



# LTC Eastbourne Safeguarding Policy

**Policy Drawn up by**  
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October 2016  
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January 2017

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# Safeguarding Policy Statement

## 1. Background information

LTC is responsible for providing a safe and healthy environment for international students and staff where everyone thrives but with particular care for students under 18 and vulnerable adults. Safeguarding will always be a key part of how we do our job and require a whole school response involving all departments and areas of the school.

LTC Eastbourne welcomes:

- General English students from 16 plus
- Students from 13 plus in homestay as part of a group or as individuals participating in the Summer School
- Students from 13 plus in closed groups year-round
- Young Learners from 10-17 in their residential accommodation year-round.

We, therefore, have a high percentage of students under 18, particularly in the summer months.

Many of our international students, even those over 18, particularly new arrivals, can be considered 'vulnerable' because they may be:

- in an unfamiliar culture
- living far from their family and friends
- studying and communicating in a second language
- having greater freedom and independence than in their home country

Younger students may need more support as the degree of vulnerability varies with the students' age.

## 2. Safeguarding

Safeguarding is about:

- Building relationships of trust with under 18s
- Ensuring appropriate safe systems are in place in such areas as Health & Safety, including Fire Evacuation
- Having clear procedures in place if things go wrong

## 3. Child Protection

- Is protection from neglect, sexual, physical or psychological, emotional or any other types of abuse
- It involves protection from the threat of direct harm
- It provides robust procedures for dealing with abuse when it occurs

## 4. LTC believes that:

- Child's welfare is paramount
- All children and young people have the right to be protected from harm, exploitation or abuse whatever their background and culture, age, disability, gender, racial origin, religious belief, sexual orientation and/or gender identity. All young people need to be safe and to feel safe in an environment free from violence, fear, abuse, bullying and discrimination. In addition even greater sensitivity will be shown to students who are arriving in the UK from territories currently in the midst of internal or international conflict
- Under 18s need support which matches their individual needs
- Under 18s have the right to speak freely and voice their values and beliefs
- Under 18s must be encouraged to respect each other's values and support each other
- Under 18s have the right to be supported to meet their emotional and social needs as well as their educational needs
- LTC must contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviour
- All staff play an important part in safeguarding and protecting children

## 5. Overall aims:

In order to achieve this, LTC's overall aims are to:

- Make clear our standards of behaviour to staff and students
- Contribute to the ethos within the school of mutual respect and shared values
- Use appropriate work within the curriculum
- Encourage the participation of all staff and students
- Alert all staff to the signs/indicators that all might not be well
- Develop staff awareness of the risks and vulnerabilities their students face
- Address any concerns at the earliest possible stage
- Reduce the potential risks students face of exposure to violence, extremism, exploitation or victimisation

We can support our students by:

- Identifying the most vulnerable
- Identifying student's individual needs
- Drawing up plans to meet these needs

#### **6. Who is involved in this policy?**

LTC will work in partnership with those covered by this policy, i.e. all adults who have unsupervised access to LTC under 18 students. Typically, this includes residential staff, teachers, administrative staff, managers, ancillary staff, homestay families accommodating students under 18 and service providers (transport, activities, etc).

#### **7. A Safe Environment**

LTC staff are well placed to observe signs of abuse because of their day to day contact and position of trust with children.

LTC must:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to
- Ensure children know there are adults in the school who they can approach if worried
- Have a designated person who will have delegated responsibility for general issues to do with the welfare of students under the age of 18 and a Designated Safeguarding Lead who is at management levels and will act as the point of contact and information for any child protection issues
- Ensure the welfare officer and Designated Staff receive the necessary appropriate training and support
- Ensure every member of staff with significant contact with children (including temporary staff) knows the name of the Designated Staff responsible for child protection and welfare
- Ensure all staff with significant contact with children understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated person responsible for child protection

#### **8. Our expectations are that those involved will:**

- Be familiar with the safeguarding policy
- Be subject to Safer Recruitment processes and checks
- Be alert to signs and indicators of possible abuse
- Be trained in recognising Prevent Duty issues
- Record concerns and give the record to the Designated Safeguarding Lead
- Deal with any disclosure of possible abuse from a child in line with procedures. The Designated Safeguarding Lead should be informed immediately and a written account provided as soon as possible

See Appendix A for more detailed information about the school and its safeguarding team

#### **9. Training**

All staff will receive in-house Basic Awareness Safeguarding training when starting their employment and then a refresher at least once every three years delivered by the Designated Safeguarding Lead. Senior management and Designated Staff will undertake higher level face-to-face training regularly. All members of staff receive a copy of our safeguarding policy, Codes of Conduct and all relevant procedures.

#### **10. The Designated Safeguarding Lead**

Each school will have a Designated Safeguarding Lead . S/he has lead responsibility and management oversight and accountability for child protection and Prevent Duty and together with the Principal or Director will be responsible for co-ordinating all safeguarding activity. The Designated Safeguarding Lead participates in relevant local and national training events in relation to their role and represents their school at YLEUK.

#### Designated Staff for LTC Eastbourne

Maria Bayne	<a href="mailto:maria@ltc-eastbourne.com">maria@ltc-eastbourne.com</a>	Safeguarding Lead
Radek Kwietniewski	<a href="mailto:radek@ltc-eastbourne.com">radek@ltc-eastbourne.com</a>	Responsible for Young Adults on General English courses
Martin Sketchley	<a href="mailto:martin.sketchley@ltc-eastbourne.com">martin.sketchley@ltc-eastbourne.com</a>	YL Co-ordinator

### **11. Safer Recruitment**

It is vital that we have a culture of safe recruitment and adopt recruitment practices that help deter, reject or identify people who might abuse children. Managers and Directors must act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence. This includes enhanced DBS checks, references and interview information for all employees of AMVIC UK. Recruitment materials for LTC include reference to the organisation's commitment to safeguarding and inform applicants that:

- References will be required, followed up and at least one will be in writing
- All gaps in CV must be explained satisfactorily
- Originals of proof of identity and (where applicable) qualifications will be required, copied & signed off
- Reference requests will ask specifically whether there is any reason that they should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18
- Appropriate suitability checks will be required prior to confirmation of appointment
- Enhanced DBS will be required before employment
- We request employees to declare any criminal convictions

When appointing new staff, schools must:

- Verify a candidate's identity , preferably from current photographic ID or passport with proof of address
- Obtain evidence for an enhanced DBS check
- Verify the candidate's mental/physical fitness to carry out their work responsibilities.  
(A candidate can be asked relevant questions about disability and health)
- Verify the person's right to work in the UK
- If the person has lived or worked outside the UK, make any further checks necessary
- Verify qualifications as appropriate
- Discuss any issues which have arisen in case of criminal convictions etc and , if necessary, conduct a risk assessment

#### **i.) Employment history and references:**

We must always ask for written information about previous employment history and check that information is not contradictory or incomplete. References must give objective and factual information to support appointment decisions. They should always be obtained directly from the referee. We do not accept open testimonials. Names and details of referees for all short-listed candidates should be obtained before interview. Referees must state if there is any reason why the candidate cannot work with under 18s.

#### **ii.) Suitability checks**

All current holders of roles involving responsibility for or substantial access to under 18s and all new appointees to such roles, will have appropriate suitability checks, such as DBS (Disclosure and Barring Service) or Police ' Certificate of Good Conduct' (outside the UK) in line with LTC's safeguarding policy.

A DBS certificate must be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, LTC will undertake an online update check through the DBS Update Service. Individuals can join the DBS Update Service when applying for a new DBS check to allow them to re-use the check when applying for similar jobs. With the individual's consent, LTC as employer can go online and carry out a free instant check to see if a new certificate is required: [www.gov.uk/dbs-update-service](http://www.gov.uk/dbs-update-service).

Whilst waiting for the check to come through and after completing an appropriate risk assessment (*Appendix B*), we may agree for the new employee to start their duties if they have a recent clear DBS check done at the right level and for the children's workforce. An appropriate risk assessment will be put in place prior to them starting.

If an applicant has a DBS check showing previous convictions, we will assess each case individually in line with our Recruitment policy. An appropriate risk assessment (*Appendix C*) will be carried out by the relevant manager/s and the Designated Safeguarding Lead. A decision of employment / working with this service provider will be based on the outcome of the risk assessment.

We will not employ anyone who has been disqualified from working with children directly or by association.

**iii.) Group Leaders & non-UK Residential Staff**

We require a Certificate of Good Conduct provided by the local law enforcement agency. We cannot employ anyone who has been disqualified from working with children directly or by association.

**iv.) Groups and Young Learner Summer School**

Group leaders and other adults travelling with students under 18 will be responsible only for students in their own group.

**v.) Service Providers**

Regular service providers such as taxi, coach companies, and tour providers must provide written evidence that their staff have undergone satisfactory DBS disclosure within the last 3 years.

## **12. Accommodation**

**i.) Home stay**

We require:

- A valid DBS enhanced certificate within the last three years for the main carer. Any problems with the main carer of Under 18s will in turn highlight any issues at that address.
- A Children's Act Declaration disclosure form signed by any other members of the family over 18
- An initial inspection and subsequent regular inspections of the homestay providers' facilities
- Regular feedback(at least 2 questionnaires plus verbal feedback) from students

We cannot accept anyone who has been disqualified from working with children either directly or by association. Students from 13 – 17 who stay in homestay

- must be home before 11pm if they are 16-17 year olds
- must be back by 9pm if they are under 16, except when they are on LTC activities with group leaders/LTC staff.

All homestay families are given guidance on hosting Under 18s and are aware of procedures in case of problems. Homestay families and Under 18s have each others' mobile phones and the emergency number of the school.

**ii.) Private Fostering**

Private fostering is a private arrangement made between a parent/school and a carer/homestay provider for 28 days or more. It is a legal requirement that LTC contacts the Local Authorities to inform them that a child under 16 ( under 18 if disabled) will be living in a private fostering arrangement with one of our homestay providers.

**iii.) Residential**

LTC Eastbourne has residential accommodation for children of 10 – 17. It offers shared bedrooms and bathroom facilities. Students do not stay in this accommodation longer than 28 days.

## **13. Mobiles for under 18s**

We recommend all students have a mobile which works in the UK during their stay at LTC. We ensure we have the mobile numbers of all our students under 18 and produce weekly reports of all young learner details and their emergency contact details. All main carer homestay providers should have under 18s' mobile numbers and vice versa. We provide school mobile phones to facilitate contact between staff and under 18s.

#### **14. Airport transfers & transport providers**

All companies used by LTC schools will be required to supply evidence that their drivers have been suitably vetted and DBS checked to the required level every 3 years.

LTC states that all independent Young Learners Under 18 must be transferred by Park and Assist taxi. If a relative or friend wishes to meet them and bring them to the school, a written permission must be obtained from the parents / guardian/ language tour operator and detailed information given.

All under 18s on a General English course travelling without an adult should be taken to their homestay provider by pre-booked taxi. However, if parents wish for an elder child to travel by some other means, full details must be obtained to ensure LTC is satisfied with the arrangements for the child and a parental permission form is signed.. However, if their parents/guardians wish them to travel independently, they are required to give the necessary permission in writing. Parents/agents are required to complete detailed travel information not less than 5 working days before the child departs.

Parents will be informed that such arrangements may not be deemed adequate by the UKVI and may hinder their child's entry into the UK.

#### **15. LTC Safeguarding Staff Code of Conduct**

As well as a Staff Code of Conduct, there is also a specific Safeguarding Code for all staff to provide guidelines for behaviour with under 18s. This Code of Conduct also applies to General English students under 18.

LTC staff must demonstrate exemplary behaviour not only to protect themselves from false allegations but also to safeguard children in their care.

All LTC staff and service providers are in a position of trust. This describes relationships where an adult (18 years or older) has power or authority in a child's life (under 18 years) and may have a key influence on their future, by the nature of their role within an organisation. A person aged 18 or over is also said to be in a position of trust in relation to a younger person if they care for, advise, train or have sole charge of them in the community on a one-to-one basis because of a court order. This power or influence might be abused to persuade and encourage or intimidate a child or young person into certain behaviours or activities. All staff must recognise the responsibility they have to ensure they do not abuse their positions of trust.

The Sexual Offences Act (2003) re-enacts and extends the abuse of position of trust offences set out in the Sexual Offences (Amendment) Act (2000). While young people aged between 16 and 17 can legally consent to some types of sexual activity this is not the case in a situation where there is an abuse of trust.

##### **Conduct with Children**

- Treat all children and young people with respect
- Maintain professional behaviour at all times
- Be a role model
- Keep all personal data relating to the child confidential
- When it is necessary to reprimand a child, do so in a way that does not humiliate them and in private
- Give enthusiastic and constructive feedback rather than negative criticism
- Do not use, teach or allow inappropriate language in or outside the classroom
- Never discipline a child physically in any way
- Never swear at a child or use aggressive language or behaviour
- Do not initiate any physical contact with children
- If a child initiates physical contact, deflect them
- If a child has an accident, only appropriately trained staff can administer First Aid with a chaperone present / open door.
- Children could approach you with their problems. Listen carefully and sensitively but avoid becoming involved. Do not agree to keep the issue secret. Then follow procedure, tell any Designated Staff.
- If something a child tells you leads you to suspect that they are being abused, you must report it *immediately* to the Designated Staff.
- Ensure students under 18 know the laws re alcohol, drugs, shoplifting etc

### **Conduct around the school**

- Dress appropriately
- Only smoke in the designated areas outside the school (and never socially with under 18s)
- Please remember that under 16s are not allowed to smoke in LTC grounds
- Drugs must never be taken onto school premises
- Staff on duty must never drink alcohol.
- There must be no excessive drinking of alcohol on the premises and only in the designated area when off-duty.
- Prescribed drugs should be kept hidden and out of reach of the children e.g. in a locked cupboard
- Make sure language and conversation is appropriate to the school environment
- Report any accidents or breakages immediately
- Wear your name badge at all times

### **Your vehicle**

- Never give a child a lift in your vehicle unaccompanied.
- Never use your vehicle on school business without appropriate insurance

### **Don't ever:**

- Discuss child's personal matters with colleagues in a public space
- Have social contact of any sort with students under 18
- Exchange mobile numbers, Facebook details, photos or indulge in any social networking / gaming sites with students under 18
- Give lifts to any students under 18 unless there is another adult present / informed
- Engage in rough, physical or sexually provocative activities
- Share a bedroom with a student under 18
- Be alone with a student under 18 in a room. If this happens, the door must be left open
- Allow or engage in any form of inappropriate touching
- Allow children to use inappropriate language unchallenged
- Make sexually suggestive comments to a child, even in fun
- Reduce a child to tears as a form of control
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature for children that they can do for themselves
- Be drunk / drugged on duty or allow the effects of the previous alcohol / drug intake influence your conduct

### **16. Use of media and filming under 18s**

LTC staff must obtain a consent in writing from either a parent or a group leader when filming a child for educational or marketing purposes. Appropriate consent will be sought through the group enrolment or the permission forms or a stand-alone consent form.

When showing any pieces from TV or other channels (i.e. YouTube, etc) or DVDs to the children, LTC teachers and activity staff will ensure that they are suitable to their age. This includes cinema trips. Whenever necessary, the staff will watch the piece in question to vet it prior to demonstrating it to the children.

### **17. Anti-bullying Policy**

There are clear policies for staff guidance and a Student Code of Behaviour. There is also a Harassment and Bullying Policy in the Staff Handbook in the staffroom.

### **18. Health & Safety Procedures**

Our policy is to act promptly in response to recommendations or reported risks. There is a clear Health and Safety policy and an H&S committee including a teaching representative. Any risks or problems are entered in the Maintenance book which is checked daily.

Please consult the following documents that cover our emergency procedures

- **Fire Procedures**
- **Emergency Action Plan**
- Individual **Risk Assessments** for activities and trips; unsupervised time for under 18s

### **19. Under 18s on GE courses**

Parents of international students may have little knowledge of the education system in the UK and may not be aware that some LTC schools include adult as well as young learners.

If parents send their children of 16-17 on a General English course, they should be aware that they are not legally adults and the implications of this. Young adults on a General English course will have a certain amount of freedom but parents will be informed about the security measures and support available on site and in accommodation in order to allow them to make a decision about whether LTC is a suitable environment.

LTC will ask parents sending a student of 16 -17 will be asked to sign an agreement noting that their child will be in a primarily adult environment.

#### **i.) Under 18 Social Programme**

The LTC adult social programme supports and provides services and activities for all general students. The majority of our students for General English are over 18. Students aged 16 and 17 may need risk assessments to be specifically created. Attendance at some activities is restricted to students who are 18+ and ID is required. If an under 18 goes missing, LTC staff should ring the school or emergency phone holder immediately.

#### **ii.) During their stay**

A weekly list of under 18s in school is compiled and circulated to all relevant staff with a copy in the fire file.

### **20. Documentation required by Under 18s:**

In order to fulfil its duty of care and support children, LTC needs:

- Completed application form
- 24 hour emergency contact details / their home address and email for correspondence for parents/guardians.
- Medical details and consents
- Information and permission relating to any off-site or extra-curricular activities

#### **i.) Visa & immigration requirements**

All necessary information on visa requirements and documentation required must be supplied. Any staff giving immigration advice must be duly trained, authorised and competent to do so.

#### **ii.) On arrival in the UK**

All students under 18 should have:

- A letter from their parents/guardians giving permission to travel
- The name of the person they are staying with (homestay/residential)
- Confirmation of enrolment letter from the school
- Name of the School Principal
- The name of the taxi firm collecting them (some airlines require the name of the driver of the taxi collecting the student as well)

### **21. Insurance**

LTC strongly advises parents/guardians of the desirability of taking out insurance and makes clear:

- What medical costs would be covered by the NHS
- What costs they will pay for when receiving medical/dental treatment

Insurance may include: personal accident or injury, private medical, personal belongings, delayed or lost luggage, money, emergency replacement passport, cancellation, travel delay, missed departure, personal liability.

## **22. Day One**

All new staff and students are told of our fire safety and first aid procedures on Day 1. Under 18 students on GE courses are integrated with other new GE students. The GE Under 18s advisor will meet students to introduce her/himself and give a powerpoint presentation and Under 18s information. S/he is available every morning break to talk to students.

Groups and Young Learner Summer School students are given specific induction and support by their Group/Young Learner teams.

### **i.) School ID Card**

All General English students receive a student ID card on Day 1 with the school's contact details and emergency number. They are told to carry these at all times and call the emergency or school number at any time if necessary.

### **ii.) Wristbands**

All groups/Young Learners receive a wristband to be worn during their stay with essential information on. At LTC Eastbourne, the colour will vary according to the course and accommodation the student has.

## **23. Absence from Class**

Any group or Summer School Young Learner is reported immediately to the Homestay Officer or to the Group / YL Operations Manager. Any under 18 GE student not in class is reported to the Young Adults Advisor before 10.00. Continued lateness will be reported to the Director of Studies and will become part of our disciplinary support procedure. Any student concerns will be responded to as part of our student assessment, support or disciplinary systems. The mobile phone numbers for all students under 18 are kept on the school database and by the GE Under 18s advisor.

## **24. Leisure Activities on and off-site**

All excursions and activities organised by LTC will be subject to risk assessments. Outsourced providers also provide operational policies and risk assessment. All providers are sent our Safeguarding Policy and relevant procedures and documentation and are required to confirm awareness of them. No student under 18 is allowed to travel with any organisation other than LTC without signed permission from their parent/guardian.

### **i.) Ratio of adults to Under 18s**

The 1998 DfEE publication Health and Safety of Pupils on Educational Visits advises the following:

1:10 for 10 year olds

1:15–20 for students 11+

LTC will exceed these ratios if the safety and welfare of the students require it in line with the level of risk identified. There will be enough staff to deal with an emergency.

### **ii.) Risk Assessments**

LTC provides clear rules and procedures to ensure ratios and risk assessments are adhered to and are appropriate to the ages of the students, for what they may do outside the scheduled lesson or activity times and without supervision.

### **iii.) Groups on activities unaccompanied by LTC staff**

In circumstances where LTC does not take responsibility for the supervision of students out of lessons or scheduled activities, this must be clearly explained in writing before the booking at the time. For closed groups it is made clear in the contractual arrangements. Appropriate support is given in line with LTC's duty of care.

## **25. E-Safety**

All PCs on the premises and the student WiFi network are protected by secure firewalls to prevent anyone accessing inappropriate content online. Our under 18 noticeboard contains advice on e-safety.

## **26. First Aid**

We advise all staff and homestay to be vigilant concerning the health of under 18s in their care. Within LTC we have trained First Aiders. In the case of an unaccompanied student under 18 falling ill, it is advised the student call the school or emergency phone or the school. Homestay may offer limited medical care but if in doubt should arrange necessary medical attention from their GP or a local medical centre.

## **27. Behaviour and Discipline**

There is a clear disciplinary procedure for Under 18s. However, in the case of exclusion for serious misconduct, safeguarding takes precedence and we may not exclude students until the parents have been informed and their safe return home has been arranged.

## **28. Prevent Duty - Radicalism and Extremism**

Staff and students are told the LTC Code of Conduct from Day One. A copy is also in the Student Handbook and in all classrooms. We aim to make our staff and students about respecting each other's views and challenging behaviour that prevents staff and students working comfortably together. See our Prevent policy and procedures (*Appendix D*)

## **29. Vulnerable Students**

Disabilities stated on the application form will be followed up to ensure the exact nature of the disability and that the necessary support can be provided by LTC and, if possible, is in place when the student arrives. The younger the student with a specific disability, the more support might be required. We are aware that young international students with disabilities may not have coped without the support of their families before and careful discussions will be necessary to ensure that their support needs have been thought about and provided for. Students and their families or Group Leaders may be used to different systems of support and there may be different cultural attitudes to disability as well. LTC must state clearly the extent of the support they can provide. We accept applications from students with learning difficulties and disabilities where it is practicable and reasonable for us to provide a suitable programme. However, we reserve the right to refuse applications when we feel we cannot provide the necessary support.

Where disabilities have not been declared or have been significantly under estimated or medical/psychological conditions and relevant medication have not been declared, LTC may require the student to leave the course early if it is not possible for suitable support to be put in place and the student is unable to cope with the course. In these cases Safeguarding needs take priority.

## **30. Curriculum for Under 18s**

LTC aims to produce a curriculum which will inspire and motivate all learners and prepare them for a lifetime of English learning. Our curriculum should enable all learners to become successful learners who enjoy using the English language, make clear progress and achieve good results.

We recognize that learners under 18 achieve their best results when their language learning programme successfully adapts to their individual needs and is directly relevant to them. The type of learning, range of interests and experience will vary according to the age and background of the student. We must therefore be flexible and responsive to reflect the changing needs and new challenges of the student and will periodically reappraise the way in which we plan and organize young learners' experiences. It is essential that classroom content and subject matter is appropriate to the age level of the students.

Please note: Young adults of 16-17 will be accepted on our adult General English course. However, the majority of students are aged 20+ and the lessons will reflect this although the teacher will take their age and interests into account.

## Outcomes for learners

The curriculum should:

- be based on the needs of all young learners
- be specific in terms of clear aims and learning outcomes
- provide learners with stimulating and engaging learning experiences
- provide material and activities relevant to their age
- enable learners to see English learning as an enjoyable lifelong process
- promote progression
- be informed by relevant and current language learning research and practice
- explore essential life skills

LTC will:

- let students use their knowledge and interests
- allow students to take an active part in their learning
- ensure students enjoy the learning experience at LTC
- be specific in terms of clear aims and learning outcomes
- provide learners with stimulating and engaging learning experiences
- provide material and activities relevant to their age
- enable learners to see English learning as an enjoyable lifelong process
- promote progression
- be informed by relevant and current language learning research and practice
- encourage students to think about safeguarding issues

## Lessons

Material used will be:

- relevant
- suitable in terms of language and content to the student's age

Tasks used will be:

- suitable for the student's age, interests and needs
- timed appropriately according to the student's age and level

Language used will be:

- suitable for the student's age and interest
- show awareness of and sensitivity to the student's age and stage of development

### **31. Marketing, Admissions & Publicity**

All staff involved in international recruitment, whether marketing, administrative or teaching staff, must be fully aware of the issues and procedures relating to the admission of under 18s and be able to give useful guidance to these children and their parents or know where to refer them.

Instructions and information should take into account whether the student or parent is making a booking or application direct or through an agent and the impact this will have on the flow of information, e.g. if agents are sufficiently informed and trained.

The majority of international students and their families are not able to visit LTC before attending a course and are therefore reliant on our website and brochures for information. We aim to make our promotional material logical and easy to use and give simple, honest information. We will provide clear, visual information where we can.

We will provide all information we can at the offer stage concerning the child's programme, accommodation and leisure activities available on and off site and other useful information on planning the trip to the UK and F.A.Q

### **32. Managing Expectations**

All communication will be clear and simple to ensure understanding. Information will include the extent of responsibility LTC has with regard to under 18s and what supervision we can realistically provide. LTC must make clear and ensure parents and students are clear about whether their contract is with the student or with the parent. A pre-arrival tracking check list should be used to ensure that all necessary information has been sent and received. Instructions for parents will need to be clear and simple to ensure this happens.

### **33. Child Protection / Responding to allegations / Whistle blowing**

#### **Recognising and responding to abuse**

The following signs may or may not be indicators that abuse has taken place but the possibility should be considered.

#### **Physical signs of abuse**

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or games
- Unexplained bruising, marks or injuries on any part of the body
- Bite marks
- Broken bones
- Constant hunger, stealing or gorging food
- Unexplained stomach pains

#### Changes in behaviour which can also indicate physical abuse

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example, wearing long sleeves in hot weather
- Withdrawn behaviour

#### **Emotional signs of abuse**

##### The physical signs of emotional abuse may include

- Sudden speech disorders
- Persistent tiredness

##### Changes in behaviour which can also indicate emotional abuse include

##### Obsessions or phobias

- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Being unable to play
- Attention seeking behaviour
- Fear of making mistakes
- Self-harm

#### **Neglect**

##### The physical signs of neglect may include

Constant hunger, sometimes stealing food from other children

- Constantly dirty or smelly
- Inappropriate dress for the conditions

##### Changes in behaviour which can also indicate neglect include

Complaining of being tired all the time

- Having few friends

## Sexual Abuse

The physical signs of sexual abuse may include

- Bruising or bleeding near genital/anal areas
- Stomach pains
- Discomfort when walking or sitting down

Changes in behaviour which can also indicate sexual abuse include

- Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive
- Fear of being left with a specific person or group of people
- Having nightmares
- Sexual knowledge which is beyond their age or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as over-eating or anorexia
- Self-harm
- Saying they have secrets they cannot tell anyone about
- Suddenly having unexplained sources of money
- Acting in a sexually explicit way with adults

## Child Sexual Exploitation

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

## 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, cutting or sunna. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence.

## What to do if you suspect that abuse may have occurred

If a student under 18 wishes to discuss something in private, please use the following procedure.

### 1. RESPOND

What to do	What not to do
Take them somewhere private	Don't close the door – leave it open or sit somewhere quiet away from people but in full view
Stay calm	Don't panic or over-react
Ask what they want to talk about	
Listen carefully to what is being said	

Ask questions for clarification only	At all times avoid asking questions that suggest a particular answer. Do not probe for more information. Questioning the child may affect how their disclosure is received at a later date.
Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others	Do not promise to keep secrets or that everything will be OK (it might not).
Allow them to continue at their own pace.	Do not make assumptions, do not paraphrase and do not offer alternative explanations. <b>Do not say</b> <ul style="list-style-type: none"> <li>○ Why didn't you tell anyone before?</li> <li>○ I can't believe it!</li> <li>○ Are you sure that this is true?</li> <li>○ Why? Who? When? Where?</li> </ul>
Reassure them that they have done the right thing in telling you.	
Tell them what you will do next and with whom the information will be shared	Do not leave them alone
Record in writing what was said using the child's own words as soon as possible, note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated.	Never make a false promise REFER to the appointed person but do not discuss with anyone else

*You should use the form "Reporting Safeguarding Concerns". Appendix E*

## 2. REFER

- If a member of LTC staff sees or suspects abuse of a child or young person, they should inform a member of a Designated Staff immediately.
- If they suspect that the person with legal responsibility (e.g. the group leader) is actually the source of the problem, they should make their concerns known to the Child Protection Officer and the Principal.

## 3. DO NOT DISCUSS

Suspicious **must not** be discussed with anyone other than those nominated above.

It is the right of any individual to make direct referrals to the child protection agencies. If for any reason you believe that the nominated persons have not responded appropriately to your concerns, then it is up to you to contact the child protection agencies directly.

### Action if bullying is suspected

The same procedure should be followed as set out in Anti-Bullying policy.

### Accidents and injuries

If a child or young person is injured an LTC member of staff must make a record of the injury in LTC accident book.

### **Allegations against a member of staff**

Complaints against a member of staff will always and without exception be investigated. The police and other agencies will be informed at the discretion of LTC. The results of the police and child protection investigation may influence the disciplinary investigation, but not necessarily. We will assure all staff that we will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child.

### Responding to allegations or suspicions

Where there is a complaint against a member of staff there may be three types of investigation:

- A criminal investigation.
- A child protection investigation.
- A disciplinary or misconduct investigation.

The results of the police and child protection investigation may well influence the disciplinary investigation, but not necessarily.

### Rights and confidentiality

If a complaint or allegation is made against a member of LTC staff, they will be made aware of their rights under both employment law and internal disciplinary procedures.

Both the alleged abuser and the person who is thought to have been abused have the right to confidentiality under the Data Protection Act 1998. The defendant is presumed innocent until proven guilty.

### Internal enquiries and suspension

In the event of an accusation of abuse being made against any member of staff or a service user, an internal disciplinary procedure will be initiated.

In all cases where the accusation of abuse is found to be true, LTC will normally terminate the employment, contract or agreement with the individual. The individual may oppose the outcomes of the disciplinary in writing to one of the Company Directors whereby external advice will be obtained from the DBS and the Child Protection Officer (see important contact details).

Irrespective of the findings of the social services or police inquiries, LTC will assess all individual cases to decide whether a member of staff or service provider can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, LTC will reach a decision based upon the available information, which could suggest that on a balance of probability, it is more likely than not that the allegation is true. The welfare of the child will remain of paramount importance throughout.

### **Whistle blowing**

It is everyone's legal duty to report any concerns they may have of any inappropriate behaviour or incidents with regards to under 18s that may endanger a child in any way. They will not be penalised and their report will remain confidential.

### **If a child is accused**

If a child is accused of inappropriate behaviour that contravenes LTC Safeguarding Policy, the complaint will be investigated in a similar manner to the one of staff being accused.

The process will only involve relevant LTC staff, language tour operator / parents and the Local Authority Designated Officer / police if necessary. All information will be kept confidential.

### **34. Associated policies and documents**

The following LTC policies and procedures should be read along with the Safeguarding Policy:

- LTC Prevent Policy
- E-Safety Policy
- Acceptable Use Policy
- No Smoking Policy
- Anti-bullying Policy
- Health & Safety Policy
- Recruitment Policy
- Student Code of Conduct & Disciplinary Procedures
- Staff Handbook
- Activity & Residential Staff Handbook
- Fire Evacuation Procedures
- Dealing with Medical Emergencies
- Filming Consent Form
- Permission and Medical Consent Forms for u18s

### 35. Supporting Documents

LTC employees and service providers may find the following documents useful:

- National Guidance for Safer Working Practice for Adults who Work with Children and Young People
- Updated legislation; re-issued March 2015
  - Working Together to Safeguard Children
  - What to do if you're worried a child is being abused
  - Information Sharing
  - Re-issued in July 2015 "Keeping Children Safe in Education + summary for staff"

#### Appendices

- A LTC Safeguarding Team Structure
- B Risk Assessment whilst waiting for a DBS check
- C Risk Assessment following an unclear DBS check
- D Prevent Statement
- E Reporting Safeguarding Concerns

#### A summary

- Children includes everyone under the age of 18
- Welfare of a child is paramount
- Everyone in LTC has a role in safeguarding children by behaving in a professional manner
- All staff should never have an attitude of 'it couldn't happen here' and always act in the interests of the child/vulnerable adult
- All staff have a responsibility to identify children/vulnerable adults who may be in need of extra help
- All staff have a responsibility to take appropriate action
- All staff should be aware of systems in their school which support safeguarding and inform students
- All staff should know procedures and the Safeguarding Lead
- All staff should receive appropriate safeguarding training
- All staff must be aware of the signs of abuse and neglect so they can identify students in need