

Child Protection Policy

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FCLC Child Protection Policy

A - Policy Statement

A1 - Context

Fettes Centre for Language and Culture (FCLC Edinburgh), part of Fettes College, an independent school, hosts 10-17-year-old students for short-term courses of two, three or four weeks over a six-week period in summer. We would welcome students from all nations and nationalities but most of our students are from Europe and Asia with smaller numbers from South America. All our students are accommodated in on-site boarding houses and are supervised 24 hours a day by our staff and accompanying group leaders. The students remain on campus for most of their time with us, going off-campus:

- Twice a week with their class and teacher in the afternoon for approximately 3 hours
- Friday afternoons with their group leader or our activity leaders for approximately 3 hours
- At weekends for full-day excursions with our activity leaders and group leaders

Our Child Protection Policy is set in the framework of the Scottish Government's *Getting it Right for Every Child (GIRFEC)*, the *National Guidance for Child Protection in Scotland (2014)* and *The Children and Young People (Scotland) Act 2014*.

The core message of GIRFEC is that everyone has a responsibility to do the right thing for each child and work towards a unified approach, with less bureaucracy and more freedom to respond to children's needs. Children should get the help they need, when they need it, and their welfare is always paramount. GIRFEC is underpinned by common values and principles which apply across all aspects of working with children and young people. These are:

- promoting the wellbeing of individual children and young people: this is based on understanding how children and young people develop in their families and communities and addressing their needs at the earliest possible time;
- keeping children and young people safe: emotional and physical safety is fundamental and is wider than child protection;
- putting the child at the centre: children and young people should have their views listened to and they should be involved in decisions which affect them;
- taking a whole child approach: recognising that what is going on in one part of a child or young person's life can affect many other areas of his or her life;
- building on strengths and promoting resilience: using a child or young person's existing networks and support where possible;
- promoting opportunities and valuing diversity: children and young people should feel valued in all circumstances and staff should create opportunities to celebrate diversity;
- providing additional help, which is appropriate, proportionate and timely, providing help as early as possible and considering short- and long-term needs;

- working in partnership with families: supporting wherever possible those who know the child or young person well, know what they need, what works well for them and what may not be helpful;
- supporting informed choice: supporting children, young people and families in understanding what help is possible and what their choices are;
- respecting confidentiality and sharing information: seeking agreement to share information that is relevant and proportionate while safeguarding children and young people's right to confidentiality;
- promoting the same values across all working relationships: recognising that respect, patience, honesty, reliability, resilience and integrity are qualities valued by children, young people, their families and colleagues;
- making the most of bringing together each staff member's expertise: respecting the contribution of others and co-operating with them, recognising that sharing responsibility does not mean acting beyond a worker's competence or responsibilities;
- co-ordinating help: recognising that children, young people and their families need interested parties to work together, when appropriate, to promote the best possible help;
- building a competent workforce to promote children and young people's wellbeing who are committed to contributing to individual learning and development and improvement of inter-professional practice.

A2 - Terminology

This Child Protection policy applies to all adults working with FCLC students. The entire policy is on the FCLC website, www.fclcedinburgh.com, and salient parts of the policy have been put into different induction handbooks, orientation materials, induction material and our brochure and is covered in face-to-face sessions with FCLC staff, group leaders and students, as appropriate. A Code of Conduct must be signed by all FCLC staff and group leaders at induction stage. Child Protection is an umbrella term and provides a framework for safeguarding and promoting child wellbeing with Use of IT and Prevent Duty as part of our safeguarding responsibility.

The FCLC General Manager, Greg Burrell, is the Child Protection Lead Person, who has overall responsibility for the FCLC programme, including Child Protection issues, while our Student Welfare Managers, who only work with us while the programme is in operation, look after day-to-day matters and are in regular contact with the students.

A3 - Statement

FCLC places the safety and wellbeing of the children in its care above all other considerations and seeks to provide an atmosphere which will be conducive to their physical, intellectual and emotional development.

A4 - Entitlement

FCLC believes in and supports diversity and equal protection for all. This policy therefore applies to all children in our care regardless of race, nationality, religion, gender, age, sexual orientation, disability or any other protected characteristic.

A5 - Adults' Responsibilities

As all our students are under 18 years of age, our staff are responsible for their emotional and physical wellbeing. All FCLC staff and group leaders receive Child Protection training at induction. All staff must be aware, vigilant and ready to report any concerns or allegations to the appropriate authority.

A6 - Associated Policies and Procedures

Policies and procedures associated with our Child Protection policy are:

- Prevent Duty
- IT Usage Policy
- Armed Intruders on Site policy
- Student Disciplinary Procedure
- Incidents and Accidents Procedure
- Abusive Behaviour policy
- Trips and Tours policy
- Photographs and Videos of Students policy
- Critical Incident Plan
- Equality, Diversity and Inclusion Policy

Elements of these policies and procedures are in induction handbooks, the student welcome pack and information given to parents and agents, as appropriate, and are explained to staff and group leaders at induction.

A7 - Policy Review

This policy is reviewed at least annually between March and June by the FCLC General Manager with approval from the Director of Fettes Enterprises taking into account feedback from the Activity Manager, Academic Manager, Student Welfare Managers, staff and group leaders given verbally and in their end-of-programme reports and questionnaires and is updated whenever there are substantial changes to circumstances, staffing or policies.

A8 - Roles and Responsibilities

Everyone—students, staff and groups leaders—shares responsibility for safeguarding our students. The students themselves must act responsibly, within the law and not place themselves in harm's way as well as looking out for each other and raising concerns about other students with adults, if necessary. Teachers are responsible for their students while they are in class and on class excursions, while activity leaders are responsible for them during breaks, at mealtimes, during projects, weekend excursions, leisure time and in the houses.

- **FCLC's Child Protection Coordinator** is the General Manager, **Greg Burrell**, and will be referred to throughout this document by his internal title, General Manager.
- **Deputy Child Protection Coordinators** are our three Student Welfare Managers, and will be referred to throughout this document by their internal title, Student Welfare Managers. Our Client Service Coordinator, **Alex Barreto**, has also received level 2 Child Protection training but is not normally involved in the summer programme.

One of these designated persons can be reached 24/7 throughout the programme on **07788 667574**.

A9 - U18s Involvement

Due to the short amount of time our students are with us and the intensity of the programme, our students have not been involved in the formulation of this policy. However, the needs of FCLC's students were paramount in its formulation.

A10 - Legal Framework

FCLC's Child Protection Policy is set in the framework of the Scottish Government's *Getting it Right for Every Child (GIRFEC)*, the *National Guidance for Child Protection in Scotland (2014)* and *The Children and Young People (Scotland) Act 2014*.

A11 - Policy Availability and Formats

This policy is available in its entirety on the FCLC website, www.fclcedinburgh.com with salient parts of the policy put into different induction handbooks, orientation material, induction material and our brochure and is covered in face-to-face sessions with FCLC staff, group leaders and students, as appropriate.

B - Code of Conduct

B1 - Overview and Principles

FCLC desires its staff and other adults associated with the programme to interact naturally with students but in a manner befitting that between adults and minors. FCLC seeks to build a climate of trust between our staff and students by presenting a safe, open culture. Therefore, staff interactions with students must be transparent and staff should always be wary of allowing situations to develop which could lead to allegations of impropriety.

B2 - Position of Trust

The *Sexual Offences Act 2003* states that any person in a position of trust who engages in sexual activity of any sort with students under the age of 18 is breaking the law even though the legal age of consent is 16. FCLC will report any instances of this to the authorities immediately.

B3 - Setting Standards

FCLC expects its staff to:

- Promote the wellbeing of individual children based on their needs
- Keep students physically and emotionally safe

- Present opportunities for students to interact with each other, our city and our country in an intellectually and/or physically stimulating way to encourage personal development
- Be excellent role models. This includes exhibiting core British values as expressed in the Prevent Duty.

B4 - Adult/Student Interaction

Below is guidance on a number of situations, behaviours and actions:

Physical Touch

The climate of suspicion that has developed with regard to child abuse poses a real dilemma for caring adults. This is true in all schools but especially so in residential situations where schools take pride in fostering a family atmosphere. In order to protect children from abuse, and staff from suspicions of abuse, the natural inclination to comfort and reassure children through physical contact needs a considered assessment of the situation. This does not mean that physical contact is never permissible. It does mean that adults touching children must operate within understood limits and that contact outwith those limits must be a considered response which can be justified if necessary.

Where those limits lie will vary according to the age of the child and the role of the member of staff. A young child in a residential situation may well require to be comforted and reassured. Any touching or comforting should be age appropriate, context specific, preferably done within vision of others and prompted by the needs of the child, not those of the staff.

One would expect the need and desirability of such contact with older students to be considerably less, although even in these circumstances, situations could arise in which it would be a natural and human occurrence. The death of a student, for example, might make it natural for students and teachers to grieve together and touching would be neither unusual nor undesirable, so long as it was agreeable to both parties and limited.

It would be impossible to lay down rigid rules about what is, and is not, permissible. Common sense is a good guide, but it must be informed common sense. It is important for caring adults to understand that too-generous limits, which can be operated satisfactorily by some can be exploited by others with less worthy motives. The difficulty in laying down clear limits makes it all the more important that we make every effort to ensure that all staff who have contact with students are carefully selected and all appropriate checks completed.

One-to-One Situations

Opportunities for abuse exist in all schools, especially residential schools and in one-to-one situations in particular. The simplest advice would be to try, as far as possible, to avoid being alone with a student. This may prove difficult, especially in a residential situation, where it might be seen as beneficial for a student to have some opportunity for one-to-one contact with an adult.

- Where one-to-one contact is appropriate, it should be timetabled and, where possible, held with others around or within earshot or view of others.
- Never have the door locked and, wherever possible, maintain a gap/barrier between you and the child.
- Another member of staff should be aware of any meeting and its purpose.
- If possible, doors should have built-in windows.
- Do not meet students off school premises or invite them to your home.
- Most one-to-one meetings will be straightforward and uneventful. But where the meeting is difficult, fraught, tense, accusatory or the student becomes distressed, the adult must record details and inform a senior manager of the incident.
- If in doubt about a meeting, agree that a colleague will be nearby.

Physical Contact and Restraint

- Physical contact should only be for the purpose of care, instruction, health and safety, physical intervention or restraint.
- Avoid any physical horseplay with a child, or any other actions another adult or child might misinterpret, no matter how innocent or well-intentioned the actions might be.
- Staff should always be able to justify resorting to physical contact in any situation.
- The nature of the contact should be limited to what is appropriate and proportionate.
- Where possible, initial responses should be to de-escalate and divert before considering physical intervention or restraint. Staff should avoid restraining a child by putting their hands on a child's joints. Where possible, another member of staff should be summoned to witness and give support. As soon as the child is under control, staff should cease any physical contact. All incidents of physical intervention or restraint should be logged, dated and signed.
- The use of physical restraint on a child should involve the absolute minimum force reasonable to the situation and is only permissible when certain that a child is at imminent risk of endangering themselves or others (or in extreme circumstances of inflicting damage to property).

'Hands on' Educational Instruction

- 'Hands on' educational instructions/support should only be used when verbal or role-modelling is insufficient, or it is necessary for health and safety reasons. Whenever possible, this should be done within earshot, and preferably within view, of others.
- Where 'hands on' is necessary you should seek the young person's permission appropriate to their age and level of understanding and explain to them what you are about to do.

Verbal Remarks

- Positive relationships between staff and students often involve warmth and humour but staff should be aware that there can be a narrow line between remarks which an adult perceives as fair and humorous, but which can be hurtful and embarrassing to a child.
- Salacious or demeaning remarks should never be made to or in the presence of students. Remarks about a child's physical characteristics or development, or suggestive or derogatory comments could fall into this category.
- Staff should avoid making unfavourable comparisons to a child and picking on particular children.

Attachments

- In circumstances where you or a member of staff's relationship with, or feelings towards, a child or young person are at risk of being construed as unprofessional behaviour, seek advice and support from your line manager.
- If it seems that a young person is becoming inappropriately attached to you or to another adult, share your concerns and seek advice from your line manager.

Inappropriate or Abusive Behaviour

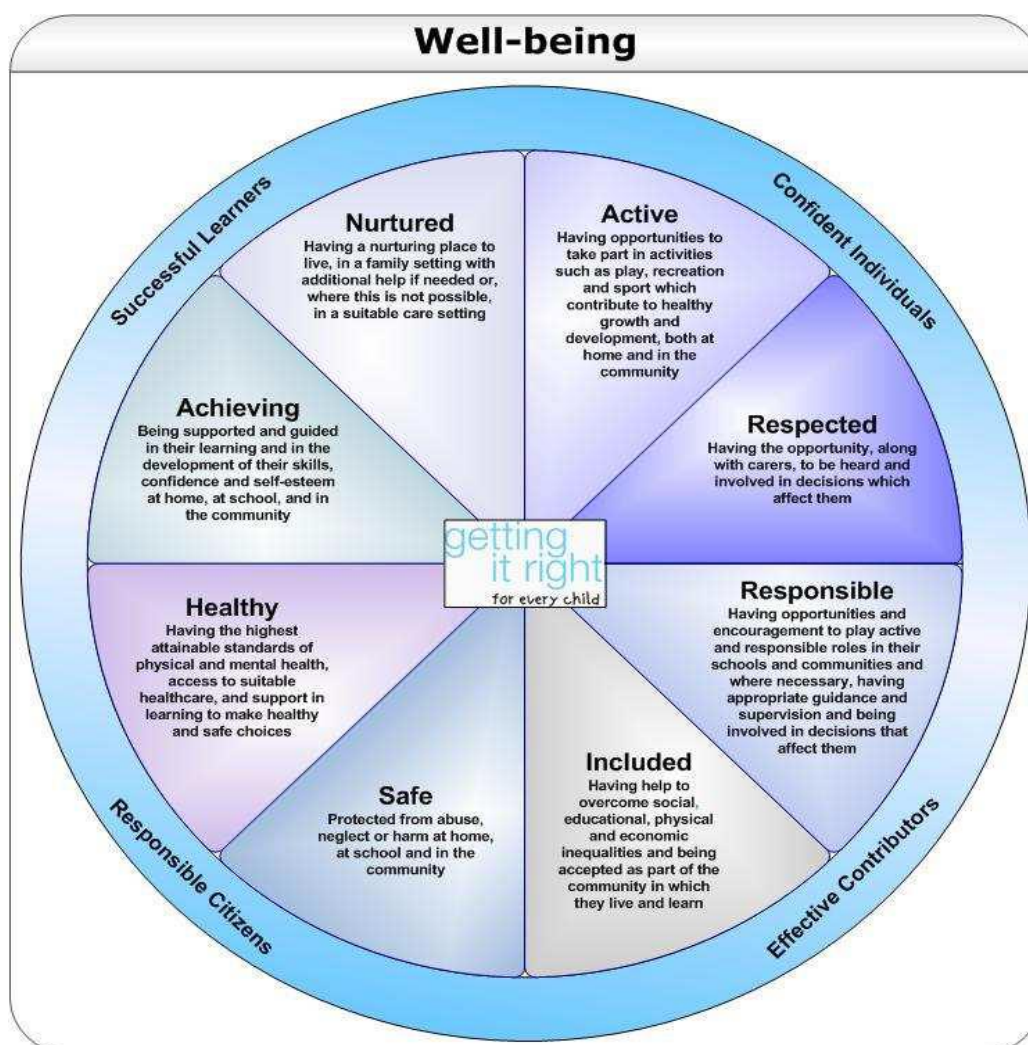
The list below is presented to show some of the ways in which inappropriate behaviour or abuse may be manifested. It is important to recognise that this list is neither definitive nor exhaustive, nor is it meant to suggest that all the actions below are in themselves abusive: they must be seen in the context of the interaction with the child and the intention of staff. Staff should bear these in mind as a way of minimising risk and encouraging good practice. Staff must always exercise professional judgement in each circumstance.

- **Physical**
 - Hitting/tapping
 - Pushing/jabbing
 - Throwing missiles
 - Shaking
- **Emotional**
 - Inappropriate/systematic sarcasm
 - Isolating e.g. in a locked room
 - Unfavourable comparisons
 - Threats
 - Intimidation
 - Scapegoating
 - Systematic personal criticism
- **Sexual**
 - Any sexual activity with a student
 - Inappropriate touching/comforting
 - Suggestive remarks or gestures

- Sexual harassment
- Sharing indecent materials
- Grooming a child for abuse

What is a Concern?

Staff may express a concern about anything that affects or has the possibility of affecting the wellbeing, happiness or potential of the child. It may relate to a single event or observation, a series of events or an attribute of the child or someone associated with them. Normally this concern will be shared with a Student Welfare Manager or the General Manager and a Cause for Concern form will be completed. The wellbeing of all students should be assessed using the wellbeing indicators shown on the GIRFEC wheel and it is our aim that all our policies reflect the values summarised by the wheel.



The **five questions** that should be asked with reference to a concern are:

- What is getting in the way of this child or young person's wellbeing?
- Do I have all the information I need to help this child or young person?
- What can I do now to help this child or young person?
- What can FCLC do to help this child or young person?
- What additional help, if any, may be needed from others?

Cause for Concern forms can be found in house folders and in digital form. Where a child is thought to be at risk of significant harm, the primary concern will be for their safety and staff should contact a Student Welfare Manager or the General Manager in the first instance.

FCLC staff may have an important part to play in the sensitive and delicate work of dealing with known or suspected cases of abuse but in addition to that, they have a role of very particular importance in the identification of the signs of abuse. Although our students are with us for a short time, there may be opportunities for observing symptoms, which could otherwise pass unnoticed. However, for advantage to be taken of these opportunities there is a need for some knowledge of those symptoms and an awareness of the action required to be taken when they are identified.

In a residential summer school, we have a particular responsibility to ensure that the children in our care are safe and secure. Therefore, all staff must be familiar with the content of these guidelines.

Staff Action

In the event of a disclosure, or if a third party expresses serious concern, or if you suspect that a child may have been abused, you must follow these guidelines:

If a child chooses to confide in you:

- Listen sympathetically and with care
- Reassure the child that he/she is not to blame
- Do not show disbelief
- Do not give a guarantee of confidentiality
- Take the allegation seriously
- Affirm the child's feelings as expressed (don't tell the child how he/she should feel)
- Avoid being judgmental about the information given
- Avoid persistent questioning
- Keep notes and make a record on the same day
- Refer to the Child Protection Officer

Observe, Record and Report

- R** Respond without showing signs of disquiet, anxiety or shock
- E** Enquire casually about how an injury was sustained or why a child appears upset
- C** Confidentiality should not be promised to children or to adults
- O** Observe carefully the behaviour or demeanour of the person expressing concern
- R** Record in detail what you have seen and heard
- D** Do NOT interrogate or enter into detailed investigations. Encourage the child to say what he or she wants until enough information is gained to decide whether a referral is appropriate.

And then **REPORT** to the General Manager or a Student Welfare Manager on the same day as the concern arises.

Seek Help from the General Manager or a Student Welfare Manager

This should be done to protect the member of staff and the student. If a Student Welfare Manager is involved, contact the General Manager or Wendy Wallace, the Director of Fettes Enterprises. The General Manager is in constant consultation with the Student Welfare Managers, the Academic Manager and Activity Manager and will decide whether further steps should be taken. The first point of referral outwith the school is the Edinburgh Council Social Work Department. The duty Senior Social Worker will, if necessary, inform the police. Decisions concerning when parents are informed will be made by the Social Work Department.

It is the responsibility of the Student Welfare Managers to ensure that the student is reassured and supported at all stages and that all concerned parties are informed of subsequent decisions and action.

B5 - Appropriate Appearance

Dress can have a great impact on students and some students may find it difficult to respect adults in their roles if they do not present themselves appropriately. During working hours:

- Activity leaders and the Activity Manager should wear an FCLC t-shirt, an FCLC hoody (if appropriate) and trousers, a skirt or shorts. The type of shorts may depend on the activity undertaken at the moment but should always be modest.
- The General Manager, the Student Welfare Managers, the Academic Manager, the Academic Supervisor and teachers are expected to wear 'smart dress', e.g. trousers, skirts, shirts and blouses as appropriate. Jeans, t-shirts, sundresses, flip flops, trainers, etc., are not appropriate.
- Group Leaders may wear whatever style of clothes they want but they must always be decently and modestly dressed.

As all activity leaders, managers and group leaders and most teachers live on-site and spend time on campus while not at work, they should be cognizant of the fact that students may not be able to separate work time from free time. Therefore, all adults should dress decently and modestly at all times while on campus.

Activity leaders and group leaders also live in the boarding houses alongside our students. Although they are not expected to remain fully-clothed 24 hours a day, they should never appear in their underwear, bare-chested or anything revealing or immodest.

B6 - Alcohol, Drugs and Smoking

As alcohol, drugs and smoking are destructive to one's health in addition to being addictive, FCLC does not allow any students on its programme to consume alcohol, drugs or tobacco products at any time, on- or off-campus, whether or not it is legal for them to do so in their home country. Doing so is grounds for expulsion from the programme and being sent home at their parents' expense. Adults associated with the FCLC programme may not smoke on campus and may only drink alcohol on campus in connection with official FCLC activities such as the group leader farewell party and cannot smoke or drink off-campus when in the

company of students or when it may affect their ability to care for students later. Additionally, adults cannot drink alcohol off-campus and return to campus while intoxicated and cannot drink alcohol on a day off if they will be on duty later that day. Consumption of illegal drugs is a criminal offense and is grounds for immediate dismissal in the case of FCLC staff and removal from the programme in the case of group leaders and students.

Adults should never encourage or help students to obtain the means to drink, take drugs or smoke. Doing so is grounds for immediate dismissal. If the topic is ever raised, the adult should take the opportunity to educate the student about harmful and/or addictive substances rather than make light about them or share personal experiences with them.

B7 - IT and Social Networks

Students may use the Fettes College Wifi from 7:30am to 10:30pm, before and after which it is inaccessible. We employ the SonicWall NSA 5600 Network Security Appliance as our security filter, which identifies and restricts access, as appropriate, to material and applications regardless of evasive techniques employed. Students, staff and group leaders are informed of the salient features of our internet usage policy in their welcome or induction material and face-to-face during orientation. Staff may not share contact details with any present or past FCLC students still under the age of 18.

The full version of our network use policy is below:

Technology is a hugely exciting area of life and an integral part of the rich and stimulating learning environment at FCLC. However, with the extensive opportunities afforded by technology comes responsibility and this policy has been drawn up to protect all parties; staff, students, group leaders and FCLC itself.

By logging onto the Fettes Network or attaching any device to it, such as a laptop, mobile or smartphone, you automatically agree to accept the conditions set out in this policy. Access is a privilege, not a right. The following list of activities is not exhaustive but represents the core aims of the policy:

Passwords/accessing the material of others

- **DO** access the school's network only via the authorised account and password issued to you;
- **DO NOT** use the password of any other person or divulge your password to anyone else.

Computer systems – **DO NOT**....

- *take any action that threatens the integrity of the Fettes College ICT systems. This includes the use of executable files that are liable to corrupt the computer systems;*
- *attempt deliberate unauthorised access to facilities, services, data or resources within the Fettes College networks or any other network or service accessible via the internet;*
- *Attempt to circumvent the school's network access controls;*

- *Install software or set up a computer to evade network mail and web filters;*
- *Use the computer systems in such a way that denies service to other users – for example by overloading network connections by unnecessarily, excessively and thoughtlessly sharing or downloading large video or other files;*
- *Interfere with wireless base stations.*

Offensive material/behaviour – DO NOT....

- *Access or create, transmit or publish offensive, obscene, defamatory or indecent material or material which is designed to cause annoyance, inconvenience, needless anxiety or offence;*
- *Participate in electronic bullying in any form including harassing, insulting or attacking others, via blogs, use of photographs or other images, web postings, email, texting or any other electronic means;*
- *Create, transmit or cause to be transmitted material such that the copyright of another person is infringed or that may lead to a breach of the Data Protection act;*
- *Use the internet, social networking or email in any way that would bring the name of Fettes College into disrepute;*
- *Transmit by e-mail any confidential information relating to FCLC otherwise than in the normal course of your duties.*

DO...

- *Observe this policy at all times and note the disciplinary consequences of non-compliance which, in the case of a gross breach or repeated breach of the policy, may lead to dismissal or expulsion from the programme;*
- *In the case of staff, produce and write e-mails with the care normally given to any form of written communication;*
- *Appreciate that electronic mail is relatively insecure and consider security needs and confidentiality before transmission.*

FCLC and Fettes College reserve the right to monitor staff and student communications and stored files in order to

- *establish the existence of facts;*
- *ascertain compliance with regulatory or self-regulatory procedures;*
- *monitor standards which are achieved by persons using the system in the course of their duties and for staff training purposes;*
- *prevent or detect crime;*
- *ensure the effective operation of the system such as protecting against viruses, backing up and making routine interceptions such as forwarding e-mails to correct destinations;*
- *gain access to routine business communications for instance checking voice mail and e-mail when staff are on holiday or on sick leave;*
- *maintain system integrity and ensure that users are using the system responsibly. Users should not expect that network use will be private.*

B8 - Accommodation

All FCLC students stay in our on-site boarding houses where they are supervised by our activity leaders and their group leader(s) if they came as part of a group. Students' bedrooms should never be locked but adults must respect students' privacy and should not enter bedrooms unannounced and, should there be a need to enter a child's bedroom, the door should be left open while in the room. Adults should not enter shower rooms when they are being used by students.

Activity leaders are responsible for all students in their house and a Senior Activity Leader is assigned to each house as a point of reference for group leaders and activity leaders about house rules and life but do not have increased safeguarding or protection duties or responsibilities. In addition to FCLC's activity leaders, houses may also be staffed by group leaders, who are only responsible for students in their group.

B9 - Transport

FCLC works with Central Taxis, S & M Pickering and Edinburgh Coach Lines for our transfers and excursions. All their drivers have PVG clearance. Staff should never arrange transport for students outwith these companies.

B10 - Whistleblowing

In working with young people, it is possible for staff, through ill-considered actions, to lay themselves open to allegations of abuse. Their best protection is to encourage a climate of openness within the programme, where students feel confident to point out aspects of behaviour they do not like.

If a member of staff is seen to behave inappropriately with a child, it should not be ignored but should be shared with a Student Welfare Manager or the General Manager. If the concern is about a Student Welfare Manager, it should be reported to the General Manager and if it is about the General Manager, it should be reported to the Director of Fettes Enterprises.

Should anyone feel that a child is in imminent danger and the authorities should be involved immediately, several options are available. If the crisis is life threatening, one should call 999 or 112. If calling about an ill child, one should call 111. In serious but not life threatening situations, one may call Edinburgh Council's Social Care Direct on 0131 200 2324. In the evening and at weekends or public holidays, one can call Emergency Social Work on 0800 731 6969. If calling from outside the UK, one can phone +44 131 553 8286.

C - Child Protection

C1 - Overview

Our Child Protection Policy is set in the framework of Scottish Government's *Getting it Right for Every Child (GIRFEC)*, the *National Guidance for Child Protection in Scotland (2014)* and *The Children and Young People (Scotland) Act 2014*.

Where a child is thought to be at risk of significant harm, the primary concern will be for their safety and staff should contact the General Manager. The General Manager will consider the immediate needs of a child once a concern about their possible safety is raised, considering the following questions:

- Is the child at immediate risk?
- What is placing this child at immediate risk?
- What needs to happen to remove this risk now?

Although our staff may spend an extensive amount of time with students on a daily basis, as our students are with us for only two to four weeks, signs of abuse may not be immediately recognisable. However, staff are trained to recognise signs of abuse and what to do should they have any concerns about a student's safety or wellbeing.

C2 - Child Protection Officers

- Child Protection Coordinator: Greg Burrell, General Manager
- Deputy Child Protection Coordinators: Student Welfare Managers

The General Manager has undergone Designated Child Protection Lead (formerly Level 3) training and trains the Student Welfare Managers to Advanced Safeguarding level (formerly Level 2). The General Manager is on-site six days a week, 8.00am to 8.00pm and at least one of the Student Welfare Managers is on-site at all times. Additionally, any concerns can be raised 24/7 on the emergency phone which will be answered by the General Manager or one of the Student Welfare Managers.

C3 - When adults need to respond

An adult needs to respond if:

- They note something themselves
- They are told something by a third party
- A student discloses something to them.

Guidance on adult interaction is given in B4 above while information about recognising symptoms of abuse and how to respond is given in C4 & C5 below.

C4 - Recognising symptoms of abuse

Adults are taught the four categories of significant harm at induction:

- **Neglect** - Failure to meet a child's basic/psychological needs, including food, shelter, clothing, emotional support, medical care and protective environment safe from physical harm.
- **Physical Abuse** – This includes hitting or shaking a child, or grabbing a child by an article of clothing.
- **Sexual Abuse** - This includes physical contact, making children look at pornography or encouraging children to behave in sexually inappropriate ways.

- **Emotional Abuse** – Persistent ill-treatment of a child, which may involve conveying that the child is worthless, unloved, or inadequate. It may also involve the imposition of inappropriate expectations.

It is important to remember that lists such as the one below are neither definitive nor exhaustive. The information has to be used in the context of the child's whole situation and in combination with a range of other information related to the child and his/her circumstances.

These are general indicators that the child may be troubled though not necessarily about abuse. The child may have some of these problems or none at all. It is the combination, frequency and duration of signs that will alert you to a problem. There can be an overlap between all the different forms of child abuse and all or several can co-exist.

Physical Abuse

Signs of possible physical abuse:

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries, or delay in reporting them
- Excessive physical punishment
- Arms and legs kept covered in hot weather
- Fear of returning home
- Aggression towards others
- Running away

When considering the possibility of non-accidental injury, it is important to remember that the injuries may have occurred for other reasons, e.g. genuine accidents or medical disorders.

Physical Neglect

Signs of possible physical neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Frequent lateness and/or unexplained non-attendance at school
- Untreated medical problems
- Low self-esteem
- Poor peer relationship
- Stealing
- Significant lack of growth
- Weight loss
- Hair loss

- Poor skin or muscle tone
- Circulatory disorders

Emotional Abuse

Signs of possible emotional abuse:

- Low self-esteem
- Continual self-deprecation
- Sudden speech disorder
- Significant decline in concentration
- Socio-emotional immaturity
- 'Neurotic' behaviour (e.g., rocking, head banging)
- Self-mutilation
- Compulsive stealing
- Extremes of passivity or aggression
- Running away
- Indiscriminate friendliness

Sexual Abuse

Not all children are able to tell parents or adults that they have been assaulted. Changes in behaviour may be a signal that something has happened. It is important to remember that in sexual assault there may well be no physical or behavioural signs.

Signs of possible sexual abuse:

- Behavioural
 - Lack of trust in adults or over familiarity with adults
 - Fear of a particular individual
 - Social isolation - withdrawal or introversion
 - Sleep disturbance (nightmares, irrational fears, bed wetting, fear of sleeping alone, needing a nightlight)
 - Running away from home
 - Girls taking over the mothering role
 - Reluctance or refusal to participate in physical activity or to change clothes for activities
 - Low self-esteem
 - Drug, alcohol or solvent abuse
 - Display of sexual knowledge beyond the child's years
 - Unusual interest in the genitals of adults, children or animals
 - Expressing affection in an age inappropriate way, e.g., 'French kissing'
 - Fear of bathrooms, showers, closed doors
 - Abnormal, sexualised drawing
 - Fear of medical examinations
 - Developmental regression
 - Poor peer relations

- Inappropriate or sexually harmful behaviours
- Compulsive masturbation
- Stealing
- Psychosomatic factors, e.g., recurrent abdominal pain or headache
- Having unexplained/abundance of sums of money and/or possessions
- Sexual promiscuity
- Physical/Medical
 - Sleeplessness, nightmares, fear of the dark
 - Bruises, scratches, bite marks to the thighs or genital areas
 - Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
 - Pain on passing urine or recurrent urinary infection
 - Stained underwear
 - Unusual genital odour
 - Anxiety/depression
 - Eating disorder, e.g., anorexia nervosa or bulimia
 - Discomfort/difficulty in walking or sitting
 - Pregnancy - particularly when reluctant to name father
 - Venereal disease, sexually transmitted diseases
 - Soiling or wetting in children who have been trained
 - Self-mutilation/suicide attempts

C5 - Response to a disclosure guidelines

In the event of a disclosure by a child to an adult or if a member of staff suspects that a child may have been abused or if a third party expresses serious concern to a member of staff that a child may have been abused, the following guidelines must be followed:

If a child chooses to confide in you:

- Listen sympathetically and with care
- Reassure the child that he/she is not to blame
- Do not show disbelief
- Do not give a guarantee of confidentiality
- Take the allegation seriously
- Affirm the child's feelings as expressed (don't tell the child how he/she should feel)
- Avoid being judgemental about the information given
- Avoid persistent questioning

In all cases:

- Keep notes and make a record on the same day using the child protection concern form.
- Refer to the Student Welfare Managers and/or the General Manager
- **Observe, Record and Report**

- R** Respond without showing signs of disquiet, anxiety or shock
- E** Enquire casually about how an injury was sustained or why a child appears upset
- C** Confidentiality should not be promised to children or to adults
- O** Observe carefully the behaviour or demeanour of the person expressing concern
- R** Record in detail what you have seen and heard
- D** Do NOT interrogate or enter into detailed investigations. Encourage the child to say what he or she wants until enough information is gained to decide whether or not a referral is appropriate.

And then **REPORT** to the General Manager or a Student Welfare Manager on the same day as the concern arises.

Primary attention will be given to ensuring the child is safe from immediate harm. The General Manager, in consultation with the Student Welfare Managers, will decide whether further steps should be taken. The first point of referral outwith the school is the Edinburgh Council Social Work Department. The duty Senior Social Worker will, if necessary, inform the police and the Reporter to the Children's Hearing. Decisions concerning when parents are informed will be made by the Social Work Department.

It is the responsibility of the Student Welfare Managers to ensure that the student is reassured and supported at all stages while the General Manager will ensure all concerned parties are informed of subsequent decisions and actions.

C6a - Keeping Records

Records are stored separately from student and staff files in digital form in the General Manager's personal computer drive, which only he can access. Records are kept for three years and, should no further action be required on them, are then deleted.

C6b - Confidentiality guidelines

FCLC aims to build up relationships of trust with its students and their parents. Both should feel able to raise with FCLC concerns about safety and welfare in the knowledge that these will be dealt with sensitively. Because of the sensitivity of these issues, FCLC operates on the presumption that anything imparted in confidence will be treated in confidence. This is subject to three qualifications:

1. Anything imparted in confidence to one member of staff or person approached as an associate of FCLC may be shared with a restricted number of colleagues if that person feels in need of support and guidance from them.
2. If serious concerns are raised about the safety or welfare of a child, the person approached may be obliged, in terms of our child protection procedures, to pass that information on to the General Manager for consideration as to whether it should be shared with the appropriate authorities. In these circumstances, the person approached would not, except in an emergency, breach the confidence without letting the person seeking assistance know that he/she intended doing so.
3. FCLC must pass on information when legally obliged to do so, for example, by a court of law.

Children must feel able to share concerns with a member of staff. Problems may arise when a child consults a member of staff about a problem and does not want that information to be shared with parents. While staff will encourage children to share that information with parents where that is appropriate, there may be circumstances in which any pressure to pass the information on could result in the child keeping the problem to him or herself or not sharing concerns in the future. This is why in these specific circumstances the General Manager may make a decision not to include parents.

Students are given the following advice: Staff are here to listen and to help. Talk to someone if you are at all concerned or worried about anything. They may need to share the information with others if they are concerned about your safety but, if so, they will tell you first. A list of people to contact for specific issues is given in the Student Welcome Pack.

C7 - If an adult is accused

If a concern or allegation is brought to the attention of a Student Welfare Manager or the General Manager, they will immediately discuss the situation with each other and any other staff involved to consider the nature, content and context of the allegation and agree a course of action. The General Manager may ask the Student Welfare Managers to provide or obtain relevant additional information and/or may contact Edinburgh Council Social Care Direct for guidance.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the General Manager and the Student Welfare Managers, and agreement reached on what information should be put in writing to the individual concerned and by whom. The General Manager will then consider with the Student Welfare Managers what action should follow, both in respect of the individual and those who made the initial allegation.

The General Manager should inform the accused person about the allegation as soon as possible after consulting the Student Welfare Managers and will provide them with as much information as possible at that time. However, where Children's Social Care Services need to be involved, the General Manager should not do that until those agencies have been consulted and have agreed what information can be disclosed to the accused. At this point, the General Manager will decide whether the person should be suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension will be considered prior to taking that step.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, the Edinburgh Council Social Work Department will be contacted immediately.

Where it is clear that an investigation by Children and Families Social Care Direct is unnecessary, or Children and Families Social Care Direct decides that is the case, the General Manager will discuss the next steps to take with the Student Welfare Managers.

Measures to take will range from taking no further action to dismissal or a decision not to use the person's services in future. An individual will be suspended only if there is no reasonable alternative.

FCLC will inform the individual of the concern or allegation as soon as possible and will give an explanation of the likely course of action, unless there is an objection by Children's Social Care Services or the police. The individual will be advised to contact a friend or colleague for support and, in the case of FCLC employees, will be given access to welfare counselling. The General Manager will keep the person who is the subject of the concern or allegation informed of the progress of the case and consider what other support is appropriate for the individual. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence. Once an investigation has been initiated, it will be carried through to its conclusion, even if the subject of the investigation resigns.

Parents or carers of a child or children involved will be told about the concern or allegation as soon as possible if they do not already know of it. However, where Children's Social Care Services need to be involved, the General Manager will not do so until those agencies have been consulted and have agreed what information can be disclosed. Parents or carers will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence. Parents and carers will also be made aware of the requirement to maintain confidentiality about any allegations made against staff while investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, Children's Social Care Services, or the police, as appropriate, should consider what support the child or children involved may need.

FCLC will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered with reporting restrictions applying until the point that the accused person is charged with an offence.

C8 - If a child is accused

If an FCLC student is accused of inappropriate behaviour or abuse, staff to whom the incident is reported or who first discover the incident should:

- Make the situation safe, if necessary
- Refer the incident to the Student Welfare Managers or General Manager
- Be prepared to give a full account of the incident to him/her, both orally and in writing.

The General Manager and Student Welfare Managers will investigate the incident and the accuser and accused may be brought together to ascertain the facts. Should the General Manager be certain an act of abuse has occurred, Children's Social Care Services will be contacted for advice, the abuser's parents will be informed of the situation, the student will be expelled from the programme and, in most cases, will be repatriated at the parents' expense as soon as possible. The child may not be repatriated if a case will be opened against him/her and in this case the parent will be responsible for arranging for accommodation, sustenance and supervision for the child at their expense. The abused child's parents will be informed and the abused child will be offered support including counselling.

Should there be no clear evidence of abuse or should the offense be minor, such as a cultural misunderstanding of appropriate and inappropriate behaviours, both parties will be given clear guidelines for future behaviour and a code of conduct agreed. FLC staff will be informed of the situation and will monitor it closely. Parents will be notified of the situation.

C9 - Child Sexual Exploitation

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

It is highly unlikely that, during the limited time our students stay with us, they could become involved in a sexually exploitative relationship. It could be, however, that students will already be in this type of relationship prior to arrival. The warning signs of being sexually exploited are similar to those of being sexually abused and any concerns should be forwarded to the General Manager or Student Welfare Managers.

C10 - Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. If staff have a concern regarding this, they should contact the General Manager or a Student Welfare Manager. Where staff discovers that an act of FGM appears to have been carried out on a

girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.

D - Training

D1 - Responsibility

The General Manager, who has completed Level 3 safeguarding training, is responsible for ensuring all adults associated with the programme receive training to the appropriate level.

D2 - How training is delivered

The General Manager gives the Student Welfare Managers Level 2 training during the weeks leading up to the opening of the centre or at the beginning of their contract period. All other staff are given basic awareness training during the induction days, specifically on the second day when all staff should be present. The General Manager also provides basic awareness training to all group leaders on the first Monday of their stay after the general group leader meeting. As for most people associated with the programme, the six weeks working at FCLC will be their only experience of safeguarding throughout the year, salient features of our Child Protection policy are regularly raised at staff meetings to ensure Child Protection is kept at the front of everyone's mind. The General Manager attends a refresher course in Child Protection at least once every two years.

E - Safer Recruitment

E1 - Overview

FCLC seeks to provide an environment of trust and openness between students and adults associated with the programme. Therefore, FCLC is committed to choosing the correct staff to work with our students. All staff are interviewed by two year-round FCLC staff, one of them being the General Manager, and all interviews include Child Protection and wellbeing questions appropriate to the positions. Additionally, all staff must be enrolled in the PVG Scheme prior to commencement of employment and two positive references must be received before a final job offer can be made, as is stipulated in the contracts sent out to all staff. All group leaders must undergo a criminal record check in their home country and their agency must verify they have received a clean report prior to arrival.

As most FCLC staff work on short contracts with nearly one year between appointments, all returning staff will require a PVG Scheme update (undertaken and paid for by FCLC) for each contract period. All year-round staff will require a PVG Scheme update (undertaken and paid for by FCLC) every three years.

E2 - Recruitment materials

All prospective applicants are given job specifications which include Child Protection requirements and apply using our application forms, which include statements regarding the Rehabilitation of Offenders Act and the requirement of a PVG check as well as a question about spent/unspent criminal convictions.

E3 - Recruitment stages

Every candidate is asked the child protection questions listed for the position they have applied for and reasonable answers must be obtained. Interviewers should remember that many staff will not have received child protection training prior to the interview, so wrong answers can be accepted as long as a concern for the wellbeing of the child was expressed and correct answers are furnished by the interviewers. All candidates are also informed of the need to undergo a PVG check and that employment can only be taken up once the check has been completed favourably. Once a candidate has been selected for employment, they are sent a contract specifying that their employment is dependent upon a clean PVG check and receipt of two positive references. They are also sent a reference request authorization form. As soon as these are returned to FCLC, the General Manager hands the PVG application form on to the Fettes Enterprises nominated PVG representative, who applies and informs the General Manager when the application has been processed and also informs him of any convictions which were flagged.

E4 - Applicants informed of the child protection policy

All calls for applications for all positions within FCLC specify that the employment will involve working with under-18s. This is repeated on the application forms wherein the applicant must describe their previous work with children, declare whether they have any spent or unspent criminal convictions and are informed that they will be required to undergo an enhanced background check. Questions related to child protection are asked in every interview and applicants are asked to confirm whether they would be willing to undergo a Disclosure Scotland PVG check for which new applicants will have to pay £30.

E5 - Applicants awaiting their Disclosure Scotland PVG background check

No staff may commence work with FCLC until an acceptable PVG certificate has been received.

E6 - Applicants with a criminal record

Positions with FCLC are exempt from the Rehabilitation of Offenders Act (1974) which means that all convictions, cautions, reprimands and final warnings on an applicant's record must be disclosed. However, only relevant convictions and other information will be taken into account; disclosure may not necessarily be a bar against obtaining a position.

E7 - Applicants where a Disclosure Scotland PVG background check is not possible

All applicants must undergo a PVG check. Additionally, those who have resided, as adults, in another country outside the UK for six consecutive months or more in the past five years must produce a Certificate of Good Conduct from the country or countries of residence covering the period(s) of residence. In the case of group leaders, the agency sending the group leader may submit a declaration confirming that they have obtained a Certificate of Good Conduct in respect of the group leader and that they have no reason to believe that the group leader would not be suitable to work with under-18s. FCLC also requires all staff

to submit at least two positive letters of reference which include the referee confirming that they have no reason to believe that the applicant would not be suitable to work with under-18s.

E8 - Recruitment of homestays

FCLC does not offer homestay accommodation.

E9 - Single central record

FCLC has a single central record to ensure pre-appointment checks have been made for all staff and group leaders including identity, qualifications, eligibility to work in the UK, membership in the PVG Scheme, overseas criminal checks, references, acceptance of our Code of Conduct and attendance at a Prevent training course, as appropriate.

E10 - Disqualification by association

FCLC does not work with students under the age of 8, nor with host families.

F - Welfare/Implementing Child Protection

F1 - Use of risk assessments

FCLC, together with Fettes College's full-time Health & Safety Officer, Scott Crawford, have completed risk assessments for all accommodation, classrooms, activities and excursions and has used these to formulate a number of procedures and policies including, but not limited to, ones for trips and tours, missing students, internet usage, armed intruders onsite, abusive behaviour and accidents & incidents. All staff are informed of these policies during induction while elements of the trips and tours policy are included on each excursion information sheet and risk mitigation information for each activity is included on each activity plan. Students are informed of our abusive behaviour and internet usage policies in their welcome talk and in their welcome pack. As special care must be taken on excursions, we only take our students to reputable and safe sites. Additionally, Session 3 of every teaching day is devoted to preparing students for their mid-week and weekend excursions. Although the main focus of the sessions is on the sites to be visited, issues regarding safety are also covered, as appropriate.

F2 - Supervision ratios

As carers for students under the age of 18, the *Protection of Children (Scotland) Act 2003* states our responsibility for safeguarding and promoting the welfare of all the children who attend our programme. Appropriate and adequate supervision is necessary at all times. FCLC exceeds its legal obligations and operates a staff-to-student ratio of at least 1:15 both on- and off-campus and offers 24/7 care and supervision to all students.

FCLC always ensures that staffing is appropriate to the nature of the activity/excursion and exceeds the above ratio where the safety and welfare of our students requires it.

Teachers are responsible for supervision in class and on academic excursions while activity leaders provide supervision during meals, breaks, activities, in the boarding

houses and on excursions organised by the activity team. All activity leaders and group leaders are resident in the houses with the students and are required to stay overnight and be available in residence at all times, except for designated time off.

F3 - Missing Students

Students must be accounted for at all times. Students are never to be left in a house unattended and should attend all lessons and activities, on- and off-campus.

Lessons: Students must attend all lessons. The only reasons that they may miss classes are if they are ill or their group leader or parent/guardian has agreed permission with the General Manager for them to be elsewhere. Teachers record absences and attendances in the database within the first five minutes of class and this is checked by the Academic Manager or Academic Supervisor at that time. Should any students be absent, the Academic Supervisor or Academic Manager goes to the class to check the situation. If the student is indeed absent, a Student Welfare Manager is contacted to ascertain where the student is. Additionally, should a student leave class and not return, the teacher must inform the Academic Manager or Academic Supervisor of this as quickly as possible and they, in turn, should either locate the child themselves or contact a Student Welfare Manager to locate the child. Students who miss lessons without an excuse more than once are reported to the General Manager who will then speak to their group leader or parent to discuss courses of action and possible disciplinary procedures.

Accommodation: Students must sign in and out of their accommodation every morning and evening. These sign-in/sign-out lists are checked by the Senior Activity Leader responsible for each house and are given to the Student Welfare Managers every morning during the activity leaders' meeting. The Student Welfare Managers are contacted immediately if any students are not in their house when they should be and the Student Welfare Managers locate the students and return them to their house.

Excursions: If a student gets separated from a group, the activity leader or teacher in charge should follow the steps below in order:

1. Don't panic. The student is almost certainly nearby and care must be taken not to upset the other students by being visibly shaken.
2. Ask the other students if they know where the student is.
3. If no one knows where the student is, the staff member should leave the rest of the students in the care of the other teacher, activity leader or group leader and go to the meeting point. The member of staff left with the group should keep the students together, calm and out of the way.
4. If the student is not at the meeting point, they should be called on their mobile.
5. If the student does not respond, the staff at the venue should be informed of the situation and the General Manager should be called on **07788 667574**.
6. Do not leave the venue without the child. If the rest of the group needs to return to the school, they may do so but only if the staff-to-student ratio is at least 1:15. If

this ratio is not met, the General Manager will arrange for another member of staff to meet the group at the venue to help escort the rest of the group back to campus. If the student is united with the group before step 5, there is no need to pursue the matter further. If the student is found from step 5 on (venue management and the FCLC General Manager have been informed of the situation), both parties must be informed of this immediately. Additionally, upon returning to the school, the staff member must fill in an Accident & Incident Report and speak with the Academic Manager and/or the General Manager to ensure better practice in future.

F4 - Welfare Provision

The General Manager, Greg Burrell, is the Child Protection Coordinator and is ultimately responsible for our students' welfare. He or his nominee is available 24 hours a day, seven days a week for the six weeks of summer on the emergency mobile and is on-site from 8:00am to 8:00pm Monday to Friday and is on-site or out on excursions with students most weekends.

FCLC also employs resident Student Welfare Managers who deputise for the General Manager in his capacity as Child Protection Coordinator. The activity leaders, who have the most contact with the students, answer to the Student Welfare Managers in their pastoral duties and report any wellbeing and child protection issues to them. The Student Welfare Managers are responsible for the day-to-day wellbeing of the students and therefore take care of such things as distributing prescribed medications, ensuring dietary requirements are met, ensuring students are satisfied with their accommodation, welcoming students to the campus, explaining school rules to them and ensuring they are happy and well-socialised.

A complaints procedure for students is printed in the student welcome pack and this is pointed out to them during their orientation talk. The following appears in the Student Welcome Pack:

If you wish to talk about...

Classes

Cultural Programme

Accommodation/Welfare

You should speak to...

Your teacher or the Academic Manager

An AL or the Activity Manager

A Student Welfare Manager

Alternatively, you can speak to your Group Leader (where appropriate) about any aspect of the programme. Your Group Leader will inform a member of staff and follow-up action will be taken. A record of your complaint and the reply / follow-up will be made.

If you are not satisfied with the response to your complaint, you should make an appointment to see the General Manager. You may take a friend, your Group Leader or any other member of staff with you to this meeting. A record of the meeting and its outcome will be made.

Activity leader meetings are held every morning, Monday to Friday, during which any concerns for students' wellbeing can be raised and shared with each other, the General

Manager, and the Student Welfare Managers. Additionally, the Student Welfare Managers and General Manager have meetings with the group leaders three times a week during which any concerns for students' wellbeing can also be raised.

Child protection information is included in employment handbooks for all positions with specific and enhanced child protection material in the Student Welfare Managers' handbook.

F5 - First aid & medical

Parents are asked to inform FCLC of any medical issues their child may have at booking stage. They must also state any medication their child will need to take and state whether the child can self-medicate with over-the-counter pain killers in the case of mild discomforts. Additionally, FCLC asks that all students have medical insurance.

FCLC offers a certified First Aid training course to 12 of its staff at the beginning of each summer and therefore, approximately 50% of staff is qualified to offer first aid assistance. There are First Aid boxes in every house, the Spens Building, the Dining Hall and Westwoods Health Club and defibrillators in the Spens Building, the main building, Westwoods Health Club and the Dining Hall. First Aid packs are taken on every off-site excursion. It should be noted that there is no doctor or nurse on the premises. However, we have an agreement with Bangholm Medical Centre, close by the school, for more serious issues, which those involved in our programme can attend Monday to Friday. Our staff can also phone NHS 24 for advice and to gain an appointment at a local hospital outwith doctor's surgery hours and, in case of emergencies, the school is located across the road from the Western General Hospital.

While every effort is taken to protect students' privacy, medical conditions are shared with FCLC staff to ensure appropriate measures are in place to deal with those conditions.

In an effort to ensure students recover from any illnesses they may have quickly and to ensure students do not miss classes unnecessarily, our sick student policy is that if a student misses lessons in the morning due to illness, they are not allowed to attend afternoon activities. If a child is vomiting because of a virus, they are kept out of lessons and activities for between 24 and 48 hours.

If a student requires an appointment with a GP, a Student Welfare Manager will call the surgery. If part of a group, the student will attend with their group leader and if an individual student, they will attend with an activity leader.

F6 - Behaviour & discipline

While remembering that we are dealing with young people and that different countries have different expectations of acceptable conduct, our students are expected to abide by British law and, within reason, to abide by British norms of behaviour. Parents are emailed a list of school rules which they must agree for their child to abide by, students are given the same rules as part of their welcome pack and, during their orientation meeting, they must

sign the rules and agree to compliance. Many teachers also have classroom rules set after negotiations between themselves and their students and all staff are encouraged to behave as we would expect our students to behave.

In cases of misbehaviour or indiscipline, FCLC has a structured disciplinary procedure, which seeks to encourage good behaviour rather than threatening punishments. Students are informed during their orientation talk, however, that good behaviour is expected of everyone and that gross misconduct will be punished with measures up to and including being sent home at the parents' expense as outlined below.

Student Disciplinary Procedures

Behavioural issues are any conduct that clearly impacts on the student's own or other students' progress or behaviour that disrupts or detracts from the academic or cultural programme. There are four stages to the Student Disciplinary Procedure. In cases of severe misconduct such as drinking alcohol or leaving campus without permission, FCLC may skip the first three steps and move directly to expulsion and repatriation.

Stage 1: 1st Verbal Warning

If a student's behaviour is causing disruption during a lesson or activity, they should be given a verbal warning by the teacher or activity leader of further action, which may take the form of informing the Academic Manager, Activity Manager or Student Welfare Managers, depending on the circumstances, or missing the weekly disco or other activity.

If it has been necessary to issue a verbal warning, the staff member must inform the Academic Manager or Activity Manager, as appropriate, so that Stage 1 action can be noted. It is hoped that an initial verbal warning will be enough to end the inappropriate behaviour but if further action is required (with sanctions imposed), it must be done by a member of the management team. This is essential as a report must be written on all disciplinary action taken and matters must be discussed with group leaders, if appropriate.

Stage 2: 2nd Verbal Warning

Refer the student to the Academic Manager, Activity Manager or Student Welfare Managers, as appropriate. A 2nd verbal warning will be issued with sanctions imposed if appropriate (e.g. the student to miss an activity). The student will be warned of further action which may include contacting their parents.

Stage 3: Final Warning

Refer the student to the General Manager. Sanctions will be imposed. Parents will be notified of the student's behavior and they and the student will be warned of further action which may include:

- Certificate being withheld
- Being withdrawn from class and/or activities and put in the care of a group leader or member of staff.

Stage 4: Expulsion

Should a pattern of bad behaviour continue or, in cases of serious misbehaviour, (e.g. abuse, bullying, smoking, possessing or consuming alcohol), students are liable to be sent home at the parents' expense.

F7 - Fire safety

All buildings on the Fettes College campus are fitted with smoke detectors. Alarms and fire exits are clearly marked, as are routes of escape. Fire drills are conducted by the Student Welfare Managers in each house where there are new arrivals every Monday afternoon. Additionally, fire drills are conducted in the Spens Building every Monday in student intake weeks.

F8 - Airport transfers

In most cases, airport transfers are organised by FCLC. Unless a student has a relative or guardian in Edinburgh who will bring the student to the school themselves, FCLC meets all individual students at the airport and escorts them to the school either in a coach, minivan or a taxi. This is pre-arranged with the parents/agents and they are given the name and contact information of the member of staff who will be meeting the student on arrival at the airport. All coach and taxi drivers we deal with are members of the PVG Scheme. Students travelling independently to the school must be dropped off and picked up by a person made known to FCLC in advance and must be presented to and take leave of a Student Welfare Manager. Parents may not organise private transfers for their children except with a person previously known to the parents.

F9 - E-safety

Students may use the Fettes College Wifi from 7:30am to 10:30pm, before and after which it is inaccessible. We employ the SonicWall NSA 5600 Network Security Appliance as our security filter, which identifies and restricts access, as appropriate, to material and applications regardless of evasive technique employed. Students are informed of the salient features of our internet usage policy in their welcome pack and face-to-face during orientation. Teachers may make reference to online safety in class. Students should inform a member of staff if they receive any unwanted contact online or via text during their time at FCLC.

F10 - Radicalisation & extremism (Prevent Duty)

Prevent is a government strategy to stop people becoming involved in violent extremism and/or supporting terrorism and applies to any form of extremism, including Muslim terrorism, racism, homophobia, right-wing ideologies and sectarianism. Although students at FCLC have minimal risk of becoming radicalised during their time with us owing to the short-term nature of our courses, some staff, students and group leaders may arrive at the school already holding extremist views, which are any extreme political or religious views which seek to deny rights to any group or individual and can be expressed in vocal or active opposition to core British values including democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs.

The General Manager, Greg Burrell, is the Lead Person at FCLC for ensuring our Prevent duty is met and it is he that should be contacted in case of concerns, however small, about any student, staff member or group leader holding extremist views. He may be contacted at g.burrell@fettes.com, in his office on 0131 297 5251 or on the 24-hour emergency phone on 07788 667574. All reports will remain confidential and will be dealt with sensitively and carefully.

To counter risks of radicalisation, FCLC:

- Promotes a safe and supportive international environment via clear expectations of accepted behaviours and those, including radicalisation and extremism, that will not be tolerated.
- Promotes core British values through notices around the school and references made during lessons, as appropriate.
- Where possible, develops critical awareness and thought to counter accepting extremism without question, especially of online material.
- Encourages staff, group leaders and students to challenge radical or extremist views in any context with an immediate response and reporting concerns.
- Will react when world or local events cause upset and the likelihood of conflicting feelings being expressed.
- Has strong filters on IT equipment which do not allow access to extremist/terrorist websites or use of social networks to exchange extremist/terrorist views.
- Encourages staff to get to know students, their home circumstances and friendship groups to better enable them to spot changes in behaviour.
- Encourages staff to be vigilant in noticing any signs of radical or extremist behaviour.
- Endeavours to offer support to any students identified as vulnerable and therefore more likely to be influenced by extremist ideology.

All FCLC staff receive face-to-face Prevent training at the beginning of their employment while Fettes College staff who have contact with FCLC students undergo Prevent training prior to the commencement of the programme with a record of training kept in each FCLC staff member's file or in the Fettes College office, as appropriate.

The Police Scotland Prevent Delivery Unit East will be contacted if there is need for advice or guidance about potential risks and/or individual cases of concern.

F11 - Provision for those more vulnerable

FCLC seeks to provide a supportive, caring environment for all students. Our Student Welfare Managers and activity leaders will identify and discuss with other staff members, any special needs they may perceive and will offer every help at our disposal to the children in question within the limited time the students are in our care. We also ask, prior to arrival, if any students have any issues that we should be made aware of for more robust care.

F12 - Private fostering

FCLC does not offer private fostering services.

F13 - Critical Incident Plan

Critical Incident Planning is an essential part of any business' long-term strategy and FCLC is no different. Critical Incidents will, in the main, relate to buildings and property or personnel (primarily students). The primary concern of all FCLC staff will be the safety of our students and all programme participants. As the campus is large and staff and students may also be off-campus during the incident, instructions will be given to staff on the staff and managements Whatsapp chats.

This plan relates to an event which may involve:

- the safety of students and/or staff
- the school premises
- a serious accident involving students and/or school personnel on or off the premises
- the death of a child or staff member
- a violent intrusion onto school premises (e.g. an armed intruder or a bomb alert)
- extensive damage to school premises
- the release of hazardous substances near or on the school site
- a crisis which might affect the public reputation of the school

This plan seeks to cover any and every critical incident which occurs. There are 3 levels of incident and subsequent response defined as:

Serious Incident	The school is able to manage the incident without support
Major Incident	The school requires outside support, possibly in the form of a Children's Service team from the Local Authority or other emergency services
Critical Incident	The school requires multi-sector support and may itself be co-ordinated by another group

Incident Management Team (IMT)

The IMT will comprise of:

- Bursar of Fettes College
- Director of Fettes Enterprises
- FCLC General Manager
- FCLC Head of Business Development
- Student Welfare Managers

Base for Incident Management Team

The base for the IMT will be the FCLC office where it is still possible to use this. The reserve on-site location will be the Spens Building. In cases where it is not possible to use the school premises as a base, the IMT will make use of an area of the Western General Hospital, opposite the school.

Deployable Teams:

FCLC Staff

Estates Team/Housekeeping Team/Security/ICT/H&S

Fettes College year-round staff

Media Response Team (Director of Marketing)

Foundation Director/HMs PA/Bursars PA – based in Registrar's Office/William House Head Study

1. On Campus – When A Critical Incident Occurs

First person on the scene should:

- 1) Assess the situation
- 2) Remove people from danger, if safe to do so
- 3) Call the emergency services as required and provide the following information:
 - The name, address, postcode of the school & precise location therein
 - Description of the incident
 - Time of the incident
 - Number of casualties
 - Nature of injuries
 - Total number in the party (if an off-site trip)
 - Your name and telephone number
- 4) Make sure other people are safe from danger and looked after
- 5) Inform the General Manager or Student Welfare Manager and include the following information:
 - Nature of the incident
 - Emergency services involvement
 - Exact location and time
 - Number of casualties/details of injuries
 - Names of those involved, in known
 - Actions taken so far

2. Initial Report

To be completed upon receipt of critical incident notification

Name of the person informing of the incident	
Details of the incident	
Who else has been informed (e.g. emergency services etc.)	
Exact location of the incident	
Details of any casualties	
Any action taken so far	
Name of contact at the scene	
Number of contact at the scene	
What assistance is needed	

3. Critical Incident Action Plan

The General Manager, on advice from the Bursar or Director of Fettes Enterprises, should assemble the IMT & activate the plan.

Welfare

Action to be taken	By Whom	✓ when complete
Secure the immediate safety of students and staff - this may include evacuation or keeping students and staff inside a building (sheltering).		
Establish the location of all students, staff, and visitors using house 'roll-call', timetables, registers, visitor's book, and make a list of those unaccounted for.		
Identify those students and/or staff who are badly affected, and who need extra support.		
Ensure staff are available to escort students to hospital, if required		
Access personnel records of affected students		

Initial Actions

Action to be taken	By Whom	✓ when complete
Ensure that accurate, factual information is available for those arriving at the scene		
Agree liaison with the local authority, police, fire and ambulance services, and other agencies who may become involved		
Identify any specific hazards on site e.g. gas, chemical stores etc. and inform emergency services if appropriate		
Ensure all staff maintain a log of actions and decisions		
Allocate other tasks to members of the IMT as appropriate		
Provide regular briefings for staff		
Arrange for a quiet area for parents to use, if they arrive		
Inform the health and safety officer who will advise on reporting procedures		
In the event of serious injuries or a fatality, the Health and Safety Executive should be informed within 24 hours		

Communications

Action to be taken	By Whom	✓ when complete
Dedicate lines for incoming and outgoing calls and arrange extra support for reception. Line to be used for incoming calls only: Line to be used for outgoing calls only:		
Arrange for the staffing of telephone		
Ensure mobile communications for liaison personnel		
Inform parents of injured students		
Inform parents of students not directly involved in the incident		
Inform staff involved to prepare a written report of their involvement, noting events and times		

Media

Action to be taken	By Whom	✓ when complete
Establish base for press briefing in the Upper or William House Classroom		
Liaise with the Director of Marketing to prepare a press statement, to be agreed by the Bursar and to decide the ongoing strategy for dealing with the press		
Ensure that any media access to the site, staff and students is controlled		
In a major emergency, the police will deal with the press and prevent access to the school		
Liaise with and co-operate with the media and answer their queries, as appropriate		
Be aware of the potential problems caused by the spread of misinformation through student and/or staff use of mobile phones		
Provide basic information about the school and programme		
Be prepared to be interviewed by the press if necessary and agreed		
All staff must refer any press/media enquiries about the incident to the Media Control Team, without further comment		

Resources

Action to be taken	By Whom	✓ when complete
Ensure access to the site for emergency services		
Open/close parts of school as required, and turn off water, gas and electricity supplies if necessary		
Ensure the security of the school premises		
Check that all available communications and office equipment are working (phones, fax, copiers), in: <ul style="list-style-type: none"> • School Office • IMT Base • IMT Alternative Base 		
Ensure that parents do not take students away, unless directed to do so		

All other staff

Action to be taken	By Whom	✓ when complete
Respond to instructions given by members of the Critical Incident Management Team		
Be ready to respond to any potential hazard in and about the site		
Maintain a calm atmosphere		
Do not speak directly to the media but refer all enquiries to the Bursar of Fettes College, the Director of Fettes Enterprises, the FCLC General Manager or the Director of Marketing of Fettes College or other persons designated as being responsible for contact with the media		

Medium Term Actions

Action To Be Taken	By Whom	✓ when complete
Inform insurers and comply with conditions		
Secure photographic evidence/written inventory of damage		
Secure storage of salvage/replacement of equipment		
Dispose of waste		
Preserve any evidence		
Collate documented records of actions taken		
Contact third party legal advisers, including dependents who may be affected		
Decontaminate/clean up affected areas		
Maintain site security		
Make places safe/cordon off unsafe areas		
Control re-occupation		
Access alternative accommodation and facilities if required		

4. Stand-Down And Recovery

As soon as possible after the emergency:

- Arrange debriefing meetings for staff and students.
- Identify and support high-risk students and staff.
- Promote discussion of the emergency in class.
- Consider the need for individual or group support.
- Help affected students and staff to come back into school.
- Liaise with parents regarding plans for attendance at funerals.
- Liaise with parents regarding plans for attendance/representation at memorial services.
- Initiate a review of the school emergency plan, evaluating the school's response and feeding in any lessons learnt.

In the longer term:

- Consult and decide on whether and how to mark anniversaries.
- The impact of some incidents can continue for years, so thought may need to be given to ongoing identification and support measures for both students and staff who are affected.
- Remember that legal processes, enquiries and news stories may bring back distressing memories and cause upset within the school.

- Remember to make any new staff aware of which students were involved and how they were affected.

F14 - Equality, Diversity and Inclusion Policy

FCLC aims to nurture the individual while fostering a happy, well-ordered and caring community. We are committed to providing equal opportunities to all our students and staff, inclusive of age, race, religion or belief, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, sex or sexual orientation (Equality Act, 2010). FCLC is therefore committed to establishing a safe, inclusive, equitable and welcoming environment for all members of our community. All students ought to feel that they belong to our community, are safe, equally valued and are offered the best experience we can provide.

Because we are committed to promoting and celebrating a positive, diverse and inclusive culture in which all staff and programme participants are valued and supported, we are committed to addressing any language or behaviour that denigrates, labels or stereotypes students on the basis of their real or perceived differences connected to the nine protected characteristics (Equality Act, 2010). All language or behaviour that incites prejudice, discrimination, bullying or harassment is not tolerated.

FCLC seeks to fulfil this aim of promoting and developing inclusion and equality by sharing its commitment to equality and diversity with every member of its community and ensuring all staff are thoughtful about the students for whom they have responsibility and develop positive relationships with them.

All FCLC staff must treat colleagues and all programme participants with dignity and respect and avoid behaving in any manner that may give rise to claims of discrimination, harassment or victimisation. They must also support and participate in any measures introduced to promote equality and diversity, actively challenge discrimination and disadvantage in accordance with their responsibilities and report any issues associated with equality and diversity in accordance with this policy.

The aims of this policy and FCLC's wider aims are to:

- provide equal opportunities for all
- eliminate unlawful language or behaviour that denigrates, labels or stereotypes students on the basis of any protected characteristics (Equality Act, 2010);
- eliminate any unlawful language or behaviour that denigrates, labels or stereotypes students on the basis that an individual has a learning difficulty or special educational need;
- provide a secure environment in which students feel safe, valued, have a sense of personal worth and are thoughtful and considerate of the needs of others;
- help students to develop a clear sense of right and wrong, equipping them for life beyond FCLC;
- actively challenge discrimination in all its forms and ensure that every member of the FCLC community learns from these experiences;
- comply with our obligations as set out in the Equality Act 2010.

To achieve these aims, FCLC will:

- ensure all staff are aware of their responsibilities to promote equality of opportunity;

- deliver a non- discriminatory curriculum;
- ensure that educational resources are inclusive and respectful of the diverse nature of society;
- ensure staff seek to understand and provide for the individual needs of the students in accordance with the principles of Getting it Right for Every Child (GIRFEC).

F15 - Abusive Behaviour Policy

FCLC is committed to maintaining a safe and healthy environment for all staff, students and GLs and will not tolerate any form of abusive behaviour, whether physical, verbal, emotional or sexual, committed by or against any member of its community. All reports of abusive behaviour will be taken seriously by the FCLC management.

Abusive behaviour includes any attempted, threatened, or actual conduct that endangers or is likely to endanger the health or safety of a campus community member or visitor, or any threatening statement, harassment, or behaviour that gives a community member or visitor reasonable cause to believe that his or her health or safety is at risk.

Employees who engage in actions or threats of abusive behaviour will be subject to disciplinary action up to and including termination of employment. Students and other programme participants who engage in actions or threats of abusive behaviour will be subject to disciplinary action up to and including expulsion from the programme and repatriation. For serious incidents of abuse, the police and other relevant authorities will be involved as appropriate.

Examples of abusive behaviour violating this policy include but are not limited to the following:

- A direct or implied threat of harm or hostile behaviour that creates a reasonable fear of injury to another person or unreasonably subjects another individual to emotional distress
- Sexual harassment
- Intimidating, threatening, or abusive language toward another person
- Intentionally damaging Fettes College property or the property of a member of the FCLC/Fettes College community or a visitor
- Slapping, punching or otherwise physically attacking a person
- Committing acts motivated by, or related to racial, sexual or religious differences

Any individual who experiences or witnesses acts or behaviour violating this policy or who has reason to suspect that these acts or behaviours are occurring should immediately notify the GM or an SWM. Confidentiality will be maintained to the extent possible but is not guaranteed. Retaliation or harassment against a person making a report in good faith will not be tolerated and may result in disciplinary action. The making of false, frivolous or malicious allegations of abuse may result in disciplinary action.