DDSL) consults rapidly to verify the circumstances and gather any additional information.

The student(s) will then be spoken to by the Welfare & Experience Manager, together with the Course Director and other relevant members of staff as appropriate. They will be told that they can bring a friend/supporter with them to the meeting.

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

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

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

Procedure in the case of an adult abusing, or alleging, abuse of another adult or under 18

All allegations should be taken seriously.

All information should be recorded via the online safeguarding form, which is accessed by the welfare team.

The following details should be included:

- Date and time of incident/disclosure.
- Parties involved, including any witnesses to an event.

- What was said or done and by whom.
- Any further action taken by Sapphire to investigate the matter.
- Any further action taken beyond Sapphire.
- Where relevant, the reasons why a decision was taken not to refer those concerns to a statutory agency.
- Any interpretation/inference drawn from what was observed, said, or alleged should be clearly recorded as such.
- Name of person reporting on the concern, name, and designation of the person to whom the concern was reported, date and time and their contact details.

If there is evidence of the abuse taking place, then the Welfare and Experience Manager will immediately notify the Course Director, the DSL, and the Directors of Sapphire. All such instances of reported abuse between an adult and a student must be treated as serious and need to be investigated without delay.

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

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

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

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

The Welfare & Experience Manager will immediately notify the Course Director, DSL and senior Sapphire management. Collectively they will decide whether an outside agency needs to be involved at this stage. This could be the police (if over 18) or LGSP (if under 18).

Supervision ratios and arrangements

Students are expected to participate in all aspects of our courses. Outside of lesson times, there is a programme of sports and activities, and during this time, students will be supervised in various rations for on-site daytime activities, on-site evening activities, and excursions. Please refer to our 'Statement on Supervision and Rations' via our policies link.

Students who are not participating in organised activities do not have permission to leave campus unless permission has been granted by the Course Director or designated senior member of staff.

All students will be registered three times each day: in classes (am or pm) at the pre-activity meeting (am or pm) and in their accommodation in the evening. Teachers will take the register in the first class of the day. Designated Sapphire staff will be responsible for taking registers before activities, excursions and evening curfew checks.

Students will always be supervised, with one exception - when the group have completed their excursion visit, the students may be given some free time. However, if the children are under 16, then this only happens on certain conditions:

- The students are in groups of at least 3 and remain together.
- The students all have their Sapphire Emergency Contact Cards with them.
- The Student Mentors have a mobile contact number for each group of children (and vice-versa).
- A meeting point and time are clearly established.
- Safety reminders are repeated to the students (roads, strangers).
- Clear limits are put on the area where they can go independently.

Sapphire staff share responsibility for supervising students during excursions. The Course Director retains overall responsibility for student safety and programme delivery, whilst designated staff ensure students remain present and accounted for.

For certain higher risk activities, swimming, archery etc., we use qualified staff for supervision, both on site and off site.

Student Absences

The vast majority of Sapphire students come as individuals or small groups. While in the UK, all students on Sapphire courses are expected to attend 100% on the programme,

including activities and excursion, unless the child is ill. Registers are taking several times a day and any absences immediately followed up and dealt with.

Within the first 20 minutes of a lesson, a member of the Sapphire office team will check for absentees. For activity sessions, Student Mentors attend the activity meetings which happen morning, afternoon, and evening. Group Leaders are asked in that meeting if all their students are there. Staff responsible for the activity, lesson or student group will confirm attendance. Any unexplained absence will be followed up immediately by the Welfare & Experience Manager, Course Director or designated member of staff.

Student whereabouts are monitored through lesson registers, activity registers and evening curfew procedures. Any unexplained absence will be treated as a welfare concern until the student's whereabouts are confirmed.

Managing Behaviour and Acceptable Restraint

(This has been formulated in accordance with Department for Education – Use of Reasonable Force 2011)
Physical contact with students must be appropriate for the age, understanding and sex of the child and must never threaten or be sexually inappropriate. In some cases physical contact may be appropriate:

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

You cannot:

- Use force as a punishment – it is unlawful to use force as a punishment.

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

- All complaints should be thoroughly investigated.
- Where a member of staff has acted within the law – that is, they have used reasonable force in order to prevent injury, damage to property or disorder – this will provide a defence to any criminal prosecution or other civil or public law action.

- Sapphire must consider carefully whether the circumstances of the case warrant a person being suspended until the allegation is resolved or whether alternative arrangements are more appropriate.
- If a decision is taken to suspend a member of staff Sapphire will ensure that the the member of staff has access to a named contact who can provide support.

Fire Safety

Fire safety is a legal requirement for all students. Please refer to our 'Health and Safety Policy' via our policy folder. We work closely with our centres to ensure that fire regulations are adhered to and that staff are briefed accordingly.

Prevent Duty

Sapphire is committed to the government strategy to stop people becoming involved in violent extremism and/or in supporting terrorism. Anyone may be vulnerable to extremist exploitation. Our aim is to provide an environment on our courses where everyone feels safe and supported, and where there is a clear process of referral of concerns for staff, students and homestay providers. We will do this via documents, eg. our codes of conduct (see appendix), appropriate training, and promoting core British values where possible. Our Prevent Lead is our DSL, and our DDSL is our Deputy lead; both have received appropriate training.

Signs that May Cause Concern

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

How and When to React to Concerns

If there is a concern, contact the Welfare & Experience Manager, Course Director, Prevent Lead or Deputy Prevent Lead. We will discuss the issue, take advice if necessary, and then make a referral to the relevant authorities if necessary. Sapphire Education

encourages staff to report concerns, however small, so that appropriate support and intervention can be considered at an early stage.