

Safeguarding and Child Protection Policy and Procedure

The purpose of this policy is to:

- protect all learners studying at one of our partner schools.
- enable staff to safeguard and promote the welfare of all learners.
- encourage a culture that makes our school a safe place to make new friends and learn.

Who does this policy apply to?

The policy applies to everyone working, studying, or visiting our school.

Definitions

- **Children** - includes everyone under the age of 18.
- **Vulnerable Adults** are people aged 18 years or over who may not be able to protect themselves against significant harm or exploitation.
- **Staff** – for the purpose of this policy, ‘staff’ will include all school employees, volunteers, interns, agency staff, contractors, and those who are self-employed.

Safeguarding Team

- Designated Safeguarding Lead (DSL): Alan Martins (Principal)
- Deputy Safeguarding Lead: Tamara Leacy (Director of Studies)
- Safeguarding Officer: Ben Bozhkov (Teacher)
- Safeguarding Officer: Noelia Hubert (Teacher)
- Safeguarding Officer: Laura Breden (Teacher)



Who needs to understand this policy and how will they know about it?

Everyone working, studying or visiting our school needs to understand this Policy. The Policy is published on the school website and posters promoting student safety are displayed throughout the school. In addition, the following training and awareness will be put in place:

WHO?	HOW?
All staff (including volunteers)	Overview included in initial induction; mandatory Prevent on-line training and face to face Safeguarding and Prevent training on joining. Refresher training every 3 years or when necessary due to legislative changes. Specific Safeguarding Handbook for Staff available.
Staff with specific Safeguarding responsibilities	Appropriate specialist external training.
Sub-Contractors	Arrangements in place to ensure that agencies/contractors provide the necessary training for their staff.
All students	Reference made to the Policy throughout the student induction process and included in the Student Handbook. Integral part of the tutorial programme.
Visitors	On arrival, will be made aware of the school's commitment to safeguarding by Reception staff; required to sign-in on arrival, wear their Visitor ID badge at all times whilst on school premises, and sign-out on departure.
Homestay Providers	On-line Safeguarding training is mandatory for all providers hosting under 18s. Certificates must be sent to school and information logged. Prevent and Safeguarding information is readily available for all homestay providers. Information regarding disclosure and staff member contact is also given.

Policy Statement for the Safeguarding of Young People and Vulnerable Adults

At The Language Training Company, we believe that all young people and vulnerable adults, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal, fundamental right to be protected from harm, exploitation, and discrimination.

We understand that students cannot learn effectively unless they feel safe and The Language Training Company will always aim at providing an environment that promotes equality, self-confidence, worth and the knowledge that students' concerns are listened to and acted upon.

The school is committed to ensuring that best practice is adopted when working with all young people and vulnerable adults, offering support and protection, and accepts that it has a legal and moral responsibility to implement procedures to fulfil its duty of care, to safeguard their wellbeing and to protect them from abuse. We will do this by:

- Making sure our staff are carefully selected.
- Providing relevant training for staff in issues of child protection
- Taking all reasonable steps to ensure the health, safety and welfare of any child or vulnerable adult attending The Language Training Company.
- Taking all reasonable steps to prevent any staff members or members of the public from putting any child in a situation where there is unreasonable risk to their health and safety.
- Taking all reasonable steps to prevent any staff members or members of the public from physically, emotionally or sexually abusing any child or vulnerable adult.
- Reporting to the appropriate manager any evidence or reasonable suspicion that a child or vulnerable adult has been physically, emotionally or sexually abused, and referring to statutory authorities any incidents of this nature.
- Implementing this policy in conjunction with the health and safety guidelines.
- Ensuring that all visitors and interested parties are aware of this policy and have access to copies.
- Ensuring that all staff understand the importance of working in partnership with students, their parents / guardians, host families and others in order to promote and safeguard the welfare of all students.
- Following the Local Safeguarding Children's Board (LSCB) inter-agency procedures and legislative and statutory guidance.

Why do we need this policy? What is Safeguarding?

Our two key principles of Safeguarding are:

1. Safeguarding is everyone's responsibility – for our school to promote a safe environment for learning, all members of staff should play their full part.
2. A student-centred approach – for our courses and services to be effective, they should be based on a clear understanding of the needs and views of students.

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children attend our school in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. We also recognise that we have a statutory and moral duty to promote and safeguard the welfare of vulnerable adults studying at The Language Training Company.

Definitions of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults, or another child or children.

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. (FII or Munchausen's syndrome by proxy).

FGM - Female Genital Mutilation

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision. Religious, social, or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It is dangerous and a criminal offence.

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what

they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Forced Marriage

Forced marriage is one in which one or both spouses do not consent to the marriage but are coerced into it. A person faces physical pressure to marry (e.g., threats, physical violence, or sexual violence) or emotional and psychological pressure (e.g., if you're made to feel like you're bringing shame on your family). Forced marriage is a criminal offence and can now carry up to a 7-year prison sentence.

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, regardless of whether the child is aware of what is happening. The activities may involve Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate caregivers), or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Bullying

Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening, or undermining someone. It can happen anywhere – at school, at home or online. It is usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games, and mobile phones, is often called cyberbullying. A child can feel like there is no escape because it can happen wherever they are, at any time of the day or night.



A whole organisation approach

The Language Training Company is committed to a whole-organisation approach to Safeguarding. Certain groups of people have key responsibilities, as outlined later in this document, but it is everyone's responsibility to keep students safe.

There are three main elements to this Policy:

Prevention

- ✓ Providing safe physical and on-line environments
- ✓ Careful and vigilant teaching
- ✓ Accessible pastoral care, support for students and good adult role models
- ✓ Raising e-safety awareness.

Protection

- ✓ Providing training, support and clear procedures to enable staff to respond appropriately and sensitively to safeguarding and child protection concerns.
- ✓ Ensuring that our school's IT infrastructure and network are safe and secure.

Support

- ✓ Providing help and support to young people and vulnerable adults who do not feel safe or may have been abused.

Roles and responsibilities

The Language Training Company will:

- Provide Safeguarding, Prevent and e-safety instruction to students during the induction, and ensure they know who to contact should they feel unsafe or are suffering abuse.
- Appoint a Designated Safeguarding Lead (DSL) who is a member of the Senior Management Team, together with appropriately trained deputies and other nominated Safeguarding officers.
- Provide appropriate Safeguarding training for all staff
- Ensure homestay providers are aware of our Safeguarding Policy and are provided with appropriate information to ensure safety for our students
- Require all staff to read and implement (a) our Safeguarding and Child Protection Policy and Staff Handbook.
- Ensure that all staff and Homestay providers have completed DBS checks in accordance with our safer recruitment procedures.
- Ensure that all recruitment of staff and volunteers follow our Safer Recruitment Policy and procedures.
- Ensure that all allegations are managed appropriately.
- Ensure that all sub-contractors working in the school have appropriate Safeguarding training in place.
- Ensure all staff work to the agreed staff code of conduct, within professional boundaries and acceptable safer working practices.
- Have in place appropriate supporting policies and guidance (e.g., Anti-Bullying and Harassment; e-Safety and IT Acceptable Use; Equality and Diversity, Whistle Blowing, Safer Recruitment) and ensure that they are available to everyone working, studying at, or visiting The Language Training Company, including parents/carers.
- Be aware of the needs of vulnerable groups.
- Ensure work placements follow the agreed Safeguarding guidelines.
- Maintain a visitor protocol.
- Comply with inter-agency working agreements and share relevant information with and from relevant local authorities and agencies, including receiving information from the police via Children's Services relating to any instances of domestic abuse that have occurred within the household of one of our students.

The Safeguarding & Prevent team will:

- Ensure that we have effective policies and procedures in place, in accordance with legal requirements and published guidance, to ensure the health, safety and wellbeing of all students
- Oversee the school's approach to Safeguarding, Prevent and Child Protection and its adherence to relevant legislation
- Promote the safeguarding and welfare needs of all students



The Designated Safeguarding Lead (DSL) will be responsible for

- organising meetings where necessary
- updating the Safeguarding & Child Protection Policy
- the provision of services designated to safeguarding and promote the welfare of young people
- training and/or arranging refresher training of all designated Safeguarding and Prevent staff and other student - facing staff members
- making the decision to make an inter-agency referral (DSL or designated deputy)
- the collation and secure storage of all records relating to Safeguarding, Prevent or Child Protection incidents and concerns (DSL and designated Deputy DSL only).

Designated Safeguarding and Prevent Staff will

- promote and apply The Language Training Company Safeguarding and Child Protection Policy and procedures
- act as a point of reference and support staff on matters of Safeguarding, Prevent and Child Protection
- receive appropriate training and disseminate knowledge, attend relevant conferences, keep up to date with all matters relating to Safeguarding, Prevent and Child Protection and provide written reports as required
- follow agreed reporting and monitoring procedures.

Student-facing staff will

- promote and apply The Language Training Company Safeguarding and Child Protection Policy and procedures
- identify and meet the needs of individual students to ensure that students feel safe and secure and are encouraged to talk and share their concerns, and that they are listened to
- promote e-Safety to students as an integral part of their course
- recognise that students with special educational needs or disabilities may be especially vulnerable to abuse and take extra care to interpret apparent signs of abuse or neglect

All staff will

- promote and apply The Language Training Company Safeguarding and Child Protection Policy and procedures
- comply with the established Visitor Protocol by ensuring that all visitors sign in at Reception on arrival, wear their Visitor ID at all times whilst on school premises property, and sign out on departure.

Liaison with external agencies

We will promote effective liaison with other agencies in order to work together for the protection of all students.

July 19, 2021



Working with Children

Do

- Remember the child comes first
- Behave professionally
- Treat everyone with respect and communicate at their level
- Listen to children
- Be aware of policies and procedures
- Report any suspicion within The Language Training Company guidelines
- Be aware, approachable, and understanding

Do not

- Touch inappropriately
- Use inappropriate language
- Harm or frighten a child
- Be alone with a child, if avoidable
- Threaten, shout or be aggressive
- Mistreat, demean, ignore or make fun of a child
- Force a child to do something they do not want to do
- Let a child expose him/herself to danger
- Take photos of children without checking consent restrictions
- Film or photograph children with your own phone or camera

In addition, never

- Distress a child by shouting at them or calling them derogatory names
- Slap a child
- Hold a child in such a way that it causes pain, or to shake them
- Physically restrain a child except to protect them from causing harm to themselves or others
- Take part in horseplay or rough games
- Allow or engage in inappropriate touching of any kind
- Do things of a personal nature for children that they can do for themselves, this includes going to the toilet with a child unless another adult is present
- Allow or engage in sexually suggestive behaviour within a child's sight or hearing, or making suggestive remarks to or within earshot of a child
- Give or show anything to a child that could be construed as pornographic
- Seek or agree to meet a child outside of their visit/stay with The Language Training Company without the full prior knowledge and consent of the safeguarding team, parents/guardians
- Seek or agree to have any electronic form of contact with a child during or after their visit/stay with The Language Training Company

Failure to comply to the above, will be treated as gross misconduct.

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If any of the following occur, you should report this immediately to the DSL or Deputy DSL:

- If you accidentally hurt a child or young person
- If he/she seems distressed in any manner
- If a child or young person appears to be sexually aroused by your actions
- If a child or young person misunderstands or misinterprets something you have done

If a child has an accident which does not require hospital treatment

- Management should be notified and can monitor the individual.
- The child's parent(s) should be notified of the incident at an appropriate time.
- The accident/incident report should be completed.

Responding to Allegations or Suspensions

It is not the responsibility of anyone working in The Language Training Company in a paid or unpaid capacity to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate authorities.

The Language Training Company will assure all staff/volunteers that it will fully support and protect anyone who in good faith reports his/her concern that a colleague/classmate/host is, or may be, abusing a child.

If you notice any suspicious signs, report this to your line manager or the person responsible for welfare.

If a child tells you they are being abused, react as follows and remember the training you have had:

<i>What to Do</i>	<i>What Not to Do</i>
Stay calm.	Don't panic. Don't over-react. It is unlikely that the alleged victim is in immediate danger.



Listen and be child-focused.	Don't probe for more information or ask leading questions. Questioning the participant may affect how the disclosure is received at a later date.
<p>Give the person the chance to say what they want to say.</p> <p>Use TED to help you:</p> <p>Tell me, explain to me, describe to me.</p>	Don't assume, don't paraphrase and don't offer alternative explanations.
Reassure that they have done the right thing by telling you. Explain that you will need to inform your line manager in order to provide the best possible help or in the case of the line manager being accused, the next in line of duty	Don't promise to keep secrets or that everything will be OK. You can't guarantee this.
Act immediately in accordance with the procedure in this policy.	Don't wait or try to deal with it yourself: listen and refer.
Record in writing exactly what the student said as soon as possible.	Don't make negative comments about the alleged abuser. Don't 'gossip' with colleagues about what has been said to you. Don't make a child repeat a story unnecessarily.
If you feel the child is in immediate danger and cannot return home, stay with the child and report immediately to DSL who will inform MASH	

Internal enquiries and suspension

The DSL will immediately remove the adult from contact with students pending MASH inquiries. In accordance with the findings of the social services or police inquiries The Language Training Company senior management team will assess all individual cases to decide whether a member of staff or volunteer

can be reinstated and how this can be sensitively handled. ***The welfare of the child should remain of paramount importance throughout.***

Allegations of previous abuse

Allegations of abuse may be made some time after the event. For example, by an adult who was abused as a child by a staff member currently working at The Language Training Company.

Where such an allegation is made, the school will follow the procedures as detailed above and report the matter to the local authority or the police. This is because other children, either within or outside the organisation, may be at risk from this person.

Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the details of the Protection of Children Act 1999.

Action if bullying is suspected

Bullying is not accepted at The Language Training Company. If bullying is suspected, the same procedure should be followed as set out in the table above.

Action to help the victim and prevent bullying

- Take all signs of bullying very seriously
- Encourage all children to speak and share their concerns. If anyone talks about or threatens suicide, seek professional help immediately.
- Help the victim to speak out and tell the person in charge or someone in authority.
- Investigate all allegations and take action to ensure the victim is safe.
- Speak to the victim and the bully(ies) separately.
- Reassure the victim that you can be trusted and will help them, although you cannot promise to tell no-one else.
- Keep records of what is said (what happened, by whom, when).
- Report any concerns to the person responsible for welfare or your line manager.



Action towards the bully(ies)

- Talk to the bully(ies), explain the situation, and try to get the bully(ies) to understand the consequences of their behaviour.
- Seek an apology for the victim(s) with a staff member present to keep a written record.
- The School will inform the parents of the bully(ies) and of the victim(s).
- The School will impose sanctions as necessary.
- Encourage and support the bully(ies) to change their behaviour.
- The School will hold meetings to monitor progress.
- The School will inform all relevant staff members of action taken.
- Keep a written record of action taken.
- Look at supporting the bully(ies) with any issues they may have.
- Further incidents of bullying may result in the bully(ies) being expelled.

Concerns outside the immediate environment (e.g., about a parent or carer)

- Report your concerns to the person responsible for welfare or the relevant line manager, who should contact **MASH** (Multi Agency Safeguarding Hub) as soon as possible.
- See below for the information that social services or the police will need.
- If the relevant manager is not available, the person being told of or discovering the abuse should contact social services or the police immediately.
- The local authority and the person responsible for welfare or relevant line manager will decide how to involve the parents/carers.
- Maintain confidentiality, disseminating information on a need-to-know basis only.

Information for MASH about suspected abuse:

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern, which should include the following:

- The child's name, age and date of birth
- The child's home address and telephone number
- Whether or not the person making the report is expressing their own concerns or those of someone else
- The nature of the allegation. Include dates, times, any special factors and other relevant information
- Clear distinction made between what is fact and what is opinion or hearsay.
- A description of any visible bruising or other injuries, and also any indirect signs, such as behavioural changes
- Details of witnesses to the incidents

- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred
- Whether the parents have been contacted, and if so, what has been said
- Whether anyone else has been consulted, and if so, the relevant details
- If the child was not the person who reported the incident, whether the child has been spoken to, and if so, what was said
- Whether anyone has been alleged to be the abuser, and if so, the relevant details
- Where possible, referral to **MASH** should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.
- If you are worried about sharing concerns about abuse to a senior colleague, you can contact **MASH**, or the *NSPCC Child Protection Helpline on 0808 800 5000, or Childline on 0800 1111*.

Confidentiality

Confidentiality shall be maintained at all times. Information shall be handled and disseminated on a need-to-know basis only.

This includes the following people:

- The line manager responsible for the alleged abuser
- The parents of the student who is alleged to have been abused
- The person making the allegation
- MASH
- The alleged abuser (and parents if the alleged abuser is a child).
- Information must be stored in a secure place with limited access to designated people, in line with GDPR laws (e.g., the information must be accurate, relevant, secure and, where necessary, regularly updated).

Protecting yourself from false accusation

It is important, when working with children, to also ensure your own personal safety. This includes protecting yourself from false accusation. The following guidelines exist to protect you.

- Avoid any being alone with a child wherever possible. If unavoidable, tell your DSL or deputy
- Never enter a student's room without reasonable cause
- Never enter a student's room without another member of staff. At least one staff member must be of the appropriate gender.
- Never agree to keep a secret for a student
- Complete incident reports – any inappropriate behaviour of any nature should be recorded on an incident report



Communication with students via mobile phones, email and social media

Staff may join the company Facebook group and other company social media and message the students collectively. However, no personal messaging of any kind is allowed during or following employment. This includes, but is not limited to, texting, emailing, messaging through social media and telephone calls.

The Language Training Company staff are in a position of authority and therefore the relationship with the students is, and should remain, a professional one only. You are role models to the students and not friends regardless of age.

Recruitment and Training of Staff

All reasonable steps are taken to ensure unsuitable people are prevented from working with children.

Pre-selection Checks

All staff should complete the The Language Training Company application form, giving details of two referees. References must be taken up in writing and we will check suitability to work with children under 18.

All employees working with children must complete an **enhanced** Disclosure and Barring Service (DBS) check application form. This must be received before work commences.

Where employment may commence before a DBS check has been received or references have not been returned, the employee may not start work with children under 18 or will be supervised at all times where they are working with adults but there are under 18s in the building. Phone call references will also be obtained from referees on suitability to work with under 18s.

The Language Training Company recommends all adults (aged 18 or older) should join the DBS Update Service at a cost of £13 per year.

<https://www.gov.uk/dbs-update-service>

Interview and Induction

All employees will be required to undergo an interview carried out to acceptable protocol and recommendations. During the recruitment process:

- The individual's identity should be verified and copies of proof of identity taken
- A copy of the DBS will be taken
- Proof of qualifications should be substantiated and copied where necessary

All employees receive a formal or informal induction, during which they should receive, or be directed to, copies of the following documents, policies, and procedures:

- Health & Safety Policy
- Safeguarding Policy
- Risk assessments
- Prevent Policy
- Staff Handbook
- The job description and responsibilities will also be clarified during this induction.

Training

All staff must receive training in child protection covering all aspects laid out in the child protection guidance. Access to additional training in relation to safeguarding and child protection must be available at all times. Staff should request such training as and when necessary.

The Language Training Company requires:

- Employees to attend in-house child protection awareness training, to encourage good practice and to facilitate the development of a positive culture towards good practice and child protection.
- This training is updated after any incident (in school or conurbation) or whenever new legislation comes into force.
- Senior coordinating staff to have sufficient and up-to-date knowledge on child protection legislation and issues.
- Relevant, nominated personnel to hold recognised and appropriate first aid qualifications.
- Staff to sign to say that they have read and understood this Safeguarding Policy and agree to the Code of Conduct.
- All staff will undertake safeguarding training



Useful Contact Details

BCP Council MASH

01202 123334

childrensfirstresponse@bcpcouncil.gov.uk

LADO

01202 817600

lado@bcpcouncil.gov.uk

If you need help out of hours, call Pan Dorset Safeguarding Children Partnership

Bournemouth and Poole

01202 458873

pandorsetsafeguardingchildrenpartnership@bcpcouncil.gov.uk

The NSPCC (National Society for the Prevention of Cruelty to Children)

0207 825 2500

Helpline: 0808 800 5000 www.nspcc.org.uk

Childline UK

0800 1111

www.childline.org

We are committed to reviewing our policy and good practice annually.

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