



MAYFLOWER COLLEGE

Mayflower College Safeguarding Policy

Safeguarding Contacts at Mayflower College

Telephone: 01752 673784 (office hours), Mobile (call, text or leave a message) 07889 420601

Mayflower College – Paul Stevens (Director and Legal Owner) paul@maycoll.co.uk

Designated Safeguarding Lead (DSL) – Jill Tyler (General Manager) jill@maycoll.co.uk
Junior Welfare Officer – Naomi Cousans (Student Services Officers) naomi@maycoll.co.uk

Safeguarding Contacts at Plymouth City Council

Plymouth City Council Safeguarding 01752 668000 Out of Hours Service 01752 346984

Plymouth City Council Safeguarding Local Authority Designated Officer

Plymouth 01752 306430 or email LADO@plymouth.gov.uk

Simon White 01752 307144 simon.white@plymouth.gcsx.gov.uk

Plymouth Children's service (multi-agency hub)

01752 305200 mutli-agencyhub@plymouth.gov.uk

Devon and Cornwall Police – Central Safeguarding Team

101 (or call 999 if a child is in immediate danger)

Police Local Safeguarding Team 01752 487590

SECTION 1 Mayflower College Safeguarding Policy

Introduction

Purpose of the Safeguarding & Child Protection Policy

Safeguarding definitions

Child protection

Safeguarding

Children

Vulnerable Adults

Responsibility for safeguarding

Responsibility for reporting and sharing concerns

Incidents/concerns that must be reported

Whistleblowing

How to recognise signs of abuse

Sexual abuse/Emotional abuse/Physical abuse/Neglect

Dealing with a disclosure of abuse from a child (Listen-Feedback-Respond-Refer)

Reporting abuse

What happens once it's been reported

Role of the Mayflower College Designated Safeguarding Person (and Lead Person)

Confidentiality & sharing information

Procedures to follow if abuse is suspected by a child (for example another pupil)

Procedures to follow if abuse is suspected by an adult (for example: staff or homestay providers, a member of the general public or someone in the student's home country)

Prevent Strategy and Channel Programme – safeguarding against terrorism

SECTION 2 Mayflower College Safeguarding Policy (on and off site activities)

Context

Mayflower College: providing a safe and secure environment

Airport transfers provided to/from Mayflower College & off-site activities excursions

Supervision on & off-site

Curfews for under 18s

Attendance & Absence Policy

Risk Assessments

Behaviour & Discipline (Mayflower College Policies)

E-safety policy & agreement

Following a Safer Recruitment Policy for Mayflower's office, teaching and cleaning staff

Guidance for staff with respect to under 18's

Following a Safer Recruitment Policy for international group leaders

Following a Safer Recruitment Policy for Homestays

Staff/Homestay Training

Student safety & responsibilities

General Codes of conduct for students, staff, homestays, contractors, group leaders, agents etc

SECTION 3 Mayflower College Homestay Safeguarding Policy

Context

Under 18's - parental consent and emergency contact information

Homestay provider responsibilities

Private fostering

Homestay provider recruitment & training

SECTION 4 Mayflower College Safeguarding Incident Report Form

Context

Copy of Mayflower College Safeguarding Incident Report Form

SECTION 1 Mayflower College Safeguarding Policy

Mayflower College Safeguarding Policy

Introduction

All students, regardless of their age, culture, disability, gender, language, religious belief or sexual identity have the right to protection from abuse. We seek to maintain a safe and supportive environment and ensure that all staff, students, group leaders, agents and homestays working with Mayflower College accept and recognise their responsibilities with regard to safeguarding.

Mayflower College accepts junior students under 18 years throughout the year to study and stay with local homestay providers and participate in activities/excursions. We are committed to providing a safe and stimulating study environment, taking care to ensure that students under 18 years of age are adequately protected.

The purpose of the Mayflower Safeguarding & Child Protection Policy is:

- To provide appropriate advice and protection for young people and adults attending Mayflower College.
- To provide staff, homestays, parents, group leaders and agents with advice and guidance on procedures of best practice around safeguarding.
- To provide staff and homestays with guidance on how to respond if they suspect a young person or vulnerable adult may be experiencing, or be at risk of harm.
- To ensure staff and homestays know how to respond appropriately to any allegations of abuse.

This policy applies to all teaching, administrative staff and homestays employed by Mayflower College. All of us have a duty of care and responsibility to protect children from harm and ensure that we share any safeguarding concerns with relevant professionals and agencies (as well as reporting abuse and any allegations). A separate Bullying and Harassment policy is in place and other related policies are available to view online at <http://www.maycoll.co.uk/policies.htm>

Mayflower College is accredited by the British Council (Accreditation UK). We work together with other agencies (Plymouth Children's Social Care, Plymouth Safeguarding Board and Plymouth City Council) to ensure effective Safeguarding & Child protection. This policy has been developed in accordance with the principles of the Children's Act 2004, the Education Act 2011 and the Government publication 'Keeping children safe in education' (last updated September 2018, due for review November 2019).

Government publications, local guidance and procedures have also been considered, including:-

'Keeping children safe in education' statutory guidance (September 2022)

Keeping children safe in education' Information for all school and college staff (2022)

Regulated activity in relation to children: scope

'Working Together to Safeguard Children'

'What To Do If You Are Worried A Child Is Being Abused' (March 2015)

Devon Children and families partnership

Plymouth Local Safeguarding Children Board

Safeguarding definitions

Safeguarding is an 'umbrella term' for protecting children and vulnerable adults and includes:

- protecting children/vulnerable adults from maltreatment
- preventing impairment of children's/vulnerable adults health or development
- ensuring that children/vulnerable adults are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children/vulnerable adults have the best outcomes.

Child protection

Child protection is a part of safeguarding, but refers to the activities to protect specific children who are suffering, or are likely to suffer, significant harm.

Children

The Children's Act 2004 defines a child as "a person under the age of 18".

Vulnerable Adults

Vulnerable Adults are persons over 18 years who are considered in need of special care, support or attention. Mayflower College considers that foreign language students of any age are vulnerable, as their understanding of situations may be affected by their language level and/or cultural references.

Responsibility for safeguarding

Everyone who works with children and vulnerable adults (for example: administration staff, teachers, homestays, police, accident and emergency staff, pediatricians, voluntary and community workers and social workers etc) has a responsibility for keeping them safe and promoting their welfare i.e. "safeguarding".

The Teaching Standards state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. Staff members and homestays are also advised to maintain an attitude of 'it could happen here' in respect of safeguarding and child protection.

Responsibility for reporting and sharing concerns

All adults have a responsibility to report all incidents and concerns of a safeguarding nature to Mayflower College's safeguarding officers:

Designated Safeguarding Lead (DSL) – Jill Tyler (General Manager) email: jill@maycoll.co.uk

Designated Safeguarding Person (DSP) – Steve Voysey (Director of Studies) email: steve@maycoll.co.uk

Junior Welfare Officer – Naomi Cousans (Student Services Officers) email: naomi@maycoll.co.uk

Mayflower College (office hours) 01752 673784

Mayflower College emergency mobile (out of office hours, for emergencies only) is 07889 420 601

Incidents/concerns that must be reported:

- If a student is involved in an accident
- If you accidentally hurt a student
- If a student seems distressed in anyway or you have concerns for their safety or welfare
- If a student has misinterpreted something you have said or done
- If a student shows sexually motivated behaviour in your presence
- If a student makes a disclosure of abuse

No single professional can have a full picture of a child's needs and circumstances and, if children are to receive the right help at the right time, *everyone* who comes into contact with them has a role to play in identifying concerns, reporting and sharing information and taking prompt action.

In order for organisations and professionals to collaborate effectively, it is vital that every individual working with children and families is aware of the role they have to play and the role of other professionals in safeguarding children.

Whistleblowing

If you are not satisfied with how Mayflower College is dealing with a report, allegation, incident or concern, then you should contact the NSPCC Whistleblowing Advice Line 0800 028 0285. As a whistle blower you are protected by law.

How to recognise signs of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or even by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website <https://www.tes.co.uk/> and also on its own website www.nspcc.org.uk Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website: <https://www.gov.uk/schools-colleges-childrens-services/safeguarding-children> Keeping children safe in education' Information for all school and college staff (September 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741314/Keeping_Children_Safe_in_Education_3_September_2018_14.09.18.pdf contains links and references to specific safeguarding issues such as: child sexual exploitation, bullying (including cyber bullying), domestic violence, drugs, fabricated illness, faith abuse, female genital mutilation, forced marriage, gangs, gender based violence, mental health, private fostering, radicalisation, sexting, teenage relationship abuse and trafficking.

Some signs of abuse vary with age of children. Not every child will exhibit every symptom. As well as signs, children may tell you of abuse. Always listen and take them seriously.

Sexual abuse

Acting in an inappropriate sexual way with objects or peers
Nightmares, sleeping problems
Becoming withdrawn or clingy
Personality changes, seeming insecure
Unaccountable fear/dread of particular places or people
Changes in eating habits
Physical signs such as unexplained soreness around genitals, sexually transmitted diseases, bedwetting
Becoming secretive
FGM – Female Genital Mutilation <https://www.nhs.uk/conditions/female-genital-mutilation-fgm/>

Emotional abuse

Delayed physical or emotional development
Shows extremes of passivity or aggression
Sudden speech disorders
Overreaction to mistakes, or continual self-depreciation
Neurotic behaviour (rocking, hair twisting, self-mutilation)

Physical abuse

Has unexplained injuries, bruises, burns, etc.
Wearing clothes to cover injuries, even in hot weather.
Refusal to undress for sports, or join swimming sessions.

Neglect

Often hungry; may beg or steal food.
Badly dressed in clothes that need washing
Poor appearance and personal hygiene; unwashed, hair not brushed
Lacks needed medical or dental care
Often tired
May abuse alcohol or other drugs

Dealing with a disclosure of abuse from a child

LISTEN

- Take disclosures of abuse or harm seriously.
- Remain calm, accessible and receptive, listen carefully without interrupting.
- Listen to what is being said without displaying shock, disbelief or judgement.

FEEDBACK

- Communicate with the student in a way that is appropriate to their age, understanding and preference.
- Acknowledge their courage and reassure them that they are right to tell.
- Make it clear that you are taking them seriously.
- Tell the child that you may need to tell some people, whose job it is to help them and protect children.

RESPOND

- Reassure them that they should not feel guilty, let them know that you are going to do everything you can to help them and what may happen as a result.
- Do not investigate, interrogate or try to decide if the child is telling the truth.
- Don't promise confidentiality or to keep information a secret – be honest and tell them it is your duty to report the concerns to safeguarding professionals.

REFER

- It is important to remember that the person who first encounters or listens to a case of alleged abuse is not responsible for deciding whether or not it has occurred. That is the task for professional child protection and safeguarding agencies.
- Make some brief notes and write them up in detail as soon as possible – use the same language as the child/vulnerable adults use (rather than your own interpretation).
- Do not destroy your notes in case they are later required by a court of law.
- Record statements and observable things (not your interpretations or assumptions) – keep it factual.
- Refer your concerns immediately and report the abuse to the appropriate agencies (see below).

Reporting abuse

Call **999** if the child is in real danger now.

If you're worried about a child or young person or think they're being abused, even if you're unsure, call Plymouth City Council Safeguarding **01752 668000** or email gateway@plymouth.gov.uk or outside of normal working hours call Plymouth City Council Safeguarding Out of Hours Service on **01752 346984**.

If at any point, there is a risk of serious harm to a child, a referral should be made to children's social care immediately. Visit the Plymouth City Council website for information at <http://www.plymouth.gov.uk/homepage/socialcareandhealth/childrensocialcare/localsafeguardingchildrenboard/pscbchildabuse.htm>

When you get in touch with Plymouth City Council Safeguarding they will ask some questions such as:

- the child's name and date of birth
- the address and contact details for the child's parent or carer
- why you think the child is at risk or is being abused

What happens once it's been reported?

All agencies involved with the child, such as the police or the child's school, will work out together what support is needed to keep them safe. Everyone involved will work hard with the family to keep the child at home, but if it's not safe for them to stay with their family then in some cases a child can be taken in to care to keep them safe.

Role of the Mayflower College Designated Lead and Safeguarding Person

DS(L)P's are the first point of contact for Mayflower College on issues of Safeguarding and Child Protection for staff, students and homestays as well as liaising with other agencies and professionals, their role is to:

- Attend appropriate safeguarding training and promote best safeguarding practice.
- Ensure relevant information around Safeguarding & Child Protection is communicated to Mayflower College staff, students, parents (and agents/group leaders) and homestay providers.
- Ensure that when on leave or absent from work for any significant period, the role of DSP's is suitably covered by the DSLP's or another member of staff.
- Securely store records of any concerns.
- Represent and provide links with statutory agencies (i.e. Safeguarding agencies, Children's Social Care or Police) during and following formal investigations.
- Review and update the Safeguarding & Child Protection Policy annually.

Confidentiality & sharing information

Mayflower College endeavours to uphold the confidentiality of students, parents/guardians, staff and homestays. This is achieved by storing confidential information in a locked filing system at the company registered office. Information about students, staff and homestays is shared on a professional 'need to know' basis. General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to information sharing, but provide a framework to ensure that personal information is shared appropriately. Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.

The Mayflower College will pass homestay providers name, address and contact telephone numbers to the students, parents, group leaders, other homestays in the group and agents (travel and educational agents are sometimes used by students as intermediaries to organise their stay in the UK).

We produce a "homestay grid" listing all the hosts for a particular group of students (name, address and contact telephone numbers), this also includes the students names, ages and any special dietary requirements/allergies and includes the name and local address of the group leader (adults) responsible for them.

This personal information is exchanged for safeguarding reasons - so that students, parents, group leaders, other homestays in the group and agents can make contact with one another in the normal day to day duty of care and have sufficient information in the event of an emergency situation.

Procedures to follow if abuse is suspected by a child (for example by another pupil at Mayflower or someone in the student's home country)

- Ensure all children are safe, supported and reassured.
- Inform the DS(L)P at Mayflower College immediately. The DS(L)P will take appropriate action, which may involve external agencies and contacting parents/guardians.

Designated Safeguarding Lead (DSL) – Jill Tyler (General Manager) jill@maycoll.co.uk

Designated Safeguarding Person (DSP) – Steve Voysey (Director of Studies) email: steve@maycoll.co.uk

Mayflower College 01752 673784 (office hours), Mobile (emergencies) 07889 420601

- Ensure a clear written record has been made, using the Safeguarding Incident Report Form.
- DS(L)P to notify the Designated Officer at Plymouth City Council (formerly LADO - Local Authority Designated Officer).

Call **999** if the child is in real danger now.

If you're worried about a child or young person or think they're being abused, even if you're unsure, call Plymouth City Council Safeguarding **01752 668000** or email gateway@plymouth.gov.uk or outside of normal working hours call Plymouth City Council Safeguarding Out of Hours Service on **01752 346984**.
or visit

<http://www.plymouth.gov.uk/homepage/socialcareandhealth/childrensocialcare/localsafeguardingchildrenboard/pscbchildabuse.htm>

Procedures to follow if abuse is suspected by an adult (for example: staff, homestay providers, a member of the public or by someone in the student's home country)

- Ensure all children are safe, supported and reassured.
- Inform the DS(L)P at Mayflower College immediately. The DS(L)P will take appropriate action, which may involve external agencies and contacting parents/guardians.

Designated Safeguarding Lead (DSL) – Jill Tyler (General Manager) jill@maycoll.co.uk

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- If the DSL or DSP is the accused, then refer immediately to Designated Officer at Plymouth City Council (formerly LADO - Local Authority Designated Officer).

Plymouth City Council Safeguarding 01752 668000 or email gateway@plymouth.gov.uk or outside of normal working hours call Plymouth City Council Safeguarding Out of Hours Service on 01752 346984

- Ensure a clear written record has been made, using the Safeguarding Incident Report Form.
- DS(L)P to notify Designated Officer at Plymouth City Council (formerly LADO - Local Authority Designated Officer). The report must be made within 24 hours of receiving a concern of abuse made against an adult working with children.
- The person against whom the allegation is made will be informed of the allegation only after consultation with the Designated Officer (formerly called LADO Local Authority Designated Officer).

Following discussions with the Designated Officer (formerly LADO Local Authority Designated Officer), if there is any potential substance to the allegation:

- Staff (and Directors): may be considered for suspension from their duties pending further investigation.
- Students: may be considered for suspension from Mayflower College and may need to find alternative accommodation.

- Homestay families: all students will be removed and re-housed and all future bookings may be suspended until the matter has been fully investigated.

Confidential records will be kept of the allegation and all subsequent proceedings.
Unfounded allegations will usually result in all rights being re-instated.

Call **999** if the child is in real danger now.

If you're worried about a child or young person or think they're being abused, even if you're unsure, call Plymouth City Council Safeguarding **01752 668000** or email gateway@plymouth.gov.uk or outside of normal working hours call Plymouth City Council Safeguarding Out of Hours Service on **01752 346984**.

Or visit

<http://www.plymouth.gov.uk/homepage/socialcareandhealth/childrensocialcare/localsafeguardingchildrenboard/pscbchildabuse.htm>

Prevent Strategy and Channel Programme – Safeguarding against terrorism

If you have a concern about a particular student, who you think may be drawn into terrorism, follow the normal safeguarding procedures:

- Ensure all children/vulnerable adults are safe, supported and reassured.
- Inform the DS(L)P at Mayflower College immediately. The DS(L)P will take appropriate action, which may involve external agencies and contacting parents/guardians.

Designated Safeguarding Lead (DSL) – Jill Tyler (General Manager) jill@maycoll.co.uk

Designated Safeguarding Person (DSP) – Steve Voysey (Director of Studies) email: steve@maycoll.co.uk

Mayflower College 01752 673784 (office hours), Mobile (emergencies) 07889 420601

- Ensure a clear written record has been made, using the Safeguarding Incident Report Form.
- DS(L)P to notify Designated Officer at Plymouth City Council (formerly LADO - Local Authority Designated Officer). The report must be made within 24 hours of receiving a concern made against an adult working with children.
- The person against whom the allegation is made will be informed of the allegation only after consultation with the Designated Officer (formerly called LADO Local Authority Designated Officer). **Plymouth City Council Safeguarding 01752 668000 or email gateway@plymouth.gov.uk or outside of normal working hours call Plymouth City Council Safeguarding Out of Hours Service on 01752 346984**

Schools are expected to assess the risk of children and vulnerable adults being drawn into terrorism (including support for extremist ideas that are part of terrorist ideology). The Department of Education has published guidance for schools and childcare providers at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

There is a useful e-learning course <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

The module is suitable for school staff and other 'front-line' workers. It provides an introduction to the topics covered by this advice, including how to identify factors that can make people vulnerable to radicalisation, and case studies illustrating the types of intervention that may be appropriate, in addition to the work of the Channel programme, more information available at

<https://www.gov.uk/government/case-studies/the-channel-programme>

SECTION 2 Mayflower College Safeguarding & Child Protection Procedures

Mayflower College Safeguarding & Child Protection Procedures

Mayflower College is committed to safeguarding children, young people and vulnerable adults.

Context

Mayflower College offers English language and testing for international students through the year, including on and off-site activities and excursions. Mayflower College closes for 2 weeks over the Christmas period.

- **Junior activity courses:** Individual students under 18 years are accepted during the summer school programmes for juniors (aged 13 – 17 years) held during June, July and August and taught in mixed level, mixed nationality classes. Further information about the Junior Activity Courses, rules and curfew times are available at <http://www.maycoll.co.uk/english/courses-juniors.htm> Mayflower College encourages students to be aware of their safety and safeguarding is discussed at their induction (staying safe in Plymouth and how to get help if they need it).
- **Group junior activity courses:** Groups of under 18s are accepted throughout the year and taught in closed groups.
- **Adult General English classes:** Young Adults aged 16 and 17 years are accepted throughout the year to study in Adult General English classes, which include students aged 16 years upwards. In UK law, there is no distinction between children and young adults. The Children's Act defines a child as "a person under the age of 18". Students aged 16 and 17 years may follow Adult General English courses with parental consent http://www.maycoll.co.uk/pdfs/ParentalConsentForm_under18s.pdf further information is given here http://www.maycoll.co.uk/pdfs/GeneralInfo_under18s.pdf
- We ensure that students under the age of 16 years are not placed in classes with students aged 18 years and over, unless this is specifically requested by parents or when closed groups request their students study together.

Mayflower College: ensuring a safe environment

We ensure a safe and comfortable learning environment by:

- Maintaining the building in a good state of repair and ensuring its cleanliness
- Adhering to Health & safety, First Aid and Fire policies and procedures (Gas checks, PAT testing etc)
- Performing risk assessments for the building
- Secure external doors during lesson times
- Regular maintenance of fire alarms, testing and evacuation procedures
- Ensuring key members of staff undertake First Aid training
- Following safer recruitment procedures for staff and homestays along with safeguarding training
- Encouraging an open dialogue and good communication with students, group leaders, staff and homestays, where concerns and suggestions for improvements can be raised
- Giving clear guidelines for students on acceptable behaviour, prior to arrival in documentation and handbooks, along with an induction upon arrival.

We take all reasonable steps to meet safeguarding responsibilities by:

- Encouraging people to share information and concerns for the safety and welfare of students and vulnerable adults
- Requiring staff to report any incident, allegation, evidence or suspicion of abuse
- Referring any incidents to authorities as required by law

- Implementing safeguarding policies and procedures and reviewing them regularly

Airport transfers provided to/from Mayflower College & off-site activities excursions

Mayflower College uses transport providers (Need-a-cab & NO Hassle Travel) and coach companies (Plymouth Citycoach) whose drivers have been appropriately DBS checked (for airport transfers, taxi journeys in the city and to off-site activities and excursions).

Supervision on & off-site

The supervision of students under 18 years is shared between Mayflower College (during lessons and activities) and the homestay provider (evenings and weekends).

- For students under 18 years following the junior courses, a full weekday afternoon activity and Saturday excursion programme is included.
- Students under 18 years following the Adult course programme attend morning lessons (afternoons only provided if 25 hours per week is requested) and may attend Saturday excursions.

All activities (afternoon activities and Saturday excursions) adhere to the minimum ratios recommended by DfEE: at least one adult for every 15-20 students (for students 11 years and over). Group leaders can only be designated as being responsible for their own students.

Students are expected to return home promptly after activities finish each day. Activity finish times are given at Royal Parade (in the city centre), students will be escorted to Royal Parade by their teachers and students will take a public bus back to their homestay accommodation. A free bus pass for travel on local buses is included for students under 18 years to travel to and from their homestay.

Students must arrive on time for their evening meal and will be expected to join the host family meal every evening. The time of the evening meal will vary from family to family. It is good manners for students to offer to help with clearing the table or washing up.

Students under 18 years must follow the rules for their age group with regard to going out in the evenings. If students do go out, they must tell their homestay where they are going and exactly what time they will return. Homestays must be aware of where students are at all times:

Curfews for under 18s

- ◆ Students under the age of 14 will not be allowed out in the evenings unless accompanied by an adult (i.e. participating in an activity organised and supervised by either, their homestay, the group leader or the Mayflower College).
- ◆ Students between 14 and 16 years should not be allowed out alone in the evenings (they could be in pairs or groups) but must return home by 21:00 hours unless, they are participating in an activity organised and supervised by either the host family, the group leader or the Mayflower College. Older students (17 years and over) must return home (to their host family) by 22:00 hours.
- ◆ In most instances, students are free on Sundays to spend the day with their host family. Students should not go out alone (preferably in pairs or small groups for short periods of time and specify exactly where they will be going and must agree a time to return) on these days.

Homestay providers are aware of the rules for what students may do outside scheduled activity times and work with Mayflower College to ensure that these rules are adhered to. A responsible adult will always be present in the homestay overnight and normally present when students under 16 years are at the homestay. An emergency mobile number is provided for Homestay providers to call a Mayflower member of staff for advice in an emergency ([24 hours, call text or leave a message 07889 420 601](tel:07889420601)).

Attendance & Absence

There must be daily contact with the students by group leaders. Group Leaders must meet with their students every morning before lessons and should arrive at Mayflower between 08.30 am – 9.00 am. Student's attendance is checked by the teacher of each class, and a member of staff (usually the Director of Studies) will check with teachers that all students aged under 18 years have arrived for classes.

Mayflower College Policy for Absence and Illness

Student's / Group leader's responsibilities

If a student is unwell and cannot attend classes he/she (or the group leader) should:

- inform Mayflower College by telephone by 9am, or by email: office@maycoll.co.uk
- if students need to visit a doctor, they should visit their homestay's doctor or in an emergency, use the doctor's surgery opposite Mayflower College – West Hoe Surgery). The Student Services Officers will advise on how to seek medical assistance.

Mayflower College responsibilities

Each morning a member of staff (usually the Director of Studies) will check each class at 09:20am to ensure students have arrived for class. If there are any absences which have not been notified, the Student Services Officer must follow the procedure for "No notification of absence/illness".

Notification of absence/illness

If a student/homestay notifies Mayflower College of a student's absence, the student/homestay will be asked if the student needs to seek medical advice. Group leaders should follow up with a telephone call to the student/homestay and visit if necessary.

No notification of absence/illness

If a student is absent without informing Mayflower College, the Student Services Officer will take the following steps:

1. Call the student's homestay to check whether the student is ill, or whether they left the house and if so, at what time.
2. If the student was ill but failed to inform anyone, the student/homestay will be reminded of the procedure to notify absence/illness. The student / homestay will be offered guidance and help on how to seek medical assistance, if required.
3. If the student left the house late, then the Student Services Officer should wait an appropriate time to see if the student arrives, call the student's mobile telephone and also keep in touch with the homestay to see whether the student makes contact.
4. If the student fails to arrive for classes the Student Services Officer should try to contact the student via their mobile, advise the Director of Studies and take the necessary emergency procedures if the student fails to arrive.

If the student is ill or absent repeatedly and Mayflower College has reason to doubt the validity of the student's explanation for his/her absence, this will be pursued as a disciplinary matter by the Director of Studies. If the absences continue, the student's parents, agency and Home office (UKVI) may be contacted, especially where a student is not meeting the study requirements for his/her visa purposes.

Risk Assessments

Risk assessments are produced for all on and off-site activities. Leaders of activities are provided with activity packs which include:-

- Register and contact details for students/group leaders
- Activity information (description of place to be visited, handouts, booking forms, maps etc)

- Risk Assessments (with likely risks and control measures)
- Emergency procedures (lost or missing students/medical emergencies etc)
- Feedback form for the activity/excursion (with possibility to comment on suitability of activity/transport/organisation etc)
- Mobile telephone
- Emergency first aid kit

The excursion feedback forms are used for monitoring and continuous improvement. Morning meetings are also held with all international group leaders to review the previous day's activities and discuss arrangements for the current day, ensuring that any issues arising can be promptly.

Behaviour & Discipline (Mayflower College Policies)

These are available to view in separate documents, please see:

<http://www.maycoll.co.uk/policies/Discipline.pdf>

http://www.maycoll.co.uk/policies/Bullying_and_Harassment.pdf

General rules and information for under 18's on Junior courses:

<http://www.maycoll.co.uk/pdfs/General-Info.pdf>

E-safety

The internet is an essential element of education and social interaction in the 21st century. Mayflower College encourages staff and students to show a responsible and mature approach to its use. Please refer to the separate e-safety policy & agreement at <http://www.maycoll.co.uk/policies/Esafety.pdf>

Following a Safer Recruitment Policy for Mayflower's office, teaching and cleaning staff

- All new staff at Mayflower College are interviewed and required to provide at least two references (at least one of them written) as well as proof of identity (passport or driving license), sign a 'Declaration Regarding Suitability' (Children Act 1989 Part IX) form, undertake an e-learning course 'Basic Awareness in Child protection' and are subject to an Enhanced DBS check (which includes barred list information) and checking against the prohibited list (if appropriate) prior to appointment. Reference requests ask specifically whether there is any reason that the applicant should not be engaged in situations where they have responsibility or substantial access to, under 18's. Any gaps in CV's must be explained satisfactorily.
- New applicants are advised the work (paid or voluntary) involves dealing with young people in regulated activity and is exempt from the Rehabilitation of Offenders Act 1974.
- Self-declaration forms are signed by all new staff and new appointments are subject to a probationary period (and will not be confirmed) unless Mayflower College is confident that the applicant can be trusted with young people and vulnerable adults.
- Any offer of appointment made, including for those who have lived or worked abroad, is conditional on satisfactory completion of pre-employment checks. For overseas employee, refer to <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>
- Any DBS disclosure with convictions will be carefully considered by the DSP and DSL and referred to external agencies (such as PCSB) for advice.
- DBS checks will be renewed if a staff member is absent for a period of 1 year or more (unless there is due cause or a change in legislation), and renewed every 3 years.
- Staff are given appropriate training opportunities (e-learning course 'Basic Awareness in Child protection') and safeguarding training provided by English UK and Plymouth Children's Safeguarding Bureau to recognise the symptoms of possible abuse (physical, sexual, emotional and neglect) and how to respond to suspicions of abuse.

- Mayflower has a code of conduct with specific reference to under 18's. The consequences of breaching the code are clear and linked to disciplinary and grievance procedures and further information is also given on behaviour with respect to under 18's:

Excerpt taken from MAYFLOWER STAFF CODE OF CONDUCT
"Guidance to staff on behaviour (with respect to under 18's)"

Relationships with staff

Under the Sexual Offences Act 2003, it is a criminal offence for any person in a position of trust (which includes members of Mayflower staff) to engage in sexual activity (kissing, touching etc) with someone who is under 18 years of age. In addition:

- ❖ Intimate relationships between staff and any student under 18 years of age are an abuse of trust which may constitute a criminal offence.
- ❖ Situations and meetings with any student under 18 years outside the normal teaching environment and hours should be avoided. Under no circumstances should you ever agree to meet a student under the age of 18 outside of normal working hours. You may say 'hello' to them if you meet them by chance, but you should certainly not arrange meetings with them outside of working hours.
- ❖ Staff should be careful in their use of language and should not make unnecessary comments which could be misinterpreted. Staff have a responsibility to show regard for Mayflower College rules regarding drinking and smoking, particularly with respect to under 18's and a responsibility to educate under 18's about the dangers of addictive substances.
- ❖ Unnecessary physical contact which could be misinterpreted should be avoided, even if the gestures are well intentioned.
- ❖ Younger students may be affected by inappropriate dress. Staff must ensure that their dress code is appropriate for the situation in which they are working and that they present a professional image (and one that reflects sensitivity to students' perceptions).
- ❖ Staff should be careful in their use of language and should not make unnecessary comments which could be misinterpreted.
- ❖ Do not become friends with junior students on Facebook or any other social networking site or 'chatroom'. The relationship could easily become misconstrued by the student, parents, group leaders and/or staff. Students and teachers may 'like' the Mayflower College Summer School Facebook page.
- ❖ In situations where it is necessary for staff to restrain a child to prevent themselves from injury, injury to others or damage to property, only the minimum force necessary should be used, with the aim being only to restrain rather than harm.
- ❖ Staff should engage in the induction for training re: "off-site activities, risk assessments and emergency procedures" before taking students on activities/Saturday excursions.
- ❖ Staff are required to do online Safeguarding training available at <https://galleryteachers.com/service/safeguarding-basic-awareness-course/> Mayflower College has purchased pre-paid code and can provide you with the code to undertake the course. or <http://www.safeguardingchildren.co.uk/course-signup.html> (e-learning course Basic Awareness in Child protection') to recognise the symptoms of possible abuse (physical, sexual, emotional and neglect) and how they should respond to suspicions of abuse.
- ❖ From 1 July, 2015 schools are expected to assess the risk of children being drawn into terrorism (including support for extremist ideas that are part of terrorist ideology) and the English UK training includes PREVENT awareness training. The training is suitable for school staff and other front-line workers. It provides an introduction to the topics covered by this advice, including how to identify factors that can make people vulnerable to radicalisation, and case studies illustrating the types of intervention that may be appropriate, in addition to the work of the PREVENT and Channel programme.

Following a Safer Recruitment Policy for international group leaders visiting the Mayflower with junior students by

- Ensuring that Group leaders accompanying juniors to the UK are suitable to work with students under 18 years of age. Requests are sent to organisations asking for confirmation that Group leaders have undergone an official police check and obtained documented clearance which demonstrates their up-to-date criminal records and assures their suitability to work in close proximity with children.

Following a Safer Recruitment Policy for Homestays hosting under 18's:

- Ensuring new homestay providers who work with Mayflower College are inspected and interviewed and asked to provide a referee (a written reference is obtained) prior to any students being placed with the homestay. From 01 January, 2016 new homestays are requested to provide 2 references. Homestays cannot be used if a DBS check has not been received.

- Ensuring 'Self-declaration' forms are signed by homestay providers and new applicants are advised the work (paid or voluntary) involves working with young people and is exempt from the Rehabilitation of Offenders Act 1974.
- Ensuring all permanent members of the household aged 18 years and over (hosting children under 18 years of age) have an Enhanced DBS check and all members of the household aged 18 and over and complete the form '**Declaration Regarding Suitability to Accommodate Children Privately**' (**Children Act 1989 Part IX**). Where a homestay already has a DBS check, this will only be considered if the check is recent (i.e. in the past 3 months) and for a similar role. For homestays/members of the household that require a new DBS check this cost will be shared between Mayflower College and the homestay provider.
- Ensuring any DBS disclosure with convictions is carefully considered by the DSP and DSL and referred to external agencies (such as PCSB) for advice.
- Adhering to the Private Fostering requirements by contacting Plymouth Children's Social Services with details of all homestay providers, who host children under 16 years for longer than 27 nights (28 days) in the UK (or under 18 years, if the child is disabled).
- Obtaining parental consent and emergency contact information for parents of students under 18 years and ensuring that parents are kept informed of any concerns relating to their child.
- Ensuring homestay providers sign the '**Declaration Regarding Suitability to Accommodate Children Privately**' (**Children Act 1989 Part IX**)' declaration forms" at re-inspection.
- Where there are concerns about a child's safety or welfare or concerns about the actions of a staff member or homestay provider, this must be reported to **the Designated Safeguarding Person (DSP) - TBC (Director of Studies)** and/or **Designated Safeguarding Lead (DSL) – Jill Tyler (General Manager)** who will refer concerns to the Designated Officer or team of officers (previously LADO - Local Authority Designated Officer). The role of the Designated Officer is explained in this document
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811513/DRAFT_Keeping_children_safe_in_education_2019.pdf
- Where appropriate, the police, health and child protection agencies such as Devon Safeguarding and Plymouth Social Services may be consulted. <https://www.proceduresonline.com/swcpp/devon/>

Homestay providers are recommended to access the e-learning course online training available at <https://galleryteachers.com/service/safeguarding-basic-awareness-course/or> <http://www.safeguardingchildren.co.uk/course-signup.html> . The course provides training to recognise the symptoms of possible abuse (physical, sexual, emotional and neglect) and how to respond to suspicions of abuse.

Homestay providers are also invited to attend Safeguarding evenings, hosted by the LADSO (Local Authority Designated Safeguarding Officer). These are usually held annually, prior to the summer season.

Homestays are made aware of the safeguarding and welfare requirements for under 18s (both on junior and adult courses) in the Homestay Handbook. Homestays have a dedicated online portal at <http://www.maycoll.co.uk/english/home-stay.htm> which includes information for current and prospective homestay providers.

In addition to Safer Recruitment policies, Mayflower College regularly reviews the Safeguarding & Child Protection policy and disseminates information to interested parties (students, staff, homestay providers etc). A complaints procedure (publicised to students, staff and homestays) exists to ensure complaints and suggestions for improvement and are dealt with appropriately.

Staff/Homestay Training

Staff are required to do Child protection online training available at <https://galleryteachers.com/service/safeguarding-basic-awareness-course/> or <http://www.safeguardingchildren.co.uk/course-signup.html> and a log-in is also provided for online resources at <http://platinum.educare.co.uk/> and in addition, the Prevent online training (part of the government's counter-terrorism strategy) at <https://www.elearning.prevent.homeoffice.gov.uk/la2/screen1.html>

This is suitable for school staff and other 'front-line' workers. It provides an introduction to the topics covered under the Government's PREVENT strategy, including how to identify factors that can make children and adults vulnerable to radicalisation, and case studies illustrating the types of intervention that may be appropriate, in addition to the work of the Channel scheme.

Homestay providers are also recommended to access the e-learning courses above by signing up (and creating a log-in password where required).

Staff involved in responsible positions undertake higher level safeguarding training offered through English UK (Advanced and Specialist Training) and Plymouth City Council (Plymouth Safeguarding Children's Bureau) as well as WRAP (Workshop to raise awareness of PREVENT).

Student safety & responsibilities

We take reasonable steps to ensure that all of our students are informed, instructed and aware of safeguarding rules and procedures, by:

- Giving clear guidelines about behaviour and rules in advance of arrival in the Junior course Handbook <https://www.maycoll.co.uk/pdfs/General-Info.pdf>
- Ensuring parents complete the parental consent form at [https://www.maycoll.co.uk/pdfs/Parental Consent Form.pdf](https://www.maycoll.co.uk/pdfs/Parental%20Consent%20Form.pdf)
- Providing students (particularly those under 18 years) with a clear and detailed induction, as well as safety advice and walking tours on their first day
- Issuing students with a student card that includes emergency contact details
- Placing children in separate classes, with separate break times, to reduce interaction with adult students
- Monitoring attendance of under 18's and investigating a missing child immediately

Staff & Homestay responsibilities

- To share their safeguarding concerns with staff at Mayflower College, including welfare and safeguarding officers (and local authorities where appropriate)
- To report any incident, allegation, evidence or suspicion of abuse.
- To refer incidents to local authorities, as required by law.
- Implementing Safeguarding policy and procedures and attending training, as required.

CODES OF CONDUCT & SAFEGUARDING VALUES

All employees, students, volunteers, contractors, group leaders and others connected with our work have a responsibility to promote a safe environment and to ensure the safety and well-being of the children, adults and communities we come into contact with. Managers have a responsibility to model appropriate behaviour and ensure that all staff understand and comply with the Code of Conduct & Safeguarding values, which include:

- Prevention: we aim to prevent harm, abuse or exploitation to ourselves and others through professional, responsible conduct and by sharing concerns so that appropriate measures can be taken to improve safeguarding procedures.
- Responsibility: we assume individual and collective responsibility for safeguarding and provide staff/students/homestays and others connected with our work with appropriate advice, guidance and access to training to fulfil their obligations.
- Communication and sensitivity: we maintain best practice through open, transparent dialogue with others. By listening and being sensitive to others, we ensure our conduct is appropriate to each context and the unique needs of those we are working with.

All welfare and safeguarding concerns must be reported to the relevant line manager, the Safeguarding teams or by reporting via e-mail. All concerns will be taken seriously and will be investigated.

Breaches of the Code of Conduct may result in disciplinary action, termination of contracts and, where appropriate, referral to other agencies such as the police/LCSB (Local Children's Safeguarding Bureau).

The Sexual Offences Act 2003 states that any person in a position of trust, engaged in sexual activity of any sort (kissing, touching etc.) with students under the age of 18 years is breaking the law - in spite of the fact that the legal age of consent is 16. This applies to all adults working or volunteering with under 18s.

- Mayflower College has a separate "Bullying & Harassment Policy" available online at http://www.maycoll.co.uk/policies/Bullying_and_Harassment.pdf
- Mayflower College has a separate Discipline and Grievance Policy for staff available online at <http://www.maycoll.co.uk/pdfs/disandgrie.pdf>

GENERAL BEHAVIOUR & CODES OF CONDUCT

- I will maintain high standards of behaviour at all times and refrain from any acts that may harm the well being of students or staff, treating others with dignity and respect.
- I will use working hours wisely and effectively for the consistent delivery and improvement of our service as an education provider.
- I will not engage in or condone any form of harassment, intimidation, abuse or exploitation.
- I will not engage in or condone any behaviour that is illegal or could in any way bring Mayflower College into disrepute.
- I will report all welfare concerns to the Safeguarding and/or Junior welfare/accommodation officers.
- I understand that making intentionally false or misleading allegations against another person is a serious matter and could result in disciplinary action.

ACTIVITIES ON and OFF SITE

- I will ensure that I am aware of and follow Mayflower College's safeguarding policies and procedures and take care to ensure mine and others safety.
- I will dress appropriately for on and off-site activities.
- I will only take photos and/or video where consent has been obtained and with the prior approval of others.
- I understand that it is strictly prohibited to possess, use or be under the influence of alcohol or drugs during on or off site activities.

Staff have a statutory duty to observe all health and safety rules and take all reasonable care to promote the health and safety at work of themselves and their fellow employees. A separate

Mayflower Health & Safety policy is available to read at
http://www.maycoll.co.uk/policies/Health_and_Safety.pdf

SAFEGUARDING CHILDREN

The Sexual Offences Act 2003 states that any person in a position of trust, engaged in sexual activity of any sort (kissing, touching etc) with students under the age of 18 years is breaking the law - in spite of the fact that the legal age of consent is 16. This applies to all adults working or volunteering with children under 18.

- I will listen to what children are saying and respond appropriately.
- I will not act in ways that shame, humiliate, belittle or degrade children.
- I will not discriminate against, show differential treatment, or favour particular children to the exclusion of others.
- I will behave appropriately in children's presence and refrain from comments that may cause discomfort or which could be deemed sexually provocative.
- I will avoid spending time alone with individual children and I will not initiate physical contact with a child, as this could be misinterpreted and cause fear or discomfort.
- I will never hit or otherwise physically assault or physically abuse children.
- I will not develop relationships with children that could in any way be deemed exploitative or abusive and will never engage in physical/sexual relationships with children.

In addition, please be mindful of your relationships and interactions with adults, some of whom may be classed as vulnerable (due to a variety of reasons which may include undisclosed learning difficulties and/or cultural differences).

SAFEGUARDING CHILDREN IN THE HOME (HOMESTAY PROVIDERS)

- I will be sensitive to the fact that students are from different cultures and backgrounds and will promote tolerance, understanding and respect in the home.
- I will follow the curfew guidelines for under 18's.
- I will provide a clean and safe home environment and be aware of under 18's whereabouts at all times.
- I will be aware that although there are no strict rules, dress codes amongst family members in the home should be appropriate for hosting under 18's.
- I will be aware of professional boundaries when dealing with under 18's and avoid physical contact, which could be misinterpreted, except to prevent harm.
- I will ensure that I do not engage in excessive drinking of alcohol, swearing or smoking in the presence of students.
- I will contact Mayflower College (or the necessary Safeguarding contacts listed in the Safeguarding policy) in the event of any accidents, welfare issues or concerns.

PERSONAL INFORMATION & DIGITAL SAFETY

- I will not share photographs or personal information about students on my personal social media accounts.
- I will not seek to obtain or access personal information about Mayflower College staff/students/homestays/contractors/agents etc with unless this is strictly necessary within my role and I have authorisation to do so.
- I will follow Mayflower College's data protection policies and procedures when handling personal information.
- I will not use the Mayflower College's computers or other equipment to view, download, create or distribute inappropriate material (such as pornography) or material which is criminal in nature.

OVERSEAS TRAVEL

- I will avoid unnecessary risk to the safety, health and welfare of myself and others, including partner organisations and the others I meet.
- I will observe local laws and if I become aware of any illegal activity, I will make it known to the appropriate authorities.
- I will be sensitive to local customs and seek to learn from and respect the experience and knowledge of the local professionals and communities that I meet.
- I will ensure that I am travelling in a socially responsible manner and behave appropriately.

CODES OF CONDUCT WHILST STUDYING/WORKING AT MAYFLOWER COLLEGE

Mayflower College has a zero-tolerance approach to abuse and exploitation of any kind – physical, verbal, emotional or sexual. By setting out our values and expectations, this Code of Conduct aims to:

- Ensure a safe working environment for all those engaged in Mayflower's work
- Ensure the safety and well-being of the children, vulnerable adults and communities we come into contact with.

SECTION 3 Mayflower College Homestay and Safeguarding Policy

Context

The Mayflower College provides homestay accommodation for children under 18 years and adults. We also accept children under 18 years, who are living locally with their family, or family friends. Adults also have the option of finding their own accommodation privately (for example in local guest houses or University residential accommodation).

Mayflower College recognises that a greater degree of care must be afforded to children under 18 years in our care. We accept a few children over 12 years of age to study (the majority of juniors are aged 13-17 years) and discourage children under 18 years from staying for longer than 4 weeks. In cases where a request is made for a child to be hosted for 28 days or more, the school is aware of private fostering regulations, and has a good working relationship with the local private fostering team.

We separate the job role at Mayflower College for recruiting, inspecting and organising child (under 18 years) and adult homestays:

Accommodation officer (for Adults)

Accommodation officer (for Children under 18 years)

Under 18's - Parental consent and emergency contact information

Whenever a child under 18 years is accepted on a programme of study, a parental consent form is sent to their parent(s) or legal guardian(s). This document clearly explains the level of care that will be provided to their child and ask parents/students to agree to the curfews and provide emergency contact information. A copy can be found at https://www.maycoll.co.uk/pdfs/Parental_Consent_Form.pdf

Under 18's – Homestay information sharing and emergency contact information

The Mayflower College will pass homestay providers name, address and contact telephone numbers to the students, parents, group leaders, other homestays in the group and agents (travel and educational agents are sometimes used by students as intermediaries to organise their stay in the UK).

We produce a "homestay grid" listing all the hosts for a particular group of students (name, address and contact telephone numbers), this also includes the students names and ages (along with special dietary information/allergies) and the name/local address and contact details for the group leader (adults) responsible for them.

This personal information is exchanged for safeguarding reasons - so that students, parents, group leaders, other homestays in the group and agents can make contact with one another in the normal day to day duty of care and in the event of an emergency situation.

Homestay provider's responsibilities

The supervision and care of juniors is shared by Mayflower College (during lessons and activities) and homestay providers (evening and weekends). Everyone who works with children (and that includes admin staff, teachers, homestays, police, accident and Emergency staff, social workers etc) has a responsibility for keeping them safe and promoting the welfare of children, i.e. safeguarding.

We also encourage homestays to refer to the **GENERAL BEHAVIOUR & CODES OF CONDUCT**, as detailed in Section 2 of this Safeguarding policy, with respect to how to behave with children in their care.

There are important considerations and responsibilities for families who host junior students (i.e. children under the age of 18). UK Statute Law defines anyone under 18 years of age, as a child. In the past, in common law, homestay providers had a duty of care to act “as a reasonably prudent parent would”. However, in recent case law, this duty has been replaced by “safeguarding” (i.e. minimising risk of harm to children and taking action and sharing concerns with agencies and professionals, when necessary). Homestays should know the whereabouts of their under 18’s at all times. A responsible adult must always be present overnight and normally present when students under 18 years old are at home.

Private fostering

If homestay providers accept to host a child under 16 for more than 28 days (27 nights) then we are required to inform Plymouth Social Services of your name and address to comply with Private fostering laws. “Private fostering” is when a child under 16 years is looked after for 28 days or more by someone who is not a close relative. In this instance we ask homestay providers to complete the private fostering registration form and Plymouth Social Services will normally make a visit to see you and the child at home - there are no costs incurred by you for this service. You can read more about Private Fostering here

<https://www.plymouth.gov.uk/childrenandfamilies/lookedafterchildrenandyoungpeople/lookingaftersomeoneelseschild>

Homestay provider recruitment

Mayflower College takes care to ensure that homestay providers are suitable by:

- following safer recruitment procedures
- inspecting all potential hosts and revisiting active hosts regularly
- giving hosts clear guidelines on behaviour and reporting concerns
- encouraging an open dialogue with homestays and encouraging them to share concerns about welfare/behaviour
- encouraging them to attend Safeguarding training and events
- other documents to support homestays and safeguarding in the homestay environment include: Recruitment policy, Homestay Handbook including guidance and curfews, accommodation application forms and risk assessments.

SECTION 4 Mayflower College Safeguarding Incident Report Form

All allegations, complaints or suspicions of abuse must be recorded as close as possible to the time of the incident. Details of incidents should be recorded in as much details and as accurately as possible. Any disclosures must be a reflection of what was actually said, rather than your interpretation – just record what was said or witnessed. We also encourage you to let us know of any issues relating to children’s welfare/safety.

Mayflower College

SAFEGUARDING & WELFARE INCIDENT REPORT FORM

Your name:	Date of incident:
Your role:	Time of incident:
Child's name:	Child's date of birth:
Child's nationality: <i>Please state</i>	Does child have a disability or any other information about their medical/mental health: <i>Please state</i>
Child's gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	
Parent's / carer's/ Group leaders name(s):	
Contact information (parents/carers): <i>Address:</i> <i>Postcode:</i> <i>Telephone numbers:</i> <i>Email address:</i>	
Have parent's / carer's been notify of this incident? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES please provide details of what was said/action agreed:	
Are you reporting your own concerns or responding to concerns raised by someone else: <input type="checkbox"/> Responding to my own concerns <input type="checkbox"/> Responding to concerns raised by someone else	
If responding to concerns raised by someone else: <i>Please provide further information below</i>	
<i>Name:</i>	
<i>Position in company or relationship to the child:</i>	
<i>Telephone numbers:</i> <i>Email address:</i>	
Date and times of incident:	
Details of the incident or concerns: <i>Include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay.</i>	
Child's account of the incident:	

Please provide any witness accounts of the incident:

Please provide details of any witnesses to the incident:
Name:

Position within the company or relationship to the child:

Date of birth (if child):

Address: *Postcode:*
Telephone number: *Email address:*

Please provide details of any person involved in this incident or alleged to have caused the incident / injury:
Name:

Position within the company or relationship to the child:

Date of birth (if child):

Address: *Postcode:*
Telephone number: *Email address:*

Please provide details of action taken to date:

Has the incident been reported to any external agencies?
 Yes
 No

If YES please provide further details:

Name of organisation / agency:

Contact person:

Telephone numbers:

Email address:

Agreed action or advice given:

Your Signature:		Print name:	
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Date:	
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