



**Safeguarding Children and Child Protection Policy, including other related Duty of Care Policies, regarding students ages up to 17 years on our Residential English Language Courses at Hurst**

**2024**

**Safeguarding Children & Child Protection Policy**

- Statement & Introduction,
- Procedures - Implementing the Safeguarding Children Policy,
- Guidance regarding Allegations & Disclosures,
- Other Notes (Awareness, Support, Record-keeping, Visitors),

**Staff Code of Conduct**

- Introduction,
- Guidance regarding Specific Scenarios,
- Staff Safer Conduct, Duty of Care & Professional Boundaries,
- Low-level Concerns, Reporting,
- Prizes, Rewards, Gifts, Favouritism,

**Related to Staff Conduct, Data Protection Policy, and Staff IT Acceptable Usage Policy**

- Social Contact with Students – Code of Conduct,
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**Safer Recruitment Policy**

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**• Procedure and Policies regarding Student Conduct, and Other Duty of Care related Policies**

- Child-on-child Abuse - Abusive Behaviour, Discrimination, Harassment, Bullying,
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- Provision and Levels of Care, and Other Safety Measures,
- Registrations and Attendance,
- Excursions & Off-Campus Supervision,
- Student Rules, Conduct & Disciplinary Procedures,
- Complaints,

## **MC Policies**

### **Statement**

- Safeguarding is about:
  - building and not compromising relationships of trust between under-18-year-olds (U18s) and adults
  - ensuring appropriately safeguarding systems are in place for the well-being of U18s
  - having clear procedures in place if things do go wrong
- Manor Courses (MC) takes very seriously our commitment to the provision of a safe and stimulating environment that is responsive to the needs of young students (aged under 18).
- We therefore take seriously the responsibility to safeguard and promote the health, welfare and mental wellbeing of students, and work to ensure adequate arrangements to identify, assess, and support any student who is suffering harm, distress, neglect, abuse or injury.
- We recognise that all adults, including temporary staff and non-Manor Courses employees, have a full and active part to play in protecting our students from harm, and that the student's welfare is our paramount concern. Under no circumstances should any MC or Hurst staff member or third party contractor or other visitor inflict physical or psychological harm on a child.

### **Introduction**

These Policies regard those connected to the Manor Courses (MC) English Language School and specifically students enrolled on our Residential English Language Course. We use the school premises of Hurst College, and share relevant information with them. Parts of the Course also take place off-campus, away from Hurst College, when on coaches and at destinations during Excursions, or at airports or transfers to airports.

These students are all children, accommodated in boarding houses at Hurst College, West Sussex. They are all covered, regardless of race, gender, nationality, religion, sexual orientation and other forms of identity and are entitled to protection.

Adherence to these Policies is obligatory for all staff and groups leaders and to act upon. Hurst College personnel, and sub-contracted service providers such as taxi/coach companies, activity session leaders and tour guides, can find these Policies on our website [www.manorcourses.co.uk](http://www.manorcourses.co.uk).

*Students who join a UK Tour before/after the Course are not covered for the period they are not at Hurst College. Parents who enrol on a private one-to-one Tuition Course are adult 'students' and are not covered in the Policies as 'students'.*

*Some parts are more relevant to staff and group leaders that have access to children throughout the course than to sub-contracted personnel.*

## MC Policies

### Terminology

- **‘Safeguarding’**: is the action we take to **promote the welfare** of children and **protect them from harm**.  
It means **caring** for children appropriately and **protecting** them from that which is not in their best interests; as such, it includes **health and safety, child protection and pastoral care**.  
Connected to safeguarding is the phrase **‘Duty of Care’**; there is a legal responsibility that adults who work with children as professionals or volunteers have a duty to **look after** them properly; children depend on adults for their **safety and well-being**.
- **‘Child protection’**: means **protecting** children from **abuse**.  
The definition of **abuse** commonly used by the World Health Organisation: *‘Child abuse’ or ‘maltreatment’ constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.’*  
Abuse is also defined by **inflicting harm** or by **failing to act to prevent** harm.
- **‘Children/Child/U18’**: defined as a **person under 18 years of age**, by the Children’s Act 1989
- **‘Staff’**: referred to throughout the Policies includes groups leaders (GL). All staff are in the law ‘adults’. They are in a **Position of Trust**. However, for some policies and procedures, sometimes we differentiate between GL and Employees. There are other adults around the children who are not ‘staff’.
- **‘Employees’**: referred to throughout the Policies does not include groups leaders (GL) because they do not work under UK employment law guidelines.

## MC Policies

### Roles

- Staff referred to throughout the Policies generally includes both MC employees and international group leaders (GL), who are our clients. Essentially, all staff should act as role models.
- All staff are obliged to abide by our Policy. A child may choose any adult to talk to.
- Everyone needs to have a good understanding of and a positive attitude to safeguarding.
- There is strong leadership and line of accountability from the top to ensure that safeguarding is properly embedded.
- Safeguarding Team:
- 1 DSL (Designated Safeguarding Lead) - Logistics Manager, Su Barnard.
- 3 DPS (Designated Safeguarding Persons) –
  - The Welfare Manager, Shirley Mawer,
  - The Managing Director, Nick Barnard,
  - Recruitment Officer, Jon Barnard,
  - We have a male and a female DSP.
- A DSL or DPS can be contacted 24hrs 7 days a week while at Hurst, either in person at the office, by phone 07973 131982 (Nick), 07703 345977 (Su) or by email: [info@manorcourses.co.uk](mailto:info@manorcourses.co.uk), [su@manorcourses.co.uk](mailto:su@manorcourses.co.uk)
- DSL and DPS are responsible for: keeping written records of concerns about a student (even if there is no need to make an immediate external referral); ensuring that all such records are kept confidentially and securely; organising student protection awareness training and guidance for staff at induction.
- Our Recruitment Officer – The Course Director, DSP, Jon Barnard.
  - Supported by DSL, Su Barnard (also the Recruitment Coordinator).
  - Ensures that our selection and recruitment of staff meet the requirements as set down in 'Safer Selection & Recruitment' guidance.
  - We carefully select our employees and undertake references and collect police & criminal checks to help ensure that employees are suitable to work with young students.
  - We, alongside the DSP (the Welfare Manager, Shirley Mawer), are responsible for keeping written records of concerns about staff.
- As the proprietor, Hurst liaise closely with MC.
- Hurst IT department filter and monitor access to and usage of online resources. Details of harmful or illegal content that has been accessed is passed on to MC.
- First aiders manage administration of medications and allergy management. First aiders will assist the Directors to identify the students to the catering company at Hurst, Sodexo.
- Night security are also first aiders.

## MC Policies

### Visitors

*The below references to staff include group leaders.*

Boarding or overnight facilities are not provided except to registered staff and students. Visitors may use the Office toilets but cannot enter any areas where students are, unless accompanied by MC staff for the minimal time necessary.

### **Staff's visitors**

- Staff are forbidden from bringing personal visitors on-site or to Excursions without prior permission from the Directors.
- Staff's visitors, unless those accompanying staff on to campus to start/finish work, must:
  - immediately go to the MC Office,
  - register in and out,
  - write and sign their name with a declaration of agreement to policies,
  - show ID,
  - not remain on campus for longer than necessary,
  - be accompanied by MC staff who have undergone a police check.
- Meals will not be provided.
- Staff cannot have visitors, partners, family or friends stay overnight on campus.
- If staff need to meet any personal family/friend/partner/associate, this is accepted:
  - off-campus during their time-off (off-duty) or day-off (permission not required),
  - during Excursions if it is clear on their duty checklist that they are not on-duty for that period and are away from students (MC Directors or Line Manager must be informed in advance).

### **Students, customers' parents, family members or family friends**

- Those accompanying students to or from campus, must be immediately registered at the Office. Names will be taken and a visitor's pass will be handed to them. They should not remain on campus for longer than necessary and must be accompanied by staff who have undergone a police check.
- Meals can be provided, with staff accompanying, on arrival/departure days.

## MC Policies

### Procedures - Implementing the Safeguarding Children Policy at Hurst College

The following are the procedures staff, students and others connected to the work of Manor Courses will adopt when safeguarding those in its care.

MC will ensure ways of **building trust** between students and staff, children and adults, and create a safe school culture and environment.

Remember, a child may **choose** any adult **to talk to**. This Policy is to **protect** both staff and students.

Abuse includes 4 areas: **physical, sexual, emotional and neglect**.

#### Protecting Students and supporting them throughout

We recognise that:

- that a student, who is harmed, injured, neglected or abused, or witnesses any of them or any violence, may develop **negative emotions**. We believe we have the means to support them.
- some children have more **complex support needs**, caused by a range of factors, e.g. disability, health or development being impaired, poor home or social environment, family issues, parent/guardian issues.
- all matters relating to student protection are **confidential**.
- our staff play a significant part in the prevention of harm to our students by providing students with good lines of communication with trusted adults, supportive friends and an ethos of protection.

To do this, staff will:

- respond if they suspect, witness anything themselves, or if they hear anything.
- not wait until an abused student themselves tells them such.
- not withhold information or delay due to issues of cultural sensitivity.

Together we will:

- establish and maintain an ethos where students feel secure and are encouraged to talk, and are always listened to;
- ensure that all students know there is an adult at MC whom they can approach if they are worried or in difficulty.

To maintain this ethos, staff will:

- remain consistent and positive, be transparent in their discipline, use praise, listen, and grade the language they use.

After their return home we will:

- support all students by providing continuing support, by ensuring that appropriate information and records are forwarded confidentially to the student's parent/agent.

#### Allegations

- Allegations are taken to mean information which indicates that either an adult or another child may have:
  - behaved in a way that has harmed, or may have harmed a child
  - possibly committed a criminal offence against or related to a child
  - behaved towards a child in such a way that indicates s/he would pose a risk of harm to children

## **MC Policies**

### **Guidance regarding Allegations and Disclosures at Hurst College**

#### **Stages of investigation –**

MC will:

- **investigate** sensitively to gather more information
- **record** and **get** signatures from initial reporter; and keep securely
- **inform** group leader / parents / agent prior to any action
- **monitor** as required until No Further Action can be recorded.

#### **Allegations against Students - allegations that have been made by other students or staff or others (about abuse or harm by other students, or risks posed by other students)**

- This concerns child-on-child or peer-on-peer harm. Students are encouraged to report any behaviour that makes them uncomfortable or upset.
- A student who is abused or threatened may be pressured by the perpetrator to keep the abuse a secret.
- Telling a member of staff will take a great amount of courage. Children have to manage a number of issues, including the fear that no one will believe them or that the problem will get worse after the accusation.
- Our Rules and Discipline Procedures (in the Student Handbook) state how a student may be reprimanded, but depending on the seriousness of the accusation, the investigation stages may be quite different.
- The DSL will decide when to inform any external agencies, eg. the LSBC.
- The Anti-Bullying Policy procedures (when a student accuses a bully of one or more different kinds of abuse) may differ very slightly from below, especially at the reporting stages. See the section later.

#### **Allegations against Staff – allegations that have been made by students or other staff (about abuse by staff)**

- It is recognised that in this area of work tensions and misunderstandings can occur. Allegations may be malicious or misplaced. They may arise from differing perceptions of the same event, but are inevitably distressing and difficult for all concerned.
- We understand that a student may make an allegation against a member of staff.
- All staff should take care not to place themselves in a vulnerable position with a student. It is always advisable for lessons or activities with individual students to be conducted in view of other adults; however we recognise this is not always possible.
- Equally, it must be recognised that some allegations will be genuine.
- All accusations made and incidents that occur will be taken seriously, and a thorough investigation carried out.
- In cases where a staff member is found to be in breach of this Safeguarding Children & Child Protection Policy, we will follow disciplinary and grievance procedures as detailed in the staff handbook and will involve external agencies (eg. police, LSCP).
- Note that although this Policy refers to group leaders, they are not employed by MC and thus staff discipline procedures do not exist.



## MC Policies

### Staff Code of Conduct at Hurst College (including Group Leaders) Introduction

*The below references to staff include group leaders.*

#### Background to our Staff Code of Conduct (for Employees)

We endeavour to:

- keep students safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided;
- assist staff to work safely and responsibly and to monitor their own standards and practice;
- support managers in setting clear expectations of behaviour;
- give a clear message that unlawful or unsafe behaviour is unacceptable and that disciplinary or legal action may be taken;
- support safer recruitment of employees practice;
- minimise the risk of misplaced or malicious allegations made against staff;
- reduce the incidence of positions of trust being abused or misused.

MC ensure that all staff who work with our students are competent, confident and safe to do so.

However, we recognise that Policy documents, handbooks and induction guidance cannot cover all eventualities. Company guidance cannot provide a complete checklist of what is, or is not inappropriate behaviour for adults in all circumstances.

Furthermore, there may be circumstances in which staff have to make decisions or take action in the best interests of the student which could contravene any guidance given.

Before placing them in a position of trust, most employees undergo a 3 day induction, and those who start their contracts alter have a shorter Induction.

Group Leaders complete the online Safeguarding by British Council.

Staff are therefore required to:

- *make judgements* about their behaviour in order to secure the best interests and welfare of the students. Such judgements, in these circumstances, should always be shared with a line manager.
- *maintain* appropriate professional boundaries and avoid behaviour which might be misinterpreted by others.
- *report and record* any incident with this potential.
- *avoid* any conduct which would lead any reasonable person to question their suitability, motivation and intentions.
- *work* in an open and transparent way.
- *demonstrate* integrity, maturity and good judgement in their behaviour at all times.
- *apply* the same professional standards in any context regardless of students' culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- The same standards should apply whether working on-campus or off-campus (where the setting may appear to staff and students less formal than the normal workplace).

Low-level concerns, regarding staff not doing the above, should be reported.



## MC Policies

### Staff Code of Conduct (including Group Leaders) in specific scenarios at Hurst College and Excursions

*The below references to staff include group leaders.*

#### **Infatuations & Sexual Contact**

Occasionally, a student may develop an infatuation with a staff member.

*These staff will:*

- o deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned;*
- o be aware that such infatuations carry a high risk of words or actions being misinterpreted;*
- o therefore make every effort to ensure that their own behaviour is above reproach; and to avoid any hurt, distress or embarrassment;*
- o report any issues to their line manager.*
- Intimate or sexual relationships between students and staff will be regarded as a grave breach of trust.
- Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.
- Any sexual activity may be regarded as a criminal offence and will always be a matter for disciplinary action.
- Students and young people are protected by specific legal provisions regardless of whether the person consents or not.
- The sexual activity referred to does not just involve physical contact. It may also include non-contact activities, such as causing students to engage in or watch sexual activity.

*Staff will:*

- *be aware that consistently conferring inappropriate special attention and favour upon a student might give rise to concerns about their behaviour.*
- *not have any form of communication with a student which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.*
- *not make sexual remarks to, or about, a student or discuss their own sexual relationships with or in the presence of students.*

#### **Physical Contact**

There are occasions when it is entirely appropriate for staff to have some physical contact in ways which are appropriate to their professional role and responsibilities.

- Sports or dance activities may involve some physical contact, eg. to demonstrate technique or a particular piece of equipment, to adjust posture, or to support a student so they can perform safely without injury.
- It should take place in a safe and open environment that is easily observed by others and last for the minimum time necessary.
- Not all students feel comfortable about physical contact.
- Therefore, although MC accept that different cultures and group leaders have different views on physical contact, staff must be aware of this Code of Conduct.

## **MC Policies**

- One important principle of this Policy is awareness of other people's interpretations of what they see or hear.

### **Staff will:**

- *not make the assumption that it is acceptable practice to use touch as a means of communication. seek permission from a student before physical contact is made.*
- *be aware of cultural or religious views about touching and always be sensitive to issues of gender.*
- *explain to a student the reason why contact is necessary.*
- *never touch a student in a way which may be considered indecent or indulge in 'horseplay'.*
- *be aware that even well intentioned physical contact may be misconstrued by the student, an observer or by anyone to whom this action is described. Staff must be prepared to report and explain actions and accept that all physical contact be open to scrutiny.*

### **Physical Intervention and Control and Appropriate Restraint**

We acknowledge that the decision whether or not to intervene physically is down to professional judgement of the staff member concerned and should always depend on the individual circumstances.

There are circumstances in which staff working with students who display extreme behaviours can legitimately intervene by using either non-restrictive or restrictive physical interventions if they have failed to defuse situations any other way.

### **Staff may:**

- *use physical intervention as a last resort*
- *use minimum force for the shortest period necessary*
- *and are empowered to use reasonable force to prevent students from hurting themselves or others, from damaging property, or from causing disorder*

### **Staff will:**

- *report such events to a line manager*
- *not use physical force or intervention as a form of punishment*
- *not use it for prolonged periods, regularly or let it become the norm*
- *not sustain injuries to a student*

### **Behaviour Management**

As above, MC believe physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behaviour management strategies have failed.

### **Staff will:**

- *not use any form of degrading treatment to punish students.*
- *not use corporal punishment.*
- *not use sarcasm, demeaning or insensitive comments.*
- *not use isolation/seclusion unless it is in the best interest of the student or others.*
- *report any situation where a student becomes distressed or angry to a line manager.*

## MC Policies

### Working Alone - First aid, Intimate Care, Comforting and Caring

There are occasions when a distressed student needs comfort and reassurance, or first aid or medical care, and this may involve physical contact.

This may be unavoidable, and sometimes it is unexpected/unplanned. It may be impossible to invite another responsible adult to observe or wait close by, but must be done where others can see it.

*Staff will:*

- *use their professional judgement to comfort or reassure a student in an age-appropriate way whilst maintaining clear professional boundaries.*

*When administering first aid or medication, wherever possible, staff will:*

- *ensure that another staff is aware of the action being taken,*
- *explain to the student what is happening,*
- *report and record it.*

### Working Alone - Privacy and one-to-one situations

This may be unavoidable, and sometimes it is unexpected. It may be impossible to invite another responsible adult to observe or wait close by, but must be done where others can see it.

When it is planned as part of MC's services, we will get written consent from parents.

- One-to-one **English tuition** is only permitted according to the schedule given by the Directors, at an agreed location.
- Activities (sport, art etc.) should never take place one-to-one, except as **coaching** according to the schedule given by the Directors, at an agreed location.
- If any staff member has to **transport** a student by private transport they must consider safety and always report it to a line manager as soon as possible before or after.
- In houses when on-duty staff must be aware of students' rights to privacy in their **bedroom** and **showers**. Due to health and safety considerations there may sometimes be a need for staff to be present during these situations.

*Staff will:*

- avoid intrusive behaviour, and should announce their intention to enter or be present.
- avoid carrying out any duty in a remote or secluded area where there is a student present, though this may be unavoidable, and may indeed be necessary to ensure safety.

### Confidential and sensitive data about students

- Emergency Contact details for each student are collected at Check-in or in Orientations, once a week, for the company to use in cases of emergency. This information should be handed at the Office to the Welfare and House Coordinator, who will store this confidentially on behalf of the Directors.
- Sensitive medical, welfare, mental health, SEND etc. data will be shared between First Aiders and the Directors, and may be passed to the relevant staff responsible for supervising the specific student.
- Staff will also read our Student Data Protection Policy.

## MC Policies

### Guidance for Staff Code of Conduct (including Group Leaders) at Hurst College regarding safer conduct, duty of care & professional boundaries

*The below references to staff include group leaders.*

#### Standards

Contracted staff/employees will refer to their Staff Handbook and Contract.

Group leaders will refer to their Group Leader Handbook.

Together, staff will help MC:

- develop an open, honest and supportive culture,
- with clear boundaries,
- resulting in a 'safer school' culture - safer for students and for staff.

#### **Staff can also help students in the following ways:**

- help students understand, use graded and appropriate language to their age and language ability
- assist them to make sensible decisions
- set safe and clear boundaries
- respond and react, don't ignore
- listen, be interested and get to know the under 18s and what they are doing
- be responsible and a good role model
- be approachable
- show that you care, even when that means saying 'No' to an under 18
- be alert; notice things, especially things that don't seem quite right.
- have effective communication systems amongst all the adults so that information that matters is easily received and then shared with those who need to know.
- contribute to a culture of safety for under 18s throughout the organisation.

#### Duty of Care / Code of Conduct

As a staff member working with students under 18 years of age, there exists a professional/legal duty of care and trust between staff/adult and student/child. This relationship must not, under any circumstances, be abused in any way.

Professional Boundaries not only extend to how we act and respond to the needs of those in our care, but also to how we, as individuals, work together to show professionalism, commitment, legal duty, obligation and responsibility to the summer school.

Because all staff are working in a residential environment, Professional Boundaries are not just about **adult < > child** conduct or **child < > adult** (ie. staff to student, student to staff) interaction, but also refer to **adult < > adult** (ie. between colleagues) interaction.

This **Code of Conduct** is important to protect staff by ensuring they avoid getting into compromising situations where misunderstandings or malice put them at risk. Breaking this position of trust is breaking the employment contract and in some instances is also breaking the law. For example, any person in a **Position of Trust** engaged in sexual activity of any sort with students under the age of 18 is breaking the law (even if the age of consent is 16) according to the Sexual Offences Act 2003.

## MC Policies

The following are some examples of breaches of boundaries, some more obvious than others, that may result in investigations being carried out, reports made or disciplinary action being taken against an employee - but it is by no way an exhaustive list.

Low-level concerns, or any observations of these happening, must not be ignored.

### Regarding Adult < > Adult interaction, or Adult behaviour in the vicinity of students, or performance of duties, and other actions (at work or outside of work, eg. while at Hurst or on Excursions / at Airports) even while off-duty

- *Swearing or using inappropriate language to or in front of students.*
- *Smoking/vaping or drinking alcohol while on duty or in the vicinity of students.*
- *Taking drugs.*
- *Performing poorly due to prior drinking or other abuse.*
- *Having negative effects on colleagues by late night disturbance or noise while under the influence of alcohol.*
- *Making suggestive remarks or gestures towards students, or colleagues while students are present.*
- *Socialising with colleagues during working hours.*
- *Making or receiving personal calls during contact time with students.*
- *Mixing your personal life with your professional role at work.*
- *Pursuing personal relationships with students or their guardians, or becoming involved in their personal affairs.*
- *Failing to report any health and safety concerns (see section 35, on Health & Safety).*
- *Listening to music/headphones while on duty.*
- *Failing to report anything suspicious between students and staff.*
- *Allowing ill-feeling between staff to be witnessed by students.*
- *Discussing personal life and anything deemed to be inappropriate in the vicinity of students.*
- *Not reporting staff's own actions in relation to any student Discipline.*
- *Entering another residential house where they are not living – they must first contact and ask the present Supervisor (a House Manager, Leader or Teacher) for permission. This is essential during periods that students are out of lessons, but during lessons permission is not required. Entrance must be recorded on a register or by swipe codes. Staff of the opposite sex must be accompanied around the house by the Supervisor.*

### Regarding Adult < > Child interaction

- *Shouting at students (except in situations of extreme danger).*
- *Swearing or using inappropriate language with students.*
- *Being aggressive towards students.*
- *Threatening or frightening a student.*
- *Forcing a student to do something they do not want to do.*
- *Ignoring a student.*
- *Having negative effects on students by late night disturbance or noise while under the influence of alcohol.*

## MC Policies

- *Ridiculing, making fun or bullying.*
- *Making suggestive remarks or gestures towards students.*
- *Touching anyone inappropriately.*
- *Communicating via phone (except on excursions or in instances of absence from registrations) or email/text/internet or other social media or online game with any student.*
- *Taking photos/videos of students without the Directors' consent or the students' knowledge and permission.*
- *Allowing their web profiles to be seen by students.*
- *Uploading photos/videos of, or distributing information about students.*
- *Taking students in private vehicles without authorisation from the Directors.*
- *Allowing a student's swearing and threatening/abusive language, attitudes or behaviour to go unchallenged.*
- *Using other languages in conversations with an exclusive nationality group of students (other than emergency or necessary translations).*
- *Discussing personal life and anything deemed to be inappropriate with students.*
- *Failing to recognise that different cultures have different attitudes to boundaries, personal space and sensitive topics.*
- *Punishing students outside of our stipulated Discipline Procedures and methods.*
- *Being alone with just one student (unless unavoidable); this is not only for the student's protection but also the staff member's.*
- *In situations where physical contact is unavoidable (greetings, hugging, kissing etc.), ensure this is unreciprocated and occurs in public places.*
- *Using the same bathroom / toilet facilities as students, when at Hurst.*
- *Failing to acknowledge the effect their appearance may have on students or that it may be hard for some students to respect them/their role if they do not present appropriately.*



## MC Policies

### 'Low-level' Concerns

- The term 'low-level' concern does not mean that it is insignificant.
- This means any concern involving an adult that may have acted in a way that is inconsistent with the Code of Conduct above, but which is not serious enough to consider a referral to the LADO.
- If any staff action or inaction has harmed a child or put them at risk or harm, or if repeated against a child would endanger the child - for example, they have not harmed a child, but there is a risk that they may cause harm to a child in the future.

### Reporting

- Staff may feel the **need to do some of the above** in order to **carry out their duties** effectively.  
If they do so, they must **report** the incident to the Directors or Line Manager as soon as possible.  
Staff must also report any incidents of a student **misunderstanding** or **misinterpreting** them.
- All **accusations** made about staff and incidents that occur will be taken seriously and a thorough **investigation** carried out. In cases where a staff member is found to be in breach of our Safeguarding Children / Child Protection Policy we will follow Disciplinary Procedures as detailed in section 32 of their Staff Handbook. Records of this may be passed on to the relevant external bodies.
- Staff have a duty to **report** any **allegation or suspicion** of inappropriate contact with children to the Directors or a Line Manager. **Professional boundaries** not only extend to how we act and respond to the needs of those in our care, but also to how we, as individuals, work together to show professionalism, commitment, legal duty, obligation and responsibility to the summer school.
- Staff who **witness** any of the above actions may report example incidences to their Line Managers or the Directors, but witnesses to serious breaches of the Code of Conduct, or clear incidences of inappropriate behaviour or abuse between students and staff must be reported to the Directors (Designated Safeguarding Person or Lead) only.
- Records are kept for 25 years. See Record Keeping, page 9.



## **MC Policies**

### **Staff Giving Prizes, Rewards, Gifts & Favouritism Policy**

*This does not refer to group leaders. But group leaders should be aware of this.*

#### **Rewards**

- The giving of gifts or rewards to students must only be done as part of this Policy, for either supporting positive behaviour or recognising particular achievements.

#### **Meal Passes**

- Line managers are responsible for distributing meal passes daily to teachers.
- These can be given for good performance or behaviour in the class/house or for outstanding effort/results.
- Students return their pass to staff in the meal queue and go to the front.
- Activity leaders return them to their line managers and in turn they are returned to the office.

#### **House Points**

- House managers may give these for positive behaviour.
- Activity leaders count the number of students per house that have participated in their organised activities, to generate more house points.
- These points add up at the end of the week to count toward the 'house cup'.

#### **Medals or Certificates**

- Sports, arts, and other activities will be rewarded for participation or achievement with medals or certificates in the weekly presentations.

#### **Giving meal passes, points, prizes, medals**

- It must always be clear to all participants/residents how to win or receive the above and students must agree and understand before the event/lesson/session begins.
- Such competitions or challenges must be well-thought and be authorized by Lin Managers. Generally meal passes distribution is part of the lessons are sanctioned and controlled, and sports tournaments are promoted and obvious.

#### **Giving gifts**

- We acknowledge that there are occasions when staff wish to give a student a gift. This is only acceptable where staff discuss it with the line manager.
- Any gifts should be given openly and not be based on favouritism. Staff need to be aware, however, that the giving of gifts can be misinterpreted by others.

#### **Fairness and favouritism**

- Staff should exercise care when selecting students for specific activities or privileges to avoid perceptions of favouritism or unfairness, and be transparent and subject to scrutiny.

#### **Receiving gifts**

- There are occasions when students (or their parents/guardians) wish to pass small tokens of appreciation to staff and this is acceptable.
- However, it is unacceptable to receive gifts on a regular basis or of any significant value.

## **MC Policies**

### **Social contact with Students at Hurst College** **Code of Conduct**

*This does **not** refer to group leaders' relations with their students. But group leaders should use their professional judgement.*

Definitions of terms used in this section:

- Social contact - the exchange of personal information between two or more people.
- Electronic contact – the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to): landline and mobile phones, other handheld electronic devices, gaming equipment and computers. Electronic contact may include but is not limited to: voice communication, SMS, other text format communication, instant messages, email, social network site/groups, blogs, sharing photos/videos, voice message, other apps on mobile phones or devices.
- This applies to the relationship between students and staff before, during or after a course.

#### **Staff working with children will not (without lawful purpose/reason):**

- establish or seek to establish social contact with under 18s/students during or after the course.
- give personal email addresses or personal phone numbers to students under 18.
- communicate via email, text, phone, social network site/groups, blogs, web pages or message services with under 18s.
- post photos or videos of students under 18 on any social networking site/groups.
- distribute (by any means) images or information about students of any age.

#### **Appropriate social contact (electronic or otherwise):**

Staff will:

- maintain neutral, friendly relationships with students while avoiding exclusivity or overfamiliarity.
- resist any attempt by a student to develop an overfamiliar or exclusive social relationship.
- listen and respond in a professional manner in accordance with organisational guidelines, if a student confides sensitive personal information.

#### **Duty to report:**

- Staff have a duty to report to MC any actual or perceived inappropriate development of the relationship between student and staff, electronic or otherwise.
- Any sensitive information communicated by a student to a member of staff, electronic or otherwise, will be reported to the employer.

#### **Failure to comply:**

- Non-compliance with these Policies will result in disciplinary procedures.
- MC have a duty to remove staff from regulated activity where there is risk of harm to children.

## **MC Policies**

### **Online-Safety Policy at Hurst College, Employees Electronic Communication and Employees Social Media Usage Policy at Hurst College**

*This does not refer to group leaders. But group leaders should be aware of this.*

All residents at Hurst are kept safe online by Hurst College filters and security systems. Any breach of the below Policies may lead to disciplinary action being taken against staff. Staff should also read the IT Acceptable Usage Policy. This refers to before, during and after the Course, and thus not only the period of the Contract or at Hurst College.

#### **Parents'/Students' consent/agreement to student contact with MC staff via MC social media**

- Although MC does not agree with students aged under 16 using social media, we do ask all parents/agents of any student for their consent to their child to use (ie. 'friend' or 'follow' us on) social media.
- parents/guardians are sent a Consent Form in June, before their child arrives at Hurst. We collate their consent responses.
- Group leaders are asked to read this Policy, and are given a Consent Form upon arrival, to sign on behalf of the students in their care. We collate their consent responses.
- Students, parents/guardians and agents can advise the Directors if they disagree with this Policy or want to change their consent response.

#### **Filtering & Monitoring Systems & Standards:**

- MC will ensure all students and staff using the college IT network do so responsibly and will communicate directly with anyone breaching the rules.
- Hurst utilises Smoothwall as a web filtering and firewall programme. This monitors all users' accounts for any web traffic associated with radicalisation sites, terrorism, criminal activity, as well as intolerance, and any form of search on personal weapons, etc. It blocks any known material under these category headings, and flags inappropriate searches, providing a daily log to the Directors. The Directors then take appropriate action based on findings.

## MC Policies

### Photographs & Videos of Children (Usage, Storage, Retention) Policy

*This does not refer to group leaders. But group leaders should be aware of this.*

This policy does not refer to photos/videos that students take or use/share/upload. There are guidelines about students taking photos/videos of staff in the previous section. When students take photos/videos of staff, staff will **ensure that other students are included** in the photos/videos and that the **location and activity is clear** and cannot be misinterpreted.

#### Purpose

MC take photos/videos of students during the summer courses, which are sometimes used for **promotional, records of work and archive purposes**. Sometimes photos/videos are used to **promote** the upcoming activity programme to students while at Hurst.

These photos may be used by MC:

- **digitally**, publicly as posts/shares/updates on our **Blog, Facebook profile/page, our website, Instagram, or other social media accounts**, or internally/privately in the closed environment at Hurst, on TV screens;
- in **print**, publicly in our promotional **brochure, student handbook and training materials**, or internally/privately in the closed environment at Hurst, on posters, projects, or classwork.

They may also appear:

- **digitally**, publicly in any social media posts/profiles of our **agents or industry bodies** that we are a member of;
- in **print**, publicly in any brochures/magazines/catalogues/posters of any of our agents or industry bodies that we are a member of.

#### Types of image that MC take and use

- action shots during activities
- students in front of landmarks on excursions
- images of the campus and its daily routines
- class projects, class newsletters
- group class shots
- students receiving certificates

#### Official photographers, official use

- We have a number of designated official photographers.
- The company collects all the photos/videos taken by our official photographer and any other photos/videos taken by staff, on the Manor Courses computer hard drive.
- The Directors make the decisions of which photos/videos to keep for future promotional and archive purposes, and which ones to delete.

## **MC Policies**

- The official photographers will carry identification and be introduced to the students at the welcome assembly.
- When possible they will notify students that he is taking photos/videos.
- They will notify students when photos/videos are likely to be uploaded or posted (or re-posted, shared) to a blog, Facebook, Instagram etc. Public shares/uploads are usually timed so that they do not interfere with organised activities, lessons and registrations. Students can immediately contact MC to ask for deletion if they want.
- A cameraman/photographer may also lead activities where using a camera is part of the task. S/he will check if any students have refused consent, and will avoid their images being taken.

### **Parents'/Students' consent/agreement**

- parents/guardians are informed of this in their Terms & Conditions, and are sent a Consent Form in June, before their child arrives at Hurst. We collate their consent responses.
- Group leaders are informed of this in their GL Handbook and asked to read this Policy, and are given a Consent Form upon arrival, to sign on behalf of the students in their care. We collate their consent responses.
- Students themselves are given abridged Consent Questions as part of their weekly Questionnaires or Check-in procedures. Students will be asked during Orientations if they agree to be photographed. They can choose 'no'.
- Students, parents/guardians and agents can advise the Directors if they disagree with this Policy or want to change their consent response.
- Students should also tell the photographer if they do not agree. The photographer will identify them and avoid taking their picture.
- They can also request this of any staff they want to talk to, or email the Directors.
- If students see a published (shared, uploaded) digital photo/video of themselves they do not like, they can inform the directors by email, and we will delete it.
- This may not be possible with printed photos.
- In cases where students are required to take photos/videos of fellow students as part of a project in Lessons/Activities, consent will be asked of participants by the staff responsible.

### **Rights**

- In addition to the above, students and parents/guardians have the rights to access and amend their data.
- In line with this, they can request us to stop using a photo/video, ask for a copy for their own usage, or amend any information associated with it.

### **Retention, storage, security**

- MC collect all photos/videos taken by our official photographers and any others taken by staff, and store them on the Directors' MC computer hard drives.
- Periods for retention are included in our Data Protection Policy. This was updated 15<sup>th</sup> March 2023.

## MC Policies

### Safer Recruitment (of Employees) Policy

#### Suitability Checks for Residential Employees and other Adults at Hurst College – DBS (Disclosure and Barring Service) Police & Criminal Record Checks

*Group leaders are not recruited by MC but there are suitability checks in place.*

One objective of MC is to ensure the personal safety of all children using the facilities and resources at Hurst College, through actively promoting awareness, good practice and sound procedures. Our aim is to ensure, as much as possible, that anyone who seeks to work with or gain access to children through MC is safe to do so.

Our selection and recruitment procedures meet the requirements as set down in 'Safer Recruitment Guidance' from various charitable, childcare and educational, and government bodies. In accordance with UK law on safeguarding children, MC ask Staff to submit and show ID along with addresses to check for any police records. These are kept on a Single Central Record. Then we implement a number of additional ways of checking the suitability of staff once at Hurst.

We document what action has been taken to obtain a check and if and why this has not been possible.

#### Group Leaders:

Group leaders have unsupervised access to children both in their group, and also those in their house.

Agents are asked to confirm by email that their leaders all have recent **police/criminal records checks** and whether they are local or national.

They then send them in advance and request their group leaders to bring the original to submit on arrival.

Furthermore, when group leaders arrive at Hurst they sign **suitability self-declarations**.

For those group leaders that cannot or did not get a police check, or the agent cannot confirm this, MC insists they are accommodated off campus.

In May we survey our agents with a list of questions about their country and company guidelines and policies. Based on the results we do a Risk Assessment and decide what training they need when they arrive in UK at Hurs

## MC Policies

### **Child-on-child/Peer-on-peer Abuse - Abusive Behaviour, Discrimination, Harassment, Harmful Sexual Behaviour, Bullying at Hurst College an on Excursions (by Staff or Students) Policy**

Students are given information about the Rules and how they will be disciplined if they are found to be guilty of Abusive Behaviour, including verbal abuse, harassment, bullying, actual or threatened violence or damage to property.

*The below references to staff include group leaders.*

#### **Statement**

- MC is committed to providing a caring, friendly and safe environment for all of our students so they can learn in a relaxed and secure atmosphere.
- We welcome students from all backgrounds and will not permit discrimination by students or staff on the grounds of religion, culture, gender, sexual orientation, or ethnicity. In addition, even greater sensitivity will be shown to students who are from territories currently in the midst of internal or international conflict.
- We expect students to be accepting and tolerant of a range of views, lifestyles, religions, and to acknowledge that people think differently and believe different things. Staff are expected to report any incidences where students' beliefs hurt or denigrate those with other beliefs.
- Bullying, abusive behaviour, and discrimination of any kind is unacceptable at our summer school. If any incidents of bullying, abuse or discrimination occur, all students should be able to report knowing that incidents will be dealt with promptly and effectively. This means that anyone who knows that this is happening is expected to tell a member of staff immediately.

#### **Anti-Bullying Policy & Procedures**

##### **Objectives of this Policy**

- All the staff, group leaders, parents/guardians and students should have an understanding of what bullying is.
- All the staff, group leaders, parents/guardians and students should know what they should do if bullying arises, and is reported, and should be assured that they will be supported when bullying is reported.
- Students who are bullying need to learn different ways of behaving.

##### **What Is Bullying?**

Bullying is aggressive behaviour with the intention of hurting another person.

Bullying results in pain and distress to the victim.

A bully is a person who habitually seeks to harm or intimidate somebody they think is vulnerable.

Bullying can include when a person intends to do the below:



## MC Policies

- **Emotional** - being unfriendly, tormenting (e.g. hiding things that belong to another student, using threatening gestures), abusing intimate personal relationships
- **Silent** - ignoring or excluding a person by trying to stop them joining a group, communication or activity of any kind
- **Physical** - pushing, kicking, hitting, punching, shaking, biting or any aggressive behaviour towards another person
- **Racial** - racial comments, graffiti, or gestures that make fun of another person's ethnic background, appearance, religion, way of speaking or any other characteristic
- **Sexual** - unwanted physical contact, sexually abusive comments
- **Homophobic** - because of, or focusing on the issue of sexuality
- **Verbal** - name-calling, sarcasm, spreading rumours, teasing
- **Cyber** - All areas of internet, such as email & internet chat room misuse; Mobile threats by text messaging & calls; Social media; Misuse of associated technology, eg. camera & video facilities; Gaming

Certain students are more vulnerable, e.g. those with physical disabilities, or those requiring more help with personal care; or students coming from difficult home situations. Extra attention should be paid to these students.

### Signs and Symptoms

A child may indicate by signs or behaviour that he or she is being bullied. It is important that the staff are aware of these signs and that they should report any suspicions to the Welfare Manager and/ or the Directors if a student:

- is frightened of walking anywhere on campus
- changes their usual routine
- begins to miss classes
- becomes withdrawn anxious, lacking in confidence, or stammering
- expresses unbearable unhappiness
- cries themselves to sleep at night or has nightmares
- feels ill in the morning
- does poorly in class
- has clothes torn
- has possessions which are damaged or "go missing"
- starts stealing money (to pay bully)
- is continually losing money
- has unexplained cuts or bruises
- becomes aggressive, disruptive or unreasonable
- is bullying other children
- stops eating
- is frightened to say what's wrong
- gives improbable excuses for any of the above

These signs and behaviours could indicate other problems, but bullying should be considered a possibility and should be investigated

## **MC Policies**

### **Procedures**

- Staff must report possible bullying incidents to the Welfare Manager and Directors.
- The Welfare Manager will speak with and support the victim. In cases of possible bullying, they will look into and record the incident.
- The bullying behaviour will be investigated and the bullying stopped immediately.
- An attempt will be made to help the accused/bully/abuser/perpetrator/s change their behaviour.
- In serious cases group leaders/ agents/ parents will be informed.
- A warning letter will be issued to the accused/bully/abuser/perpetrator/s.
- If necessary and appropriate, police will be consulted.
- Relevant staff will be informed.

### **Outcomes**

- The Welfare Manager and /or the Director/s will support the victim, who will explain what has happened.
- The Welfare Manager and/or the Director/s will then speak to the bully/abuser/perpetrator. He/ she will give an account of what has happened.
- The bully/abuser/perpetrator/accused will be asked to genuinely apologise.
- If possible, a reconciliation will be attempted between the students.
- This restorative practice aims to resolve issues by encouraging the one harmed to convey the impact of the harm on the 'bully'.
- In serious cases, we will consider sending the student home.
- When the case has been investigated and dealt with, the student/s will be monitored to ensure that bullying does not take place again. The accused/bully/abuser/perpetrator/s may be asked to sign a behaviour contract.
- Other consequences may take place, according to our Rules and Discipline Procedures.

### **Prevention**

- To prevent bullying/abuse and to support our students having a positive experience, we have a set of rules that encourage respect for all other people and their belongings.
- The timetable and registrations are organised so that we are aware where our students are at all times.
- We encourage students to come and see the Welfare Manager or any adult, if someone is behaving badly towards them or if they are feeling unhappy in any way.
- We give all our students a Student Handbook and rule sheet with this information in it.
- Group leaders make sure they understand these rules during meetings.

## **MC Policies**

### **Mental Health and Wellbeing**

Mental health problems are common among children, but they can be difficult to identify. Here are some signs and symptoms of mental health problems, but will differ from child to child.

Some common signs include:

- becoming withdrawn from friends and family
- persistent low mood and unhappiness
- tearfulness and irritability
- change in diet and appetite
- sudden outbursts of anger
- loss of interest in activities they once enjoyed
- absence and avoidance of the organized schedule
- problems eating or sleeping

Mental health problems may also be indicators of:

- abuse and neglect
- child-on-child abuse
- exploitation
- grooming
- radicalisation

Students who are suffering from mental health problems may also be more vulnerable to harm.

Staff must report any incidences or suspicions they have to their Line Manager or directly to the Welfare Manager, Directors or DSL.

## MC Policies

### What is Sexual Abuse ?

Harmful sexual behavior can include:

- inappropriate sexual language
- the sharing of nude or semi-nude images or videos
- accessing age-inappropriate sexual material online
- sexual activity without consent
- sexual violence, such as rape or sexual assault
- upskirting

All allegations and suspicions must be reported to the DSL, who may instigate police investigations.

Staff are required to read and acknowledge all of the below and to interpret things they hear about or witness according to the below, and report and react as necessary.

#### **What is problematic sexual behaviour?**

Problematic sexual behaviour (PSB) is developmentally inappropriate or socially unexpected sexualised behaviour which doesn't have an overt element of victimisation or abuse.

#### **What is harmful sexual behaviour?**

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour which is harmful or abusive.

#### **What is peer-on-peer sexual abuse?**

Peer-on-peer sexual abuse is a form of HSB where sexual abuse takes place between children of a *similar age or stage* of development.

Child-on-child sexual abuse is a form of HSB that takes place between children of *any age or stage* of development.

#### **Children's understanding of sexualised behaviour**

Students may not always understand that they have experienced or displayed problematic or harmful sexual behaviour, because they:

- don't understand what constitutes appropriate, problematic or abusive sexualised behaviour
- have been exposed to sexual content or conversations about sex they aren't developmentally ready to understand
- have experienced sexual abuse but don't realise that what happened to them was wrong
- don't know whether consent was given
- believe the abuse happened between friends or partners
- know the abuse took place only online
- blame themselves for being abused

## MC Policies

- haven't received appropriate relationships and sex education

### **1. Developmentally typical (green) behaviours**

NSPCC use the term 'developmentally typical' (ie. green on their continuum) –such behaviours may be called 'healthy', 'normal' or 'developmentally expected'.

- is developmentally expected and socially acceptable
- is consensual, mutual and reciprocal
- involves shared decision making.

### **2. Problematic (amber) behaviours**

NSPCC use 'problematic sexual behaviour' (PSB) as an umbrella term (ie. amber) - described as 'inappropriate' or 'problematic'.

#### **Inappropriate behaviour**

- Single instances of developmentally inappropriate sexual behaviour.
- Behaviour that is socially acceptable within a peer group but would be considered inappropriate outside that group.
- Generally consensual and reciprocal.
- May involve an inappropriate context for behaviour that would otherwise be considered normal.

#### **Problematic behaviour**

- Developmentally unusual and socially unexpected behaviour.
- May be compulsive.
- Consent may be unclear and the behaviour may not be reciprocal.
- May involve an imbalance of power.
- Doesn't have an overt element of victimisation.

### **3. Harmful (red) behaviours**

NSPCC refer to 'harmful sexual behaviour' (HSB) (ie. red) as 'abusive' and 'violent' - harmful to the child who displays them, as well as the people the behaviour is displayed towards.

#### **Abusive behaviour**

- Intrusive behaviour.
- May involve a misuse of power.
- May have an element of victimisation.
- May use coercion and force.
- May include elements of expressive violence.
- Informed consent has not been given (or the victim was not able to consent freely).

#### **Violent behaviour**

- Physically violent sexual abuse.
- Highly intrusive.
- May involve instrumental violence which is physiologically and/or sexually arousing to the perpetrator.
- May involve sadism.

## MC Policies

### Procedures – with regards to sexual abuse

#### **Building a safe environment**

MC's general welfare standards encourage students to speak out if they are worried about their own or someone else's behaviour.

MC will help them understand that any incidents of problematic, harmful or abusive sexual behaviour will be taken seriously and responded to effectively.

The Welfare Manager is identified as the person to talk to if anything upsetting has happened.

Once staff identify any locations where there are concerns about abuse taking place, eg. toilets, unsupervised corridors and areas that are poorly lit or hidden from adult view, the Directors will make these places safer – for example, increasing supervision levels in certain areas or improving lighting.

#### **Staff must consider**

- The age of the student/s who has displayed the sexual behaviour.  
What is developmentally typical sexual behaviour for a 15-year-old may be problematic or harmful for an 8-year-old. Consider the child's developmental ability as well as their chronological age.
- The age of the other student/s involved.  
If the children involved are the same age or developmental ability the behaviour may be considered developmentally typical. But if the children are of different ages or developmental abilities, the behaviour might be problematic or harmful.
- Is the behaviour unusual for that particular child or young person?  
If out of character, it is important to take time to consider why the child is behaving unusually.
- Have all the children or young people involved freely given consent?  
If the behaviour involves coercion, intimidation or forcing others to take part, it should be considered harmful.
- Are the other children or young people distressed?  
If the behaviour is upsetting others, this could indicate it is problematic or harmful.
- Is there an imbalance of power?  
If the child displaying the behaviour is in a more powerful position than the other children involved, this indicates it is problematic or harmful. This might happen if there are significant differences in age, size, power or developmental ability.
- Is the behaviour excessive, degrading or threatening?  
Excessive behaviour means behaviour that is obsessive, persistent, compulsive or has been going on for a long time. Any behaviour that involves force, coercion, bribery or threats is harmful.
- Is the behaviour occurring in a public or private space?

#### **Taking appropriate action**

Staff response to a child displaying sexualised behaviours should vary depending on:

- the child's age
- their stage of development
- where their behaviours sits on the sexualised behaviour continuum (ie. green, amber, red, as above).

## MC Policies

### Developmentally typical (green) behaviours

It's normal for children to be curious about their own and other people's bodies. The process of experimentation and exploration mean that young people might get it wrong from time to time but this does not necessarily indicate a serious concern.

#### How to respond

- Talk to Su Barnard, DSL, if you're unsure or have any concerns. Sharing information can help to identify any patterns or escalation of behaviour.
- Listen to what children have to say and respond calmly and non-judgementally.
- Let children know they can always talk to you, the Welfare Manager or DSL if they are ever worried about anything.

### Problematic (amber) sexual behaviours

These must not be ignored. The child will need support to help them change their behaviour and stop the behaviour escalating.

This might also indicate that a child has experienced trauma or abuse, so it's important to respond appropriately to keep the child safe.

### Harmful (red) sexual behaviours

Staff should take immediate intervention and action to keep everyone involved safe. Our DSL will need to know what's happened as soon as possible. They will consider whether the child or young person displaying the behaviour is at risk and take the necessary action to protect them. They will take action to mitigate the risk the harmful sexual behaviour may pose to others.

#### How to respond to amber or red

- Report to the DSL.
- Talk calmly and non-judgementally to the child who has displayed the behaviour, and take appropriate measures to support them.
- Make sure children who have experienced it are safe and supported.

### Recording incidents

MC keep detailed records about any incidents. This will make it easier to identify any changes or patterns in a child's behaviour that might be cause for concern, and help ensure the child gets the right support.

Any staff who witness or is concerned, should make a detailed record of what happened and share it with the DSL.

#### The record includes:

- the date and time
- what was happening before the incident took place
- specific details of the behaviour – avoid generalised terms, eg. 'inappropriate touch'
- any power imbalance between the children involved
- whether the behaviour appeared spontaneous or premeditated
- any coercion, force or secrecy involved or whether the behaviour was consensual
- the child's age (date of birth) and stage of development
- any specific vulnerabilities they have (eg.if they have a disability or are in care)
- the child's view of what happened – in their own words if possible
- what action you have taken, what support have you provided to the child



## **MC Policies**

### **Implementing the Policy / Policies** **Procedures for Supervising Children around the Campus** **and Monitoring Student Adherence to the Rules and Safeguarding**

These procedures and rules enable us to supervise children and ensure their safety. We give staff clear procedures to protect them from students, staff or other adults. It is harder to identify abuse and harmful risks when students are not directly supervised in small groups, such as the English Lessons.

Contexts where students may be supervised remotely, from a distance, include:

- Houses and bedrooms;
- Excursions, coaches, when at destination;
- Meals times, when in the dining room, queue or before/after eating when they are at liberty to relax in the campus grounds;

Apart from filtering and monitoring by Hurst's IT department, there are no measures to supervise any activity students choose to do online. However, there are rules regarding staff usage and contact with students online.

### **Campus Supervision Policy - in afternoons & evenings at Hurst College** **during 'Restricted' Free-Time Sessions**

Staff codes referred to in the below:

AM = Activity  
Managers

LM = Line Managers

AL = Activity  
Leaders

ET = English Teachers

WM = Welfare  
Manager

ADOS = Director of Studies, also  
includes DOS

FA = First Aiders

WHC = Welfare & House Coordinators

HM = House  
Managers

MC GL = MC Group Leaders (Assistant  
House Managers)

GL = Group  
Leaders

OM = Office Managers, sometimes the  
same as MC GL

The codes are used in the singular form (without 's'), but do refer to the plural (ie. AL refers to all ALs).

Throughout the period of 5 weeks the amount of the above staff fluctuates, for example we may have 2 or we may have just 1 FA, and there are periods when staff are off-duty or off-campus, for example the WM is part-time.

### **'Organised' Activity Sessions & 'Restricted' Free-Time Sessions - Policy & Procedures**

*Parents / Guardians / Agents / Group Leaders who disagree with any of the below must inform the Directors in writing, for example, if they want a student to join an 'organised' Activity in all sessions, or if they want a student to have more 'restricted' Free-Time. Note, MC do not use the term 'Restricted' with the students. We refer to it simply as Free-Time in their Handbook and rules, posters etc.*

## MC Policies

### What are 'Organised' Activity sessions?

- Activity Staff lead and supervise sessions during the afternoons and evenings.
- Times: 3.15-4.45pm, 5.30-7.00pm, 8.15-9.45pm.
- These include sports, art, crafts, drama, music and dance.
- Students aged 13 years and older **can leave** the session early.
- Students aged 12 years and younger **cannot leave** the session early.

### What is 'Restricted' Free-Time Sessions?

- This is only for students aged 13 years and older.
- These students **can choose** Free-Time when they choose not to join an Activity.
- 1 full session per day is the maximum.
- But they also **can have** Free-Time when they leave an Activity early (after the first 45 minutes).

### How is it 'restricted'?

- They **register** for having this option. We know who has chosen this.
- It is **limited** to one full session per day.
- It is only available for **older** students, above 13 years old.
- If younger students, below 12, want the option, they must be **supervised** by GL..
- Students **can only**: go to the activity centre, internet room, shop, office, house, gardens, or watch organised Activities.
- They **cannot go off-campus**. The map shows the areas that are restricted.
- House Managers **patrol** the campus, gardens, fields, and supervise every house, every afternoon and evening. A professional Security guard **patrols** the campus during the evenings and nights.

### Registering students' names and Activity choice

- **Registering their name and Activity is compulsory for all students.**
- Students **must meet** in the Quad / Garden 15 minutes before Activities begin.
- Times: 3.00pm, 5.15pm, 8.00pm.
- Students **must register their name and age** with their Group Leader.
- And when they register their name they **must tell their choice** of Activity to GL..
- Students go to the Activity Staff and they **must register their name and age** again with the Activity Staff.

### Joining Activities

Students aged **13 years and older**:

- **must join** 2 organised Activities per day.
- **can have** 1 Free-Time session per day.
- **can leave** the Activities early (after the first 45 minutes).
- On Excursion days there is 1 session, in the evening. They **can have** Free-Time.

Students aged **12 years and younger**:

- **must join** an organised Activity every session.
- **must stay** for the full session.
- **cannot leave** the Activities early.
- But they can leave or choose not to join if they **stay with** their Group Leader.

## MC Policies

### Joining an Activity late

Students aged **13 years and older ONLY:**

- Students **can join** an Activity late.
- They **must tell** the Activity Staff their name.
- **Reasons** for this include when students:
  - o *chose* Free-Time but changed their plans,
  - o *finished* a shorter activity session (eg. 45minute swimming session),
  - o *had* health/emotional issues, *were with* a First Aider or other staff *dealing with other* issues (eg. discipline, welfare concerns),
  - o *needed to return* to their house, to *get suitable* equipment/clothes,
  - o *met* their Group Leader, *contacted* their parents, etc.

### Staying until the end or leaving an Activity early

Students aged **13 years and older ONLY:**

- Students **can leave** their Activity early, after the first 45 minutes.
- They **must tell the** Activity Staff their name.
- Then they **can have** Free-Time, following the guidelines above.
- **Reasons** for this include they:
  - o *do not like* the activity, *cannot* do the activity,
  - o *do not have the suitable* equipment/clothes,
  - o *feel ill*, need to see the First Aider,
  - o *need* the *toilets* (many facilities do not have attached toilets), *need* a drink, food or medicine,
  - o *need to return* to their house, *meet* their Group Leaders, *contact* their parents etc.
- This is restricted. They **can only:** go to the activity centre, internet room, shop, office, house or gardens, or watch the organised Activities.

Students aged **12 years and younger:**

- Students **cannot leave** an Activity early.
- They **must stay** until the end of the Activity session.
- They **cannot choose** any unsupervised restricted Free-Time.
- We encourage them to take part in the full Activity programme.

### Choosing 'Restricted' Free-Time Sessions

Students aged **13 years and older ONLY:**

- Students **can choose** 1 Free-Time session each day as their choice of Activity.
- They **must register their name** again with House Managers/Staff when they start Free-Time and leave the registration point (Quad / Garden).
- There is an identified 'Gateway to Free-Time' which they must exit through.

Students aged **12 years and younger:**

- Students **cannot take** any Free-Time.
  - Group Leaders must supervise students in their group who want/need Free-Time.
- .....

## **MC Policies**

### **Provision and Levels of Care for the Periods of Free-Time – both 'Restricted' Free-Time Sessions and when there are no Lessons/Activity Sessions (eg. Meal times)**

There will be short periods when students are not supervised (between Lessons and Activity sessions, and before or after they finish their meals).

MC have sufficient supervision at all times, including 'restricted' Free-Time, during activity sessions (as an alternative to an 'organised' activity), and Free-Time between lessons/activities, during breaks, and before/after meals. Students of any age could be 'free' during certain parts of the day.

Safety and security arrangements are made clear in duty checklists and risk assessments. Below are our Levels of Care and measures taken to reduce risks. They do not simply depend on staff presence or staff duties, but depend on the boundaries we set and the help we give students to understand these.

The below levels/ratios are during weeks 1-4, or when 5 boarding houses are in use (when 4 houses or less are in use, the number of staff on duty in houses drops accordingly).

#### **Free-Time – periods when there are no lessons/sessions**

All duties have checklists except FA/Security, who record only when there are incidences.

- Houses are either locked or supervised by 1 staff
- 3 AL supervise **dining room** and queues at meals
- 1 ET and 1 AL work alongside 1 HM from 10pm onwards in each **house**, ie. 3 staff per house, with FA and Security available until bedtime (11.30pm)
- 1 of the above on **overnight** duty in each **house**
- 1 HM or MCGL/OM **patrol** quad, garden, road crossings, internet room, class block during breaks, meals, and in other gaps
- **Security** patrols campus after final activities finish

#### **'Restricted' Free-Time - as alternative to Activity sessions**

These duties have a checklist.

- For students aged **13 and over** only
- GL must supervise any **under 13s** in their group that want Free-Time
- 1 HM on duty per **house**
- **Security** patrols campus from 9.30pm
- 1 HM or MCGL/OM **patrol** quad, gardens, fields, road crossings, class block

### **Other Safety measures**

#### **During Lessons, Activities, House Meetings, Orientations**

- There are individual Risk Assessments for each activity offered, 1 for the classroom block when in use by teachers during lesson times, and just beforehand and afterwards.
- Risk Assessment for each different house cover the periods of meetings and orientations.
- All of these events have attendance registers.

## MC Policies

- Fire drills only take place in houses for every student.
- Fire drills in classrooms take place during summer, but not all students may be present.
- All classrooms and corridors are sign-posted.
- First aiders and Group Leaders check up on any absent students and care for them if they are ill.
- Fire drills do not take place in activities, but Activity Leaders show assembly points to all students on their initial campus tour.
- All indoor activity facilities have sign posts.
- First Aiders are always available to attend to emergencies during activity sessions.

### **During Assembly, Presentation, Meals, Breaks, Registrations**

- All of these events are supervised, sometimes remotely, or only upon entrance to the event. Staff are always present.
- Of these events, only meals have attendance registers.
- Fire drills do not take place for any of these events.
- Fire exits are signposted in the dining room and chapel.
- The campus is patrolled for most of the period that meals and breaks take place, it includes the classroom block, main building and gardens.
- The campus map shows which areas students should not enter.
- Houses are generally locked, or codes blocked, when supervisors are not on-duty in houses.
- Before a staff's house supervision duty shift ends, the duty checklist requires staff to ensure all students have vacated the house.

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## **MC Policies**

### **Registrations and Attendance at Hurst College**

#### **Attendance & Absences in Lessons - Policy & Procedures**

- Students must attend every Lesson. Students must be punctual and arrive on time.
- ET check attendance in every class (2 times day, or 3 times when there is lesson 3).
- ET report absences 5 minutes after each Lesson has begun.
- If the GL or FA receive such a message, they check the students' house/room.
- If the student is ill, the FA must assess their health. Records are kept in the medical folder.
- Students sleeping/avoiding class are sent to class. A record is kept on the 'Form'.
- If a student arrives at Lessons *later* than 5 minutes s/he may already be considered *absent*.
- Every student that is *late* or *absent* is recorded.

#### **Attendance & Absences in Houses - Policy & Procedures**

- HM check their iPad or paper register every time a student enters or leaves house in afternoon/evening or during meals/breaks.
- HM sit near the entrance of house on duty. When they patrol the house, the register is left at the door for students to sign themselves in and out.
- At approx. 10.10pm every night HM take the house register on entry.
- On the first and last day of each week, HM hold a meeting in-house at 10pm to give out any 'Night Notes' with messages from the office to students at this meeting.
- If a student does not attend, and they are not in the house, the Security or the HM of other houses is contacted. If their presence is unknown and they cannot be found in another house or building, Security will patrol and check the campus. If the student is missing for an excessive amount of time the Directors, Security and Safeguarding Lead (DSL) will make a decision about what action to take.
- Students who want to go to bed before registration must let the duty staff know, and the staff can read any notes/messages for the meeting to them before they sleep at their chosen time.

#### **Attendance & Absences at Activity Registrations in the Quad (Meeting Point) - Policy & Procedures**

- All groups have a clear gathering point, shown to them or their GL after Assembly.
- GL (and MC GL) wait in the Quad for the students to gather.
- Students register their name and age on the paper register; Registers are kept in the office between registrations.
- GL ask and log their choice of activity/Free-Time.
- GL distribute wristbands for any Free-Time (for students aged 13 and older only).
- If MC individual students do not come to register, MCGL/OM can call their mobile via the iPad. Other GL are responsible for recording and enforcing the rules on their students who do not attend registers.

## **MC Policies**

- After registration, students join their chosen activity or queue at the Free-Time gate.
- AL keep registers of the attendees at their session, and log any students who leave early or join late.
- HM or FA or OM keep registers of the students who chose Free-Time.

### **Lateness**

- This should always be recorded for Lessons and House Registers.
- Cases of lateness might be taken as due to harm and may entail safeguarding investigations.
- In cases when participating after late arrival will disturb the Activity/Lesson, staff may ask a Line Manager to supervise the student in a different location. This must be judged carefully as to whether it will be taken as punishment, or a safety measure for the student or other students' benefit.



## MC Policies

### Excursion & Off-Campus Supervision (During Free-Time on Excursion)

Our **ratio of supervisors** (staff and Group Leaders) to students complies with HM Government (DfES) recommended ratios for parts of the day (walking between coach drop-offs and site-seeing spots & town centres) but older (aged 13+) students are given free-time for shopping without an adult. Supervisors are provided, once at the destination (apart from free-time for 13+), at the ratio **1:8 for 8-12yrs** and **1:15 for 13-17yrs**.

#### Off-Campus

Students only leave campus –

- **On excursions** - students are accompanied by staff but will be given unsupervised Free-Time for shopping of approximately 1 hour periods, a maximum of 3 times per trip. Students aged 12 years and younger will not be given unsupervised Free-Time. They will stay with MC Staff. If Parents / Guardians Agents / Group Leaders disagree with this Policy they must inform the Directors in writing. Some extra excursions may be organised for students aged 15 and older.
- **During a normal day** - only if the Directors have permission from Parents / Guardian / Agents / Group Leaders in writing and only for a special occasion/reason. In circumstances when a student goes to the doctor with MC Staff, we will not request permission.
- **Overnight** - only if the Directors have permission from Parents / Guardian in writing and only for a special occasion/reason. In emergencies when a student stays at hospital with MC Staff, we will not request permission.

#### MC Provision and Levels of Care

##### Free-Time on an excursion

Before and during Free-Time, for students aged 13 or older:

These duties have a checklist. Duty staff are designated according to group size. Staff duties and student guidelines include:

- Registers are taken with names and ages of students
- Lanyards, maps must be carried by students, and must be visible
- Staff are accountable, with checklists and strict rules for 1 hour free time, 3 periods maximum
- Return to meeting point arrangements are acknowledged by each student writing the arranged return time on the register next to name
- Comprehension and instruction checks are carried out by staff, as per their training and practice in induction
- FA are accountable, with checklists for their role at traffic crossings, meeting points
- Group Leaders are requested to stay with students aged 12 or younger
- Extra MC staff are provided for groups which consist of 12 years and younger students, to enable 1 staff to always stay with the group
- Rules about what they must and must not do are provided in the Student Handbook
- Guidelines are also given in their handouts, via house meetings the night before, and via lessons which focus on pre-excursion tasks

## MC Policies

- Advice/rules given about what they should do after/before site-seeing on lanyards handouts: You are allowed to: / we recommend you: Have a drink/snack in a café; Sit in a park/beach; Go to the shops, buy souvenirs/clothes/toys/snacks; Do more site seeing; take photos

### Other safety measures

- All students *must wear lanyards and maps* around their necks while at the destination.
- During **Orientation and Campus Tours** students are *given advice* on **crossing campus roads**.
- Students *can find* information about **UK traffic, road crossings and safety precautions** in the **office**.
- Our regular contracted **coach companies** *undergo* their own coach **safety checks**.

## MC Policies

### Rules, Conduct & Disciplinary Procedures

MC has **40 golden rules** to help limit students endangering themselves and each other, the college and scheduled programme. We start by making it clear what is expected.

#### Rules & Conduct

All students must read, understand and follow these rules.

They must use a dictionary if they do not understand.

Translations or English handouts are provided at Check-in. Translations are available. It is also the responsibility of the Parent / Guardian or Agent / Group Leader to show each student the rules in: traditional Chinese, simplified Chinese, French, Italian, Portuguese, Spanish, Polish, Russian, Turkish, Arabic, and Japanese.

Students are given these rules again at house meetings and via lessons which focus on life at Hurst.

#### Empowering students

Students must always be informed in advance of the rules guiding their behaviour.

MC do this in the following ways:

- **Published** rules - the rules are presented in a student handbook, on posters.
- **Translations** - rules are translated into 10 common languages, given at check-in.
- **Welcome Assembly** – some basic rules are presented verbally.
- **Orientations** - staff help explain and ensure all students comprehend the house and campus safety rules.
- At the start of **Excursions** - staff explain specific rules for the day.
- At the start of **Lessons** - staff explain specific rules for their classroom.
- At the start of an **Activity** - staff explain the specific rules of the game/activity.
- Outlined on the **website** and in the **Terms & Conditions** for Parents.

#### Empowering staff / group leaders

All staff *must* take the responsibility of keeping a **watchful eye** on students at all times when they are **on duty**, and **report** any questionable behaviour or breaking of rules to the Office.

Whenever a student breaks a rule, staff should **inform** them what they did wrong.

This is not always possible or necessary.

If possible or necessary, when encountering misbehaviour, staff *should tell* the student **what rule** that has been broken.

If staff have the printout, student handbook or poster handy, staff *should point to the rule* that has been broken.

If staff feel students' behaviour has not violated any of the following rules, they *should consult* the Directors before reprimanding a student.

Then this information should be **recorded** on a Duty Checklist or **passed on** to a Line Manager, the Directors or Security, or the students' Group Leader, identifying:

- *the student, and nationality and (if applicable) his/her group,*
- *along with the time and location,*
- *and the fact the student was informed of their misconduct, and any response they made.*

## MC Policies

### 8 Safety Rules

Please help us – Respect all students and staff. Staff = your supervisors, teachers, leaders, house staff, directors, first aiders, security.

We will help you – The Directors are always in the office. We can need help if do not understand.

Students **must** ...

1. Students must **go to** all lessons, registrations, activities and meetings early.
2. Students must **carry** the identity card.
3. Students must **stay** in the central campus area on the map.
4. Students must **cross** the roads carefully. (Use the 2 safe crossing places).

Students must **not** ...

1. Students must not **have or use** alcohol, tobacco, E-cigarettes or drugs.
2. Students must not **damage or take** other students' or college property.
3. Students must not **fight, threaten violence, bully or say bad words** to other students.
4. Students must not **enter** classrooms or activity areas without a staff.

### 8 House Rules

Please help us – The campus map shows red lines. Please do not enter the red areas.

We will help you – You can get permission to leave the college if a visitor collects you.

Students **must** ...

1. Students must **register** your name when staff ask.
2. Students must **listen** to staff. (Be quiet when they speak).
3. Students must **keep** the room, house and college clean, safe and calm.
4. Students must **keep** money and valuables safe. (Use the office bank or lock it in your suitcase).

Students must **not** ...

1. Students must not **damage or play** with fire alarms and fire detectors.
2. Students must not **leave** the house after 10pm. (Do not escape).
3. Students must not **enter** another student's bedroom. (Ask their permission).
4. Students must not **enter** houses of the opposite gender. (No boys can enter girl houses and no girls can enter in boy houses).

### 8 Excursion Rules

Please help us – Please listen to the staff about meeting times and places.

We will help you - You will stay with your group and staff. But if you are 13 or older you can have some free-time

Students **must** ...

1. Students must **wear** the information card with map around your neck.
2. Students must **stay** in groups of minimum 3 students all the time. (Never be alone).
3. Students must **be careful** of strangers.
4. Students must **be careful** at road crossings. (First stop, look right and left, listen, look again. Then you can cross).

Students must **not**...

1. Students must not **be late** for meeting the group.
2. Students must not **go off** the area on the map.
3. Students must not **leave** the staff if you are 12 years old or younger.

## MC Policies

4. Students must not **buy** alcohol, tobacco, E-cigarettes, drugs, DVDs or games with age restrictions.

### 8 Activity & Free-time Rules

Please help us – If you are 13 or older and do not want to join an activity, you have only 1 session to relax per day. If you are 12 or younger you must join activities.

We will help you - Staff will explain the rules of each activity at the start of each session.

Students **must** ...

1. Students must **register** your name with your Group Leader.
2. Students must **choose and tell** your Group Leader your activity or free-time choice. (Get permission from a Group Leader if you choose free-time).
3. Students must **register again** with the staff for the activity you join or with the staff for free-time.
4. Students who do not join an activity must **choose** to go to A) house, B) shop/office, C) internet/activity centre, D) gardens, E) watch activities.

Students must **not**...

1. Students must not **leave** the meeting point before you register your name.
2. Students must not **misbehave or disturb** other students or the staff.
3. Students must not **finish** an activity early before you tell the staff your name.
4. Students must not **relax** for 2 or 3 free-time sessions in 1 day.

### 8 Lesson Rules

Please help us – Please use every opportunity to speak English.

We will help you - Teachers will explain the rules of each class at the start of the course.

Students **must** ...

1. Students must **attend** every lesson.
2. Students must **tell** staff if you cannot go to lessons.
3. Students must **turn off** phones or **give** them to the teacher.
4. Students must **behave** in the class building before, during and after lessons.

Students must **not**...

1. Students must not **use** your first language. (You can use it only for translations or emergencies).
2. Students must not **be late** for the start of lessons.
3. Students must not **leave** the classroom. (You can leave only for toilet or emergencies).
4. Students must not **disturb** other students from learning.

### Student Disciplinary Procedures

The Directors have the right to discipline students found breaking the Rules or seriously disrupting the harmonious running of the Summer School, as defined in the following ways. Causing or intending to cause damage to:

- students' own personal health, the mental and physical health and safety or property of fellow students, MC property, *Hurst College* property, the MC schedule, or MC staff carrying out their duties.

The Directors will judge whether damage is considered to be 'deliberate' or 'accidental' upon viewing and investigating it.

## **MC Policies**

### **The Directors' Role**

Staff must not discipline children (except minor classroom issues). When staff must inform students of their unacceptable behaviour, they must inform the student what they have done wrong, and ensure the students understand. The Directors and Welfare Manager are the only people responsible for administering 'punishments', and it is dealt with in an Office 'consultation room' with more than 1 adult/staff present, and perhaps another student to accompany the 'culprit'. Sometimes authorisation is given to Line Managers to take on this role. The punishment will depend on the seriousness of the behaviour.

MC and its staff will not inflict physical or psychological harm on any child.

### **Here are some sanctions/punishments the Directors may use:**

- Ask the student to help a member of staff
- Take away free time (ie: students miss one or more activity session/s)
- Change the student's bedroom or residential house
- Withhold the student's Attendance Certificate
- Contact the parents/guardian or agency
- Ask parents/guardian or agency to pay for damages
- Contact the police
- Send (expel, repatriate) the student home

### **Serious offences - MC reserve the right to send home (without either a verbal or written warning) any student that:**

- Disrupts the harmonious running of the summer school;
- Continues to break our rules;
- Commits a serious offence (includes violence, harm, sexual offences, theft, smoking in boarding houses, possession, purchase or consumption of alcohol or illegal drugs);
- Breaks a UK law, committed a crime or involved the Police;
- Damages property willfully;
- Is violent to other students;
- Bullies other students.

### **Serious sanctions/punishments - MC will:**

- Investigate the circumstances;
- Make arrangements for the student to go somewhere else or be collected;
- Try to rearrange the student's flight to an earlier departure;
- Request the parents / Agent to pay the cost or request them to reimburse the company for the cost;
- Inform parents/guardians of the new flight details;
- Ask the GL to escort student to the airport.

### **Damage - our advice to parents/agents/students:**

- All damage should be reported to the Directors as soon as possible.
- MC will charge students for wilful damage.
- MC will not charge or penalise students for accidental damage.

## MC Policies

**Other sanctions/punishments may be dealt with by the Directors, and on the recommendation of a parent or Group Leader, depending on the actions of the student. Here are some other specific scenarios**

- Anonymous vandalism/theft of MC /Hurst College/staff/students' property or accidental damage:  
At evening register, duty staff will offer the chance for students to confess or admit any knowledge. If nobody confesses/admits, all residents (of the house of the victim, suspect or damage) may miss an Activity Session.  
This measure is intended to put pressure on the perpetrator, but may not be successful. Students are recommended to confess any accidents. Once the student is identified s/he may be asked to write a report. Anonymous reports and confessions are also encouraged by staff.
- Residential discipline problems, and lateness:  
In-house discipline is not carried out by the duty staff. Children's welfare must always be respected, so it is recommended that staff phone/contact the Directors immediately. Security may be called for assistance, but punishments are not dealt by them. Students are dealt with in the office.
- Classroom discipline problems, and lateness:  
Classroom discipline may be carried out by the respective teacher. Children's welfare must always be respected, so only minor 'constructive' 'punishments' may be given by the teacher, eg. 'yellow cards' and 'red cards', and these may continue until the negative action stops. The aim is to create a positive scenario for the entire class out of the negative behaviour, wherever possible. If the behaviour continues to cause problems, it must be brought to the A/DOS/Director's attention, and students will be dealt with in the office during or after lesson time.
- Setting off fire alarms:  
This is difficult to judge whether wilful or accidental and we will take advice from the Hurst College Fire Officer. If watching CCTV is not possible, an investigation will begin into who is responsible and why.
- Breaking UK laws:  
We reserve the right to expel (or repatriate) the student. They may be repatriated under certain conditions, assuming presence of parent/guardian at home. The police may get involved and may advise us.

**Discipline is always dealt with in line with our Child Protection & Safeguarding Children, and Data Protection Policies and procedures, where investigations are carried out to assess different versions of events.**

**MC prefers not to use empty threats as sanctions/punishments that cannot actually be carried out. MC does not believe in punishing a group in place of the perpetrator, unless there is good reason, will bring about a good result and the punishment has been authorised by the relevant Line Manager.**



## MC Policies

### Complaints Procedure (for students/parents/guardians)

If customers are not satisfied or not happy with our service, they can complain. We have the following procedure:

#### Students must:

- Make sure they can speak to somebody in their language.
- Speak to Parents / Guardians / Group Leaders when they first have a problem. Do this soon. Do not wait.
- Go to the Office as soon as possible.
- Speak to the Directors or Office or Welfare Manager.
- Say – “*can I speak to the Directors or Shirley*” – or - “*can I have a **Complaint Form** please.* “
- Write about the problem on the **Complaint Form**. It is possible to ask somebody to help.
- Give it to the Directors or Office or Welfare Manager when they finish - or - ask somebody in the office to give it to them.
- Say - “*please give this to the Directors*” + “*please make a copy of this **Complaints Form** for me to keep.*”

#### Manor Courses:

- *Will make an appointment to talk about the problem within 24hrs.*
- *Will investigate the problem before the appointment.*
- *If the student is not happy with our response we will try to investigate more.*
- *We cannot investigate complaints before students write a **Complaint Form**.*
- *It may not be possible to investigate old problems.*

#### Parents / Guardians / Agents can:

- Email the Directors at any time [\*\*info@manorcourses.co.uk\*\*](mailto:info@manorcourses.co.uk).
- It is also possible to complain after summer.
- When the student gets home we can email a **Complaint Form** within 1 month.
- But it may not be possible to investigate old problems.
- If the student is still unhappy with our response within 6 months, it is possible to contact English UK

[www.englishuk.com/en/students/english-in-the-uk/student-complaints-procedure](http://www.englishuk.com/en/students/english-in-the-uk/student-complaints-procedure)