

# NCG Safeguarding Policy

## Care of Under 18s

<b>Version:</b>	December 2020
<b>Reviewed by:</b>	Peter Dean & Kerill Kennedy (Designated Leads)
<b>Implementation Date:</b>	January 2021
<b>Next Review Date:</b>	December 2021
<b>Policy Owner:</b>	Designated Leads

# 1) Policy Statement

NCG has a duty and responsibility to ensure that everyone that comes into the organisation is safe and that all staff are aware of methods to ensure a safe environment for colleagues and students alike; in particular children (referred to as **Under 18s**). All adults associated with under 18s have a responsibility to safeguard them. This policy outlines safeguarding responsibilities and actions to be taken in the event of a concern.

NCG will ensure that the service they provide:

- is accessible, well publicised, ensures confidentiality and is available in an environment that is sensitive to the needs of under 18s.
- takes account of the views of children, young people, and adult service users, in the decisions about and delivery of services.
- ensures that racial heritage, language, religious beliefs, sexuality, gender and disability is taken into account - for example by the use of interpreters or by making adjustments to enable access for disabled people.
- takes into account the service user's wishes and feelings and balances this against their rights and need to be safeguarded.
- considers if there are risks from any form of abuse, mental health problems or misusing drugs or alcohol.

To ensure the policy is up to date with current legislation, it will be reviewed annually by the Designated Leads. The Designated Leads will also make any necessary amendments in between official reviews. To ensure accurate and up to date records are maintained, all are monitored on a regular basis by the Designated Leads.

*For the purpose of this document and for rules and procedures in the school, there are two main classifications of non-adult students; under 18s (16-17) who are treated in some respects as adults and allowed to attend adult classes, and under 16s who cannot join adult classes and for whom restrictions are more stringent. Within the under 16s group they are further sub-classified into 14-15 year olds and 12-13 year olds.*

## Versions of this policy

This is the full safeguarding policy. There are also summary safeguarding information pages or presentations for the following groups:

- Homestay hosts
- Under 18 students
- Site visitors

## NCG Welfare & Safeguarding Teams

NCG has two UK colleges, one in Manchester and one in Liverpool. The following structure is applicable across the group and contact details of the key people can be found on the following page.

### NCG Welfare & Safeguarding Team Roles

**Designated Safeguarding Lead (DSL)** - The DSL has overall responsibility for safeguarding at the college. They are the lead person in making decisions, writing policies and enforcing procedures. They provide advice and support to students and colleagues.

**Deputy Safeguarding Lead** - The deputy lead stands in for the DSL when they are unavailable or if a concern relates to the DSL.

**Designated Safeguarding Officer (DSO)** - The DSO works with the Designated Lead in dealing with concerns and ensuring procedures are adhered to. They provide advice and support to students and colleagues.

**Welfare Officer** - The Welfare Officer provides front line support to students with welfare issues. Welfare issues can affect adults or students under the age of 18. The Welfare Officer also provides advice and support to colleagues.

## Key People:

NCG Manchester	
<b>Contact Details</b>	9 Portland St Manchester M1 3BE Tel: +44 (0)161 233 4290
<b>Designated Safeguarding Lead</b>	Peter Dean Extension 214 <a href="mailto:pdean@newcollegegroup.com">pdean@newcollegegroup.com</a>
<b>Safeguarding Officer &amp; Deputy Lead</b>	Riccardo Lanza Extension 252 <a href="mailto:rlanza@newcollegegroup.com">rlanza@newcollegegroup.com</a>
NCG Liverpool	
<b>Contact Details</b>	Graeme House Derby Square Liverpool L2 7ZH Tel: +44 (0)151 236 2749
<b>Designated Safeguarding Lead</b>	Kerill Kennedy Extension 3005 <a href="mailto:kkennedy@newcollegegroup.com">kkennedy@newcollegegroup.com</a>
<b>Deputy Lead</b>	Christine Flanagan Extension 3004 <a href="mailto:cflanagan@newcollegegroup.com">cflanagan@newcollegegroup.com</a>
<b>Safeguarding Officer</b>	James Jenkins Extension 3001 <a href="mailto:jjenkins@newcollegegroup.com">jjenkins@newcollegegroup.com</a>
<b>Welfare Officer</b>	Lucia Martin Extension 3007 <a href="mailto:lmartin@newcollegegroup.com">lmartin@newcollegegroup.com</a>

## Terminology

### ***The Difference between Safeguarding, Child Protection & Welfare***

The term Safeguarding refers to the policies and procedures put in place by the college to keep children safe and promote their wellbeing. Child Protection is a related term, but it refers to activity that is undertaken to protect specific children who are suffering or are likely to suffer significant harm. Welfare is a broader term which can involve supporting students with any social, financial or emotional problems and can be applied to adults and students under 18.

For the purpose of this document the following definitions apply:

**Safeguarding** means the active prevention and protection against the abuse of any person or persons under 18, who work or study at New College Group.

**Abuse** means a violation of an individual's human and civil rights by another person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a child is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Within this context abuse can take the form of:

- **Physical abuse:** including hitting, pushing, kicking, and misuse of restraint or inappropriate sanctions.
- **Sexual abuse:** including sexual assault, rape, inappropriate touching, the taking of sexual images/videos, or any other acts to which a child did not, or could not consent to.
- **Psychological abuse:** including emotional abuse, bullying, threats, deprivation of contact, humiliation, intimidation, coercion, verbal abuse.
- **Financial or material abuse:** including theft, blackmail, fraud or damage to property.
- **Neglect or acts of omission:** including ignoring medical or physical care needs, inadequate nutrition and failure to provide appropriate health, social or educational services.
- **Discriminatory abuse:** including racism, sexism and other forms of harassment.
- **E-abuse:** any abuse conducted via the internet, or other e-technologies. (See E-Safety Policy)
- **Being radicalised:** being vulnerable to or at risk from indoctrination by radical or extremist groups. (See the Prevent Policy)

## 2) Code of Conduct

All staff are responsible for safeguarding students under the age of 18 whilst they are on NCG premises or off-premises with students on an organised trip or conducting an NCG activity. NCG has a duty of care to safeguard under 18 students at all times whilst they are studying with NCG and it is the safeguarding team's responsibility to oversee out of care. This code of conduct aims to build trust between under 18s and adults to promote a safe culture in the college. Adults are expected to be excellent role models for under 18s by dressing and behaving appropriately, using appropriate language and challenging inappropriate behaviour. Adults in the college are in a position of trust, so under the Sexual Offences Act of 2003 any sexual activity with a student under the age of 18 is against the law.

### Appropriate Staff & Student Relationships

Staff should bear in mind that many students may form personal attachments to them, due to various reasons; for example, feeling lonely or homesick. These attachments are understandable, however, students may misinterpret attention outside of working hours or sharing personal contact details as being more than just a professional relationship so it should be avoided. Staff must adhere to the following in terms of their interaction with students.

- Staff should not socialise with students outside of working hours, unless they are leading a social activity organised by the college.
- Physical contact between adults and under 18s is not acceptable and should be avoided.
- No personal emails or telephone numbers of staff should be shared with students; if a student requests this, then work contact details should be given. During Social Activities/Trips the college's emergency telephone number is given to all students in case of an emergency.
- Requests from students for a member of staff to befriend them on Facebook, or any other social media site, should be politely refused and the student directed to the college's Facebook page. As we are a predominantly adult college, if an adult student requests this, then it should be discussed with the member of staff's Line Manager to deem if it is appropriate or not.

It may be difficult at times to refuse a student, but it should be clearly explained that this is college policy.

### Safety on the Premises

For staff to be aware and keep track of students who are under 18, the following measures are in place.

- **ID Badges:** All staff and students must wear their ID badge at all times. There are different coloured lanyards for staff (yellow), students over 18 (purple) and students under 18 (pink); so minors may be easily identified.
- **A Minors' List:** This is updated weekly following the intake of new students and is kept at reception. It includes; name, age, address in the UK, contact details, classes & teachers & next of kin details.
- **Registers:** the age of each student is available for teachers to see in our online attendance system; if a teacher notes that a student who is under 18 is absent, they must leave the class and report it to reception as soon as is practically possible. A member of the operations team will call the student to ensure they are safe and well.
- **Sign In Sheet:** Students under the age of 18 are required to sign in at reception each day. If an U18 student has not signed in and is not in class, the student will be contacted to ensure they are safe.
- **Visitors:** all visitors must sign in and out of the college, be accompanied by a member of staff and wear a red visitor's pass.
- **External Speakers or Trainers:** The content of the speech or training is subject to a risk assessment. They are also given a copy of the staff code of conduct which they must sign prior to the event.

## Presenting an Appropriate Image

Adults must present themselves appropriately as they are role models for our under 18 students.

- Staff should wear business casual clothing in the college to maintain a professional appearance. More casual clothes are acceptable on trips but clothes should not have holes or stains, clothing should be modest and not revealing and any tattoos should be covered.
- Staff should be on time to classes, activities and other school events.
- Staff should use appropriate language and challenge inappropriate behaviour.

## Alcohol, Drugs and Smoking

Adults must be positive role models and their behaviour is likely to be closely observed regarding these areas by students under 18.

- Alcohol is strictly prohibited on all NCG premises. Adults should always ensure that under 18s know that they need to be 18 years old to drink alcohol in the UK.
- Drugs are strictly prohibited. Adults should educate under 18s on the dangers of drugs and not make light of them.
- Staff should avoid smoking where under 18s are present.

## **Internet Safety**

NCG has a duty and responsibility to ensure that everyone that comes into the organisation is safe and that staff are all aware of methods to ensure a safe environment for colleagues and students alike, in particular children and vulnerable adults. As the use of technology is part of daily life, it is important that both staff and students have an awareness of using this safely, both inside and outside the college environment. If a student is concerned about bullying or other online behaviour, they should speak to a member of the safeguarding and welfare team.

## **Accommodation**

A simplified version of this policy is available for host families. The following guidance should be observed in both homestay and residential accommodation.

- Bathrooms are a private space and only one person should be in the room at one time. There should be a bolt on the inside of the door for privacy. Curtains or blinds should be fitted on windows.
- Bedrooms are also a private space. It is acceptable for adults to knock and if no response enter if they are concerned about the student's welfare. Students should feel that the bedroom is their own space where they can relax.
- Curfew for 16-17 years is 10pm. Curfew for under 16s in homestay is 8pm. If a student is out past curfew, the responsible adult (usually a homestay host) must try and contact the student immediately to check on their wellbeing. The adult should contact a member of the safeguarding team on the emergency phone if they cannot contact the student within 15 minutes or they are concerned about their welfare.
- Any student who wishes to travel overnight must complete an U18's Overnight Travel Authorisation Form which they can pick up from college reception. They can only travel if approved by NCG.

## **Transportation**

Any suppliers contracted for services to transport students under the age of 18 must demonstrate that they have a safeguarding policy in place with safer recruitment procedures.

## **Whistleblowing**

All staff have a duty of care to safeguard our students under the age of 18. Staff have a legal obligation to report any colleagues breaking the code of conduct. They should report any concerns to the Designated



Safeguarding Lead (DSL), or to the Deputy Safeguarding Lead if the concern relates to the DSL or the DSL is not available.

### 3) **Child Protection**

NCG has a duty of care for all students under the age of 18 studying at the college. All adults have a responsibility to report any concerns they have to a member of the safeguarding team. At least one of the key people is available at all times, 24/7.

#### **Signs of Abuse**

Staff should be aware that the following could be signs that a child is at risk of, or is being abused and they should report these immediately to the Safeguarding Team. As the signs may apply to different forms of abuse, they have not been related to any particular type, but noticing any should be immediate cause for concern. The list is not exhaustive, and if any staff have concerns, they should follow the reporting procedures.

#### **Physical Signs**

- Frequent physical injuries such as, bruising, fractures, burns, cuts
- Weight loss or weight gain: changes in appetite
- Poor personal hygiene
- Changes in style of dress or appearance

#### **Psychological & Behavioural Signs**

- Sudden changes in behaviour or personality: becoming withdrawn, anxious, depressed, extroverted, sexually inappropriate or aggressive
- Avoiding contact with others, especially members of the opposite sex
- Signs of alcohol or drug misuse
- Sudden poor attendance or participation in lessons
- Being unusually tired or frequently sick
- Not wanting to return home
- Expressing extreme views or opinions

#### **Specific Areas**

In addition to the types of abuse mentioned above, four other specific types of abuse that staff must be aware of are Child Sexual Exploitation (CSE) and Female Genital Mutilation (FGM), Peer-on-Peer Abuse

(which includes bullying, cyberbullying, sexual violence and sexual harassment), and Honour-based Violence (HBV).

### **Child Sexual Exploitation**

This is a form of sexual abuse where under-18s are exploited to engage in sexual activity in return for money, gifts, drugs, affection or status. CSE does not always involve physical contact as it can happen online or involve pressure from peers or cyber bullying.

*Signs to look for in under-18s include:*

- Having a much older boyfriend / girlfriend
- Appearing with unexplained gifts or new possessions
- Associating with others involved in exploitation
- Misusing drugs or alcohol
- Being absent from school, going missing or regularly returning late.

### **Female Genital Mutilation (FGM)**

This is a practice that can cause severe and long-lasting damage to physical and mental health. It is carried out for religious, social or cultural reasons, however there are no medical reasons for carrying it out. It is a criminal offence if done in the UK. Staff should be aware that a person who has suffered FGM may ask for help without being explicit about the problem due to embarrassment or fear. Any causes for concern are to be reported to the DSL. Any suspected case of FGM must be reported to the police.

### **Peer-on-Peer Abuse**

It should be remembered that abuse does not only come from adults, but can come from other children. Peer-on-peer abuse can include bullying (including cyberbullying), sexual violence and sexual harassment.

### ***Cyber-bullying***

Cyberbullying is bullying that takes place over digital devices such as mobile phones, computers, and tablets. It can occur through text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour.

The most common places where cyberbullying occurs are:

- Social Media, such as Facebook, Instagram, Snapchat, and Twitter
- SMS (Short Message Service) also known as Text Message sent through devices
- Instant Message (via devices, email provider services, apps, and social media messaging features)
- Email

*Signs to look out for in under-18s include:*

- Appearing nervous when receiving a text, instant message or email;
- Unwillingness to share information about online activity;
- Unexplained anger or depression, especially after going online;
- Abruptly shutting off or walking away from a computer or mobile device mid-use.

### ***Sexual violence and sexual harassment***

Sexual violence is defined as any sexual act or attempt to obtain a sexual act by violence or coercion, acts to traffic a person or acts directed against a person's sexuality, regardless of the relationship to the victim. Sexual harassment is unwanted conduct of a sexual nature that can occur online and offline. It can include, but is not limited to:

- sexual comments, such as: telling stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, inappropriate touching, interfering with someone’s clothes, upskirting and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including on social media; and
- sexual exploitation; coercion and threats.

Some people might try to excuse mild transgressions as a “joke” or “teenage fun”. However, all forms of sexual violence are unacceptable. It should also be noted that both perpetrators and victims can be either male or female.

## **Honour Based Violence (HBV)**

This is coercion or violence used against a person in the belief that family or tribal honour requires action. A person can be seriously injured or even killed in extreme cases. Signs to look out for include:

- The student being withdrawn, anxious or frightened.
- A decline in behaviour or performance.
- A family member keeping a close eye on the student.

## **Raising a Concern**

Should any person within the organisation suspect that a welfare or safeguarding issue has arisen, they must inform one of the Safeguarding Team as close to the event as possible, and no later than 24 hours after they first become concerned.

Following any reported concern, the officer informed should immediately pass on these concerns to their counterparts so that a decision can be made as to what action should be taken. In the case of a serious concern being raised, immediate risk of harm, or an allegation of abuse by a staff member or a fellow student, the LADO (Local Authority Designated Lead) and/or Police must be informed immediately. Only the Designated Lead, (or deputy in their absence), will make an external referral.

## **Handling a Disclosure of Abuse & Ensuring Confidentiality**

If you are approached by a student wanting to talk you should:

- Always listen positively and reassure them. If you can, try and ensure a degree of privacy, but this may not always be possible.
- Do not show revulsion or distress, however distasteful the events are.
- Stay calm and controlled.
- Let the student know at once that it was not his/her fault and keep restating this.
- Reassure the student that you still care for them and that what they have said does not make you care less.
- Do not make false promises, i.e. that you will keep the abuse a secret or that the police will not be involved. Do not promise confidentiality.
- Make them aware that disclosure will be reported to only those that need to know and can help.
- Do not question the student; try to limit your involvement to listening. A child can be interviewed only once.

It is imperative that what is said, is documented as accurately as possible, and that leading questions are not used as these may render the documentation inadmissible should legal action be taken. By leading questions, we mean direct questions that are asking if someone did something specific.

For example:

*Did X touch you here?*

*Did you feel upset?*

Instead, ask open questions like:

*Can you tell me what happened?*

*How did this make you feel?*

This allows the person to tell things in their own words, without being led by another person's assumptions about what happened or might have happened. This should be documented using, as closely as possible, the words of the young person or vulnerable adult. This must be documented on a *Welfare/Safeguarding Record of Concern Form*; available on the N-Drive in Shared Documents folder then going to Forms/Compliance/Safeguarding. The completed form should be emailed to the Designated Lead and will be stored on the N-Drive in the Safeguarding Folder and filed in a separate folder named with the student ID: this is only accessible to the Safeguarding Team.

### **Investigating a Concern**

Once it has been established that there is a safeguarding or welfare issue, the following actions should be taken. The persons involved should be contacted, and if necessary removed from an unsafe situation immediately. A meeting between the student concerned and one of the Safeguarding & Welfare Team should take place within 24 hours of it being reported. The student's parents will be contacted by a member of the team to inform them of the situation.

### **Support Following a Concern**

Once it has been established that there is a safeguarding or welfare issue, the following actions should be taken. The student and their family should be offered immediate and then regular support by a member of the team. If the support required is outside the college's remit, support from external agencies will be sought. The officer involved will act as a point of contact for the student, their family and any outside support agencies that the student has been referred to.

## **Handling Allegations against Staff & Students**

Any staff who have concerns about a colleague, or a student, being a perpetrator of abuse must report them to the Designated Lead. The reporting member of staff will be protected as a whistle blower and should not feel concerned about making an allegation. Confidentiality must be maintained at all times. Any breach of this could result in disciplinary action.

### **Initial Response**

In cases where a member of staff or another student has been accused of some form of abuse, the utmost should be done to keep this allegation confidential until it has been fully investigated. Upon receipt of a *Record of Concern Form*, naming a staff member or a student as a possible abuser, the Designated Lead will contact the LADO immediately. Two possible courses of action may be taken following consultation with the LADO, and in line with their recommendations.

1. The member of staff, or student, will be removed from the college until an investigation has been completed. In the case of staff, this will be done in accordance with the College's Disciplinary Procedures (See Staff Handbook).
2. The member of staff, or student, will be allowed to remain at the college, but restrictions will be put in place. For example, a student will be placed in another class, where possible at a different time of day. They will have no contact with the alleged victim and must be supervised during all breaks. The staff member will not engage in any duties that could put them in contact with the alleged victim, their working hours arranged so as to minimise any casual encounter, and possibly work under supervision.

### **During an Investigation**

Whilst an investigation is being carried out, support will be offered to any person against whom an allegation has been made. If the allegation is against a student, they will be supported internally by a member of the Safeguarding Team, and external support will be signposted. Where a staff member has been accused, they will be referred to the HR Coordinator, who will arrange for them to receive support.

### **Following an Investigation**

If the allegation is proved to be true, the member of staff or student will be removed permanently from the college. In the case of a visa student their embassy and UKVI will be informed of the offence immediately. In the case of a staff member, the DBS will be informed, as per the law.

If the allegations are proved to be unfounded, this will be clearly documented on the records. All records will be kept, as per Government recommendations, in a password protected folder.

Summaries of the Safeguarding procedures can be seen on the following pages. All procedures are in line with those recommended by:

Manchester Safeguarding Partnership (<https://www.manchestersafeguardingpartnership.co.uk/>)

Liverpool Safeguarding Children Partnership (<https://liverpoolscb.org.uk/scp>)



## 4) Training

All staff must complete basic safeguarding training (level 1). This can be NCG developed safeguarding training online or by qualified staff face to face. Alternatively, online training developed by the British Council is available. The British Council training can be found here:

<https://accreditation-uk.english.britishcouncil.org/>

It is the responsibility of the HR Coordinator to ensure that level 1 training is completed by all staff.

It is recommended that our homestay hosts also complete safeguarding training, which is the responsibility of the accommodation team.

All staff involved in accommodation or student welfare need to complete an advanced safeguarding course (level 2) within six months of starting with NCG. Advanced safeguarding training must be renewed every two years.

At least two staff in each centre must be trained to be the safeguarding lead (level 3). They should be in leadership positions and able to make decisions if an incident occurs. Advanced Training for Designated Lead must be renewed every two years.

## 5) Safer Recruitment

NCG operates rigorous recruitment practices across all departments with the aim that all its employees are safe to work with under 18s. Our recruitment practices can be found in the Safer Recruitment Policy, and information pertaining to all staff can be found on the Single Central Register; which is maintained by the Human Resources Coordinator. We also have a DBS policy and a Recruitment of Ex-offenders policy.

All job advertisements state the school's commitment to safeguarding and the promotion of student welfare for under 18s. All stakeholders are expected to share this commitment. It is made clear that a DBS check will be carried out, there should be no gaps in work or educational history that cannot be explained, and that references will be checked.

### **Applicants informed**

All applicants are informed before their interview that we will follow up references, we require a DBS disclosure or overseas police check, all gaps in work or educational history must be accounted for, and proof of identity and qualifications will be required.

### **Applicants awaiting DBS**

In cases where a DBS check or police check has not been returned before the applicant commences certain procedures must be put into place. When the applicant is a teacher there are several measures in place to allow the teacher to start work: the DoS monitors the room where the teacher is working at least once each lesson, the teacher is required to teach with the door open, he or she should not be alone with one or two students at any time, he or she cannot teach 1:1 or 2:1 classes to students under 18 years old.

Staff members for all positions may be able to work but cannot supervise students under 18 years old without the presence of a DBS-checked staff member until such time that the DBS is available.

## 6) Welfare / Implementing Safeguarding

This section of the policy details the way NCG colleges look after students under 18 and the measures in place to ensure their safety and wellbeing.

### **Pre-Arrival Information & Documentation**

The care of our students begins prior to their arrival in the UK and consists of providing them and their parents/guardians with a Student Handbook containing the following:

- Contact details for staff including the 24 hour emergency phone number
- Information about what to expect during their stay, both on and off campus.
- Details of their accommodation.
- A summary of safeguarding at NCG.
- Parental Agreement Forms which allow parents/guardians to stipulate what their child/children are or aren't allowed to do.
- Arrival information (See below for procedures).
- Information we require, such as mobile number, medical problems or dietary requirements.
- Other information about the site they are attending.

### **Arrival**

Unless it has been previously agreed and expressly confirmed between the student's guardian and New College Group, all students will be met at the airport by a DBS checked coach/taxi driver or member of NCG staff at the Information Desk. The driver will have a sign with the group/student's name clearly stated on it. After being collected by the driver, the students are then driven to their accommodation.

### **First Day Procedures**

Students will have an induction by a member of the NCG team, which includes information about what they need to do while they are at the college, how to keep themselves safe both on and off campus, and where they can get support during their stay. They will also be given a Student Handbook, which includes the information provided in the induction and a section on staying safe and appropriate behaviour. They will be given an identity card which has the 24 hour emergency number printed on it.

## Risk Assessments

Risk assessments are used to assess risk for specific activities or locations. They are used to set out preventative measures, minimising risk and promoting safety.

- All NCG activities must have a risk assessment in place and it must have been read by the activity leader. Where a generic risk assessment is used, such as a “museum visit”, the risk assessment should be checked for any additions that should be added for the specific venue.
- Any buildings that will be used by under 18s, such as a residential block, should have safeguarding risk assessment in place. All staff who use the building should read the risk assessment.
- All NCG premises must have a health & safety risk assessment in place.

## Supervision Ratios

In residential accommodation, there will be at least 1 adult for every 15 students if there are under 16s staying there. If there are only 16-17 year olds staying there, the supervision ratio is 1:20. There should always be a minimum of two adults.

## Supervision on Trips & Activities

In order to balance the minimising of risk, while ensuring that students get the full benefit of being in the UK, some under 18s will be allowed unsupervised time on activities and trips depending on the results of the risk assessment and their age. The risk assessment will decide which category of risk the trip falls under:

**Class A-** The location is deemed very risky such as a visit to a major metropolitan area such as London. For class A all under 18s must be supervised throughout.

**Class B-** The location is deemed of moderate risk such as a small town/city with little pedestrian traffic, low crime and/or with which students and staff are already familiar. For class B, 16-17 year olds can be unsupervised for up to 1 hour. Younger students must be supervised throughout.

**Class C-** The location is deemed of low risk. For example, inside a museum where there is only one normal entrance/exit and CCTV throughout the building. For class C, 16-17 year olds can be unsupervised for up to 1.5 hours and 14-15 year olds can be unsupervised for up to 30 minutes. Students of 12-13 years of age, (or younger if this ever becomes applicable), can never be left unsupervised.

If a trip/activity includes a location that falls under a lower level of risk (for example they visit a museum in London) then they may be unsupervised for their time at this location for the requisite length of time. In any unsupervised time, students will be told to stay in pairs or small groups.

## Missing Students

The following procedures should be followed if a student is missing.

Scenario	Action
Student is missing from class	If 20 minutes after the start of class an under 18 student is not present, staff should call the student to enquire about their welfare. If they cannot be contacted, staff should go to their residence room or call their host family. These actions should be repeated until staff have spoken to the student. If the student has still not been contacted by 4pm, they should be reported missing to the police.
Student is missing on activity	Activity leader should try to contact the student by phone. After repeated attempts for 20 minutes, they should inform the member of staff with the emergency phone. If the student still cannot be contacted after 1 hour, they should be reported missing to the police.
Student does not return for curfew	Host or residence staff should attempt to contact the student. If they cannot be contacted after 30 minutes, they should inform the member of staff on the emergency phone. If the student still cannot be contacted after 1 hour, they should be reported missing to the police.

## Other Provisions

The following policies outline other systems that may be relevant to safeguarding under 18s as well as other students:

- Welfare Policy
- First Aid Policy
- Student Handbook (for behaviour and discipline)
- Fire Safety Policy
- E-Safety Policy
- Prevent Policy