

## **Safeguarding Young People & Vulnerable Adults and Child Protection Staff Guidelines & Policy**

### **Context**

The majority of students who attend International Business College Manchester (IBCM) are 18 and over, but we do also accept under-18 years. All students under the age of 18 are minors, and as such we have a special "Duty of Care" towards both the under-18s and any vulnerable adults who attend the school. Factors that may make someone a vulnerable adult may include, but not be limited to disability (both physical and mental) and level of English. Each student's level of vulnerability may depend on the context and it cannot be assumed that someone who may not be regarded as a vulnerable adult within the school premises doesn't become vulnerable off-site.

All students and visitors under the age of 18 and who fall into the category of vulnerable adult are entitled to be protected under this policy regardless of their race, nationality, age, gender, sexual orientation or religious belief.

This duty of care applies to all members of staff, and whether or not students are on the premises, are on their way to or from the school, on an excursion or doing a sports or social activity organised by the school.

### **Terminology**

The following terminology is used throughout this policy and other school policy. It is important that all members of staff are familiar with the terms used, and where a term refers to a named person, they know who that person is and how they can be contacted.

Under-18 – Any student or visitor who is under the age of 18. They are deemed to be a minor by law. All students of IBCM who are under the age of 18 have their age highlighted on their Student Card.

Vulnerable Adult – Any student or visitor to the school whose personal circumstances may make them more vulnerable than many other adults. Factors that may deem someone to be a vulnerable adult may include a physical disability (e.g. sight/hearing impairment, mobility impairment), special needs (e.g. learning difficulties, dyslexia), level of English (lower students may not fully understand instructions or be able to effectively express a concern), lack of local knowledge (unfamiliar with the local vicinity or customs).

Designated Safeguarding Lead (DSL) – A named member of staff, trained to Advanced Safeguarding for the DSL, who has full overall responsibility to ensure meets the aims of this policy. The Designated Safeguarding Lead is :

Rachena Kumari

The identity of the DSL is advertised around the school in posters and on the student's arrival she meets all new students on the Monday of their first week.

Designated Safeguarding Person (DSP) – A named or named member(s) of staff trained to Advanced Safeguarding Level. The DSP is Mark Harrington

Local Safeguarding Children's Board (LSCB) - key statutory mechanism for agreeing how the relevant agencies in each local area will co-operate to safeguard and promote the welfare of children in that locality, and for ensuring the effectiveness of what they do. The Children Act 2004 requires each local Children's Board authority to establish a Safeguarding Board. IBCM falls within the catchment area of Manchester Safeguarding Partnership.

Designated Officer (DO) – formerly Local Authority Designated Officer (LADO) – The officer or team of officers involved in the management and oversight of allegations against people that work with children.

Duty of Care – This is a responsibility of all staff and group leaders to protect under-18 and vulnerable adults from direct harmful behaviour, for example, emotional abuse, physical abuse or any other physical harm, sexual abuse and neglect.

Child Protection – Part of the Safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

### **Staff Responsibilities related to Safeguarding**

A detailed description of the responsibilities all staff have in relation to safeguarding under-18s and vulnerable adults connected to the school can be found in the sections below. The overarching principles are that all staff have the responsibility to safeguard under-18s and vulnerable adults, be vigilant and know to report concerns, including small ones, or allegations and who to contact both within and outside of Berlitz Manchester. All staff must be trained in Safeguarding to the level of Basic Awareness, all Designated Persons to the level of Advanced Safeguarding and the Designated Safeguarding Person to the level of Advanced Training for the DSL.

### **Legal Framework**

This policy is informed by the following legislation enacted by the UK Parliament:

The Children Act 1989  
Local Government Act 2000  
The Sexual Offences Act 2003  
Children Act 2004  
Safeguarding Vulnerable Groups Act 2006  
Protection of Freedoms Act 2012  
Counter-Terrorism and Security Act 2015  
Children & Social Work Act 2017  
Working Together to Safeguard Children 2018

### **Policy Availability**

This policy can be found in the Berlitz Manchester Teacher Handbook and Staff Handbook, which all staff receive upon appointment. Staff are required to sign a declaration that they have read and understood the policy. It is also available to the public on the Berlitz Manchester Website ([www.berlitzmanchester.com](http://www.berlitzmanchester.com))

### **Designated Safeguarding Team**

The following members of staff form the Designated Safeguarding Team

#### Role

Designated Safeguarding Lead –Rachena Kumari

Designated Safeguarding Person – Mark Harrington

## Code of Conduct

### Statement of Intent

It is the policy of IBCM to safeguard the welfare of all vulnerable adults, children and young people by protecting them from all forms of abuse including physical, emotional and sexual harm.

This organisation is committed to creating a safe environment in which young people can feel comfortable and secure while engaged in any of IBCM programmes. Staff must at all times show respect and understanding for the individual's rights, safety and welfare, and conduct themselves appropriately.

### **Guidelines for all IBCM Staff**

#### Attitudes

Staff must be committed to:

- Acting professionally at all times.
- Treating vulnerable adults, children and young people with respect and dignity. - Always listening to what a vulnerable adult, child or young person is saying.
- Valuing each child and young person.
- Recognising the unique contribution each individual can make.
- Encouraging and praising each vulnerable adult, child or young person.

#### **By Example**

Staff must endeavour to:

- Provide an example, which we would wish others to follow.
- Use appropriate language with children and young people and challenge any inappropriate language used by a young person, child or an adult working with young people.
- Use neutral language at all times in order to prevent any misunderstanding of intent, or possible accusations of misconduct.
- Respect a young person's right to privacy.
- Be dressed appropriately at all times when on school premises or carrying out any work duties.
- Please refer to the section in the IBCM Employee Handbook on Dress Code for appropriate attire. Pg. 2.

#### **Prohibited Actions**

Staff may not engage in any of the following activities:

- Allow any student under the age of 18 to consume alcohol or tobacco products either on or off the premises, inside of outside of working hours.
- Initiate any form of physical contact or engage in inappropriate physical contact with any student.
- Be in a relationship with any student under the age of 21. (NB Any member of staff entering a relationship with any students aged 21 or over MUST inform their line manager immediately.

- Meet any student under the age of 21 outside of the work premises unless this meeting is work related (e.g. meeting a group of students for a Social Programme activity).
- Have contact with any student via the internet or any type of media including email, social networking sites or any other type of social media, unless this contact is part of normal work duties and uses School networking systems.
- Do things of a personal nature for a vulnerable adult, child or a young person that they can do for themselves.
- Accept gifts of a high value from students at any time. Small gifts from students are acceptable when a student, teacher or other staff member leaves.

Staff are reminded they are in a Position of Trust and that any sexual contact with a student under the age of 18, even if the student is over 16, is a criminal offence.

“Inappropriate physical contact” may be difficult to define in a multi-cultural environment, when students from some other cultures may be more tactile. Staff are therefore prohibited from initiating any physical contact with a student or, if alone with a student, from engaging in physical contact if initiated by the student. Students may wish to have a photograph taken with a member of staff and it is quite natural in this situation for the student to place their arm around the member of staff. This is deemed acceptable provided that the staff member is not alone with the student, the staff member refrains from reciprocating, and the hand or arm isn’t placed on any protected area of the staff member’s body. Staff must otherwise, tactfully and sensitively explain to students that they cannot engage in physical contact with them.

Staff who may need to meet with students under the age of 18 outside of the workplace, for example if they need to drive them to a new homestay, must inform a senior member of staff that they are doing this and report back to them when the student has been safely delivered to their destination.

### **Whistleblowing**

Staff are required to report to their line manager (or any senior manager) any instances where they suspect a fellow member of staff to be engaging or to have engaged in any inappropriate or illegal activity. Confidentiality and support will be given to any staff member who raises such concerns.

### **Anti-bullying policy**

IBCM has a written policy on bullying, harassment and extremism for staff and information for students. Staff can find this guide in the IBCM Employee Handbook. Students can find the guide in the Student Handbook, and are referred to this during their Induction on Day One. This information for students is also displayed in each classroom.

### **Safeguarding Young People and Vulnerable Adults on the Premises**

It is the responsibility of all staff members to ensure that students are in a safe and secure environment while they are at the school. For these purposes, our premises include not only the main building, but the area to the front, and any other premises we may use from time to time. Annual general safety and fire risk assessments are carried out in our main building and all other buildings we use.

The following are guidelines for ensuring our students enjoy a safe and secure environment while on school premises:

#### *Avoiding accidents*

- Ensure that all infrastructure is secure. For example, if you feel that any of the chairs or desks are in need of repair or replacement, put them out of use immediately and inform the Facilities Coordinator and/or your line manager of this. The Facilities Co-ordinator is Robert Squires
- Make sure that all electrical cables are covered and are not protruding or in a position that would cause students to trip over them. This is particularly important in classrooms in which there is a computer and in the Study Centre.
- If any student is seen to have an object that could be potentially harmful to him or herself or to another student (e.g. a knife) you should politely ask the student to hand it to you and report the incident to the Managing Director or another senior manager. They will decide what further action to take.
- All staff should be aware of which members of staff are trained in First Aid and where they can be found in the event of an accident.

#### *Alcohol and tobacco*

- Students are informed about the law regarding alcohol and tobacco during their induction on day one.
- While smoking is permitted outside the building, the legal age to be able to purchase tobacco in the UK is 18. As such, and despite what the law may be in students' own countries, students under the age of 18 should not smoke while under the care of the school. If a student known to be under the age of 18 is seen smoking, they should be asked to stop.
- The same applies to alcohol. Students are not permitted to bring alcohol onto the premises. All social activities involving alcohol should be for students aged 18+ only, and care should be taken to ensure that younger students do not attend. If you suspect a student is under 18, ask to see their student card.

#### *Fire safety and evacuation*

Full details of what to do in the event of the school needing to be evacuated can be found in the Fire Safety document.

- Students are informed of the fire and evacuation procedure during their initial tour of the school. Please check periodically that students understand what to do in the event that the school needs to be evacuated.
- Ensure that nothing is blocking the fire escapes and passageways. Should you see anything, such as a desk or bicycle blocking an escape route remove it and/or report it to your manager.
- All staff have a responsibility to ensure students evacuate the building safely in the event of a fire alarm. All teachers must take their registers and check that all students are present.
- Anyone with impaired mobility may be regarded as being vulnerable in the context of having to evacuate the premises. Such people may require a Personal Emergency Evacuation Plan (PEEP). Please see the Personal Emergency Evacuation Plan (PEEP) Policy and Procedures for details on this.

#### *Walking to off-premises classrooms*

- All students should be made aware of the safest route to any off-premises classrooms and reminded of road safety. Note that trams go in both directions directly in front of the school. It is important to remind students to look right then left when crossing the road as those from countries where they drive on the right will be used to looking left then right.

#### *Students in the classroom*

- While all students are normally expected to attend classes and be on time every day, this is particularly important for under-18s and vulnerable adults, as it is our responsibility to know where they are during school hours. For this reason, if an under-18 or vulnerable adult is absent, please report this fact to reception by 9:35 so that the student or student's home stay host can be called. If you are teaching in an outside classroom, please call the school from your mobile phone to inform us that an under 18 is absent.
- Teachers must check that the materials they use in the classroom will not be harmful in any way to under-18s. This should not normally be an issue if materials are chosen so as not to cause offence to any student. However, there may be some under-18s who are not as mature for their age as they otherwise might be expected to be, and particular attention needs to be paid to this.

### *General Well-Being*

The following applies to all students; however, staff need to consider the implications of the following to our under-18s and vulnerable adults.

- All students should be dressed appropriately for school and should not wear any clothes that would offend anyone, e.g. clothes that are too revealing or T-shirts with offensive slogans or images. If you see anyone who is dressed inappropriately or is wearing something which may cause offence, please speak to them, or ask a member of staff of the same gender as the student to speak to them.
- While bullying is clearly against the school rules, staff should be particularly sensitive to the possibility of under-18s being bullied. Ensure that all students treat others with respect and don't allow students to talk to one another in an inappropriate way even if they say it's just a joke or they don't really mean it.
- Keep an eye on who under-18s appear to be socialising with. Do they appear to be uncomfortable with the people they are with?
- All new students are given the address of their host family and a map of how to get from their host family to the school. Teachers should check that all new students who are under 18 know how to get back home. This should be done at the end of second lesson on a Monday in case students do not have a lesson that afternoon.

### **Safeguarding Young People and Vulnerable Adults in School Accommodation**

Due care and attention is given to where students are placed in school accommodation. The following rules are in force when placing students:

- All students under the age of 18 are placed in homestays and never in a residence. All adult members of homestays are required to have an up-to-date DBS check.
- No under-18 is ever placed in a school residence.
- Under-18s are not placed in a homestay with other students who are over the age of 18.
- Parents of under 18s are asked to complete Parental consent forms. Amongst other things, these stipulate the curfew times as 9pm Sunday to Thursday and 10pm Friday and Saturday. Parents may stipulate they wish their child to have an earlier curfew time, but not a later one. Copies of these forms are sent to the hosts.
- Under-18 are always placed with hosts who are within walking distance of the school or who are near to a bus stop on a main road that allows them to reach the school easily.
- Under-18s are never placed with single hosts of the opposite gender.
- The age of any children in the homestay is taken into consideration. For example, a sixteen year old girl will not be placed in a homestay where there are boys of a similar age.
- Depending on the vulnerability of an adult they may be placed with an appropriate host family rather than a school residence, if that residence is deemed not to be fit for that adult.

### **Safeguarding Young People and Vulnerable Adults on the Social Programme & on Class Excursions**

Events on the social programme take a number of forms, such as sports activities, and afternoon, evening or full-day excursions.

- All social programme leaders should be aware of the potential risks for the activity they are leading. If in doubt consult the Social Programme Organiser before agreeing to do an event. All activity & excursion leaders must read the related risk assessment and instructions related to the Social Programme activity they are about to lead and sign the related document to declare they have read and understood them.
- The Social Programme Organiser ensures that the following staff to student ratios are met: Afternoon & Evening excursions 1:20 (September-June), 1:15 (July-August); Sports Activities 1:15; Full-day excursions 1 IBCM staff member per coach, with no more than 20 under-18s per coach.
- For all social activities that take place within a controlled location, such as the school or a sports hall, ensure that the room being used is fit for purpose, e.g. that all obstructions have been removed for any physical activities so that there are no accidents.
- Sports activity leaders should ensure that students are playing their respective sports in a safe manner and should immediately calm students down if too much aggression is shown on the sports field.
- Sports activity leaders must also be provided with a sports first aid kit whenever leading a group of students on a sports activity. It is the responsibility of the Social Programme Organiser to ensure that this happens.
- For all social programme activities and class excursions leaders/teachers must have a list of names of all students in their group and mobile phone numbers (where possible) of all under-18s. They should also get to know by sight all those students who are under
- 18. All group leaders must therefore be issued with a school mobile phone whenever they lead students on an off-site social programme activity.
- On excursions in which students have time to themselves, no-one under 18 should be left to wander around on their own. Students should be told to stay in groups of at least 3, should have a written copy of the group leader's mobile phone number to call in case of any problems, and should be told to call the school emergency number (on their student card) if they are unable to contact the group leader.
- When using public transport with a group of students the group leader should ensure students stay together. In the event of there being two group leaders with larger groups, one should take the lead while the other brings up the rear to ensure no students are left behind. Do a head count at every change of train to ensure no-one has been left behind. When known, inform students which platform the group will be using in case they lose the group.
- It is the responsibility of the group leader to be aware of the environment that they are taking students into. Be aware of any potential danger (such as heavy traffic, crowded trains, demonstrations, etc).
- Ensure that all students understand where and at what time to meet the group after their free time is over.
- Group leaders are encouraged to take photographs of excursions. Particular attention needs to be paid to this. While all students need to give their consent to their image being used for publicity, photos of under-18s can only be used if their parents have given their consent. Therefore, it is best to avoid taking photographs of under 18s on social programme activities.
- On returning to the school, under no circumstances should anyone under 18 be allowed to leave the group. It is the responsibility of the group leader to ensure that all under-18s return safely to the School.

### **Safeguarding Young People and Vulnerable Adults during Airport Transfers**

During taxi transfers between the airport and the student's accommodation the following rules are in force:

- All taxi drivers are DBS checked.
- Taxi transfer confirmations that involve a passenger under the age of 18 are always clearly marked to say that the passenger is under-18.

- Drivers have clear instructions that they must not leave the airport without their instructions. If their passenger does not arrive, they must phone the IBCM Emergency number to receive confirmation that their passenger has not left their country before being allowed to leave the airport.
- On delivering under-18s to their hosts, drivers must ensure that their under-18 passenger is met by the host before leaving.

#### Staff Use of Own Cars

- If staff have to use their own vehicles to transport under-18s, preferably have another adult in the car, or the under-18 should sit in the back.
- If there are 3 under-18s in the car one can sit in the front but is the first to get out.

#### One-To-One contact with students

Staff should:

- Not spend excessive amounts of time alone with any student away from others.
- In the event of having to meet with an individual vulnerable adult, child or young person make every effort to keep this meeting as open as possible.
- If privacy is needed, ensure that other staff are informed of the meeting and its whereabouts. For these meetings there should be two members of staff, one male and one female, present. Staff are strongly advised against meeting any student, especially of the opposite sex, alone in a closed space.

#### Electronic contact with students under 18

- Electronic contact is defined as the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment and computers. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.
- This policy applies to the relationship between students and staff before, during or after a course.
- Staff must request permission from the Academic Director, Business Manager or Managing Director, for any electronic contact with a student which is of a non-work-related nature before, during or after a course. Requesting mobile phone numbers from students is necessary for an excursion, however, staff should only give out the school excursion mobile number, and not their own private number. Social networking on Facebook, etc is strictly prohibited.
- In any electronic contact with students, staff must pay particular attention to use neutral, un-emotive language that will not be misconstrued. Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.
- Students are informed during the day one induction and in the new student handbook that staff are not allowed to befriend them on Facebook.

#### Online safety for students

While some websites that may pose a risk to students are blocked on the school server all staff must be aware that certain sites may not be blocked and must remain vigilant when students are using the internet. All staff, and teachers in particular, must periodically remind students of the potential dangers of sharing personal information on the internet, uploading photographs, online harassment and the potential for scams. There are posters around the school advising students on internet safety and these



must be pointed out to students. The school's Online Safety policy is given to student to read and sign during the Day One induction.

### **Radicalisation and Extremism**

The college is a multicultural and international community in which we help to foster an acceptance and tolerance of a range of views students many encounter in such an environment. We fully subscribe to the Government's Prevent strategy and we encourage our students to express their views and beliefs as long as these respect the core British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those of different faiths and beliefs.

At IBCM, we are aware that some students may have been exposed to extremist influences or prejudiced views before their arrival in the UK, or may be exposed to them after coming here. These influences may emanate from a variety of sources and media, including via the internet, and at times students may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and dealt with in line with the relevant policies on student behaviour and staff conduct.

As part of wider safeguarding responsibilities, staff will be alert to and have a duty to report:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of the school, such as in their homes or community groups.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Any reports of changes in behaviour, friendship or actions and requests for assistance.
- Students voicing opinions drawn from extremist ideologies or narratives.
- Use of extremist or "hate" terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, sexuality, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or Anti-British views.

In the first instance, reports of any of the above will be made to the Designated Safeguarding Lead, Business Manager or Managing Director. In extreme cases the police may need to be notified.

In order to help prevent such occurrences, the school is committed to:

- Raising staff and student awareness of radicalisation and extremism,
- Working with local agencies and sharing information,
- Maintaining robust ICT measures to prevent access to extremist or otherwise inappropriate websites.

### **Dealing with problems outside of work hours**

The duty of care to our students extends to outside of the work place and outside of work hours. You will see a number of our students around the Manchester area in the afternoons and evenings and at weekends. If you see any student who is known to be under 18 engaging in any harmful or inappropriate behaviour (such as drinking alcohol), it is your responsibility to stop that behaviour, if it is within your capability and/or to report it immediately to a responsible person at the school. Outside of working hours, this can be done via the Emergency Phone.

### **Child Protection**

Child Protection forms part of the duty of care we have to our under-18s and vulnerable adults. This means the need to protect them from direct harmful behaviour, for example emotional abuse, physical abuse or any other physical harm, sexual abuse and neglect. It should be noted that this abuse can come from another child and not just an adult.

All staff must undergo training in Basic Awareness in Child Protection and must be aware that they are at all times responsible for maintaining a safe environment for all under-18s and vulnerable adults. It is each staff member's manager who has responsibility for ensuring that this is done, with the Managing Director having overall responsibility for this.

### **Child Protection Policy**

IBCM is committed to a practice which protects children and vulnerable adults from harm. This includes a) safeguarding, which is the school's duty of care to look after vulnerable adults and children and help them to achieve their potential, and b) child protection, which involves protection from abuse. Abuse can include neglect, sexual, physical, or psychological and emotional abuse. For the purposes of this policy a child is defined as a person under the age of 18 and all children regardless of race, nationality, religion, gender or sexual orientation are protected by this policy.

All staff undergo training in Basic Awareness in Child Protection.

### **Introduction**

Staff in this organisation accept and recognise our responsibilities to develop awareness of issues which cause children and young people harm. We will endeavour to safeguard vulnerable adults, children and young people by:

- Adopting child protection guidelines through a code of behaviour for staff.
- Sharing information about child protection and good practice with children, parents, and staff.
- Sharing information about concerns with agencies who need to know and involving parents and children appropriately.
- Following stringent procedures for recruitment and selection of staff including mandatory DBS checks for staff and homestay providers.
- Providing effective management for staff through supervision, support and training.

We are also committed to reviewing our policy and good practice at least once a year. The Managing Director is primarily responsible for this.

The identity of the DSL ( James Hough) is advertised around the school and on the students' arrival she meets all new students on the Monday of their first week.

- If any student or staff member has any concerns about the welfare of an under-18 this will be reported to the DSP (Rachena Kumari ) in his absence.

### **Sharing information regarding child protection**

Good communication is essential in any organisation. At IBCM, every effort will be made to assure that, should individuals have concerns; they will be listened to and taken seriously.

It is the responsibility of the management to ensure that information is available to, and exchanged between all those involved in this organisation and its activities. Some information is confidential and should only be shared on a strictly need-to-know basis. At times it may be necessary to share information with a Designated Officer in the Manchester Safeguarding Partnership.

## **Children and young people**

IBCM will act to ensure that young students have information about how, and with whom, they can share their concerns, complaints and anxieties.

When sharing information, IBCM personnel will be sensitive to the level of understanding and maturity, as well as to the level of responsibility, of the people with whom they are sharing information.

## **Parents**

Parents / persons with parental responsibility are ultimately responsible for their children's welfare at all times, and they should be assured that their children are involved with a credible organisation. We achieve this by having a full copy of this Safeguarding and Child Protection Policy available for anyone to view.

## **Staff**

As an organisation, which works with children and young people, it is imperative that each member of the IBCM staff is aware of their responsibilities under the Child Protection legislation and has a working knowledge of IBCM procedures. Each member of staff will receive online training shortly after they start and refresher training at least every two years.

## **Other Bodies**

A copy of our Child Protection Policy will be made available to any other appropriate body.

## **Safer Recruitment**

IBCM is committed to safer recruitment. A position offered to a successful applicant is subject to references and a DBS check, or overseas equivalent. All applicants undergo a DBS check before they are in the post of employment. All adult members of any homestay who wish to host under-18s also undergo a DBS check before they are able to start hosting them. Homestays can never be used if DBS has not yet been received.

Where a vacancy at IBCM is advertised the school's commitment to safeguarding as well as our requirement that a candidate must undergo a DBS check is clearly stated in the advertisement. Candidates are also informed that any gaps in their work history must be explained satisfactorily. Questions at the interview stage of recruitment are designed to assess candidates' attitudes to the principal of Safeguarding and Child Protection. They are also informed that when taking up references we always ask referees to comment on the candidate's suitability to work with under-18s.

New staff who are taken on before their DBS check has arrived will be allowed to take up their post, but will be barred from being alone with any under-18 until a clear DBS check can be verified. In the case of teachers, they will not be scheduled to teach one-to-one lessons with any under-18.

## **Referrals to the Disclosure and Barring Service (DBS)**

A referral must be made to the DBS when IBCM withdraws permission for an individual to engage in work with under-18s or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which does not involve contact with under-18s, because they think that the individual has:

- engaged in relevant conduct; i.e. action or inaction that has caused: neglect, emotional/psychological, sexual, or physical harm
- satisfied the Harm Test; to harm or cause harm, put a child at risk, attempt to harm or incite others to harm
- received a caution or conviction for a relevant offence

If these conditions have been met the information must be referred to the DBS.

The referral should be made to the DBS when the provider has gathered sufficient evidence as part of their investigations to support their reasons for withdrawing permission to engage in work with under-18s and in following good practice, consulted with their local authority Designated Officer (DO) or Health and Social Care Trust Designated Officer if appropriate.

## **Recognising Abuse**

While abuse of young people at IBCM is extremely unlikely we should not assume that it could never happen. Our duty of care to young people and vulnerable adults extends to watching out for signs of potential abuse.

Here are some signs to look out for that may indicate a child or vulnerable adult is suffering from abuse. Some signs may vary with the age of the child or vulnerable adult. Not every child or vulnerable adult will exhibit every symptom. As well as signs, children and vulnerable adults may tell you of abuse. Always listen and follow the procedures for responding to allegations of abuse (below).

Signs of abuse can include:

### *Sexual abuse*

Acting in an inappropriate sexual way with objects or peers. Nightmares, sleeping problems  
Becoming withdrawn or clingy  
Personality changes, seeming insecure

Unaccountable fear/dread of particular places or people  
Changes in eating habits  
Physical signs such as unexplained soreness around genitals, sexually transmitted diseases  
Becoming secretive

### *Emotional abuse*

Delayed physical or emotional development  
Shows extremes of passivity or aggression  
Sudden speech disorders  
Overreaction to mistakes, or continual self-depreciation Neurotic behaviour (rocking, hair twisting, self-mutilation)

### *Physical abuse*

Has unexplained bruises, burns etc.  
Wearing clothes to cover injuries, even in hot weather

### *Neglect*

Often hungry; may beg or steal food  
Badly dressed in clothes that need washing  
Poor appearance and personal hygiene; unwashed, hair not brushed Lacks needed medical or dental care

Often tired  
Might abuse alcohol or other drugs

### **Specific Areas**

In addition to the types of abuse mentioned above, two other specific types of abuse that staff must be aware of are Child Sexual Exploitation (CSE) and Female Genital Mutilation (FGM).

### **Child Sexual Exploitation**

This is a form of sexual abuse where under-18s are exploited to engage in sexual activity in return for money, gifts, drugs, affection or status. CSE does not always involve physical contact as it can happen online or involve pressure from peers or cyber bullying.

Signs to look for in under-18s include:

- Having a much older boyfriend / girlfriend
- Appearing with unexplained gifts or new possessions
- Associating with others involved in exploitation
- Misusing drugs or alcohol
- Being absent from school, going missing or regularly coming back late to homestays.

### **Child Criminal Exploitation**

This is a form of abuse whereby criminal gangs exploit young people to carry-out a wide range of criminal activities. Examples include County Lines whereby gangs use young people to transport drugs from urban to rural areas for local sale.

Signs that a child or young person is being groomed or exploited into criminal activity or county lines include:

- Persistently going missing from school or home and/or being found out-of-area
- Unexplained acquisition of money, clothes, jewellery, or mobile phones
- Excessive receipt of texts or phone calls
- Spending more time online or on their devices
- Using more than one phone
- Suddenly acquiring expensive gifts such as mobile phones, jewellery – even drugs – and not being able to explain how they came by them
- Having hotel cards or keys to unknown places
- Being secretive about who they are talking to and where they are going
- Relationships with controlling older individuals or groups
- Leaving home/care without explanation
- Unexplained absences from school, college, training, or work
- Returning home unusually late or staying out all night
- Coming home looking dishevelled

### **Female Genital Mutilation (FGM)**

This is a practice that can cause severe and long-lasting damage to physical and mental health. It is carried out for religious, social or cultural reasons, however there are no medical reasons for carrying it out. It is a criminal offence if done in the UK. Staff should be aware that a person who has suffered FGM may ask for help without being explicit about the problem due to embarrassment or fear. Any causes for concern are to be reported to the DSL.

### **Procedure for reporting allegations or suspicions of abuse**

#### *Responsibility of staff to report*

It is the duty of Berlitz Manchester staff to disclose cases of abuse or allegations of abuse to the Designated Safeguarding Lead without delay.

It is NOT for staff to decide whether or not a suspicion or allegation is true.

All suspicions or allegations of abuse must be taken seriously.

If a member of staff has suspicions, they should contact the Designated Safeguarding Lead or Person in confidence. If a vulnerable adult, child or young person starts to talk to the staff member directly, they should allow that person to disclose and should allow them to continue talking following the guidelines below. They should then see the Designated Safeguarding Lead or Person in confidence.

What to do if abuse is suspected or disclosed

- Never guarantee absolute confidentiality, as Child Protection will always have precedence over any other issue.
- Endeavour to meet the child in a semi-public or visible space if possible
- Listen to the child, rather than question him / her directly.
  
- Offer him / her reassurance without making promises, and take what the child says seriously.
  
- Allow the child to speak without interruption.
- Accept what is said – it is not your role to investigate or question.
- Alleviate feelings of guilt and isolation, while passing no judgment.
- Advise that you will try to offer support, but that you must pass the information on.
- Explain what you have to do and who you have to tell.
- Record the discussion accurately, as soon as possible after the event,
- Use the child's words or explanations – do not translate into your own words, in case you have misconstrued what the child was trying to say.

### **Record keeping**

All records, information and confidential notes should be kept by the Designated Safeguarding Lead in separate files in a locked room or in secure electronic files. Only the Principal and Academic Director or another nominated senior manager and the Designated Safeguarding Lead and Designated Safeguarding Person will have access to these files.

### **The Records**

In any case where an allegation is made, or someone in Berlitz Manchester has concerns, a record should be made. Details must include, as far as practical:

- Name of vulnerable adult, child or young person
- Age
- Home address (if known)
- Date of birth (if known)
- Name/s and Address of parent/s or person/s with parental responsibility
- Telephone numbers if available
- Is the person making the report expressing their own concerns, or passing on those of somebody else?
  - If so, record details
- What has prompted the concerns?
- Include dates and times of any specific incidents
- Has the vulnerable adult, child or young person been spoken to?
- If so, what was said?
- Has any individual been identified in the allegation?
- If so, record details
- Who has this been passed on to, in order that appropriate action is taken? E.g. Managing Director, DSL, DSP, Business Manager, Academic Director, local social services, police etc.

- Has anyone else been consulted?
- If so, record details
- ACTION TAKEN: this must be recorded.

### **Designated Child Protection Persons**

For reasons of confidentiality the only people who need to know this information are the following designated Child Protection Persons: The Managing Director, Academic Director, Business Manager, the DSL, the DSP, the Accommodation Manager, and any other staff members with specific responsibility for under-18s. These will report to the Managing Director.

### **Further Action**

Once a statement has been collected from a student further questioning should be avoided apart from important clarification of factual detail.

A senior management representative (usually the Managing Director) and the Designated Safeguarding Lead will meet at the earliest possible opportunity to consider an appropriate course of action in response to the information revealed by the student and consider any other relevant information.

The Managing Director will decide if it is appropriate to involve other members of the school staff, e.g. the Academic Director, Operations Director, Director of Studies or Accommodation Manager at this stage, and also whether to inform the student's agent and parents. There may be no need to take any further action in which case this decision should be recorded in writing.

Further action may include the immediate removal of any imminent threat of danger, seeking advice from the Local Authority Designated Officer, contacting the police, or making a referral to the Independent Safeguarding Authority (ISA) depending on the severity of the allegation.

**ALWAYS REPORT ANY ALLEGATIONS, PROBLEMS, CONCERNS OR ISSUES TO THE WELFARE AND DESIGNATED SAFEGUARDING LEAD (DSL), IMMEDIATELY. IN HER ABSENCE REPORT THESE TO THE DESIGNATED SAFEGUARDING PERSON (DSP), BUSINESS MANAGER, OR MANAGING DIRECTOR.**

### **Outside Contacts**

The following contact information should be used to report a concern about a child.

### **MANCHESTER SAFEGUARDING PARTNERSHIP**

MCC Designated Officer

If you have concerns about an adult working with children or young people please go to: <https://www.manchestersafeguardingpartnership.co.uk/resource/lado/> and report your concern using the MCC Designated Officer (LADO) Referral Form (Aug 2019)

If you wish to have an informal conversation with the MCC Designated Officer before making a referral please call 0161 234 1214.

Completed referrals forms should be emailed to [quality.assurance@manchester.gov.uk](mailto:quality.assurance@manchester.gov.uk) – it is essential that all sections of the referral form are completed.

### **NSPCC Whistleblowing Helpline**

tel: 0800 028 0285

### **Greater Manchester Police**

<https://www.gmp.police.uk/contact/af/contact-us/>

## RELATED POLICES

Please also refer to Supplementary Policies:

- Berlitz Safeguarding Children U16 Years Old
- Harassment & Bullying Policy
- E-Safety Policy

## VERSION CONTROL

Version	2.0
Originator	QA & Academic Manager
Effective from	1 <sup>st</sup> October 2022
Approved by	Governing Body
Date Approved	2022