



## **SAFEGUARDING POLICY**

**Company Name: Comuni-co Coaching & Services**

**Company Number 11710310**

**Company Address: 126 Fletton Avenue, Peterborough PE2 8BT, UK**

**Approved by: James Fordham, Director of Operations, 20/12/2023**

**Date for review: 20/12/2024**

### **A. POLICY STATEMENT**

#### **STATEMENT**

Comuni-Co Language Coaching & Services is committed to safeguarding and promoting the welfare of each learner and expects all staff, volunteers and partners to endorse and practise this commitment at all times.

Comuni-Co Language Coaching & Services acknowledges its duty of care to safeguard and promote the welfare of children and is committed to ensuring excellent safeguarding practice. We understand the paramount importance for children to feel and remain safe at all times, achievable by a suitable safeguarding provision being in place and properly maintained.

This policy seeks to ensure that Comuni-Co Language Coaching & Services undertakes its responsibilities with regards to the protection of under-18s and vulnerable adults and will respond to concerns in the appropriate manner and within appropriate timescales by outlining a framework to support all adults in their practices and clarifying the organisation's expectations.

#### **UNDER-18'S ENTITLEMENT**

Comuni-Co Language Coaching & Services recognises that the welfare and interests of all under-18s and vulnerable adults are paramount at all times. This policy aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or social economic background, all under-18s and vulnerable adults have a positive, enjoyable and safe experience and are suitably protected from harm and abuse whilst taking part in English language tuition courses and activity programmes provided by the school.

#### **ADULTS' RESPONSIBILITIES**

All adults have the responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns to relevant contacts.



We expect and require all adults to promote good practice by being excellent role models, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

## **ROLES & RESPONSIBILITIES**

Comuni-Co Language Coaching & Services Directors and Management team have a joint responsibility to ensure that the school has policies and procedures in place in respect of Safeguarding and Child Protection.

They have appointed directors with special responsibility for Welfare, Safeguarding and Child Protection issues who are appropriately experienced.

All staff and teachers who are contracted or recruited to work with young people and adults with additional needs receive appropriate training to familiarise themselves with safeguarding issues and their responsibilities and the school's procedures and policies.

There is a Company director with Lead Responsibility for Safeguarding who is the Lead Designated Senior Person (DSP) for Child protection who is assisted by a Deputy Designated Senior Person.

### **Designated Safeguarding Lead:**

- **Concetta Laquintana, Company Director** - 0044 7856168019 / [hello@comuni-co.com](mailto:hello@comuni-co.com)

### **Deputy Designated Safeguarding Lead:**

- **James Fordham, Operations Director** – 0044 7980 903237 / [hello@comuni-co.com](mailto:hello@comuni-co.com)

## **B. STAFF CODE OF CONDUCT OVERVIEW & PRINCIPLES**

### **OVERVIEW & PRINCIPLES**

Comuni-Co Language Coaching & Services understands the importance of a Code of Conduct to ensure that all adults are able to carry out their duties undisturbed and without grievance, protected from situations where behaviour may be misconstrued and false allegations made; and reduce the opportunities for the abuse of under-18s.

The following **(SETTING STANDARDS)** outlines the expected behaviour of all adults. It is a requirement of the establishment that all adults follow this code and ensure that it is being followed by those around them.

Any adult found not complying with this code will be subject to disciplinary procedures.



## REVIEW

We review our policy on an annual basis and aim for best practice standards. Prior to courses and after completion the company directors meet to review safeguarding and welfare concerns and discuss future planning with these in mind.

## SETTING STANDARDS

It is the responsibility of all adults to:

- Treat all under-18s with an equal respect and respect their right to privacy
- Ensure that all interaction with under-18s is done in a professional manner
- Exercise the duty to report any observations or suspicions of abuse to a DSP
- Report any observations or suspicions of non-compliance with this code to the management

### All adults must:

- Exercise caution when discussing sensitive issues with an under-18 or vulnerable adult and avoid giving advice on sensitive matters if you are not qualified to do so
- Record any attempt of an under-18 looking to make personal contact with them and seek advice from management
- Maintain friendly yet impartial relationships with under-18s whilst avoiding exclusivity or over-familiarity
- Listen when an under-18 or vulnerable adult confides sensitive details, makes an allegation of abuse or concerns of abuse and respond in accordance with the school's Child Protection Policy and Procedure

### All adults must not:

- Become personally involved in an under-18's personal affairs
- Do things of a personal nature for under-18s that they are capable of doing for themselves
- Spend time alone with an under-18 without first informing another adult
- Allow or engage in any inappropriate touching of any form
- Initiate physical contact with an under-18 unless vital (further guidance on physical contact and the use of force can be found in Use of reasonable force, Department of Education 2013, available online)
- Establish or seek to establish a personal relationship with an under-18 during or after their course
- Exchange personal information of any kind with under-18s; this includes but is not limited to personal contact information, imagery and other sensitive information



- Make over-familiar or sexually suggestive comments or gestures to an under-18 or in view of an under-18, even as a 'joke'
- No member of staff should make contact with a student under the age of 18 on social media either before, after or during the student's course of study

### **C. CHILD PROTECTION**

All staff who are contracted or recruited to work with students are provided with a safeguarding induction prior to starting work with the school.

### **D. TRAINING**

School Management will ensure safeguarding is a high priority and approve and annually review procedures with the aim of:

- Raising awareness of issues relating to the welfare of young people and adults with additional needs and ensuring the promotion of a safe environment for all learners within the Comuni-Co Language School. This will be achieved by regularly promoting and embedding safeguarding and health and safety key messages into our teaching, learning and student support.
- Following appropriate procedures to ensure staff are trained and supported to respond appropriately and sensitively to safeguarding and child protection concerns. This will be achieved by close monitoring of staff and ensuring that all are trained to the required standard.
- Establishing clear procedures for reporting and dealing with allegations of abuse against members of staff and or learners. This will include seeking timely advice from external safeguarding agencies when learners are potentially at risk of any harm.

We will ensure that all adults recruited to work for the school have received Child Protection and Safeguarding training to at least level 1 within an educational framework.

### **E. PREVENT**

Comuni-Co Language Coaching & Services is intent on creating a safe and inclusive learning climate where all pupils learn to understand others, value and embrace cultural diversity and develop essential critical thinking, representational and leadership skills.

At Comuni-Co Language Coaching & Services students are encouraged to stretch their thinking to understand opposing views and ideologies and are taught respect for cultural and religious differences. Multicultural education pervades the school's syllabus and students are guided to acquire the knowledge, attitudes and skills needed to function in an ethnically and racially diverse world.



As part of wider safeguarding responsibilities Comuni-Co Language Coaching & Services ensures that:

- Any messages communicated to students support fundamental British values.
- Any messages communicated to students are consistent with the school’s mission and do not marginalize any races, faiths or cultures.
- All permanent and voluntary members of staff have a good understanding of Prevent and know how to recognize vulnerability to being drawn into terrorism and act upon by adhering to the school’s policy. The school ensures all staff has sufficient training that equips them with the knowledge and confidence to identify vulnerable students at risk of being radicalized and know where and how to refer pupils for further help.
- The school strives to provide a balanced curriculum, so that our students are encouraged to speak freely, share their opinions and acknowledge that they are entitled to have their own opposing views which should not be used to influence others.
- All academic and extracurricular activities are carefully evaluated by our directors to ensure that they are effective. These activities are designed to fully support students by broadening their cultural horizons and enriching their cultural awareness.
- All teachers help set a tone of respect in the classroom and seek to establish a culture of inclusion, tolerance and respect that welcomes all faiths, races and cultures.

Useful sites promoted: [www.nationalarchives.gov.uk](http://www.nationalarchives.gov.uk) for ‘The Prevent Strategy/ [www.legislation.gov.uk](http://www.legislation.gov.uk)

## **F. WHISTLEBLOWING**

Whistleblowing is an important aspect of a safeguarded institution whereby staff and volunteers are encouraged to share concerns about a colleague’s behaviour in confidence.

Working with vulnerable groups including minors and young people places staff and volunteers in positions of power. In order to retain the trust of vulnerable people, it is essential that all reasonable steps are taken to ensure this power is exercised responsibly.

There may be situations whereby staff or volunteers have concerns about the conduct of a colleague towards a student. Anyone employed by Comuni-Co has the right and the responsibility to raise concerns, without prejudice to their own position, about the behaviour of staff, managers, volunteers, students or others, which may be harmful to those in their care and will receive appropriate support when doing so.

### **Low Level Concerns**

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a “nagging doubt” – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct.



The term 'low level' does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm.

Any low-level concerns should be:

- Raised with the DSL and/or DDSL (as appropriate)
- Addressed as soon as possible in order to support individuals to correct inappropriate behaviour at an early stage
- Dealt with sensitively and proportionately
- Used to update and improve the safeguarding policy

Examples of low-level concerns include:

- Being over friendly with children
- Having favourites
- Taking photos of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

## **G. SAFER RECRUITMENT**

Comuni-Co Language Coaching & Services aims to attract, reward and retain the best available people and to make the maximum possible use of the abilities of all its employees whilst ensuring it safeguards and promotes the welfare of young people and adults with additional needs receiving and attending courses at the school or in the workplace.

All staff, volunteers and host families are now required to complete an enhanced DBS disclosure prior to commencement of employment or voluntary work with the School and in the case of host families, in all used host families providing accommodation for under 18s the main carer has provided Comuni-Co with a recent DBS check.

## **RECRUITMENT MATERIALS & APPLICANT INFORMATION**

All vacancies advertised by Comuni-Co Language Coaching & Services are seen with the following statement:

A DBS certificate of an Enhanced Disclosure for the Children's Workforce is required for this position; any certificate must be three years old or less. For applicants who do not already hold such a certificate, Comuni-Co Language Coaching is able to process DBS applications for a fee.



Comuni-Co Language Coaching & Services is committed to safeguarding and promoting the welfare of under-18s and expects all of its employees to share this ethos. We see it as our duty to rigorously check any potential members of staff to ensure that they are fully suited to working in an environment where they will come into regular contact with under-18s.

All applicants should note that:

- references will be followed up
- all gaps in CVs must be explained satisfactorily
- proof of identity and (where applicable) qualifications will be required
- reference requests will ask specifically whether there is any reason that the candidate should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18
- appropriate suitability checks will be required prior to confirmation of appointment

#### **RECRUITMENT STAGES FOR ALL**

All applicants that submit an application to Comuni-Co Language Coaching & Services will be shortlisted to a number suitable for interview. A director will then interview each suitable candidate and will ask relevant questions about the candidate's attitude and experience to working with U18's. DBS / suitability checks will need to be returned and cleared prior to employment commencement.

#### **APPLICANTS WITH A CRIMINAL RECORD**

If a suitability check returns showing evidence of a criminal record, the management will make an informed judgement on whether the applicant is suitable for the vacant position. Factors taken into consideration will be:

- The seriousness and nature of the offence(s) in relation to the responsibilities of the position (e.g. violent, sexual or drug offences would be a strong reason to reject a candidate for a role involving the care of under18s)
- The age of the offence(s)
- The frequency of the offence(s)

Before a judgement is made, the contents of such a disclosure will be discussed with the candidate in question to confirm that the information disclosed does relate to them. This discussion will aid the decision making process and provide the opportunity to discuss the offence(s) in greater detail.

Any judgement will be agreed by at least two Directors.

The decision-making process will be clearly recorded, referencing the discussion, judgement and reasons for the final decision.



## H. IMPLEMENTING SAFEGUARDING

### USE OF RISK ASSESSMENTS

Risk assessments are maintained for all programmed activities and excursions, a copy of which will be held by all relevant staff, such as relevant teachers and group leaders. Copy risk assessments are available for students from reception upon request. All Risk assessments are in place to:

- Prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace
- Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work
- Engage and consult with employees on day-to-day health and safety conditions Implement emergency procedures – evacuation in case of fire or other significant incident.
- Maintain safe and healthy working conditions, for both staff and students

### SUPERVISION RATIOS

This section refers to guidance provided by the British Council and refers to the general principles in determining suitable ratios of young people to supervising adults.

It is vital to give adequate thought to the level of supervision and who will be undertaking supervision during the planning of a site visit.

When planning a trip, think about the appropriate adult to pupil ratio. There are no legal requirements – supervision should be based on a reasonable judgment of the numbers and expertise of adult supervisors necessary, taking into account as seen in the risk assessment the:

- nature and hazards of the trip
- number, age, gender and aptitudes of the pupils
- Competence, authority and experience of the adults.

As an absolute minimum, Comuni-Co Language Coaching believes that at least two adults should accompany any group of up to 20 pupils. If a student is taken ill or another emergency arises, one adult can deal with it while the other looks after the rest of the party (suitably altering the activities to reflect the lower level of supervision). However, trips involving hazardous activities will normally require a much smaller ratio than for trips that do not.

- Comuni-Co also recommends that at least one of the supervisors has completed a first aid course.

For trips to local sites and museums, government guidelines suggest a ratio of one adult to every: 15-20 pupils aged 11 and above.





- For Holiday Groups, it is the responsibility of the school to provide adequate group leaders to satisfy this ratio during all programmed activities. For all privately booked groups, it is the responsibility of the group organiser to ensure that this ratio is met upon booking and maintained through all activities scheduled by the school.

### **MISSING STUDENTS**

- An under-18 is deemed as missing if their whereabouts becomes unknown at any point during their programme. For scheduled 'Free Time', a student is deemed as missing if they do not return to a predetermined point when expected.
- The school has a missing student procedure for each scenario in which a student may become missing; from lessons, during excursions or activities, during transfers and in their accommodation.
- The school will issue all adults with the relevant Missing Student Procedure, which is to be followed in the event of a missing student.
- Teaching staff are prepared before a class with a list of student names and are aware that they must notify the DSL.
- Adults must act immediately upon the knowledge of a missing under-18.

### **FIRE SAFETY**

All students and staff at Comuni-Co will be told about the fire procedure for the location at which they are studying or working and all under-18s will be inducted into the relevant fire evacuation procedure for the premises on which lessons/volunteering are taking place within their first day of activity, this induction will include an explanation of the sound of the bell, along with the exit strategy and meeting points.

### **FIRST AID & MEDICAL**

Under-18s and adults will be made aware of the provision of first-aid depending on the premises at which they are studying or working during their programme.

Medical forms are provided during the enrolment process when medical requirements must be declared by parents/guardians before enrolment and will be made known to relevant adults. The school will not accept the enrolment of under-18s prior to the receipt of a signed and dated declaration form from a guardian, confirming that all medical conditions and special requirements have been disclosed.

The school reserves the right to remove an under-18 from their course and request their return home if a medical condition or requirement comes to light during their stay which has not been previously declared and has or may have an impact on the under-18s safety or welfare, or the safety or welfare of those around them.



## **AIRPORT TRANSFERS**

Comuni-Co Language Coaching & Services organise pick-up and drop-off from airports using our own trusted provider, who has undergone an enhanced DBS check. A member of the Comuni-Co team will usually also be present when students are met or dropped at airports. Telephone numbers are exchanged with relevant parties prior to arrival / departure.



## **APPENDIX A – PROCEDURES FOR RAISING AND DEALING WITH CONCERNS**

### **Who to share a concern with**

Any concern should be shared with Concetta Laquintana (DSL) on 0044 7856168019/ [hello@comuni-co.com](mailto:hello@comuni-co.com) or James Fordham on 0044 7980 903237/[hello@comuni-co.com](mailto:hello@comuni-co.com)

The DSL will decide if it is a low-level concern but may refer the concern to the LADO if it meets the threshold for harm.

All low-level concerns are recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then Comuni-Co will aim to do this as far as reasonably possible. Records are kept securely and comply with GDPR.

If the concern has been raised via a third party, such as a school, the DLS will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses

Where a pattern of behaviour is identified, Comuni-Co will decide on a further course of action, either through our disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold the case will then be referred to the LADO.

## **DISCLOSURES**

### **Initial procedure when abuse is suspected or a complaint is made:**

A staff or host family member suspecting or hearing a complaint of abuse should report all allegations or complaints of abuse to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead

### **Staff or host family members should:**

- listen carefully to the student and keep an open mind. Staff or host family members should not take a decision as to whether or not the abuse has taken place
- not ask leading questions, (a question which suggests its own answer)
- reassure the student but not give a guarantee of absolute confidentiality
- the staff or host family member should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken (please note that the giving of information to others, who have an obligation to receive the information for the purpose of protecting a child, is not a breach of confidentiality);



- keep a sufficient written record of any conversation regarding the suspected abuse. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead as soon as possible.
- attempt to safeguard and preserve all available evidence, (for example, notes, mobile phones containing text messages, clothing, computers);
- as soon as reasonably practicable after making a verbal report to the Designated Safeguarding Lead, ensure the disclosure form is passed to the DSL or DDSL (in her absence);
- if deemed necessary and with full support from the DSL or DDSL immediately provide a safe environment for the student.

Once the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead has been informed of the allegations or complaints of abuse, the staff or host family member suspecting or hearing of the abuse should continue to pass on any further information that comes to light but should not carry out any further investigations into the incident as this may prejudice the investigations of external agencies.

Parents and others who suspect abuse by or hear a complaint of abuse involving a Comuni-Co student should also inform the Designated Safeguarding Lead straightaway.

### **Allegations against Comuni-Co staff, host families or any other adult**

Our procedures for dealing with allegations against Comuni-Co staff and host families aim to balance the need to protect students from abuse and the need to protect staff and host families from false and unfounded allegations. Where appropriate, these procedures follow the guidance in the current edition of the Department of Education guidance Keeping Children Safe in Education September 2023.

- Suspension of staff will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the student or students concerned; and the need for a full and fair investigation.
- If an allegation is made against a member of the student's host family, Comuni-Co will provide the student with alternative accommodation while a full investigation takes place.
- All staff are required to report to the Designated Safeguarding Lead any concern or allegations about Comuni-Co's practices or the behaviour of colleagues or host family members which they feel are likely to put students at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report, provided that it is done in good faith.
- If Comuni-Co ceases to use the services of a member of staff because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS) or other relevant body as determined by future legislation. This report will be made by the DSL. Any such incidents will be followed by a review of the safeguarding procedures within Comuni-Co and will be carried out by the DSL.



### **Allegations against students**

If a student for whom we have responsibility is accused of abuse against another student for whom we have responsibility, we will take all appropriate action to ensure the safety and welfare of both students, including the student accused of abuse. These procedures will also apply as appropriate if a student for whom we have responsibility is accused of abuse against any other student for whom we do not have responsibility.

If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, we will ensure that, in consultation with the student's school or college, parents or guardians are informed as soon as possible and that the student is supported during the interview by an appropriate adult.

If the school or college decide that it is necessary to suspend the student during the investigation, we will provide appropriate support, assistance and accommodation wherever possible