

# BABEL FISH

Safeguarding Policy 2023/24

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## 1 POLICY STATEMENT

Firstly, at Babel Fish we recognise that we have a duty of care to young people that employ our services. To ensure that duty of care is met, we have a robust safeguarding policy that is consistent and embedded in our business practice. This handbook details the relevant policies and procedures relating to our approach to Child Protection and Safeguarding. We recognise that the welfare of children and vulnerable adults is paramount. All students, whatever their age, culture, disability, gender, language, racial origin, religious beliefs, and/or sexual identity, have the right to be kept safe and given protection from abuse.

### 1.2 CONTEXT

Babel Fish Ltd is a private EFL language school. We offer international students English language teaching (EFL) at our premises in Trenance Heritage Cottages, Newquay, Cornwall. As part of our provision, we frequently offer surfing lessons and outdoors activities. Our Students' ages range from 13-70. Adult students and children are taught in separate classes. Students stay from a week up to 2 months. They stay with host families in a homestay environment.

### 1.3 TERMINOLOGY

All adults that are to abide by this policy will be referred to as **ALL** in this document.

- **Safeguarding** refers to representative measures in place to ensure that there are processes and procedures that deal with keeping young people safe.
- **Child Protection** is a term that encompasses measures that protect children from direct harmful behaviour.

Designated Safeguarding officer :Auriol Drummond-Hay

Designated responsibility:Alex Trumble (Director)- day to day matters, training and recording systems.

### 1.4 STATEMENT

We are committed to safeguarding all children in our care and in the wider community, such as those in the homes of our host families. We believe that it is always unacceptable for any child to experience abuse of any kind and we recognise our responsibility to safeguard the welfare of all children by a commitment to practise which protects them

### 1.5 ENTITLEMENT

All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

### 1.6 AIM OF THE POLICY

We recognise at Babel Fish that we have a responsibility to every child that employs our services. To that end Babel Fish will provide staff and host families with guidance and training on procedures they should adopt if they suspect a child may be experiencing, or be at risk of, harm. This policy applies to everyone that comes into contact with Babel Fish - including as applicable - Directors, Cottage Trustees Employees, Sessional Workers, Agency Staff, Suppliers, Volunteers,

Students on work experience, as well as anyone working on behalf of Babel Fish. All those adults involved will know that they should alert Babel Fish's Safeguarding Officer - Rebecca Gray, and also Cornwall Council LADO (01872 326536), as well as the NSPCC (0808 8005000). We adhere to the Legislation set out in: Working Together to Safeguard children 2018.

## 1.7 ROLES AND RESPONSIBILITIES

Both Auriol Drummond-Hay (Tel: 07772019952) and Tom (.....) Safeguarding Officers are responsible for delivering the Safeguarding Policy. Equally, seasonal teaching staff, and group leaders from foreign schools will have a responsibility to carry out the procedure set out in this document. Our safeguarding policy will be available on our website, and students will all be briefed on the standard of care that should expect, albeit this briefing will be dependent on the individual, subject to age and maturity, but all will be aware that there is safeguarding in place and all will be provided with the location of this document.

In order to write this document, we have taken appropriate measures. We have read the legislation outlined in Working Together to Safeguard Children, 2018 alongside Keeping Children Safe in Education, 2020. We have undergone Safeguarding Training and will refresh this annually. We have also used the writing guidance outlined by the British Council. We have been guided by safeguarding policies in place at schools and charities in the County. Our policy is available to download on our website, there are hard copies in the school at Trenance Heritage Cottages.

## CODE OF CONDUCT

### 2.1 OVERVIEW

Babel Fish is committed to providing young people with outstanding EFL teaching in an environment that is friendly and welcoming. We teach them language skills and offer other experiences - particularly in showcasing British culture and teaching them to surf. We are committed to the wellbeing of each student and ensure that they always feel safe. Our culture is one of learning and respect - we absolutely oppose behaviour that is inappropriate, and firmly discourage behaviour that can be misconstrued, we aim to protect all adults and students from inappropriate conduct.

### 2.2 POSITION OF TRUST

We recognise that all Adults working with children under 18 works in a position of trust, and as such, with specific reference to the Sexual Offences Act 2003 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 legal age of consent is 16)

### 2.3 SETTING STANDARDS

- We expect all adults that work with our students to adhere to being:
- Excellent role models
  - Encouraging of students

- Kind
- Advocates of a safe environment
- Well prepared for the delivery of activity or service
- Be also expect all to appreciate that the welfare of the child is paramount, and as such: Be familiar with this safeguarding policy
- Be alert to signs and indicators of possible abuse indicators.
- Deal with a disclosure of abuse from a child in line with the guidance set out in this policy and inform the Designated Safeguarding Officer (Auriol Drummond-Hay).

## 2.4 ADULT INTERACTION

We recognise that physical contact is usually not acceptable between adults and U18s. However, we understand that there must be reasonable physical contact - particularly when it comes to the physical activities that we offer namely surfing tuition, water sports activities and beach games. We also recognise that students that are staying with host families might want to hug each other on departure - we deem this as acceptable. We recognise equally that in the classroom setting, where physical contact is minimal, a high five, or a pat on the back is generally acceptable. Fundamentally, we recognise that adults must use their own judgement when making physical contact with Under 18s. All adults must be mindful that inappropriate physical contact is entirely prohibited and unacceptable.

We recognise that children staying with host families will socialise, but that socialising should be according to in locus parentis (parental). Adult socialising with Under 18s (going to bars/nightclubs) is deemed as entirely unacceptable. We expect appropriate adult behaviour, and that all adults are examples of good behaviour, and as such they should employ appropriate language at all times

## 2.5 APPROPRIATE APPEARANCE

We expect all adults to dress appropriately when engaged in a student activity. All adults must be aware that they set an example in class, on activities, in accommodation, and on activities in the evening.

## 2.6 ALCOHOL, DRUGS & SMOKING

We recognise that there are instances where a glass of beer or wine is acceptable - be that around the dinner table, or in a restaurant. If host families, for example, drink wine or beer with their meal, that is a cultural practice, and as such entirely acceptable. Adults must provide a good example to young people, and an example that is realistic. All adults in a position of trust have a duty of care to educate young people on the misuse of addictive substances. Taking illegal substances is entirely prohibited and will result in immediate disciplinary procedure.

## 2.7 IT & SOCIAL MEDIA

We understand that children use a range of IT devices and social networking platforms. We discourage the use of mobile phones in class, and we condemn all acts of online bullying. Children found to be using IT inappropriately be that involved in bullying or visiting inappropriate sites on-line will be disciplined in line with our disciplinary procedure. Should inappropriate usage be concerning, if for instances children are using or posting sexual images,

and we deem it an issue of child protection, we will not hesitate to contact our MARU, or LADO and will follow these steps:

1. If a device is involved- confiscate it and set it to flight mode or, if not possible, switch it off.
2. Seek advice – report to your DSL via your normal child protection procedures.

For DSL- record all incidents including sexting, including both the actions you did take as well as the actions you didn't and give justifications. In applying judgement to each incident, consider the following:

- Is there a significant age difference between the sender/receiver involved?
- Is there any external coercion involved or encouragement beyond the sender/receiver? Do you recognise the child as more vulnerable than usual i.e. at risk?
- Is the image of a severe or extreme nature?
- Is the situation isolated or has the image been more widely distributed?
- Have these children been involved in a sexting incident before?
- Are there any other circumstances relating to either sender or recipient that may add cause for concern i.e. difficult home

If any of these circumstances are present, then we will escalate or refer to the incident using our normal child protection procedures. This includes reporting to the police. We recognise that reproduction of any image of an Under 18 is illegal.

If none of these circumstances are present, we will then manage the situation accordingly within the school. Record the details of the incident, action and resolution.

## 2.8 ACCOMMODATION

We recognise the benefit host family accommodation provides in welcoming students from all around the world. We also recognise the special responsibility that being a host family involves. As such, appropriate behaviour must be always observed particularly with regards to expectations around privacy. Crucial to the wellbeing of students and host families the mutual respect required - students must have access to private bedrooms and bathrooms.

## 2.9 TRANSPORT

All those transporting students are required to have appropriate car insurance. Those transporting students must have a recent DBS certificate. The use of using own transporting children by employees is discouraged, unless in special circumstances.

Coach and taxi companies are required to supply relevant insurance and DBS.

## 2.10 WHISTLEBLOWING

We recognise that all staff and employees of Babel Fish are responsible for maintaining the safety and wellbeing of each child as such all have a legal obligation to inform management of any concerns about colleagues not following Code of Conduct. Staff who report this (or any other problems) will (a) not be penalised and (b) their report will remain confidential.



## CHILD PROTECTION

### 3.1 OVERVIEW

At Babel Fish we understand that all children in our care should feel safe. We value all students and recognise that children are frequently vulnerable. Our safeguarding policy aims to provide a clear practice and process to keep children safe. All employees and host families must acknowledge that they have read our safeguarding policy, which is available online. All should know the steps and processes required set out in the policy.

### 3.2 DESIGNATED SAFEGUARDING LEAD

Auriol Drummond-Hay, is the designated safeguarding lead, she is contactable on 07772019952 in her absence Tom B who is contactable on is the deputised officer. Both Auriol and Tom have received bespoke Safeguarding Training (Level 3).

### 3.3 PURPOSE AND AIM OF PROCEDURE

We aim to ensure that those children who attend and/or participate in our courses, including activities or events organised by Babel Fish receive the protection and support they need if they are at risk of abuse, radicalisation and exploitation. This procedure provides clear direction to all staff at Babel Fish if they have concerns that a child needs protection.

### 3.4 TYPES OF ABUSE

There are four main types of abuse.

- **Physical** Deliberate harm to a child which causes bruises, cuts, burns or broken bones.
- **Emotional** Ongoing emotional maltreatment.
- **Sexual** Sexual activity with a child under the age of 16
- **Neglect** Persistent failure to meet a child's basic physical and/or psychological needs.

#### 3.4.1 PHYSICAL ABUSE

It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them.

**Defining physical abuse:** Physical abuse is deliberately hurting a child and causing injuries such as bruises, broken bones, burns or cuts. There's no excuse for physically abusing a child. It causes serious, and often long-lasting, harm. In severe cases, death. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell - this is known as fabricated or induced illness (FI).

#### 3.4.2 EMOTIONAL ABUSE

Children who are emotionally abused suffer ongoing emotional maltreatment or emotional neglect.

**Defining emotional abuse:** Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development as well as causing serious harm.

### 3.4.3 SEXUAL ABUSE

A child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact and it can happen online. Sometimes the child won't even understand that what's happening to them is abuse or that it is wrong.

**Defining child sexual abuse:** There are two different types of child sexual abuse - "contact abuse" and "non- contact abuse". Further information on each type is detailed below:

- **Contact abuse** involves touching activities where an abuser makes physical contact with a child, including penetration. This includes but is not limited to.
  - Sexual touching of any part of the body-whether the child's wearing clothes or not.
  - Rape or penetration by putting an object or body part inside a child's mouth, vagina or anus.
  - Forcing or encouraging a child to take part in sexual activity.
  - Making a child take their clothes off, touch someone else's genitals or masturbate.
- **Non-contact abuse** involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet and flashing. This includes but is not limited to;
  - Encouraging a child to watch or hear sexual acts.
  - Not taking proper measures to prevent a child being exposed to sexual activities by others.
  - Meeting a child following sexual grooming with the intent of abusing them
  - Online abuse including making, viewing or distributing child abuse images.
  - Allowing someone else to make, view or distribute child abuse images showing pornography to a child.
  - Sexually exploiting a child for money, power or status (This is known as child exploitation and is covered in further detail later in this section).

Changes in behaviour are often indicators of sexual abuse. This includes but is not limited to:

- Staying away from certain people
- Avoiding being alone with people, such as family members or friends
- Seeming frightened of a person or a reluctance to socialise with them.
- Showing sexual behaviour that's inappropriate for their age.
- Becoming sexually active at a young age
- Being promiscuous
- Using sexual language or knowing information that you wouldn't expect them to
- Having physical symptoms such as anal or vaginal soreness, an unusual discharge, sexually transmitted infection (STI) and/or pregnancy.

### 3.4.4 NEGLECT

Neglect is the ongoing failure to meet a child's basic needs. It's dangerous and children can suffer serious and long-term harm and neglect is the most common form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A

child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents or carers. A child who is neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death.

There are **four** specific types of neglect, and each is listed below with further detail:

- **Physical neglect:** This is failing to provide for a child's basic needs such as food, clothing or shelter. It is also failing to adequately supervise a child or provide for their safety.
- **Educational neglect:** Failing to ensure a child receives an education such as not ensuring school attendance.
- **Emotional neglect:** Failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, intimidating or isolating them. This form of neglect is often the most difficult to prove.
- **Medical neglect:** Failing to provide appropriate health care, including dental care and refusal of care or ignoring medical recommendations.

Neglect can have serious and long-lasting effects. It can be anything from leaving a child home alone to the very worst cases where a child dies from malnutrition or being denied the care they need. In some cases, it can cause permanent disabilities.

**Changes in behaviour which can indicate neglect:** Having one of the signs or symptoms below doesn't necessarily mean that a child is being neglected. However, if Babel Fish staff members ever notice multiple - or persistent - signs then it could indicate that there is a serious problem. Children who are neglected may have: Poor appearance and hygiene, health and development problems and housing and family issues.

### 3.5 PEER ON PEER ABUSE

It is essential that all Babel Fish staff understand the importance of challenging inappropriate behaviours between peers.

Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Peer on peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers.
  - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/ or encourages physical abuse);
  - Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
  - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; consensual and non-consensual sharing of nudes and semi nudes images and or videos; upskirting, which typically involves taking a picture under a person's clothing

without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; initiation/hazing type violence and rituals.

## BULLYING AND CYBERBULLYING

### 4.1 OVERVIEW

There is clear evidence that bullying is abusive and will include at least one or more of the four core categories of abuse - sexual abuse, emotional abuse physical abuse and/or neglect. For this reason, bullying in all its forms has been included in Babel Fish's Child Protection & Safeguarding Policy.

Bullying can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

### 4.2 BULLYING

Bullying is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. Bullying includes the following:

- **Verbal abuse**- such as name calling and gossiping.
- **Non-verbal abuse**- such as hand signs or text messages.
- **Emotional abuse**- such as threatening, intimidating or humiliating someone.
- **Exclusion**-such as ignoring or isolating someone.
- **Undermining**- by constant criticism or spreading rumours.
- **Controlling or manipulating** someone.
- **Physical assaults**- such as hitting and pushing.
- **Making silent, hoax or abusive calls.**
- **Online or cyber bullying**- further details are provided below.

Some of the main types of bullying are as follows, types of bullying are not limited to that stated below.

**Racial bullying** - identified by the motivation of the bully, the language used, and/or by the fact that victims are singled out because of the colour of their skin, the way they talk, their ethnic grouping or by their religious or cultural practices.

**SEN & Disability bullying** - this is where children are singled out because of a disability and which deaf children can be bullied more than other children with SEN or disabilities.

**Sexual bullying** - behaviour, which whether physical or non-physical, is based on a person's sexuality or gender; and is when sexuality or gender is used as a weapon by boys or girls towards other boys or girls. Sexual bullying is more prevalent towards girls than boys.

**Homophobic/Bi-phobic bullying** - irrational dislike, hatred or fear of individuals that are, or are perceived to be lesbian, gay or bisexual.

**Transgender bullying** - transgender is an umbrella term to describe people whose gender is not

the same as - or does not sit comfortably with - the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, crossdresser, non- binary, gender queer.

#### 4.3 CYBERBULLYING

Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos. Children may know who's bullying them online - as it may just be an extension of offline peer bullying, they are already experiencing - or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of an individual engaging in bullying behaviour. Because cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - it can feel like there is no escape. Cyberbullying includes the following:

- Sending threatening or abusive text messages.
- Creating and sharing embarrassing images or videos.
- Trolling – which is the sending of menacing or upsetting messages on social networks, chat rooms or online games.
- Excluding children from online games, activities or friendship groups.
- Setting up hate sites or groups about a particular individual.
- Encouraging young people to self-harm.
- Voting for or against someone in an abusive poll.
- Creating fake accounts, hijacking or stealing online identities - with the aim to embarrass a young person or cause trouble using their name.
- Sending explicit messages- also known as sexting.
- Pressuring children into sending sexual images or engaging in sexual conversations.

#### 4.4 HOW TO SPOT BULLYING AND CYBERBULLYING

**Changes in behaviour which can indicate a child is being bullied or cyberbullied:** It can be hard for adults, including parents, to know whether or not a child is being bullied. A child might not tell anyone because they're scared the bullying will get worse. They might think that they deserve to be bullied, or that it's their fault. However, the following should be looked out for by Babel Fish staff members and volunteers:

- Belongings getting “lost” or damaged.
- Physical injuries - such as unexplained bruises.
- Being afraid to go to school, being mysteriously ‘ill’ each morning, or skipping school Not doing as well at school.
- Asking for, or stealing, money- to give to a bully.
- Being nervous, losing confidence, or becoming distressed and withdrawn.
- Problems with eating or sleeping.
- Bullying others.

## CHILD SEXUAL EXPLOITATION, CHILD TRAFFICKING FEMALE GENITAL MUTILATION

### 5.1 CHILD SEXUAL EXPLOITATION (CSE)

Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status. Children may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children are trafficked into - or within the UK - for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

**Defining child sexual exploitation:** Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people - or a third person or persons - receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) because of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition e.g. being persuaded to post sexual images on the Internet and via mobile phones without immediate payment or gain.

### 5.2 CHILD TRAFFICKING

Child trafficking is child abuse and is a type of abuse where children are recruited, moved or transported and then exploited, forced to work, or sold. They are often subject to multiple forms of exploitation. Children are trafficked for many reasons which include:

- Child sexual exploitation.
- Forced marriage.
- Domestic servitude such as cleaning, childcare, cooking.
- Forced labour in factories or agriculture.
- Criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft.

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another. Trafficked children experience multiple forms of abuse and neglect because physical, sexual and emotional violence are often used to control victims of trafficking. Children who are trafficked are also likely to be physically and emotionally neglected.

**Defining child trafficking:** The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in human beings' (Official definition of child trafficking produced by the Council of Europe and ratified by the UK government in 2008)

### 5.3 FEMALE GENITAL MUTILATION (FGM)

There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous - as well as being a criminal offence.

**Defining female genital mutilation:** Female genital mutilation is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting

or Sunna.

**The UK law and female genital mutilation:** FGM has been a criminal offence in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. Since July 2015, anyone can apply to the court for an FGM Protection Order if they are concerned that someone is at risk of FGM. Breaching an FGM Protection Order is a criminal offence with a maximum sentence of five years' imprisonment. Since October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales.

**Professionals must make a report to the Police, if, in the course of their duties:**

- They are informed by a girl under the age of 18 that she has undergone an act of FGM.
- They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

**Changes in behaviour which can indicate a child has undergone female genital mutilation:** A

girl or woman who has had FGM may:

- Have difficulty walking, sitting or standing.
- Spend longer than normal in the bathroom or toilet.
- Have unusual behaviour after an absence.
- Be particularly reluctant to undergo normal medical examinations.
- Ask for help but may not be explicit about the problem due to embarrassment or fear.

**Changes to look out for which may indicate a child is at risk of undergoing female genital**

**mutilation:** A girl at immediate risk of FGM may ask a teacher, or another adult for help if she suspects FGM is going to happen, or she may run away from home or miss school. Although the girl may not know what's going to happen, she might talk about:

- Being taken 'home' to visit family.
- A special occasion to 'become a woman'.
- An older female relative visiting the UK.

**Please note: Although this Handbook is specifically concerned with child protection and safeguarding, the following is relevant to this aim:**

There is no requirement for automatic referral of adult women with FGM to adult social services or the police. Therefore, referral to the police must not be introduced as an automatic response when identifying adult women with FGM - and each case has to therefore be individually assessed. Adult women with FGM should be supported by offering referral to community groups who can provide the appropriate support, and clinical intervention - or other services as appropriate e.g. through an NHS FGM clinic. However, the wishes of the woman concerned must be respected at all times. Where this note becomes of relevance to Babel Fish's child protection and safeguarding policies is that if the woman who has undergone FGM is pregnant - then the welfare of the unborn child or others in her extended family must be considered at this point - as these children are potentially at risk of FGM also and safeguarding action must be taken accordingly.

If any Babel Fish staff member is in any way concerned about a girl being at risk of FGM they must immediately bring their concerns to the attention of Babel Fish's Designated Safeguarding Officer.

## RECORD KEEPING

### 6.1 FORMS

Use the **Reporting Concerns about a Child Form** (available in Babel Fish's office). The form should be signed and dated by all those involved in its completion and kept confidentially and in line with Babel Fish's Data Protection Policy. The name of the person making the notes should be written alongside each entry.

### 6.2 IF AN ADULT IS ACCUSED

Babel Fish has developed clear policies and procedures for dealing with allegations against Babel Fish employees volunteers and host families) who work with children. Examples of allegations that would be covered by this policy, although no intended to be exhaustive, include:

- Behaviour that has, or may have, harmed a child.
- Criminal acts against or related to a child.
- Behaviour toward s a child or children in a way that indicates they may pose a risk of harm to children.

#### 6.2.1 Principles:

In the first instance, any such allegation against an adult must be reported immediately to Babel Fish's Designated Safeguarding Officer.

#### 6.2.2 Reporting time limits:

Babel Fish's Designated Safeguarding Officer is accountable for contacting the Local Authority's Designated Officer and informing them of all allegations that have come to their attention **within 24 hours of the allegations being made.**

#### 6.2.3. What to do if an allegation is made, or information is received:

There are potentially two issues that need to be dealt with as a matter of urgency:

- **Is a child in immediate danger or do they need emergency medical attention?**
  - If a child is in immediate danger and is with you, remain with them and call the Police.
  - If the child is elsewhere, contact the Police and explain the situation to them.
  - If the child needs emergency medical attention, call an ambulance and, while you are waiting for it to arrive, get help from Babel Fish's first aider.
  - If a first aider is not available, use any first aid knowledge that you may have yourself to help the child.
  - You must also contact your line manager and Babel Fish's Designated Safeguarding Officer to let them know what is happening.



- The Babel Fish Director should also inform the child's group leader / family if the child needs emergency medical attention and arrange to meet them at the hospital or medical centre.
- The parents/carers should be informed that an incident has occurred; that the child has been injured; and that immediate steps have been taken to get help.

#### 6.2.4 Is the adult at the centre of the allegation working with children now?

If this is the case, the concern needs to be discussed immediately with Babel Fish's Director and the Designated Safeguarding Officer. Either the Director or Designated Safeguarding Officer should then, in a sensitive manner, remove the staff member or volunteer involved in the allegation from direct contact with children.

It should then be explained to the person, in private, that there has been a complaint made against them, although the details of the complaint should not be given at this stage. The person should be informed that further information will be provided as soon as possible but that, until consultation has taken place with the relevant agencies and within the organisation, they should not be working with children. It may be best, under the circumstances, for the person to return home on the understanding that either Babel Fish's Director or Designated Safeguarding Officer will telephone them later in the day.

The information provided to them at this stage will need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the Local Authority's Designated Officer, the Local Authority's Children's Social Care Department and the Police.

If the person is a member of a Trade Union or other professional organisation, they should be advised to contact that Body. Arrangements should also be made for the Babel Fish's staff member or volunteer to receive ongoing support in line with the responsibilities the organisation has towards their welfare.

#### 6.2.5 Investigating:

Once any urgent necessary steps have been taken, attention can be given to dealing with the full implications of the allegations. There are up to **three** possible lines of enquiry when an allegation is made:

- A Police investigation of a possible criminal offence.
- Enquiries and an assessment by the Local Authority Children's Social Care Department about whether a child needs protection.
- Investigation by Babel Fish and possible disciplinary action being taken against the person in question. This will include implementing a plan to manage any risk posed by the individual to children connected with Babel Fish until the outcome of the other investigations and enquiries are known.

#### 6.2.6 Taking disciplinary action:

If the initial allegation does not involve a possible criminal offence, Babel Fish's Designated Safeguarding Officer considers whether formal disciplinary action is needed.

### 6.2.7 Dealing with a criminal offence:

If there is reason to suspect that a criminal offence may have been committed (whether the threshold of 'significant harm' is reached), the Local Authority's Designated Officer will contact the Police and involve them in a similar strategy discussion, which will include Babel Fish's Designated Safeguarding Officer.

The Local Authority's Designated Safeguarding Officer - and any other representative from Babel Fish - will cooperate fully with any discussion involving the Police and will ask for similar cooperation from the Police in terms of the sharing of information relevant to the person's employment or volunteering with the organisation.

Discussions with the Police will also explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place - or whether disciplinary action must wait until the criminal process is completed.

### 6.2.8 Talking to parents about the allegation or concern:

If the child's parents/carers do not already know about the allegation, Babel Fish's Designated Safeguarding Officer and the Local Authority's Designated Officer will discuss how they should be informed and by whom.

## CHILDREN'S WELFARE AND IMPLEMENTING SAFEGUARDING

### 7.1 Use of Risk Assessments

We are committed to keeping children safe whilst they are under our care. To this end we practise rigorous safeguarding including up to date and clear risk assessments for all activities at Babel Fish, not limited to lessons in the classroom, to walking to the beach to go surfing. Risk Assessments are written by the director's business and their approval is then ratified by our technical advisor. The key information in these practices is clearly relayed to each student prior to activity.

### 7.2 Supervision Ratios

As per our operational procedures and risk assessments, we ensure that our ratios are no more than 1-8 while surfing, and 1- 15 whilst teaching. Whilst by law we must keep to 1 to 15 whilst teaching and out of activity, we believe that a lower ratio enables more robust safeguarding and a better learning experience.

### 7.3 Missing Students

Throughout each day we regularly register students. We register each morning in class and register whilst out on activity both in the afternoon and in the evening. We ensure that we investigate any missing child immediately and without delay. All students have access to our emergency contact details.

## 7.4 Welfare Provision

We recognise that fundamental to the successful practice of our school is the safety and wellbeing of all the students that we teach regardless of age, culture, disability, gender, language, racial origin, religious beliefs, and/or sexual identity, have the right to be kept safe.

## 7.5 First Aid and Medical

There will always be a qualified first aider either delivering lessons in the classroom or on activity. We will ensure that out on activity the qualified first aider carries a fully stocked first aid kit. Upon induction both Directors are responsible for providing health and safety rules and procedures, including first aid facilities, and emergency evacuation procedures. First aid kit is located at our offices at Terance Cottages, and in the cafe, and in the museum. If there are incidents where first aid is required, an incident report must be filled out (detailed below) and parents will be immediately informed. Should your child have a medical condition or allergy, please ensure that you have filled in the appropriate detail on our registration form, and clear instructions are given to the directors.

## 7.6 Behaviour and Discipline

We believe that our School offers unique experiences to young people; experiences that enable language learning, as well as being culturally rich. Our ethos is founded upon mutual respect. All students on arrival will be given a brief on acceptable behaviour briefing- which will include school rules. All staff and employees will be provided with Babel Fish's behaviour policy and will be expected to clearly set the right examples. It is our responsibility to ensure children are treated fairly by all adults working with them at Babel Fish - and so they know what is expected of them.

### 7.6.1 Our code of behaviour for children is intended to:

- Identify acceptable behaviour for children
- Promote self-respect and self-control
- Raise children's self-esteem and self confidence
- Encourage individual responsibility for behaviour and outline the consequences of poor behaviour - Encourage children to recognise and respect the rights of others
- Always encourage cooperation and in all situations
- Promote the values of honesty, fairness and respect
- Anticipate and resolve any conflict that may arise
- Ensure that children are aware of when sanctions will be put into place

### 7.6.2 Dos and don'ts:

Children are expected to:

- Cooperate with each other
- Be friendly
- Respect other uses of Terance Heritage Cottages in the museum and the - coffee shop, and out on activity.
- Listen to each other
- Be helpful
- Follow this code of behaviour and other rules

- Stick to the e-safety agreement when using the internet, social networking sites, mobile phones etc. - Have good manners
- Join in
- Respect each other's differences
- Treat all staff and volunteers with respect

Children shouldn't:

- pick on or make fun of each other
- Bully each other
- Yell or shout at others
- Be abusive
- Use equipment to be abusive or to cyber bully e.g.by using mobile phones to send nasty messages, taking and sharing photos without permission, sending nasty emails, or 'trolling' (leaving unkind comments on a webpage or social network profile)

## FIRE SAFTY

### 8.1 OVERVIEW

Babel Fish will take all necessary steps to prevent the outbreak of fire on its premises - so far as reasonably practicable - and will put in place measures to protect all employees, volunteers and visitors in the unlikely event of a fire. Babel Fish's Health & Safety Officer has overall responsibility for putting this Policy into effect, although Babel Fish's Directors and all employees, volunteers, children, as well as parents and carers who use its services and facilities have responsibilities for assisting in these aims too.

### 8.2 STEPS TAKEN

- Ensuring that all Babel Fish's employees and volunteers are provided with appropriate information and instruction regarding the fire prevention measures and the emergency procedures, including any instruction required in order for them to carry out their particular role.
- Keeping employees and volunteers informed of any changes that are made to Babel Fish's fire safety procedures and fire safety risk assessment.
- Ensuring that all children, parents/carers and visitors to Babel Fish's premises are briefed on the evacuation procedures.
- Ensuring that the premises have appropriate fire-fighting equipment, detectors, alarms and emergency lighting.
- Arranging for the testing and maintenance of fire safety, electrical and gas installations and equipment.

## AIRPORT TRANSFERS

### 9.1 OVERVIEW

We provide language courses to adults and children throughout the year/ We are frequently asked to provide advice and recommendation to all students and arrange transport solutions.

## 9.2 GROUPS

When the child is part of a group, the school is invariably asked to provide group transport, in the form of coaches for airport transfer and excursions, as well as public transport travel cards. We are willing to allow groups to organise their own transport solutions if the school is satisfied that the group leaders have organised satisfactory alternatives.

## 9.3 INDIVIDUALS

When the child is an individual, and unaccompanied, we help to organise private airport transfer and, where appropriate, provide public transport travel cards as part of the programme. We encourage parents to allow us to book the tickets, to avoid any misunderstandings or mistakes, and give clear instructions on what a student should do if they miss their bus, or something goes wrong.

## E-SAFETY

### 10.1 OVERVIEW

The purpose of Babel Fish's e-safety policy is to: Protect children and young people who make use of information technology (such as mobile phones, games consoles and the Internet) as part of their involvement with the organisation.

To provide Babel Fish's staff members and volunteers with the overarching principles that guide the organisation's approach to e-safety; To ensure that, as an organisation, Babel Fish operates in line with its values and within the law in terms of how information technology is used.

We recognise that the use of information technology is an essential part of everyone's lives; it is involved in how Babel Fish as an organisation promotes itself, and gathers and stores information; as well as how we all communicate with each other. It is also an intrinsic part of the experience of the children who visit Babel Fish - and is greatly beneficial to all. However, it can present challenges in terms of it is used responsibly and - if misused either by an adult, young person or a child - can be actually or potentially harmful to them.

### 10.2 BABEL FISH WILL SEEK TO PROMOTE E-SAFETY BY:

- Developing a range of procedures that provide clear and specific directions to Babel Fish staff members and volunteers on the appropriate use of ICT
- Supporting and encouraging the children attending Babel Fish to use the opportunities offered by mobile phone technology and the internet in a way that keeps themselves safe and shows respect for others
- Incorporating statements about safe and appropriate ICT use into the codes of conduct, both for staff members and volunteers, as well as for children
- Ensuring that images of children and families are used only after written permission has been obtained and then only for the purpose for which consent has been given
- Any social media tools used during Babel Fish's work with children and families will be risk assessed in advance by the member of Babel Fish staff or volunteer wishing to use them
- Providing effective management for Babel Fish staff and volunteers on ICT issues, through supervision, support and training
- Examining & risk assessing any emerging new technologies before they are used within the organisation

## RADICALISATION AND EXTREMISM

### 11.1 PREVENT

The Prevent Duty requires specified authorities to have due regard to the need to prevent people from being drawn into terrorism. The Prevent Duty is part of the Counterterrorism & Security Act 2015 and commenced with effect on 1<sup>st</sup> July 2015.

#### The Prevent Strategy is seeking to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat that is faced from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health.
- Under the Prevent Duty, all schools and childcare providers are considered specified authorities and therefore must have due regard to the need to prevent people being drawn into terrorism. - N.B: Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The definition of extremism for the purposes of Babel Fish's interpretation of its responsibilities under the Prevent Duty also includes calls for the death of members of our armed forces, whether in this country or overseas.

Babel Fish is committed to the protection and safeguarding of all children that utilise the services it offers. As such, Babel Fish will have due regard to the Prevent Duty and will take the steps outlined below as part of our commitment to child protection and safeguarding.

### 11.2 RISK ASSESSMENTS

Whilst Babel Fish realises that there is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology, as with managing our other safeguarding risks and responsibilities, we will be alert to changes in a child's behaviour which could indicate that they may be in need of help or protection.

Babel Fish accepts that children at risk of radicalisation may display different signs or seek to hide their views, we will use their professional judgement in identifying children who might be at risk of radicalisation and bring any concerns they have to Babel Fish's Designated Safeguarding Officer -who will ensure that any action taken is proportionate. Where it is felt that there is a concern regarding radicalisation, then our Designated Safeguarding Officer will make the referral to the **Channel Programme**. (The Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages).

### 11.3 BRITISH VALUES

British values will be integrated into the working practise of Babel Fish. These values are:

**Democracy:** Respect for democracy and support for participation in the democratic process

**The rule of law:** Respect for the basis on which the law is made and applies in England.

**Individual liberty:** Support and respect for the liberties of all within the law

**Mutual respect and tolerance of different faiths and beliefs:** Support for equality of opportunity for all and respect and tolerance of different faiths and religious and other beliefs.

Because of the diverse and international backgrounds that the children that access our services come from.

If a member of staff, volunteer or host family has a concern that a particular child is at risk of radicalisation, then in the first instance they should refer to Babel Fish's Designated Safeguarding Officer.

## SAFER RECRUITMENT

### 12.1 OVERVIEW

Babel Fish is committed to safer recruitment, and we are committed to keeping all the children within our care, and who interact with our services, safe. Babel Fish is committed to equality, valuing diversity and working inclusively across all its activities - and this applies also to the selection, recruitment and induction of new staff and volunteers. To this end, Babel Fish aims to have a workforce that reflects a variety of backgrounds and cultures and who can provide the relevant knowledge, abilities and skills that are required.

### 12.2 POLICY AND PROCEDURE

Our **Safer Recruitment policy and procedure** applies to any person responsible for the recruitment, selection and induction of employees, volunteers, activities providers and Host families at Babel Fish.

Our recruitment policy is founded upon the best person or the job principle. The purpose of this Safer Recruitment Policy is to ensure that Babel Fish :

- Recruits and selects the best possible people available to join and work with the business
- Takes all reasonable steps to prevent unsuitable people joining and working with the business
- Recruits, selects and manages all employees and volunteers in a way that complies with legislation designed to combat inequality and discrimination
- Does all it can to achieve and maintain a diverse workforce
- Has recruitment and selection processes that are consistent and transparent
- Assesses and judge's applicants as competent before an offer of employment/ becoming a host family is made.
- Inducts properly and fully all new staff and volunteers

**Babel Fish recognises that:**

- Those that work for and with the business are its greatest asset.
- Unsuitable individuals sometimes seek out opportunities via employment and volunteering to have contact with children to harm them
- Some groups face unfair discrimination in the workplace
- Children, as well as their families and carers, all benefit from the organisation's efforts to recruit and select a skilled and committed workforce, drawn from a diverse range of backgrounds
- Newly recruited employees and volunteers cannot possibly perform their roles effectively unless they are inducted properly and receive on-going support and supervision as appropriate.

### 12.3 Single central record

Babel Fish will ensure it meets its legal requirements for vetting staff, and volunteers, 3<sup>rd</sup> party service providers and host families who work with children and work in Regulated Activity. To this end, Babel Fish will ensure its safe recruitment processes are recorded on a Single Central Record - and which will include information on DBS checks. Babel Fish's Single Central Record is a comprehensive record on which the safe recruitment of all Babel Fish staff and volunteers (who work with children) will be recorded. The details collated on Babel Fish's Single Central Record will include the following information relating to the staff member or volunteer:

**Identity details:** Including full name, full address, date of birth, date employment/ volunteering commenced and ID verification details.

**Role details:** including job role, department and contract type.

**Safeguarding qualifications:** including copies of certificates and dates of safeguarding training.

**Vetting details:** Including dates of checks relating to DBS. We require at least one adult in host family to hold a current and in date DBS.

**Right to work details:** Including types of evidence used to complete the check.

**YD2 self-declarations:** Where these are required (whilst waiting for DBS), all staff, service providers and host families are required to complete if applicable.

**Referencing details:** including when references were requested and received and who checked them.

**Leaver details:** Including dates, exit interviews and whether references have been issued. Where a Babel Fish staff member or volunteer leaves the business - because of a safeguarding concern, complaint or allegation - the Single Central Record will record this event.

Babel Fish will always have taken advice in line with Babel Fish Child Protection Procedures in these circumstances prior to this happening. Babel Fish uses the Single Central Record to support its Safer Recruitment of Staff and Volunteers.