



COHORT

Safeguarding Policy

Schools, young people & vulnerable adults

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Our safeguarding policy

It is the policy of Cohort to safeguard the welfare of all young people by protecting them from neglect and from physical, sexual and emotional harm.

Cohort believes that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to keep them safe.

For the purpose of this policy:

- 'Staff' refers to all employees of Cohort, whether paid or unpaid, full-time or part-time, permanent or temporary.
- 'Group or trip leader' refers to those individuals who either initiated and made a group booking with Cohort and/or those who accompany and are responsible for a visiting residential group
- 'Young people' refers to all individuals under the age of 18 years who are staying in the building, whether as part of a visiting group, with parents or on their own.

This policy applies to:

- All employees of Cohort, including management and anyone else working with or on behalf of Cohort.

The purpose of this policy is to:

- To protect children and young people who use our accommodation services, social spaces and social events. This includes children of adult guests and all those who stay as part of an organised group residential visit such as primary/secondary school or college students.
- To provide staff with the overarching principles that guide our approach to the safeguarding of young people.
- To demonstrate professional and exemplary policies and procedures which are expected of an educational accommodation provider.

Legal framework

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 2018
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Special educational needs and disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015
- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015

Accompanying policy and Procedure

This policy should be read alongside our policies and procedures on:

- Health & safety policy
- Staff code of conduct
- Overnight duty policy & procedure
- CCTV policy
- Sexual harassment, bullying or harassment policy

Principles upon which this Safeguarding Policy is based.

- The welfare of a child or young person will always be paramount.
- The rights, wishes and feelings of children, young people (inc their families) and young people here in an organised capacity will be respected and listened to.
- All staff of Cohort will work in accordance with the interests of children and young people and follow the policy outlined below.

Our Commitments

We recognise that:

- The welfare of the child is paramount, as enshrined in the Children Act 1989
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parent, carers and educational establishments is essential in promoting young people's welfare.

Child & young person safety

We will seek to keep young people who are guests or visitors of Cohort safe by:

- Valuing them, listening to and respecting them
- Adopting safeguarding practises and a staff code of conduct
- Providing effective management of staff through supervision, support and training measures
- When required record and store information professionally and securely and share information about safeguarding with children, their care-givers, group leaders and staff
- Using our procedures to manage any allegations against staff appropriately
- Ensuring we provide a safe physical environment for young people and staff by applying health and safety measures in accordance with the law and regulatory guidance

What we do to safeguard residential trips

Cohort provides accommodation to a variety of visiting residential groups such as educational, sports and activity groups. These groups will consist of young people aged between 6 -18 yrs and/or include vulnerable adults.

Cohort takes various safeguarding precautions to ensure the safety and welfare of all visiting groups:

Disclosure Barring Service (DBS) Checks

Cohort provides high quality residential accommodation, and a safe physical environment for visiting organised groups

As a responsible residential trip operator we will ensure all staff apply for a basic DBS check in order to work for us. This provides a basic level of disclosure.

As a residential accommodation provider we do not provide any type of regulated or supervisory activity as defined by the Disclosure and Barring Service, therefore we are not legally permitted to submit an application for enhanced DBS checks for our staff.

We have been in consultation with Cornwall Council HR Safeguarding Team regarding our safeguarding responsibilities who affirm we are not eligible for enhanced DBS checks. For further information and clarification please contact Lee or Daniel Strickland at Cohort on 01736 791664

That withstanding we do take the safeguarding of children and young people extremely seriously which is reflected in this policy.

Recruitment – permanent staff

We take normal safeguarding checks at the recruitment process: checking gaps in employment history and following up references. Basic DBS checks are required

Recruitment – live-in, seasonal staff

Seasonal staff stay with us from 3 – 8 months and are accommodate (onsite) in the same building as visiting groups. All trip organisers are made aware of this at time of booking. Basic DBS checks are required. Live-in staff are also subjected to strict policies around sharing communal spaces with visiting groups, especially primary school aged groups.

Staff code of conduct

We operate a strict staff code of conduct which all employees of Cohort must abide by (see below).

The three main elements of this code of conduct in relation to our safeguarding responsibilities are:

1. Staff will not engage in any kind of supervisory or regulated role with any visiting school group, unless carrying out a specific task as part of their duties
2. Staff will ensure that they do not find themselves alone with any young person, unless carrying out a specific task as part of their duties.
3. Staff will not share/receive personal details with/from any young person staying at Cohort.

Responsibility for safeguarding – Trip leaders

It is the responsibility of the trip leader and/or the person responsible for making a booking with Cohort for the safeguarding of their group.

By making a booking with us the trip leader accepts responsibility for the safeguarding and behaviour of all individuals within their party. If necessary, trip leaders are responsible for conducting their own risk assessments for their stay at Cohort.

Unless a trip leader books exclusive use of the building, trip leaders must assume they will be sharing the building with members of the public and, if necessary, conduct their own risk assessment.

If trip leaders require support or have concerns around safeguarding at Cohort then they can contact Lee or Daniel Strickland.

Responsibility for safeguarding – Cohort

Cohort provides high quality residential accommodation and a safe physical environment for teachers and students. Whilst we have a duty of care to all who stay in the building, and take all reasonable steps possible to ensure the safety and security of our guests, we do not accept sole responsibility for the safeguarding of young people and vulnerable adults. Responsibility for safeguarding lies predominantly with the trip leader present.

On request we are able to complete risk assessments for trip leaders and/or provide copies of our own relevant assessments, policies & procedures.

Cohort operates a staff code of conduct regarding visiting school groups which strengthens this safeguarding policy and the protections of young people and employees alike.

Cohort's Educational Trip risk assessment can be seen upon request

Staff code of conduct and responsibilities

Code of Conduct

We operate a strict staff code of conduct which compliments this safeguarding policy:

- Under no circumstances should staff supervise any child or young person unless carrying out a specific task as part of their staff duties.
- Under no circumstances should staff be alone with a child or young person
- Do not initiate or accept any physical contact with a child or young person
- If a young person informs you of a personal problem or disclosure of a concerning nature, report to management or the group leader immediately (see below)
- Do not ask probing questions about a child or young person's personal life.
- If a children or young person has an accident the staff/guardian/carer are responsible for administering first aid.
- Do not initiate contact with a visiting child or young person outside of the building.
- Do not share any personal details with a young person
- Do not smoke or drink alcohol in front of any young member of a visiting group
- Treat all young people with kindness, respect and dignity

Staff responsibilities: Protecting from harm

It is the policy of Cohort to safeguard the welfare of all young people by protecting them from neglect, and from physical, sexual and emotional harm. Our only duty of care is to provide safe accommodation; and whilst we hold no supervisory responsibilities towards any young member of a visiting group we still need to be aware of what to do if we have concerns regarding an individual.

What to do if...

If you suspect a young person is being abused, a young person confides in you, someone has a concern or makes a complaint about any adult or about you; in all instances it is your duty to immediately report it to senior management.

If a young person tells you they are being abused, you should do the following.

1. Allow them to speak without interruption and accept what they say.

2. Be understanding and reassuring but do not give your opinion.
3. Tell them that you will try to offer support but you must pass the information on.
4. Tell senior management immediately.
5. Write careful notes of what was said, using the actual words wherever possible
6. Pass notes onto senior management, making sure you sign/date them.

If you are concerned about a young person's safety and well-being, or there is a concern, complaint or allegation about an adult or yourself, you should do the following.

1. Inform senior management immediately.
2. Write careful notes of what you witnessed, heard or were told
3. Sign, date and pass your notes to senior management.

If the young person is at immediate risk of significant harm, contact the police or Social Services and inform senior management immediately.

Any adult at Cohort has the right to report concerns or suspicions about another member in confidence and free from harassment. You must refer any concern or complaint to senior management immediately.

DO NOT investigate it yourself.

If you are in any doubt about what to do contact the NSPCC Helpline on 0808 0800 500

Staff Responsibilities: Do's & Don't's

- **Do** ensure you are read and understand the Cohort Safeguarding Policy
- **Do** avoid all situations in which you are alone with any child or young person. If necessary, move to a place where you can both be seen and heard by others.
- **Do** respect a young person's right to personal privacy – do not enter dorm rooms without prior warning
- **Do** avoid unacceptable situations with a young person (i.e. sexual relations)
- **Do** comfort and reassure should a young person be hurt or distressed, without compromising their dignity or doing anything to discredit your own behaviour.
- **Do** allow young people to talk about any concerns they may have.
- **Do** avoid being drawn into inappropriate attention-seeking behaviour (crushes)

- **Do** remember someone might misinterpret your actions, even if you mean well.
- **Do** take seriously if a young person informs you of a personal problem or disclosure of a concerning nature; report to management immediately
- **Do** alert a supervising adult if you witness abusive or bullying behaviour
- **Do** treat all young people with respect.

Don't's

- **Don't** share any personal information (i.e address, email or phone)
- **Don't** agree to be 'friends' via Facebook or any other social media forums
- **Don't** initiate or accept inappropriate physical contact with a child/young person
- **Don't** initiate contact with a visiting child or young person outside of the building
- **Don't** ask probing questions about a child or young person's personal life
- **Don't** make suggestive remarks or gestures, even in fun
- **Don't** let suspicion or disclosure of abuse go unrecorded or unreported
- **Don't** make promises you cannot keep
- **Don't** agree to keep any information secret
- **Don't** use inappropriate language in front of young people
- **Don't** smoke or drink alcohol in front of any member of an organised group

The safeguarding of young people (and staff) is paramount and any staff member whose behaviour breaks these rules or who contravenes the spirit of our code of conduct will be subject to disciplinary action and maybe asked to leave Cohort with immediate effect.

If you have any questions regarding these responsibilities then please speak to senior management.

Last reviewed:

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