



Safeguarding Policy & Procedures

Quick Look - Contacts

Quick Look	
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PART A: Introduction

Bayswater truly believes that 'safeguarding is everyone's business'.

Bayswater is committed to proactively safeguarding and promoting the welfare of all individuals who interact with the organisation. This policy complies with all regulatory requirements and guidelines and is regularly updated. This Policy and its related procedures must be followed at all Bayswater locations and those working off-site.

The most up-to-date version of the safeguarding policy can always be found on our website. Staff members can also find it on our internal knowledge base, and students on our guided e-learning platform.

Simplified summaries of key safeguarding points are made available to students and covered in inductions. Key relevant safeguarding points are also shared with homestay providers, group leaders, and relevant adults, outlining their specific safeguarding responsibilities in accessible language.

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.

Definitions & Acronyms

- **An adult at risk:** An "adult at risk" is defined as anyone who is not a child who may face abuse or neglect due to their care and support needs, as outlined in the Care Act 2014. This includes individuals with mental health disorders, learning disabilities, physical disabilities, or those facing social challenges such as poverty or lack of support.
- **Bayswater stakeholders:** staff, homestays, suppliers, visitors, volunteers, interns, Trustees, Board members, consultants, agency staff, contractors and service providers
- **Centres:** All Bayswater schools/centres (UK, Canada, France, Cyprus and South Africa)
- **Child/children:** 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. 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.
- **Child Protection:** 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.
- **Custodian (Canada only):** Minors under the age of 17, must either come with their parent, legal guardian or have a designated Custodian in Canada.
 - A Custodian is a responsible adult, who is a Canadian citizen or a permanent resident, who will take care of and support the minor child.
 - Having a Custodian is optional for minors 17 years of age and older, but a Customs and Immigration officer can request one on a case-by-case basis.
 - Bayswater Canada offers the Custodianship service, but only for Students in homestay or residence accommodation provided by Bayswater.
- **DBS:** Disclosure and Barring Services
- **DDSL:** Deputy Designated Safeguarding Lead
- **DSL:** Designated Safeguarding Lead
- **Duty of Care:** A legal and professional obligation to safeguard others while they are in your care, using your services or exposed to your activities.
- **Minor:** As per "child/children" definition
- **PCF:** Parental Consent Form
- **RoW:** Rest of the World (France, Cyprus and South Africa)
- **Safeguarding:** 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.
- **Safer recruitment:** 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.



- SCF: Safeguarding Concern Form
- SEND: Special Educational Needs & Disabilities
- SSS: Safeguarding Support Staff

Guiding Principles & Policy Statement

Bayswater has three principal tenets in relation to safeguarding:

1. Ensuring safeguarding is part of every product, policy and process (which are regularly reviewed) to help protect all Bayswater stakeholders and students.
2. Ensuring all Bayswater stakeholders and students are aware of the importance of safeguarding, are vigilant towards safeguarding concerns, and have access to appropriate training and key policies (where relevant).
3. Ensuring robust procedures are in place to enable people to raise a concern quickly and effectively.

Bayswater is committed to practices that protect people from harm and help them be their best. While Bayswater acknowledges safeguarding is for everyone, Bayswater believes that all children have potential and that every child matters, anywhere in the world. Bayswater affirms the position that all children have the right to be protected from all forms of abuse as set out in The Convention on the Rights of the Child (UNICEF) which stipulates *"if someone uses violence against a child, it is never acceptable or justifiable. It should be possible for them to report a violent act in a safe and confidential way, and reports made by children or minors should be investigated by the authorities"*.

We recognise that:

- The welfare of Minors is paramount.
- All Minors regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have the right to equal protection from all types of harm or abuse.
- Bayswater has a duty to protect all students from extremism and radicalisation.
- Working in partnership with all Minors, their parents, homestay providers, vendors, agencies, leaders, and teachers is essential in promoting young people's welfare.
- Bayswater values student voice and regularly invites feedback from under-18 students via minor meetings.
- All Minors have the right...
 - to a voice; to be listened to and be believed.
 - to say no and this will be taken seriously.
 - to be supported to be the person they would like to be.
 - to be treated with respect and shall have their rights protected irrespective of their age, gender, ethnic background, religion, or sexual orientation.
 - to be protected from political and religious extremism
 - to have their suspicions and allegations investigated and taken seriously.

We seek to safeguard by:

- Valuing them, listening to, and respecting them
- Adopting child protection guidelines through procedures and a code of conduct for all adults
- Recruiting employees and homestay providers safely, ensuring all necessary checks are made
- Sharing information about child protection and good practice with minors, their parents and all adults
- Sharing information about concerns with relevant agencies and involving parents and minors appropriately
- Providing effective management for all adults through recruitment policies, supervision, support, and training
- Developing and implementing procedures for an appropriate and measured response to welfare and safeguarding concerns
- Developing and implementing procedures for safe recruitment
- Raising awareness of safeguarding issues and best practice amongst our employees, managers, and students

Scope and Purpose

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 where minors may interact with and learn alongside adult students as individuals or as part of closed groups.

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

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

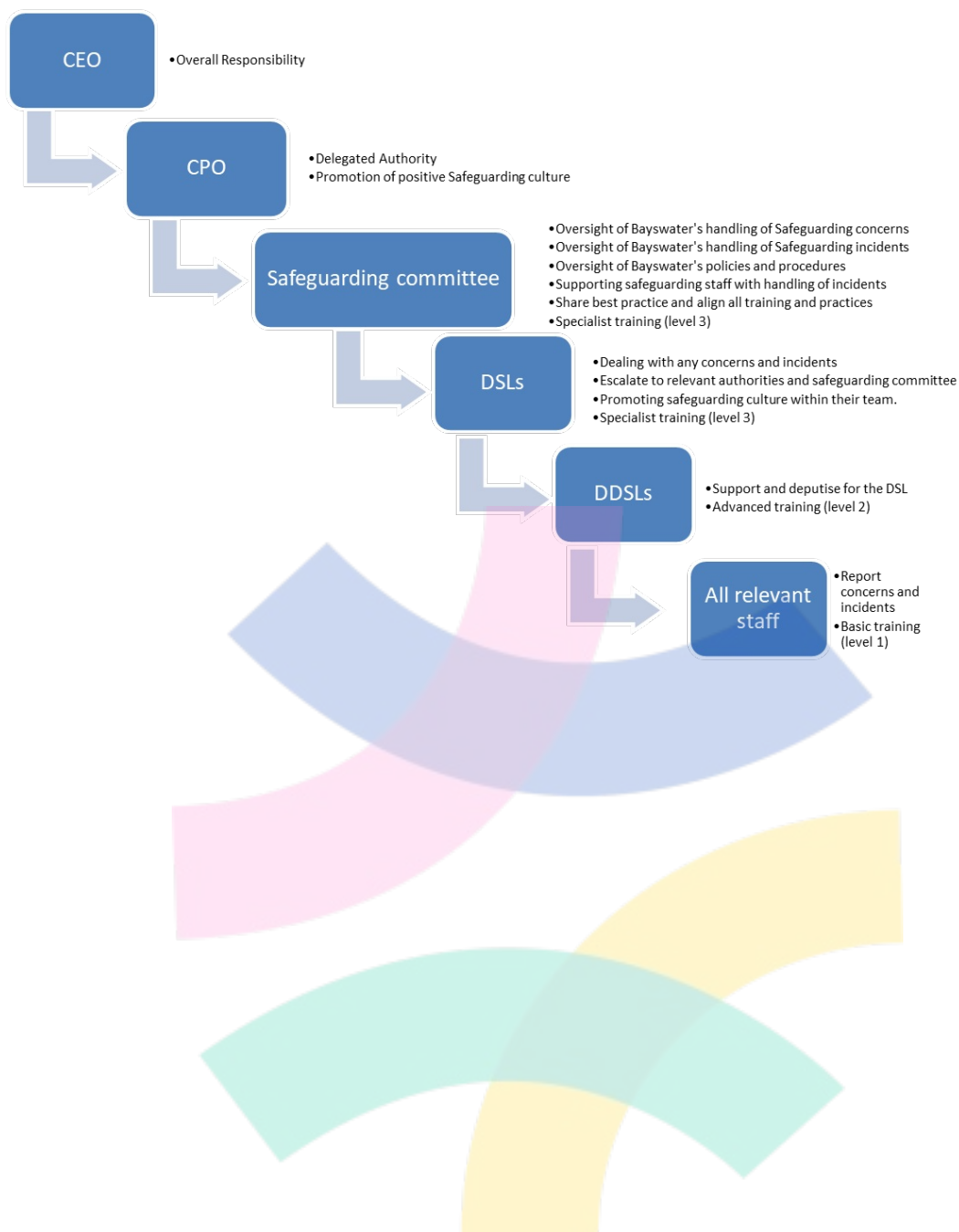
Prospective students are invited to discuss their needs prior to booking a course to ensure its location, premises, course activities, etc, are suitable and accessible to the individual.

Service providers

Services providers, as independent organisations, are ultimately responsible for internally dealing with their own safeguarding provisions and action. As part of any collaborations, Bayswater will carry out due diligence to ensure this policy aligns with the partner's relevant policies and procedures.

Bayswater expects service providers to promptly report to the appropriate Bayswater Safeguarding contact any safeguarding concerns involving Bayswater stakeholders and/or students.

Organisational Structure, training and responsibility





Bayswater Safeguarding Team			
Name	Title	Location	Contact Details
Safeguarding Committee			
Steve Wheeler	Head of Groups and Summer programmes - Chair of the safeguarding committee	Brighton	Email: swheeler@bayswater.ac
Sarah Byrne	Centre Director & UK Lead	Liverpool	Email: sbyrne@bayswater.ac
Teresa Vaccaro	Regional Operations Director (Canada)	Vancouver	Email: tvaccaro@bayswater.ac
James Herbertson	Chief People Officer (CPO)	London	Email: james@bayswater.ac
Centre Safeguarding Team Members			
Sarah Byrne	Centre Director DSL Liverpool	Liverpool	Email: sarah@bayswater.ac
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Gina Pardenwachter	Centre Director DSL Cape Town	Cape Town	Email: gina@bayswater.ac

The **safeguarding committee** is responsible for the approval of and reviewing the effectiveness of this policy. This will be carried out through the receiving of regular information regarding safeguarding incidents and concerns and monitoring reports. The role of the safeguarding committee is strategic rather than operational – they will not be involved in direct dealing with concerns or incidents but can have an advisory role. The safeguarding committee meets quarterly to review:



- Legal updates in safeguarding
- Roles and responsibilities
- Training requirements
- Policy reviews
- Best practice
- Improvements in provision

PART B: Responding to Safeguarding concerns

Being able to recognise common signs or indicators of safeguarding concerns is vitally important. Equally important is being able to respond effectively and efficiently. Dealing with safeguarding incidents can be stressful. Bayswater will provide support to staff if/when dealing with safeguarding issues.

Staff are trained to identify the four main categories of abuse: physical, emotional, sexual, and neglect. Awareness materials, such as posters on recognising abuse, are displayed in staff rooms and reviewed as part of ongoing training.

Direct disclosures

When receiving a **direct disclosure**, no matter from whom, always try and remember the following:

Stay calm and listen carefully to what is said.	Take what is being disclosed seriously and without judgement.	Allow the disclosure to continue at a natural pace.	Ask questions for clarification only – never ask leading questions. Use the TED questions*
Reassure them that coming to talk to you was the right thing to do.	Explain to them what will happen next.	Explain that you'll need to share this information with relevant colleagues.	Use calming language appropriate to their age and English level.
Make brief, initial notes but don't be all-consumed by making them.	Afterwards, write more detailed notes using facts and direct quotes.	Follow the instructions of the flowchart on the next page.	Receiving a disclosure can be challenging / triggering. Seek support from the DSL or one of the deputies.
Do not promise to keep anything a secret.	Do not discuss the disclosure with anyone who doesn't need to know.	Do not investigate the disclosure yourself nor talk to the alleged abuser.	Do not show negative emotions such as anger or shock.

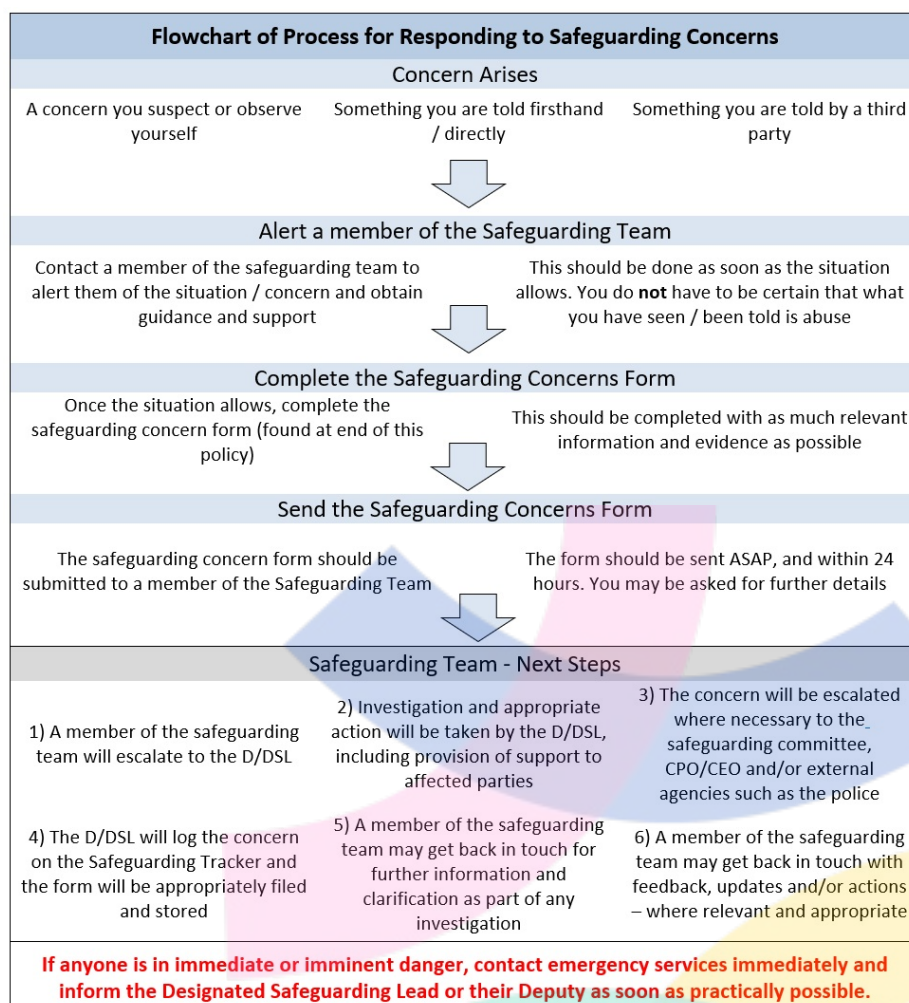
*TED questions: Tell me, Explain to me, Describe to me.

To minimise risk, staff should avoid being alone with a child. If a one-to-one meeting is necessary, it should take place in a designated room, like an office or classroom, with the door open (where possible) and the exit clearly visible. Maintain physical distance and inform another staff member (e.g., a line manager) about the meeting.

Whilst safeguarding concerns are sometimes disclosed directly, it is more common for them to come through different channels, such as via a third party, or something you may have observed.



Responding to Safeguarding concerns flowchart



*For Canadian centres – immediately contact the custodian of the student.

If any safeguarding concern relates to or implicates a member of the safeguarding team, please escalate directly to the next appropriate person within the safeguarding structure.

If a safeguarding concern implicates another student (**child-on-child allegations**), the same reporting and response procedures apply. Support is provided to all parties, and guidance from external agencies (e.g., LADO, social services) is sought when appropriate.

All staff are made aware of their legal duty to report known cases of Female Genital Mutilation (FGM) involving under-18s. FGM is illegal in the UK, and any concern or disclosure must be immediately escalated to the DSL or relevant authority.

If dissatisfied with handling a safeguarding concern, the matter should be escalated to the organisation's safeguarding committee, CPO and/or CEO. If still dissatisfied, the applicable local authority or government department should be contacted.

GDPR

To comply with GDPR best practices, sensitive data should not be duplicated. Completed forms and related documents must be stored in one central location (within the "Safeguarding" SharePoint). Access is limited to DSLs and DDSs, the safeguarding committee and Bayswater's CPO and CEO. All other copies, whether physical or digital, must be properly destroyed.

Where necessary, a copy may also be shared with relevant external agencies.

A note highlighting the existence of a safeguarding concern should be made against the student record on the internal database. Further details can be requested from a member of the safeguarding committee if required.

PART C: Safeguarding procedures and tools

All students

Safer recruitment

Bayswater follows safer recruitment guidance as outlined in "Keeping Children Safe in education", including:

- Scrutinising applicants, including interview questioning designed to ascertain motive.
- Verifying identity as well as applicable qualifications.
- Obtaining professional and/or character references.



- Checking previous employment history.
- Undertaking appropriate suitability and criminal record checks prior to employment commencing, via the country's official department / organisation, e.g. the Disclosure and Barring Service (DBS) in the UK.
- Checking prospective foreign employees do not have restrictions imposed in their own country.
- Signed acknowledgment that they have read and understood this policy.

Further details and guidance are included in Bayswater's recruitment policy.

Homestay recruitment (UK, France & South Africa)

Our homestay recruitment procedures for directly managed homestays include the following requirements:

- An initial inspection and a minimum of bi-annual inspections of homestay providers' facilities
- 2 references
- A signature of our homestay agreement
- A valid DBS disclosure/police clearance covering the household (minors only, to be renewed every 3 years in the UK)

Homestay recruitment (Canada)

Our homestay recruitment procedures for in-house homestays include the following requirements:

- Passing initial Inspection & attend Information session (follow-up inspection is every 3 years)
- Submit CRC (every 5 years)
- Sign our homestay agreement
- Fill the "suitability for working with minors" form (Languages Canada)

Risk assessments (UK, Canada & France)

Risk assessments are essential for safeguarding and health and safety management. They identify and evaluate risks, implementing preventive measures to reduce incidents. In the UK, risk assessments conducted include buildings, excursions, activities, and travel. They are regularly reviewed and updated as needed. In France, only a building risk assessment must be completed.

Emergency phone

Each Bayswater site has a 24/7 emergency phone available. This number is provided to students prior to arrival, during induction, through internal centre communication channels, and other means, e.g. student cards. Service providers, including homestays, residences, and other external partners, are also provided with this number.

Student induction

Every new student arriving at a Bayswater centre receives a thorough induction covering a range of topics. As regards safeguarding, this may include:

- Names and pictures of the local safeguarding team
- Emergency services details
- Names and pictures of centre and mental health first aiders (or Sauveteur Secouriste du Travail, SST, in France)
- Support systems available to students locally
- Specific guidance and procedures for minor students
- Behaviour expectations and disciplinary measures

Medical information, SEND and First Aid

Bayswater supports staff and students with medical conditions or SEND, aligning with the (UK) Equality Act [LH1] (2010) and the Canadian Human Rights Act (1985) to ensure appropriate adjustments and a safe, inclusive environment. Disclosure of medical conditions or SEND is requested in the registration form and as part of the student onboarding (online platform, induction, etc). In the case of not being informed of a significant medical condition/disability, Bayswater may refuse acceptance of the student and request that the student return home at his/her own expense, or result in changes in the student booking with possible additional charges. If notified of medical conditions or disability, Bayswater will request further applicable information, which will help inform employees of any additional provision or support required.

Medication should be self-managed, with Bayswater (employees, homestays, residential staff) unable to accept responsibility for its administration or procurement. Students who require or regularly use prescribed medication may be asked to provide a letter from the doctor or prescriber with the name of the medicine, the dosage and frequency of taking it and the name of the condition for which it has been prescribed, clearly described in English. This is in case the student needs medical attention whilst in our care. Bayswater should receive immediate notification if any minor requires medical assistance in order to provide additional support as per our duty of care.

Bayswater retains the right to make decisions regarding the appropriateness of students participating in certain activities if there is a medical condition and possible risks attached.

In the event of illness, minors will be accompanied to the local doctor's office or the hospital. If there is a Group Leader with the student, they can accompany them with the Bayswater Employee in the case of translation difficulties. If the minor student is unaccompanied, the Bayswater employee ensures appropriate supervision and acts as a liaison with the attending medical professionals.

Complete first-aid kits are available in each centre, and basic first-aid kits are taken to all off-site activities.

E-safety

With the rapid growth of artificial intelligence and digital technologies, e-safety has become an increasingly important focus for both students and staff. Bayswater is dedicated to ensuring the safety and well-being of all students in their online interactions. Our comprehensive e-safety policy covers key areas such as:

- Monitoring and filtering
- Online safety
- Responsible use of social media
- The integration of ai in the learning environment



We are committed to raising awareness about online risks like cyberbullying, privacy violations, and inappropriate content, while providing appropriate measures and support for those affected. Furthermore, we encourage an environment where students and staff can confidently report e-safety concerns, knowing that effective action will be taken.

Staff employee handbook, policies & procedures and code of practice

The Employee handbook, policies & procedures and code of practice aim to help all employees understand acceptable behaviour. It goes hand in hand with thorough induction procedures and robust management supervision. Employees should talk to the DSL if any aspect of those documents or the Safeguarding Policy is unclear.

The key elements of those documents cover the following areas:

- Interaction
- Appearance
- Intoxicants
- IT
- Social networks
- Accommodation
- Transport

We expect all adults working on behalf of Bayswater to be excellent role models for all students in their care and to cultivate a respectful, safe, and secure environment for employees and students.

The code of practice is available in [Annex 3](#) of this document.

Minors

Parental Consent Form

The PCF, sent to parents or guardians before a student arrives, gathers important details like medical needs, support requirements, and emergency contacts. Admissions sends the form, and the site's management team ensures it's completed on time, addressing any concerns if needed.

Accommodation & Transfers

We usually require that minor students stay in half-board homestay accommodation and book arrival and departure transfers. Any exceptions are considered on a case-by-case basis. Minor students are only placed in homestays after completing the homestay recruitment process. Student curfews are risk-assessed according to local factors, time of the year and supervision.

Canada only:

- Any minor student who is 17 years old or younger and is living in homestay arranged by Bayswater, and with Custodianship service provided by Bayswater, must book airport transfer service from Bayswater.
- Juniors (aged 12) must be placed with a Custodian or Responsible Adult / Group Chaperone and accompanied at all times when traveling to or from Bayswater, or anytime outside of the school or their homestay accommodation.

Private accommodation form

Parents of minor students seeking private accommodation must complete a request form provided by Bayswater. The site's management assesses each request for safety, adult supervision, and suitability, following British Council guidelines (UK only). All requests are considered on a case-by-case basis. If Bayswater considers a private accommodation request unsuitable, the following steps would be followed:

- Conducting a risk assessment (UK only)
- Meeting with the parent/legal guardian to present the risk assessment
- Additional written consent from parents (parent declaration for unsuitable accommodation form)
- Approval by DSL

Accounting for students

Bayswater enforces strict supervision and accountability measures for minor students, including:

- Class registers
- Daily sign-in/out procedures
- Trip/activity registers
- Curfews
- Travel forms (UK only)

These systems allow prompt action if a student is unaccounted for, supported by relevant policies, including the Missing Student and Supervision Policies.

Attendance and lateness

While attendance is important for all students, minors' absences or lateness (relating to classes, activities or accommodation) are followed up immediately until we are satisfied the student is safe.

Travel request form (UK only)

If a minor student requests to stay overnight away from their allocated accommodation, they must complete a travel request form at least 1 week in advance to allow for risk assessment and parental consultation before booking any travel. All requests are considered on a case-by-case basis.

Identification in the centre

Identifying minor students is essential for providing appropriate support, supervision, and suitable academic content and activities. Staff members are aware of minor students within the adult programme through:

- Highlighted names on registers



- Daily sign-in registers (all centres except South Africa)

Minors in closed groups or as part of summer junior provision are required to wear lanyards and/or bracelets for identification.

Minor weekly meeting (UK, Canada, France)

Minors are invited to a weekly check-in where they can share concerns and ask questions. Staff take this opportunity to check areas like weekend plans, accommodation issues and general wellbeing.

Pre-arrival letter minor letter (UK only)

The 'Minor Letter' is sent to parents/guardians of students, detailing essential steps for arrival, stay, and departure, including forms to complete, booking airport transfers (if applicable), and how to access important information on our online platforms.

Private fostering (UK only)

Occasionally, Bayswater receives booking requests for under 16 students (or 18 if disabled) for longer than 28 days, and under current UK legislation, this would result in this student being classified as requiring private fostering. For any booking falling under these criteria, Bayswater needs to contact local social services who will carry out additional checks of the student's accommodation. Local councils have their own set of rules and regulations regarding private fostering. For more information about a specific centre, please contact the admissions department or the centre directly.

Custodianship (Canada only)

It is a legal requirement in Canada for minors to have a custodian accepting legal responsibility for the student. Further information available in the Custodianship Policy.

Related Policies, Documents and Other Resources

Other policies and procedures work in conjunction with this policy. 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 policies
Allegations Against Staff Policy (internal policy available on BambooHR)
Anti-Bullying Policy Staff (internal policy available on BambooHR) / Anti-Bullying Policy Students
Anti-sexual harassment Policy (UK only, internal policy available on BambooHR)
Attendance Policy
Complaints Policy
E-safety Policy
Equality, Diversity and Inclusion Policy (internal policy available on BambooHR)
Health & Safety Policy (internal policy available on BambooHR)
Homestay Recruitment Policy
Missing Students Policy
Prevent Policy
Privacy Policy
Recruitment Policy (internal policy available on BambooHR)
SEND policy
Sexual Violence and Misconduct Policy (Canada)
Staff Disciplinary Policy (internal policy available on BambooHR)
Staff Sickness Policy (internal policy available on BambooHR)
Student Supervision Policy
Visitors Policy
Whistleblowing Policy (internal policy available on BambooHR)
Alphabetised list of documents and forms
Emergency Plan
Emergency Plan Notice
Group Leader Handbook
Homestay agreement



Parental consent and private accommodation forms process
Posters including: · E-safety · Local safeguarding contacts · First aiders
Private fostering factsheet (UK only)
Recognising types of abuse
Request Forms (Microsoft Forms) including: · Parental Consent Form (1 per centre) · Private Accommodation Request Form for minors · Travel Request Form for minors (UK only, 1 form per centre)
Risk Assessments including:
Safeguarding Policy Notice
Staff Handbook (1 handbook per region)
Staff Policies & Procedures (1 set per region)
Student Code of Conduct and Dismissal (T&Cs, 11)
Student Handbook (including minor section)
Student Induction (including minor section, 1 per centre)
Terms & Conditions

ANNEX 1 - 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: 0800 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.childwelfareafrica.org.za

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

- **Children Act 1989:** Establishes the legislative framework for child protection in England.
- **Children Act 2004:** Not a replacement for 1989 act but aims to improve and integrate children's services by promoting early intervention.
- **Children and Young Persons Act 2008:** States that both centres and local authorities must designate a member of staff to promote and care for the welfare of children and young people.



- **Children and Families Act 2014:** Created a new system for vulnerable children, and families, to access better support from the care system.
- **Children & Social Work Act 2017:** Amends Children Act 1989 & 2004 and establishes new local arrangements for safeguarding children.
- **Convention on the Rights of the Child (1989):** UNICEF outlines the internationally treaty's principles and commitments to protect children's rights globally
- **Safeguarding Vulnerable Groups Act 2006:** Helps avoid recruiting people unsuitable to work with children or vulnerable adults.
- **Local Government Act 2000:** States that sectors in local authorities must work together in terms of safeguarding.
- **Protection of Freedoms Act 2012:** DBS formed out of CRB & ISA to help safer recruitment.
- **Counter-Terrorism & Security Act 2015:** Prevent Duty introduced, which involves actions to counter radicalisation and extremism.
- **Canadian Human Rights Act (1985):** The purpose of the act is to ensure equal opportunity and accommodation for all individuals, regardless of various characteristics such as race, religion, age, and disability.

ANNEX 2 - Canada Supplemental Documents

To ensure comprehensive safeguarding practices across Bayswater's Canadian operations, it's essential to align with provincial regulations in Ontario, Alberta, and British Columbia. Below is an overview of the relevant legislation and guidelines for each province:

1. Ontario

- **Legislation:** Child, Youth and Family Services Act, 2017 (CYFSA)
- **Overview:** The CYFSA governs services for children, youth, and families, emphasizing the best interests, protection, and well-being of children. It outlines the responsibilities of service providers and establishes protocols for reporting and addressing child protection concerns.
- **Key Points:**
 - Mandatory reporting obligations for professionals who suspect a child is in need of protection.
 - Guidelines for service providers to ensure the safety and well-being of children and youth.
- **Additional resources:**
 - [2023 Review of the Child, Youth and Family Services Act](#)
 - [Rights for all children, youth and young persons](#)

2. Alberta

- **Legislation:** Child, Youth and Family Enhancement Act
- **Overview:** This Act provides the framework for the protection of children in Alberta, detailing the duties of service providers and the processes for intervention when a child's safety is at risk.
- **Key Points:**
 - Defines circumstances under which a child may be considered in need of intervention.
 - Outlines the roles and responsibilities of guardians and service providers in safeguarding children.

3. British Columbia

- **Legislation:** [Child, Family and Community Service Act](#)
- **Overview:** This Act sets out the laws for child protection in British Columbia, focusing on the safety and well-being of children and the responsibilities of service providers.
- **Key Points:**
 - Establishes protocols for reporting and responding to child protection concerns.
 - Details the rights of children and the obligations of service providers to uphold these rights.
- **Additional Resources:**
 - [Child Protection Services in BC](#)
 - [Child & Family Service Legislation & Regulations](#)

By integrating these provincial regulations into Bayswater's safeguarding policies, we ensure that our practices are not only consistent across Canada but also compliant with local legal requirements, thereby providing a safe and supportive environment for all students.

ANNEX 3 - Safeguarding Code of Practice

Bayswater is committed to creating a safe, respectful and inclusive environment for everyone. This Code of Practice (CoP) sets out clear expectations for professional conduct and applies to all staff — including full-time, part-time, seasonal, contractors, interns and volunteers. It is issued at induction and reviewed annually.

All staff are expected to uphold our safeguarding culture and avoid any behaviour that could be misunderstood or put others at risk. Breaches of this CoP may lead to disciplinary action, including dismissal, and can be referred to external safeguarding authorities.

This Code should be read alongside the Safeguarding Policy, The employee handbook, the HR policies and procedures and Student Supervision Policy. If anything is unclear, staff should speak to their line manager or the Designated Safeguarding Lead (DSL).

The CoP also helps students understand what to expect from Bayswater staff. Its purpose is to:

- Keep minors and adults at risk safe by clarifying acceptable and unacceptable behaviour
- Promote safe, responsible working practices
- Prevent the misuse of positions of trust
- Reduce the risk of false or malicious allegations

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'.
A position of trust is a role where an adult has power or influence over a child or vulnerable adult, placing them in a position of responsibility or authority (as defined by the Sexual Offences Act 2003).'



- 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: Occasionally, official Bayswater events may include alcohol. These must be approved and managed by the Centre Director, and usually take place after hours when students are off-site (e.g. staff farewells).

Any daytime events involving alcohol (e.g. site anniversaries) require senior leadership approval and a risk assessment, with alcohol stored securely in staff-only areas.

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, and all other 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 accommodation. 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 Director).
- 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

All staff have a legal duty to report safeguarding concerns immediately, in line with Bayswater's procedures. Safeguarding is everyone's responsibility — concerns about students, colleagues or others must be reported without delay.

Staff must not rely on personal or organisational reputation. Any behaviour that breaches our safeguarding standards may lead to investigation, disciplinary action, or referral to external authorities.

Date of last review	18.04.2025
Date of next review	17.04.2026