

# Safeguarding Policy and Procedures

## **ETC International College Policy and Procedures for the Protection of Juniors and Vulnerable Adults**

ETC International College, Bournemouth is fully committed to safeguarding and promoting the welfare of children, young people and vulnerable adults in line with the requirements of the law and examples of good practice from other similar organisations. An overall statement of the college's policy, and a general overview of procedures are included in this booklet.

### **Key Contacts:**

ETC Child Protection Officers :

Liz Zienkovicz - Office Manager & Designated Safeguarding and PREVENT Lead

Hazel Valvona - Acting Lead Safeguarding Officer and Assistant Director of Studies

In the absence of Liz or Hazel, colleagues will be able to contact:

Helen Rouse – Director of Studies & Safeguarding Officer at ETC.

Wendoly Gonzalez – Accommodation Manager and Welfare Officer at ETC

Patsy Pett – Junior Courses Coordinator and Safeguarding Officer

Sarah Vivian – Senior Teacher and Safeguarding Officer

Korielys Kohler – Residence Manager and Safeguarding Officer

David Jones – Principal at ETC

### **Local Area Contacts :**

Laura Baldwin, Service Manager, LADO Bournemouth, Safeguarding and Quality Assurance. Tel: 01202 456708

MASH Multi Agency Safeguarding Help : 01202 458101 (Bournemouth), 01202 735046 (Poole)

LSCB : Local Safeguarding Children Board 01202 458873

Police : Safeguarding Referral Unit (police) 01202 222229 [sru@dorset.pnn.police.uk](mailto:sru@dorset.pnn.police.uk)

Accompanying this document there is a referral form which may be used if a member of staff wishes to bring any information or concern to the attention of the Child Protection Officer.

## **Introduction**

### **College Responsibilities**

The College is legally obliged and committed to safeguarding and promoting the welfare of Juniors (ANY under-18s) and vulnerable adults who participate in its organised activities or services. These include registered students who are under 18 or would be regarded as vulnerable adults, children who come on to College premises as part of organised activities such as visits or summer schools and College staff working off campus (e.g. widening participation activities in local schools). Adult students at the College may be considered to be vulnerable adults as they are international students immersed in a foreign culture, living away from their familiar home environments usually without the support structure of family and friends. They may feel emotionally vulnerable or insecure, particularly at times of worry, distress or illness.

The College must ensure that reasonable steps to promote and safeguard the welfare of children, young people and vulnerable adults are taken and to ensure that relevant legislation and government guidance is complied with. This policy applies to all under 18s and vulnerable adults regardless of gender, ethnicity, disability, sexual orientation or religion.

All College staff are in a position of trust, in particular those staff who teach, support, guide or in any way interact with students. It is incumbent on all staff to be aware of this and to act accordingly at all times.

### **Safer Recruitment and Selection Procedures**

Many staff across The College will be in regular or significant occasional contact with under-18s or vulnerable adults in the course of their teaching or other work, or will be in positions of particular trust e.g. Student Support staff, security staff, senior members of the Residents' Support Network, named advisers in departments. Some students are required to work or undertake placements which will bring them into contact with under-18s or vulnerable adults.

The College will maintain robust recruitment practices and take steps to ensure that it complies with the requirements of the Safeguarding Vulnerable Groups Act 2006. This will include Disclosure and Barring Service (DBS) checks for staff and students required to work with under-18s or vulnerable adults in regulated activity and Independent Safeguarding Authority (ISA) registration where required. The College is committed to ensuring that relevant staff and students have appropriate checks in accordance with accepted practice to ensure their suitability to work with under-18s and vulnerable adults or their fitness to practice on certain courses. This includes Group Leaders and Homestay Providers.

### **Child Protection Procedures**

The College will work within the policy framework of the local authority and will follow existing College complaints and disciplinary procedures.

In accordance with this guidance The College has appointed a "Lead Safeguarding Officer" with regard to child protection issues. The Lead Safeguarding Officer is a member of the College's core administrative team, and has responsibility for coordinating the College's safeguarding practice. The Lead Safeguarding Officer will be assisted by personnel within the Accommodation and Welfare department to ensure that there is always a responsible member of the core administrative team to act in their absence. The names of these staff will be held by Reception staff and will be published on The College website.

All College staff must contact the Lead Safeguarding Officer if they have any cause to believe that a child is in any way at risk. The Lead Safeguarding Officer will contact the relevant Social Services Department in accordance with the statutory requirements and will follow their instructions.

### **Vulnerable adults**

Where possible, The College will identify vulnerable adults and ensure that there are appropriate support measures in place. This is most likely to be when the student presents to, or is referred to, the Accommodation and Welfare Department or the Academic Department and has mental health difficulties or a disability that would meet the legal definition of 'vulnerable'.

Any member of staff across The College with concerns regarding an adult student whom they believe or know to be vulnerable must contact the Accommodation and Welfare Department or the Director of Studies, who will liaise with the Lead Safeguarding Officer if necessary. Where the concern involves a vulnerable adult, the Lead Safeguarding Officer will consult with the Accommodation and Welfare Department and any other relevant staff in order to determine the most appropriate course of action. Where abuse is suspected the local Social Services department will be informed in accordance with statutory guidelines.

### **Code of Behaviour**

The following general principals should be adhered to by all staff who are expected to familiarise themselves with this guidance:

Protection issues are to be regarded as top priority and staff are reminded that it is the welfare of the child or vulnerable adult which is of a primary concern and it is their duty to report any concerns to the Lead Safeguarding Officer or to the Accommodation and Welfare Officer.

If staff, in the course of their work at The College, have a child or vulnerable adult protection issue brought to their notice, observe an incident of abuse themselves, or have cause for concern, they must treat this as a priority over other work and address the issue immediately.

If staff wish to seek guidance with regard to a specific incident or area of concern, advice can be sought from the Lead Safeguarding Officer who may refer the matter to the local Social Services department.

### **Induction, training and supervision**

The College will ensure that the Designated Safeguarding and PREVENT Lead, Accommodation and Welfare staff and other staff likely to be in regular contact with under-18s and / or vulnerable adults receive appropriate training. The College will also provide information to raise awareness to ensure that all staff understand what to do if someone covered by this policy discloses abuse or any other protection issue. How often is the training/refresher training ?? NB English UK offers Advanced Training specifically for the Language School industry, other organisations are more general.

### **Relationships with young people aged 16-17**

It should be noted that whilst a child can consent to sexual activity once they reach the age of 16, under the Sexual Offences Act 2003 it is a criminal offence for a person over 18 (teacher, student mentor, academic staff etc.) to have a sexual relationship with a child under 18 where that person is in a position of trust, even if the relationship is consensual.

**Students Under 18** Offers of admission to students who will be under 18 at registration will only be made where The College is satisfied that the student is equipped to study within a mainly adult, independent learning environment. Applicants will be notified of The College's child protection policy and procedures and must agree to comply with any arrangements to support and safeguard under-

18s (for example relating to licensed premises on campus, providing emergency contacts in event of welfare concerns). Details of the admissions processes for applicants who will be under 18 at registration can be obtained from the Admissions / Marketing departments.

### **Record Keeping and Confidentiality**

Records will be kept of all referrals to the Accommodation and Welfare Officer or to the Lead Safeguarding Officer and their outcomes and held by the Lead Safeguarding Officer in accordance with the Data Protection Act.

It should be noted that consent is still required from under 18s in the same way as for adults with regard to matters of data protection, however in accordance with statutory requirements, where child protection issues are involved, it is not possible to offer confidentiality to a person under 18 as any disclosures must be reported.

### **Monitoring and Review**

The implementation of the policy and associated guidance and procedures will be reviewed and updated every three years. The Lead Designated Safeguarding Officer will ensure that this policy is reviewed if there are any legislative developments that are relevant.

### **SAFEGUARDING POLICY**

ETC International College recognises that the welfare of the child is paramount and takes seriously its responsibility to safeguard and promote the welfare of the children and vulnerable adults in its care.

All children and vulnerable adults have the right to be safeguarded from harm or exploitation whatever their race, religion, gender, health or disability.

The purpose of this policy is to enable all staff and work placement interns to understand the importance of working in partnership with children, their parents, host families, Group Leaders and other agencies in order to promote children's welfare.

#### **We will endeavour to safeguard children, young people and vulnerable adults by:**

Ensuring that the college has policies covering equal opportunities, Health & Safety, safe restraints, complaints, confidentiality, anti-bullying and harassment policy, drugs, learning outside the classroom, internet safety and that child protection issues are covered in all relevant policy documents.

Valuing them, listening and respecting them

Involving them in decisions which affect them

Sharing information about concerns with agencies who need to know and involving children and their parents/host families/agents/group leaders appropriately.

Ensuring that an Enhanced DBS check is carried out on all staff/work placement interns.

Adopting a code of conduct for all staff/work placement interns.

Providing effective management through induction, support and training.

Ensuring staff/work placement interns understand about 'whistle blowing'.

Dealing appropriately with allegations/concerns about staff/work placement interns or other students in accordance with Government guidance.

Ensuring that any child protection deficiencies are remedied without delay.

Following all requirements of the Independent Safeguarding Authority (ISA) including reporting to ISA on any persons considered unsuitable to work with children within one month of them leaving the College.

## **SAFEGUARDING PROCEDURES**

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### **Safeguarding (Child Protection) Procedures**

#### **1. What is Child Protection?**

Child protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

#### **2. What is significant harm?**

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and require discussion with the statutory agencies.

#### **3. Scope and purpose of these procedures**

These procedures should be read in conjunction with the Safeguarding Policy. They apply to the Principal, all staff (including work placement interns) and anyone working on behalf of the College and explain what action should be taken if there are concerns that a child is or might be suffering harm. A child is a person under 18 years.

#### 4. Responsibilities and roles

All those who come into contact with children and families in their work, including those who do not have a specific role in child protection, have a duty to safeguard and promote the welfare of children.

The college has a responsibility for ensuring the establishment has effective policies and procedures in place. The procedures are reviewed annually. The college has several members of staff who have been designated as Child Protection Officers – Liz Zienkovicz (Designated Safeguarding Lead and PREVENT Officer) and Hazel Valvona (Acting Lead Safeguarding Officer) are the persons with whom you should normally discuss any concerns or allegations and should be able to offer appropriate advice and refer to other agencies as necessary.

In addition, Laura Baldwin (Bournemouth) & John McLaughlin (Poole), Service Managers, LADO, Safeguarding and Quality Assurance.

Tel: 01202 456708

MASH Multi Agency Safeguarding Help Tel 01202 458101 (Bournemouth)

**All action is taken in line with the following guidance:** \* Bournemouth, Dorset and Poole Local Area Safeguarding Board (formerly the 'Yellow File').

\* DSCF Guidance (2010) – Safeguarding Children and Safer Recruitment in Education.

\* Working Together to Safeguard Children 2006 (updated 2015) – Guidance published by HM Government. \*

What to do if you're worried a child is being abused – Government Guidance – DFES 31553.

\* The Children Act 1989, which states the legal definition of a child as “a person under the age of 18”.

\* Section 115(4)(a) of the Police Act 1997, which states that a person can be considered to be vulnerable if they are “substantially dependent upon others in performing basic physical functions, or his ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result, he would be incapable of protecting himself from assault or other physical abuse, or there is a potential danger that his will or moral well-being may be subverted or overpowered”.

\* Safeguarding Children: Guidance for English Higher Education Institutions, Department for Innovation, Universities and Skills, December 2007.

\*Working together to safeguard children, March 2015 (update draft April 2018) - Guidance published by HM Government

\* Aimsafer: A Framework for Safeguarding Children and Young People in Higher Education Institutions' Aimhigher 2006.

## 5. What is child abuse?

The following definitions are based on those from 'Working Together to Safeguard Children (HM Government 2015).

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

**Physical Abuse** – Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a carer/host family fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse, as well as being a result of an act, can also be caused through omission or the failure to act to protect.

**Emotional Abuse** - Is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. Emotional abuse can be difficult to measure and children who appear well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no attention from their carer. Children who are residing in households where there is domestic violence can often suffer emotional abuse.

**Sexual Abuse** – Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images or watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Boys and girls can be sexually abused by males and/or females, by adults and by other young people. This includes people from all different walks of life.

Child Sexual Exploitation - (CSE) - Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Female Genital Mutilation (FGM) is illegal in the UK and staff/other adults have a legal duty to report if told it has happened to the police and social services. People guilty of allowing FGM to take place are punished by fines and up to 14 years in prison. FGM is a cultural practice (not religious) and occurs mainly in Africa, the Middle East and Asia to girls mostly aged 5-8 years but also up to 15 years old. It has been a criminal offence in the UK since 2003. Longer term health

problems include : menstrual problems, difficulties urinating or incontinence, kidney damage or failure, infertility, complications during pregnancy and childbirth, emotional and mental health problems. (FGM Safeguarding and Risk Assessment Department of Health January 2017 ; Safeguarding in Schools- FGM - 2017).

**Neglect** – Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent/host family/carer failing to provide adequate food and clothing, shelter including exclusion from home or danger, failure to ensure adequate supervision including the use of adequate care takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child’s basic emotional needs. Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children. The physical signs of neglect may include: constant hunger, being constantly dirty or smelly, appearing extremely underweight or perhaps dressed inappropriately for the conditions. They may also complain of feeling tired all the time.

**Financial or Material Abuse** including theft, fraud, exploitation, pressure in connection with financial transactions, or the misuse or misappropriation of property, possessions or benefits.

It is accepted that in all forms of abuse there are elements of emotional abuse and that some children are subjected to more than one form of abuse at any one time. These definitions do not minimise other forms of maltreatment, such as discrimination (abuse motivated by discriminatory attitudes towards race, religion, gender, disability or cultural background).

#### Specific Safeguarding Issues

All staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Abuse is abuse and should not be tolerated or passed off as 'banter' or 'part of growing up'.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, on the TES, MindEd and NSPCC websites. Government guidance can be accessed on the issues listed below via GOV.UK and other government websites (Keeping Children Safe in Education Gov.UK Sept 2016) :

- bullying including cyber-bullying
- children missing education
- child missing from home or care
- child sexual exploitation
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse

- female genital mutilation
- gangs and youth violence
- gender-based violence/ violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking

**Radicalisation and PREVENT** - Radicalisation is the act or process of making a person more radical or favouring extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. ETC has a PREVENT policy, linked to this Safeguarding Policy, which aims to protect vulnerable individuals through the identification and referral of those susceptible to violent extremism into appropriate interventions. These interventions aim to divert the susceptible from embarking down the path to radicalisation and to ensure the core British values of democracy, rule of law, individual liberty and respectful tolerance of different faiths and beliefs, are upheld. (Protecting children from radicalisation : the prevent duty – August 2015, Counter-Terrorism and Security Act 2015)

#### E-Safety

It is recognised that the use of new technologies presents particular challenges and risks to children both inside and outside school. ETC International College will ensure a comprehensive curriculum response to enable all pupils/students to learn about and manage the associated risks effectively and will support parents and the school community (including all members of staff ) to become aware and alert to the needs of keeping children safe online. Detailed information can be found in the school's E-safety Acceptable Use Policy which can be found on the Website. Please refer to our E-Safety Policy document for further information.

#### **6. Responding to the child who makes an allegation.**

Listen carefully to what is said. Stay calm. Explain that it is likely that the information given will need to be shared – do not promise to keep secrets.

Allow the child to continue at his/her own pace and do not interrupt if the child is freely recalling events.

Only ask a few questions for clarification. Questions should not 'lead' the child in any way.

Reassure the child that he/she has done the right thing and will not be in trouble for telling you.

Explain what you will do next and with whom the information will be shared. Do not ask the child to repeat the disclosure to anyone else in college or ask him/her to 'write a statement'.

Contact the college's Designated Safeguarding Lead without delay.

Record in writing what was said, as far as possible in the child's own words, as soon as possible – note date, time, any names mentioned, to whom information was given and ensure the record is signed and dated.

Do not discuss with carers/host family. The Child Protection Officer will agree with the Social Care Team when they should be contacted and by whom.

It is important that everyone in the college is aware that the person who first encounters a case of alleged or suspected abuse is NOT responsible for deciding whether or not abuse has occurred and should not conduct an investigation to establish whether the child is telling the truth. That is a task for Social Care and the Police following a referral to them of concern about a child. Your role is to act promptly on the information you have received.

## **7. Responding to concerns or suspicions of abuse**

Any suspicion or concern that a child or young person may be suffering or at risk of suffering significant harm, MUST be acted on and discussed with the Child Protection Officer. If the child/young person is felt to be in immediate danger, the Police should be called.

A careful record should be made of what you have seen/heard that has led to your concerns and the date, time, location and people who were present. Where physical injuries have been observed, these should be carefully noted but should not be photographed. Do not ask to see injuries that are said to be on an intimate part of the child's body.

The Designated Safeguarding Lead should telephone the referral to the LADO Safeguarding Officer without delay, prior to any discussion with the carers. The Child Protection Officer should keep a record of the conversation with the LADO noting what actions will be taken and by whom, giving the date and time of the referral. The referral should be confirmed in writing on an inter-agency referral form as soon as possible and at least within 48 hours, but the college policy is to do this within 24 hours.

## **8. Responding to allegations or concerns about staff or volunteers - whistleblowing**

Rigorous recruitment and selection and other safeguarding procedures and adhering to safer practice guidance will hopefully mean that there are relatively few allegations against concerns or about staff or interns. However, if there is any reason to believe that another member of staff or intern has acted inappropriately or abused a young person, you must take action by discussing your belief or concern with the Child Protection Officer. Even though it may seem difficult to believe that one of your own colleagues may be unsuitable to work with children, the risk is far too serious for any member of staff to dismiss such a suspicion without taking action.

If the concern is about the Child Protection Officer herself, it should be discussed with the Principal.

Staff who report such concerns will not be penalised and their report will remain confidential.

## **9. Safer Working Practice**

All adults who come into contact with children at the college should behave at all times in a professional manner which secures the best outcomes for children and also prevent allegations being made.

## **10. Safer Staff Appointments**

Enhanced DBS checks have to be carried out on all Staff/Work placement interns. If a new appointee starts work before a DBS has been received it will be necessary that a careful risk assessment is made and appropriate monitoring and supervision arranged until the DBS check arrives. Any offer of employment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks (see par. 102 Gov.UK Keeping Children Safe in Education 2016). Staff recruited from outside the UK will have police checks from the last country they worked in.

The college also requires DBS checks on: All host family members (over the age of 18). If the family are private foster carers, all family members aged 16+ must be DBS checked.

The college ensures that arrangements for Private Fostering are made for students aged under 16 (under 18 if disabled) and staying with a family who is not his/her own immediate family for more than 27 nights and that this must be reported to the local authority at least 6 weeks before the arrangement starts.

The College ensures that taxi drivers used to transport junior students to and from college and also airport transfer drivers are all DBS checked.

**This document was last updated: 30<sup>th</sup> September 2018 (DJ/TM/HMV/LZ)**