

SAFEGUARDING POLICY

STAFF NOTICE: THIS DOCUMENT SHOULD BE SHARED, READ AND UTILISED ALONGSIDE BAYSWATER'S 'SAFEGUARDING PROCEDURES' DOCUMENT.

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Quick Look	
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1. Introduction

In its quest to grow communities of global thinking and explorers, Bayswater College brings together and offers courses, programmes and experiences to persons of all ages, nationalities and backgrounds. Bayswater is committed to proactively safeguarding and promoting the welfare of all individuals that interact with the organisation. This is not just an aim, Bayswater's founding promises made to its students are built on, encourage and incorporate a culture of safeguarding, including:

- Bayswater being a 'home away from home' with 'support every step of your journey'
- Bayswater promoting a 'student powered community'
- Bayswater knowing that it's 'our job to meet your needs'

Locations

For the purpose of this Policy, 'Bayswater College', herein referred to as 'Bayswater', refers to the organisation's operations at its permanent sites in the UK (Bournemouth, Brighton, Liverpool, London), Canada (Calgary, Toronto, Vancouver), France (Paris), South Africa (Cape Town) and Cyprus (Limassol) as well as its temporary sites which at time of writing include, but aren't limited to, Oxford Brookes University, University of Westminster and University of Greenwich. Additionally, Bayswater has operations and staff working in other locations too, both on site and from home. This Policy and its relating policies and procedures are to be upheld in any and all Bayswater sites and by any staff working under Bayswater's employment (see 'Scope and Purpose' below for further information).

Regional differences

Where there is conflict between this Safeguarding Policy and local legislation, local legislation should take precedence and steer the application of this Policy. For example, this Policy has been compiled whilst accepting the UN's definition of 'a child' ('anyone below the age of 18'), however in British Columbia, Canada, provincial law states a child is anyone below the age of 19. Therefore, in Bayswater's operations in British Columbia, this Policy would be applied and promoted whilst taking into account that 19-year-olds are classified as children.

In regions where this Policy imposes more rigorous obligations than local legislation, this Policy should be followed, applied and encouraged.

Bayswater's regional Deputy Designated Safeguarding Lead and the organisation's Designated Safeguarding Lead should be alerted immediately to any conflict between local legislation and Bayswater's policies and procedures.

Overarching safeguarding approach

Bayswater truly believes that 'safeguarding is everyone's business'. This means that it is the responsibility of all individuals working for or with Bayswater to respond to any concerns, suspicions or evidence of abuse or neglect by reporting and/or taking appropriate action. By individuals stepping up and everyone working to the same ethos, Bayswater can better care for and protect those who engage with the organisation. Bayswater has developed multiple policies and processes to encourage, ensure and achieve this. This Safeguarding Policy is the overarching document that bridges the multitude of other safeguarding-related policies and procedures through raising awareness of their existence via direct reference and/or inclusion of key segments.

The policies, processes and procedures that link to, promote and ensure safeguarding apply to all individuals operating within Bayswater's sphere. The purpose of this Safeguarding Policy is to protect anybody and everybody from any harm that may arise during their interactions with Bayswater. This Policy sets out the commitments made by Bayswater and informs staff, partner organisations and individuals with which Bayswater collaborates, of their responsibilities in relation to safeguarding.

Bayswater has three principal tenets in relation to safeguarding those that interact with the organisation:

1. All products and processes are created with a 'safe by design' concept and are regularly reviewed. They additionally comply with all regulatory requirements and guidelines.
2. Building safety and awareness into all people-related processes to provide protection for all parties. This includes factors and processes such as following 'safer recruitment' practices (see Bayswater's Recruitment Policy), ensuring appropriate training, conducting relevant risk assessments, and ensuring awareness of and accessibility to key policies and support.
3. Finally, if, as and when necessary, having robust procedures and processes in place to enable people to raise a concern quickly and effectively, and for the organisation to respond with equal speed and effectiveness.

2. Accessibility and Version Control

Bayswater's approach as an organisation encourages and promotes a culture of safeguarding by ensuring its policies, processes and procedures have safeguarding considerations and protocols embedded in them. In order to achieve this, Bayswater ensures that appropriate training, resources and support accompany the access to its safeguarding policies and procedures. This is internally promoted and assured from leadership, right across the organisation, and externally supported through regulatory partnerships as well as legal obligations.

Bayswater strives to create a safe, respectful, inclusive and people-centred environment where students and staff alike are listened to and encouraged to help the organisation understand the needs of both the staff and student body, as well as individuals within these groups.

Bayswater believes that '*safeguarding is everyone's business*' which is why it invests in related training, support and resources to embed safeguarding within its culture. There is a single, one-for-all Safeguarding Policy and it is available for everyone to access, no matter one's position at or relationship with the organisation.

As with many policies, this Safeguarding Policy is regularly reviewed and updated in accordance with best practice, government guidelines, and as a result of continuous learning, development, and welcomed feedback. Review is done so at Bayswater's discretion, at least annually.

The most up-to-date version of the Safeguarding Policy can always be found on the Bayswater website. Students can also find it in the 'My Bayswater' portal along with other important documents.

NB: Bayswater's 'Safeguarding Procedures' document is accessible to and should be read and referenced alongside its Safeguarding Policy by Bayswater staff. It is shared with staff (see next chapter for individuals / groups / parties considered 'staff') during the commencement of their contractual relationship with Bayswater. Staff are expected to read and follow the procedures listed. As with the Safeguarding Policy, the procedures document is regularly reviewed and updated in accordance with best practice, government guidelines, and as a result of continuous learning, development, and welcomed feedback. Review is done so at Bayswater's discretion, at least annually.

Due to the nature of the document's content, it has not been released for public reference. However, should any party require further information or have any queries, concerns or suggestions, please contact the Designated Safeguarding Lead (DSL).

3. Scope and Purpose

Staff

Bayswater's Safeguarding Policy is a one-for-all policy that must be adhered to and promoted by the following parties:

- All Bayswater employees on the payroll
- All volunteers and interns
- All fixed term and temporary agency workers engaged by Bayswater
- All consultants
- All contractors and service providers that directly interact with Bayswater students without the presence of Bayswater employees e.g. homestay agencies and its hosts
- All individuals acting as Bayswater's representatives and/or agents
- Bayswater's Trustees

For the purpose of this Safeguarding Policy, the above listed individuals and groups will be referred to collectively as 'staff'. Breaches of this Policy by staff will be treated seriously and could lead to a number of actions including termination of contracts, dissolution of professional relationships, legal action, disciplinary action and/or immediate dismissal.

Courses and participants

Bayswater's courses and operations are wide and varied and include, but aren't limited to, the following:

- Year-round adult courses at its permanent sites which are also open to 16 and 17-year-olds.
- Year-round, closed groups which are open to students as young as 11 years old (but usually not younger than 12).
- Seasonal courses at both its permanent and temporary sites where under-18s as young as 11 (but usually not younger than 12) may interact with and learn alongside adult students as individuals or as part of closed groups.

All courses and operations are governed by Bayswater's policies which have been designed to cover numerous and varying scenarios and situations including children, young persons and adults. Any additional provisions offered in the future are also governed by the organisation's policies.

Bayswater recognises that certain individuals and groups may require additional support to meet their safeguarding needs, they could include:

- Under 18s
- Vulnerable adults
- Students with greater cultural differences
- Students with additional or special educational needs and disabilities (SEND)
- Students with medical conditions
- Looked-after children

As detailed in Chapter 8 of the 'Safeguarding Procedures' document, Bayswater welcomes and encourages students and staff alike to share information on any SEND, medical conditions and/or other support needs. In sharing such information in a timely manner, it allows Bayswater to consider an individual's needs and possible support mechanisms.

Prospective students are invited to discuss their needs prior to booking a course to ensure its location, premises, course activities, etc, are suitable and accessible to the individual. Where they are not, Bayswater will always try its utmost to provide additional support, introduce additional measures and/or make reasonable adjustments.

On request, Bayswater's Admissions team can provide information on accessibility of any of its sites and intended course activities.

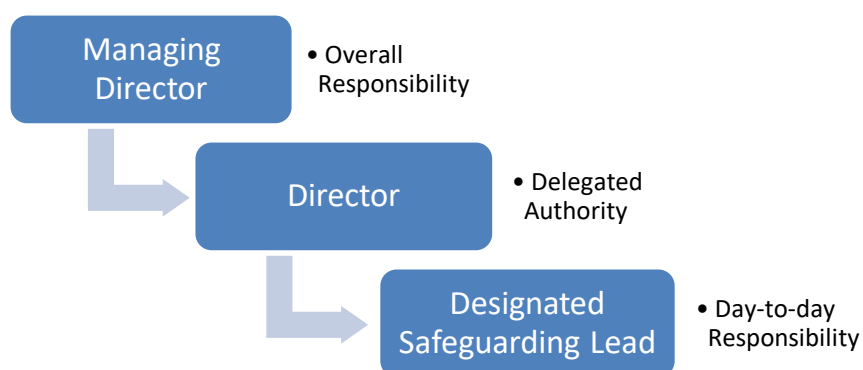
Partner organisations

Bayswater may work in collaboration with partner organisations. 'Partner organisation' means any organisation which receives funding from Bayswater, which collaborates with Bayswater to deliver any of its activities (including by providing staff time), or which is otherwise associated with Bayswater's operations, its name and/or its brand.

This Policy is intended to work alongside the equivalent policies and procedures of Bayswater's partner organisations, where appropriate. As part of any new collaboration, Bayswater will carry out due diligence for purposes of verification and risk mitigation.

Bayswater expects that the principles and approaches shared with any partner organisation means that they will support the values and commitments set out in this Policy. Partner organisations, as independent organisations, are ultimately responsible for internally dealing with their own safeguarding provisions and action. However, Bayswater expects partner organisations to promptly report to Bayswater's Designated Safeguarding Lead any safeguarding concern that arises which may impact Bayswater's policies, operations, approach, reputation or relationship with the partner organisation.

4. Organisational Responsibility



Bayswater's **Managing Director** has ultimate responsibility for safeguarding across the organisation. They have oversight of Bayswater's Safeguarding Policy and all linked policies and procedures and will have oversight of Bayswater's handling of safeguarding incidents via the Director.

Bayswater's **Director** is responsible for ensuring the promotion of a positive safeguarding culture and to support and connect Bayswater's Executive Team and Designated Safeguarding Lead.

The **Designated Safeguarding Lead (DSL)** has day-to-day responsibility for dealing with any concerns about child / adult protection and safeguarding. There is also a Deputy DSL(s) as well as other appropriately trained persons who form part of the 'Safeguarding Team' who can be contacted in the DSL's absence. The responsibilities of the DSL include the below, and they are further elaborated in the DSL's Job Description.

- Ensure there is a robust, effective and relevant Safeguarding Policy, and that it is known and accessible to all staff.
- Provide information, advice, training and guidance on safeguarding to Bayswater staff.
- Notify the Director of any significant suspicions, allegations or incidents of abuse and other safeguarding issues.
- Keep other relevant people within Bayswater informed about any action taken and any further action required.
- Contact and liaise with, as appropriate, external agencies, including child / adult protection agencies and law enforcement authorities.

- Ensure that appropriate, safeguarding-related records are kept, processed and maintained in line with GDPR* best practice.
- Regularly review and update safeguarding-related policies and procedures to ensure they reflect changes to legislation and the organisation's / sector's needs. Share any updates with staff as appropriate.
- Monitor and analyse the overall trend of safeguarding concerns to identify patterns and take combative action to address / reduce / eradicate.
- Conduct regular audits and checks, and submit quarterly reports to the Director including updates, patterns and proposed actions (including timeframe).

**General data protection regulations (GDPR) and act, and human rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.*

5. Safeguarding Team Structure and Training

The organisation-wide Safeguarding Team is led by the **Designated Safeguarding Lead** (DSL) and the UK-based **Deputy DSL(s)**.

The DSL and their UK-based Deputy(s) are supported by an identified person at each permanent Bayswater site (usually the Centre Director). In safeguarding terms these identified on-site persons are known as '**Designated Safeguarding Officers**' or 'DSOs'.

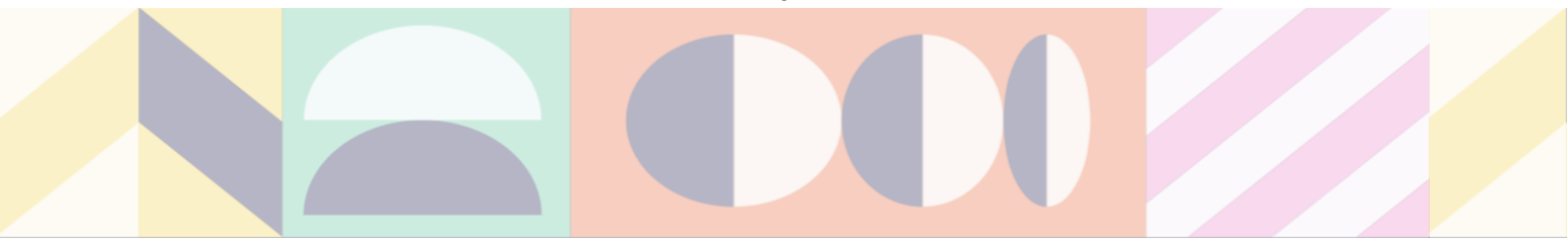
Each country where Bayswater has an operation also has a Deputy DSL for that country. If that country has only one site, the Deputy DSL will also be that site's DSOs e.g. South Africa (Cape Town).

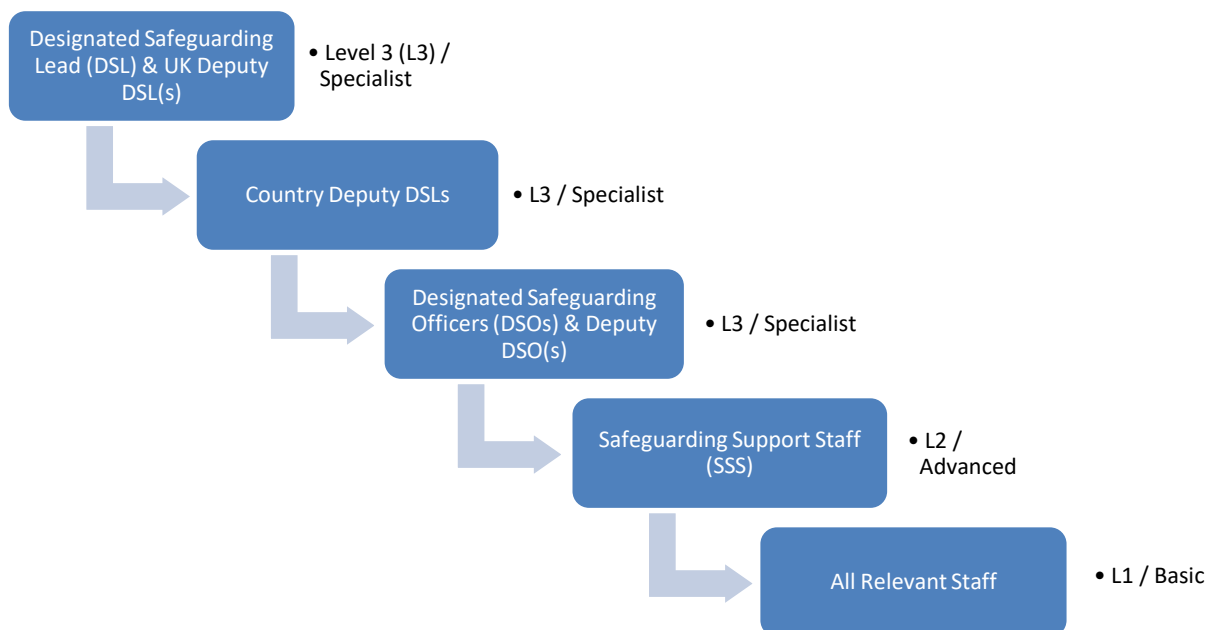
The DSO at each site has an elected **Deputy DSO** who supports the DSO and fulfils their responsibilities in the DSO's absence. DSOs and their deputies are usually further supported by colleagues within their location-specific teams known as '**Safeguarding Support Staff**' or 'SSS'.

DSOs and their deputies are responsible for promoting a safeguarding culture within their teams / departments / locations. This responsibility includes ensuring:

- Safeguarding awareness remains a constant and that relevant policies and procedures are accessible, promoted and upheld team wide. Changes to policy / procedures are effectively communicated.
- Recruitment and induction protocols are followed.
- Training provisions, including safeguarding, first aid and fire marshal, are adequate and up-to-date (this will additionally be checked periodically by HR). Training provisions pertaining to fire marshalling and first aid are elaborated in Bayswater's 'Health & Safety Policy' which can be found in Bamboo. Safeguarding training provisions are detailed in the diagram below and on the next page.
- Appropriate risk assessments (RAs) are conducted and updated to identify risks, and mitigations are designed and actively enforced to reduce the risks. RAs include those for accommodation and on-site needs (e.g. Fire RA), excursions, activities etc. This is further detailed in Chapter 7 of Bayswater's Safeguarding Policy.
- Safeguarding-related concerns are effectively and efficiently dealt with and promptly reported to the DSL.
- Staff are actively supported during / after dealing with safeguarding-related concerns.

Regarding operations at temporary sites with management teams employed on short, fixed-term contracts: all staff are required to complete the 'basic' (also known as Level 1 / L1) safeguarding training, or regional equivalent. This will be complimented by in-house safeguarding training. These temporary teams will be heavily supported by relevantly trained colleagues such as the Summer Operations Managers, the DSL, Deputy DSL and/or DSO.





As Bayswater believes ‘safeguarding is everyone’s business’, it requires all employees to complete ‘basic’ safeguarding training. In some countries where Bayswater operates, partner organisations and services providers may also be required to complete safeguarding training. In the UK for example, [homestay hosts](#) must complete safeguarding training before their services are utilised by Bayswater. In some countries it may also be mandatory for [group leaders](#) to complete such training (not in the UK – however Bayswater does encourage this). Designated Safeguarding Officers are responsible for ensuring individuals of any partner organisations and service providers are trained as per local requirements.

Safeguarding training must be completed as part of relevant staff’s induction / at commencement of staff’s (or their employer’s) contractual relationship with Bayswater.

Staff who hold / are required to hold more significant safeguarding responsibilities are required to complete a higher level of safeguarding training, for example in the UK ‘Advanced’ (L2) or ‘Specialist’ (L3).

All training must be renewed / refreshed prior to expiration, as detailed by the relevant training provider (below).

Between training, any updates in legislation, guidance and/or Bayswater’s internal policies and procedures should be shared with staff as relevant. The DSL will lead on this.

Bayswater’s Safeguarding Training Providers		
Country:	Provider:	Website:
UK	English UK	www.englishuk.com/safeguarding
Canada	Languages Canada	www.languagescanada.ca/en/
Cyprus	ELSAC	www.elsac.org

France	Groupeement FLE	www.groupeement-fle.com
South Africa	Edu South Africa	www.edusouthafrica.com

It's good practice for those that work in and around the field of education to be trained in safeguarding. In some countries and in many organisations, it is mandatory, especially when working with children, knowing about legal requirements and professional responsibilities for keeping children safe. Child protection, and particularly child abuse, can be difficult to talk about. However, it's important for everyone who works with children to understand the basic issues, definitions, types and signs of abuse, and know what to do if there are any safeguarding-related concerns.

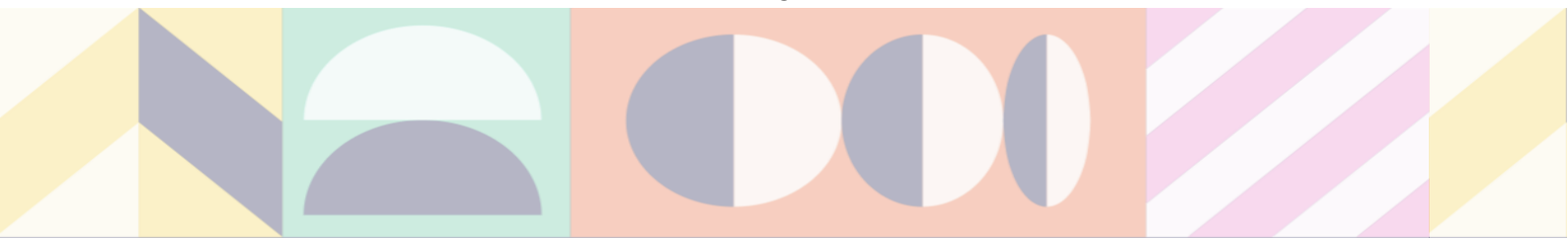
Official training via the above providers is supported and supplemented by Bayswater's internal safeguarding training. This is delivered by the organisation's D/DSOs, D/DSLs or equivalent - depending on location, situation, role, etc. All training is further supported, promoted and underpinned by Bayswater's policies, procedures and other resources – see 'Safeguarding Procedure' document for further information – as well as by supplementary training including: first aid, fire marshal, EDI (equality, diversity & inclusion) training, Prevent training and mental health first aid training.

6. Principles

Bayswater will embed a safeguarding culture for children, young persons and adults in the following ways:

- Ensuring designated safeguarding team members are effectively trained and equipped and are identifiable and accessible to staff.
- Ensuring all applicable staff have an awareness of and appropriate training on safeguarding.
- Ensuring all staff know when and how to raise a safeguarding concern.
- Managing incidents, concerns, suspicions and/or allegations of abuse efficiently and effectively and in line with appropriate procedures, including reporting to relevant parties and agencies as appropriate.
- Embedding safeguarding concepts into the product design process.
- Building safeguarding into all relevant people-related procedures, including onboarding, training, development, and performance management.
- Sharing information and cooperating with other agencies / authorities when required.
- Adhering to safer recruitment and selection procedures, including relevant criminal records checks.
- Setting clear, organisational expectations including via policies, codes and documents such as this Policy, the Safeguarding Code of Practice (Annex III) and the Employee Handbook to promote Bayswater's culture and values, and to ensure these values and culture are reflected in the behaviour of staff.
- Carrying out annual (minimum) reviews of the Safeguarding Policy and related policies and procedures.
- Effectively using the tools and processes referenced in this Policy to embed safeguarding as a key principle throughout the organisation.

Bayswater is committed to ensuring a safe and protective environment where staff and students alike, regardless of age, gender, disability, race, religion or belief, sex, sexual orientation (and so on), are encouraged to be their true and authentic selves. Bayswater encourages this in a number of ways, including:



- Prioritising the welfare of its staff and students.
- Ensuring investment in supplementary training that supports safeguarding such as that relating to: first aid, fire marshal, EDI (equality, diversity & inclusion), Prevent, and mental health.
- Ensuring effective policies and procedures are in place, utilised and promoted.
- Taking its duties of care seriously such as in relation to protection from extremism.
- Where appropriate, working to create cohesion between students, parents, staff, and homestay and other providers and agencies.
- Ensuring staff and students feel and are heard, and are supported to achieve their goals.
- Promoting the organisation's values, respect, and respectful relationships.
- Ensuring any suspicions, allegations, concerns or complaints are taken seriously and are investigated.

7. Linked Policies, Documents and Other Resources

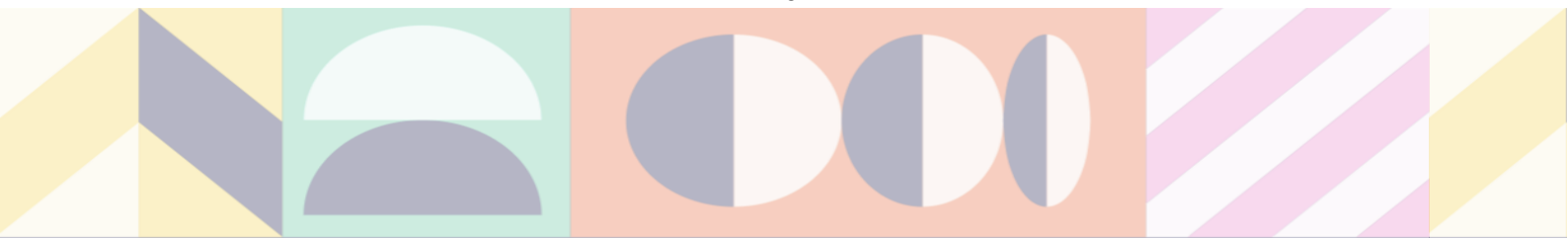
Safeguarding is embedded as a key principle throughout Bayswater. It therefore interacts with, relies on, guides and impacts numerous policies, codes and processes. The documents and resources in the non-exhaustive list below are just some of the main ones which this Safeguarding Policy should be read alongside:

Alphabetised list of linked policies, procedures, codes and handbooks
Allegations Against Staff Policy
Anti-Bullying Policy
Complaints Process
E-Safety Policy
Employee Disciplinary Policy
Equality, Diversity and Inclusion Policy
Grievance Policy
Health & Safety Policy
Homestay and Residence Code of Practice and Conduct – for all parties (including U18 section & FAQs)
Images Policy
Missing Students Policy
Prevent Policy
Recruitment Policy
Safeguarding Code of Practice (see Annex III)
Safeguarding Procedure
Sexual Misconduct Policy – for all parties
Staff Code of Conduct
Staff Handbook
Student Attendance Policy
Student Code of Conduct (including 'Student Behaviour & Discipline', 'Respect and Fair Treatment', 'Rules'. Also includes 'Code of Conduct for Adult Students on Residential Programmes' as an annex)
Student Handbook (including U18 section)
Student Induction (including U18 section)
Student Supervision Policy
Whistleblowing Policy
Alphabetised list of linked assessments, forms and other resources
Emergency Plan
Group Leader Accommodation Declaration
Group Leader Background Check Declaration
Group Leader Handbook

Group Leader Induction
Incident Form
Request Forms including: <ul style="list-style-type: none"> - Private Accommodation Request Form for Under 18s - Travel Request Form for Under 18s
Risk Assessments including: <ul style="list-style-type: none"> - Risk Assessment for Staff whose Background Checks are Pending - Risk Assessment for Adult Students Enrolled at Residential Summer School
Sign In / Out Form – Visitor
Sign Out Form – Student
Sign Out Form – Group

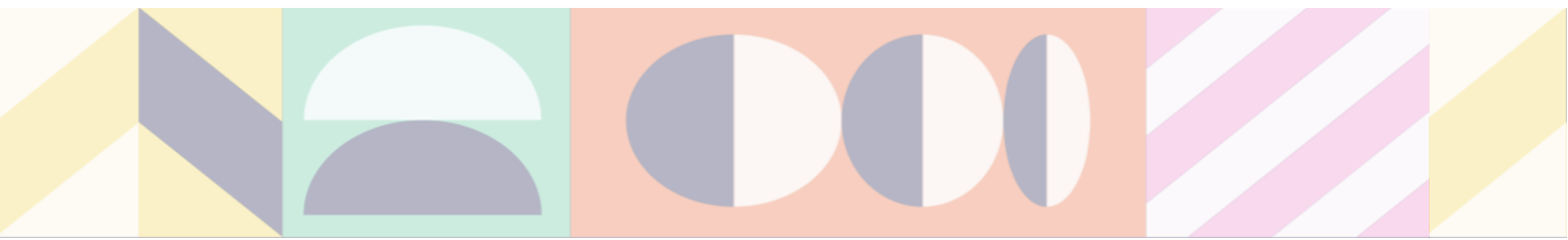
All official company policies and related plans and procedures can be accessed in the following location and/or in Bamboo and/or by contacting the Designated Safeguarding Lead or HR:

[1. NEW Policies & Procedures \(2024\)](#)

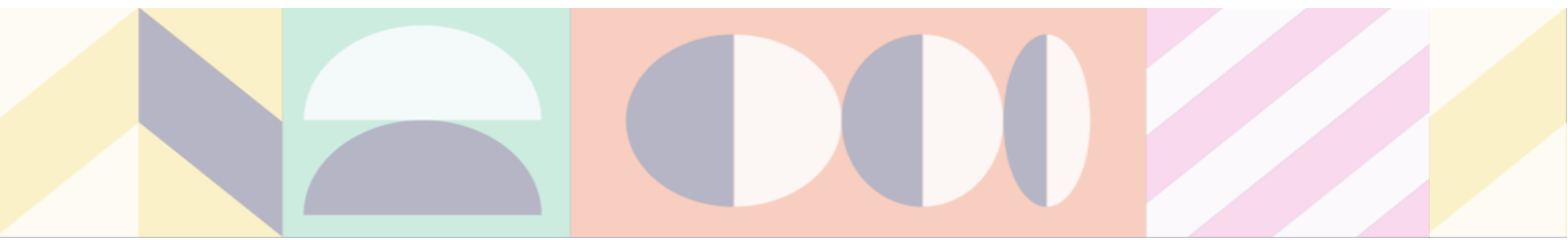


ANNEX 1 - Definitions and Terminology

<u>Safeguarding</u>	The measures designed to protect the health, wellbeing and human rights of individuals. These measures allow children, young persons and adults at risk to live free from abuse, harm and neglect. Every organisation, group and individual should be aware of their responsibilities both at work and in society.
<u>Safeguarding culture</u>	Encouraging and promoting a culture of safeguarding by ensuring policies, processes and procedures have safeguarding considerations and protocols embedded in them. Ensuring that appropriate training, resources and support accompany the access to safeguarding policies and procedures. A Safeguarding Culture should be internally promoted and assured from leadership, right across the board, and externally supported through regulatory partnerships. A safe, respectful, inclusive and people-centred environment where the needs of groups and individuals are understood and met encourages a culture of safeguarding.
<u>Child protection</u>	Child protection is one element of safeguarding. It relates to the protective action that is undertaken for a specific child or children who are suffering, or likely to suffer, significant harm.
<u>A child</u>	A child is defined in international law (UN Convention on the Rights of a Child (1989) as a person who is up to the age of 18 years. However, some countries and/or regions within countries may have local laws and definitions in which the age of a child differs from this definition, for example: In Canada's British Columbia (which is home to Bayswater Vancouver), 'a child' is a person who is up to the age of 19 years.
<u>A young person</u>	Often refers to a child between the ages of 14-17 who is more likely to be able to make decisions for themselves.
<u>An adult at risk / An adult at risk of harm</u>	Sometimes referred to as a 'vulnerable adult', an 'adult at risk' is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (<i>Care Act 2014 - England</i>). An adult at risk may be unable to protect themselves from either the risk of or the experience of abuse or neglect. An adult at risk may be a person living with a mental health disorder, additional learning needs, a physical disability, health conditions and/or be otherwise in need of additional assistance to protect themselves from harm or exploitation, for example, due to social factors such as poverty, displacement or lack of services or support.
SCF or Safeguarding Concerns Form	This form can be found as Annex V in this Safeguarding Policy. It should be completed and submitted as per the instructions on the form itself whenever a safeguarding concern arises.
<u>Duty of Care</u>	A legal and professional obligation to safeguard others while they are in your care, using your services or exposed to your activities.
<u>Safer Recruitment</u>	Recruitment procedures and practices which aim to prevent the appointment of a person who may pose a risk to children, young persons or adults at risk.



<u>DBS Check</u>	The UK's Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions by processing and issuing DBS checks. There are four levels of DBS Checks: 'Basic', 'Standard', 'Enhanced', 'Enhanced with Barred List'.
<u>Regulated Activity</u>	A term most commonly used to describe roles where suitability and criminal record checks are required by law, which includes all roles involving responsibility for or substantial access to children, young persons and/or adults at risk. NB: All roles within Bayswater are classified as 'including regulated activity'. In the UK this means an 'Enhanced' DBS check is required. Further information on regional requirements can be found in Bayswater's 'Recruitment Policy'.
<u>Risk Assessment</u>	Risk assessments (RAs) are a tool that help to protect staff and students alike, as well as the organisation itself. A RA is a careful examination of activities, tasks and events that could cause harm to people. Completing RAs can help to identify and evaluate risks, and relevant precautions, as well as prompt consideration for further preventative measures and mitigations. RAs should be clear and concise, and shared with the relevant persons as per the activity / task / event. Each one should be reviewed at least annually.



ANNEX 2 - Further Information, Guidance and Support Documents

There are many organisations and bodies that can provide further support and assistance including via dedicated helplines. Below are some examples:

Organisation	Country	Safeguarding Area	Website
NSPCC	UK	Children and young persons	24-hour Helpline: 0808 800 5000 website: www.nspcc.org.uk
Ann Craft Trust	UK	Adults and young persons	Tel: 01159 515400 Website: www.anncrafttrust.org
Local Safeguarding Adults Boards (LSAB)	UK	Adults	Website: www.safecic.co.uk/sab-england
Local Authority Designated Officers (LADO)	UK	Children	Website: www.national-lado-network.co.uk/lado-contact-details/
British Council	UK	Children, young persons & adults	www.britishcouncil.org/about-us/how-we-work/policies/safeguarding
Canadian Child Welfare	Canada	Children and young persons	Website: www.cwrp.ca/provincial-and-territorial-assistance
The Adult Protective Service Association (Ont.)	Canada	Adults	Website: www.apsao.org
Cyprus Government Services	Cyprus	Children, young persons & adults	Website: www.cyprus.gov.cy Search: 'Safeguarding'
Ministère de l'éducation nationale	France	Children and young persons	Website: www.education.gouv.fr Search: 'sécurité des écoles des collèges et des lycées nouvelles mesures'
Dept. of Social Development - Children Services	South Africa	Children and young persons	Website: www.dsd.gov.za/index.php/17-children-services-directory
Child Welfare South Africa	South Africa	Children and young persons	Tel: 0878 221 516 Website: www.childwelfaresa.org.za

Significant documents referenced and used in the creation of the Safeguarding Policy and Safeguarding Procedure documents:

The Children Act (1989 & 2004)
Working Together to Safeguard Children (2018)
UN Convention on the Rights of a Child (1989)
The Sexual Offences Act (2003)
The Care Act (2014)
Data Protection Act (2018)
Keeping Children Safe in Education (2022)

ANNEX 3 - Safeguarding Code of Practice

As detailed in the Safeguarding Policy, Bayswater recognises the vital importance, and actively encourages the creation of a safe, respectful and inclusive environment for all that interact with the organisation. Bayswater actively discourages any behaviour that runs contrary to this culture by ensuring clear and accessible policies and procedures exist, alongside robust induction processes, continuous training and accessible support.

All Bayswater staff are required to uphold the highest levels of professional conduct in their dealings with children, young people and adults alike. Bayswater is responsible for ensuring that this Code of Practice (CoP) is made available to staff and staff are expected to read and agree to follow the CoP. Breaches of this CoP by staff will be treated seriously and could lead to a number of actions including termination of contracts, dissolution of professional relationships, legal action, disciplinary action and/or immediate dismissal.

This CoP aims to ensure that all staff exercise their responsibility to ensure their behaviour is not misunderstood or misinterpreted thereby placing themselves in compromising situations. This CoP supports staff in understanding behaviour that is and is un/acceptable and goes hand in hand with a thorough induction and related training.

If any aspects of this CoP, the accompanying Safeguarding Policy, or the Safeguarding Procedure documents are unclear, the staff member should talk to their line manager or the Designated Safeguarding Lead (DSL) or Deputy DSL immediately.

Additionally, this CoP will support students in their understanding of what they can expect of Bayswater staff.

In essence, the purpose of this Code of Practice is to:

- Keep children, young persons and adults at risk safe by clarifying behaviours which support their safety and behaviours to be encouraged and avoided.
- Assist safe and responsible working practice with clear expectations of behaviour.
- Reduce the risks associated with positions of trust being abused or misused.
- Reduce the risk of misplaced or malicious allegations against staff.

Interaction with Students

All staff are expected to:

- Maintain professional and respectful relationship boundaries, and always act in a way that is appropriate to your 'duty of care' and your 'position of trust'.
- Refrain from making remarks that are or could be perceived as suggestive, derogatory or inappropriate. These may take the form of jokes, innuendo, swearing and/or discussing intimate relationships. Staff should also challenge similar remarks and behaviour from students, and report to a more senior member of staff where necessary.
- Ensure any one-to-one communication with students is for official purposes only, and using official lines of communication and devices such as the office phone and your work email address. Connecting and communicating via social media and/or your personal phone number(s) with current students is not appropriate.
- Do not engage in behaviour that may be construed as inappropriate, for example: giving money or gifts, doing favours for students, or showing favouritism.
- Situations where a staff member is alone with a child or young person should be avoided. If an occasion requires this (e.g. confidential interview / one-to-one meeting), these should be conducted in an official room such as an office or classroom. The exit should be clearly visible and unobstructed and, where possible, the door to the room should be left open. Physical distance within the room should be maintained and another member of staff should also be aware of the situation / meeting.
- Ensure any physical contact is within clear boundaries to avoid any allegations of inappropriate touching. Unnecessary physical contact with children and young persons especially be avoided. Whilst gestures (e.g. a

comforting hand on a shoulder) may be well intentioned, such actions could be misinterpreted.

- Refrain from socialising with students outside of school-organised events.
- In situations where it is necessary for staff to restrain a student in order to prevent self-harm, injury to others or damage to property, only the minimum force necessary must be used. Any incidents where restraint was felt to be required should be recorded on a Safeguarding Concerns Form and escalated as per safeguarding procedures.
- Staff required to administer first aid (normally a trained First Aider) should ensure, wherever possible, that another member of staff is present.

Appropriate Appearance

Staff should present an appearance which:

- Promotes a positive and professional image.
- Is appropriate to their role and is not likely to be viewed as offensive, revealing or sexually provocative.
- Does not distract, cause embarrassment or give rise to misunderstanding.
- Is absent of any political or contentious logos or slogans.
- Is not considered to be discriminatory.
- Is in line with company / departmental requirements, e.g. those in roles which require the wearing of a uniform, lanyard, etc.

Alcohol, Drugs and Smoking

Staff are expected to:

- Not consume/use alcohol, drugs or other intoxicating substances on school premises.
- Not work under the influence of alcohol, drugs or intoxicating substances.
- Smoke cigarettes in dedicated smoking areas only and never in front of or in the company of under-18 students.
- Not provide alcohol, drugs, cigarettes or intoxicating substances to students of any age.
- Ensure students are aware of local laws in relation to smoking, consuming alcohol and drugs.
- Not allow students to consume/use alcohol, drugs or intoxicating substances on school premises.
- Report any concerns related to the above to the site's manager and/or the D/DSL.

NB: From time to time, official, Bayswater-organised and sanctioned events may occur on-site and may involve the provision of alcohol. These events will usually be 'after-hours' (e.g. a gathering organised to say goodbye to a departing member of staff) whereby classes, activities and any other work-related tasks have finished, and students are off-site. These types of events must be sanctioned and managed by the site's lead (e.g. Centre Director).

On rare occasions, an official event which may include the provision of alcohol may occur during the workday such as a site-anniversary celebration. These types of events must be sanctioned by a member of Bayswater's senior leadership team (e.g. Director) and be jointly managed by the site's lead (e.g. Centre Director). Risk assessment must be conducted and include adequate mitigations and controls over the provision and consumption of alcohol.

Any alcohol stored on-site for such occasions must be stored in staff-only areas, out of site and securely.

Such events are not appropriate at residential sites (e.g. Bayswater's summer schools) whereby students are always on-site and staff are therefore always on-call in case of a site emergency. Bayswater's residential sites are deemed 'dry sites' meaning no on-site alcohol consumption is permitted by anyone unless authorised by a senior member of head office staff (e.g. Operations Manager Summer & Groups).

Fraternisation

Bayswater strictly prohibits:

- Any sexual, intimate, dating or other romantic relationship, even if consensual by all parties, between any Bayswater staff and any current or former student.
- Communication of any kind with a current or former student which could be interpreted as sexually suggestive or provocative.
- Staff discussing their own sexual relationships with or in the presence of current or former students.

NB: The Sexual Offences Act 2003 (UK) states that any person in a position of trust engaged in any form of sexual activity with students under the age of 18 is breaking the law, even though the legal age of consent is 16. All Bayswater staff are expected to abide by the laws of the country they're in.

Online Presence

Staff should:

- Use Company devices appropriately, safely, securely and as per GDPR best practice.
- Never initiate / accept 'friend requests' or similar from any current students of any age.
- Never initiate / accept 'friend requests' or similar from any current or former students under the age of 18.
- Never communicate with current students using non-official methods such as social media or personal phone.
- Never communicate with current or former students who are under the age of 18 using non-official methods such as social media or personal phone.
- Never share their personal contact details with current students of any age.
- Never share their personal contact details with current or former students under the age of 18.
- Ensure privacy settings on their social media accounts are appropriately set.
- Ensure their online presence and activity does not damage the reputation of the organisation.
- Be aware, when using video conferencing for professional purposes, of personal effects in the background.

NB: Should a staff member choose to connect with a former student who is 18+ via social media or other means, it should be done so / initiated at the student's request. Staff must remember that despite the student no longer being enrolled at Bayswater, the staff member is still employed by and represents Bayswater, and thus their conduct is expected to align with this Safeguarding Code of Practice, the employee Code of Conduct and Bayswater's policies.

Accommodation and Privacy

Some roles and departments require staff to live on-site, this could include in accommodation shared by students. In these environments:

- Staff must abide by accommodation rules and guidelines of both Bayswater and the host campus. This may include, amongst others, regulations pertaining to curfew, smoking, parking, facility usage, security, access.

In accommodation that serves both staff and students, staff must ensure their behaviour and actions actively protect themselves from mistaken and/or malicious accusations, whilst ensuring students are and feel respected, safe and comfortable. Staff must:

- Provide support in an emergency, whether on-duty or not.
- Report any undesirable student behaviour to the appropriate person (e.g. Centre Manager).
- Question any unidentifiable visitors and/or report them immediately to campus security.
- Not enter students' rooms without first gaining a student's permission, after announcing themselves first by knocking on the door and stating loudly and clearly their name, title and that they need to enter. Ideally, another

member of staff should be present during this interaction. The door must remain open at all times. Staff should remember that students may need a few moments to collect themselves before being ready to reply in English.

- In an emergency (e.g. fire evacuation) or in any scenario where there is a need for urgent entry (e.g. suspected drug usage in the room), a second member of staff must be present.

Transportation

Staff should avoid transporting any students in their own, private vehicle. If it is absolutely necessary such as in the event of an emergency, staff should seek authorisation from a more senior member of staff and, if authorised, the student should sit in the back of the car. The journey should be formally recorded including names, start/end times and locations, any stops, the reasons for the journey and the senior member of staff who authorised it.

If taking students on public transport, staff should research the route well beforehand and avoid, where possible, travelling during rush hour as this increases a variety of risks. Before using any public transport, students should be made aware of the stop they need to alight at, as well as what to do if they become separated, e.g. wait on the platform until a member of staff returns to collect them.

For private coach travel, each student should have a seat. Seat belts must be utilised if present and staff should be dispersed throughout the vehicle in order to monitor and encourage desirable behaviour.

Supervision ratios should be maintained during transportation as per the Supervision Policy.

Adherence

Safeguarding is everyone's responsibility, and all staff are expected to follow and actively promote the Safeguarding Policy, related procedures, and this Safeguarding CoP. All staff have a duty to appropriately report any actual or suspected behaviour or concerns pertaining to Safeguarding, be it regarding a fellow staff member, a student or other.

Staff should not rely on their reputation or that of Bayswater's to protect them. If any staff member behaves in a way that is contrary to Bayswater's safeguarding culture and values, they will be subject to investigation and further action.

Bayswater may also report a staff's behaviour to statutory agencies and/or the Police.

NB: This Safeguarding Code of Practice (not to be confused with the Employee Code of Conduct) should not be read as a standalone document but as an accompanying document to the Safeguarding Policy. Therefore, it exists only as an Annex to the Safeguarding Policy document and does not appear anywhere else.

ANNEX 4 - Safeguarding Concerns Form

This form should be used to record **any** safeguarding concerns that are a result of (a) direct disclosure; (b) concern expressed by a third party; (c) observation of a child / adult at risk; (d) online concerns; or (e) concerns about the behaviour of an adult working at / for Bayswater. You **do not** have to be certain that abuse is taking place.

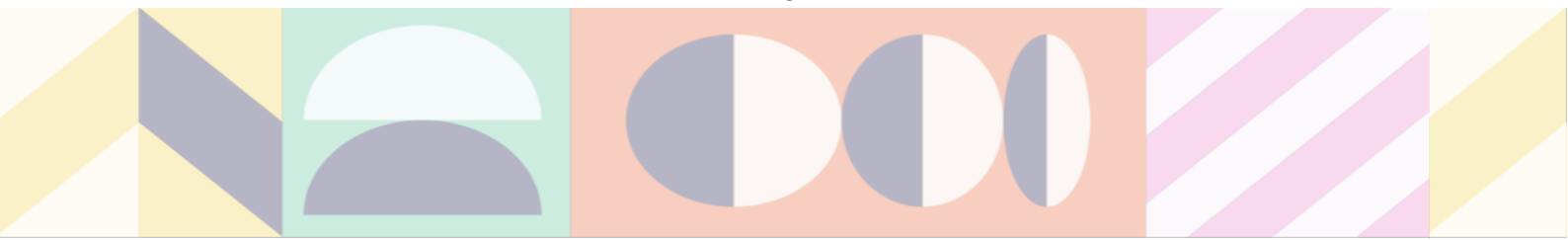
This form should be completed **as soon as practically possible** after the concern has been recognised / raised and **must** be sent by email to the relevant member of the Safeguarding Team within 24 hours. Please type/complete electronically if at all possible. Handwritten forms must be clear and easy to read.

For further details see 'Annex V - Key Contacts' of the Safeguarding Policy and 'Chapter 4 - Process for Responding to Safeguarding Concerns' of the Safeguarding Procedures. If in doubt, contact the Designated Safeguarding Lead.

General:			
Date & time of incident / concern:		Location of incident / concern:	

Person completing this Safeguarding Concerns Form (SCF):			
Full name:		Position:	
Phone number:		Email:	
If you are responding to or reporting concerns raised by someone else please record their name, role and contact details here:			
If you've talked about your concerns or reported them to anyone else prior to the Designated Safeguarding Lead (DSL) or their Deputy, please record them here including date(s), position(s) and contact details:			

Details of the person to which the concern(s) pertains:			
<i>Please complete all known / applicable fields</i>			
Full name:		Date of birth:	
Gender:		Nationality:	
Position or student ID / group name:		Enrolment dates / location & class:	



Concern / incident details, recorded chronologically if possible:

Please provide details including times, dates, locations, persons involved (including any witnesses and their contact details), any injuries, and other relevant information. Please make it clear whether the information recorded is fact, expression of opinion, observation of another person, etc. Ensure details are as correct and concise as possible. If a disclosure is made, endeavour to record direct quotes, and use speech marks to identify these.

Signed:

Date submitted to
DSL/Deputy:

For use by DSL / Deputy DSL:

Date and time
received:

Received by (full
name):

Any further advice sought, if required:
*Incl. dates, times, names, roles, organisations,
advice given, etc.*

Action taken and reasons:
*Incl. dates, times, names, roles, organisations,
reasoning, etc.*

If applicable, parents / guardians informed:
*Incl. dates, times, names, relationship,
reasoning, etc.*

Names of individuals / agencies supporting
*Incl. referral details, predicted outcomes dates
etc.*

Any further action to be taken by Bayswater
Incl. dates, times, names, roles, reasoning, etc.

Any other relevant information / notes /
actions:

Signature of DSL / Deputy DSL:

Signed:

Date:

Note to DSL / Deputy DSL: Please remember to add this concern to the Safeguarding Tracker

ANNEX 5 - Bayswater Safeguarding Team - Key Contacts

Bayswater's **Safeguarding Team** (SGT) is made up of several trained and experienced staff in multiple locations. The organisation-wide Safeguarding Team is led by the **Designated Safeguarding Lead** (DSL) and the UK-based **Deputy DSL(s)**.

The DSL and their UK-based Deputy(s) are supported by an identified person at each permanent Bayswater site (usually the Centre Director). In safeguarding terms these identified on-site persons are known as '**Designated Safeguarding Officers**' or 'DSOs'.

Each country where Bayswater has operates also has a Deputy DSL for that country. If that country has only one site, the Deputy DSL will naturally be that site's DSO e.g. South Africa (Cape Town), Cyprus (Limassol) and France (Paris).

The DSO at each site has an elected **Deputy DSO(s)** who supports the DSO and fulfils their responsibilities in the DSO's absence. DSOs and their deputies are usually further supported by colleagues within their location-specific teams known as '**Safeguarding Support Staff**' or 'SSS'.

SSS are relevantly trained and fulfil an important role in the identification and reporting of safeguarding concerns. SSS, along with the DSO and Deputy DSO(s) can be identified per location via the **Safeguarding Posters** displayed in key staff and student areas. These areas will also include other important notices such as Bayswater's Emergency Plan and posters identifying on-site first aiders and fire marshals.

Deputy DSL(s), DSOs and their deputies are responsible for promoting a safeguarding culture within their teams / departments / locations. This responsibility includes ensuring i) safeguarding awareness remains a constant; ii) safeguarding-related policies and procedures are promoted and followed; iii) training (including safeguarding, first aid and fire marshal) is adequate and up-to-date; and iv) safeguarding-related concerns are effectively and efficiently reported to the DSL.

Bayswater Safeguarding Team		
Name	Title	Contact Details
Organisation-wide Designated Safeguarding Lead & Deputy(s)		
Laura Farminer	Operations Manager – Summer & Groups DSL	Tel: +44 (0)20 7963 8494 (option 2) Email: lfarminer@bayswater.ac
Bruna Laurant	Centre Director Deputy DSL / DSO Bournemouth	Tel: +44 (0)7765 054547 Email: blaurant@bayswater.ac
Michael Bradford	Centre Director Deputy DSL / DSO Brighton	Tel: +44 (0)7912 575415 Email: mbradford@bayswater.ac
UK Safeguarding Team Members		
Sarah Byrne	Centre Director DSO Liverpool	Tel: +44 (0)7470 917648 Email: sarah@bayswater.ac
Emily Hilliard	Student Services Manager Deputy DSO Liverpool	Email: ehilliard@bayswater.ac
Arianna Pedrini	Centre Director DSO London	Tel: +44 (0)7880 653285 Email: apedrini@bayswater.ac
Marta Ermica	Director of Studies Deputy DSO London	Email: marta@bayswater.ac
Indea Mann	Student Services Manager Deputy DSO Bournemouth	Email: indea@bayswater.ac
Mara McLeod	Student Services Manager Deputy DSO Brighton	Email: mmcLeod@bayswater.ac

Non-UK Safeguarding Team Members		
Teresa Vaccaro	Centre Director DSO Vancouver	Email: tvaccaro@bayswater.ac
Akane Kameyama	Centre Director DSO Toronto	Email: akameyama@bayswater.ac
Matilda Vincent	Centre Director DSO Calgary	Email: mvincent@bayswater.ac
Jenny Pourgouri	Centre Director Deputy DSL Cyprus / DSO Limassol	Email: jenny@bayswater.ac
Delphine Crevelle	Operations Director Deputy DSL France / DSO Paris	Email: dcrevelle@bayswater.ac
Gina Pardenwachter	Centre Director Deputy DSL South Africa / DSO Cape Town	Email: gina@bayswater.ac
If anyone is in immediate or imminent danger, contact emergency services immediately, and inform the Deputy / Designated Safeguarding Lead as soon as practically possible.		

The person raising a concern will likely know who the most relevant Safeguarding Team member is to go to, e.g. the Student Services Manager in London or a homestay host of a student in London would go to the London DSO. However, if the person raising the concern is unsure and/or the Safeguarding Team member they would ordinarily report to is out of office, they must not delay reporting their concern. They should contact another member of the Safeguarding Team such as the DSO of another centre, the DDSL or DSL.

