



## Infinity English College Safeguarding Policy

### A. Policy Statement

#### A1) Context

Infinity English College welcomes foreign students to our school throughout the year. We recognise that we have a fundamental duty of care to all of these students as they are living away from home and without their normal support networks. We also recognise the additional duty of care for all under 18s. This safeguarding policy represents our belief that it is always unacceptable for a child or young person to experience abuse of any kind and it is the responsibility of all adults in contact with young people to safeguard their welfare.

#### A2) Terminology

- Safeguarding: caring for children appropriately and protecting them from that which is not in their best interests
- Child Protection: Protecting children from abuse
- Abuse: all forms of physical and/or emotional ill treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power
- All adults: Refers to all adults who are working with the children (including group leaders and homestay hosts)
- Designated Safeguarding Person: On site member of staff responsible for day to day child welfare concerns
- Designated Safeguarding Lead: Member of staff with overall responsibility for child protection and safeguarding issues in Infinity English College

#### A3) Statement of commitment

#### A4) U18's entitlement

We recognise that:

- the welfare of the child/young person is paramount
- all children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- working in partnership with children, young people, their parents, homestay providers, agencies, leaders and teachers is essential in promoting young people's welfare.



#### A5) Adult's responsibilities

This Policy applies to all Infinity English College staff including directly employed staff, homestay hosts, accommodation and transport providers, volunteers, interns and anyone working on behalf of Infinity English College. All adults are expected to read and abide by the policy and procedures set out in this document.

#### A6) Associated policies

This policy should be read in conjunction with the following related policies:

- Health and Safety Policy
- e-safety
- Recruitment Policy
- Welfare Policy

The purpose of the policy:

- To provide protection for under 18s who receive Infinity English College's services
- To provide staff with guidance on procedures they should adopt if they suspect a child or young person may be experiencing, or be at risk of harm.

We seek to safeguard under 18s by:

- valuing them, listening to and respecting them
- adopting child protection guidelines through procedures and a code of conduct for all adults
- recruiting staff and homestay providers safely, ensuring all necessary checks are made
- sharing information about child protection and good practice with under 18s, their parents and all adults
- sharing information about concerns with relevant agencies and involving parents and under 18s appropriately
- providing effective management for all adults through recruitment policies, supervision, support and training.



#### A7) Policy review

We ensure that this policy is communicated and understood and that there are sufficient resources available for its implementation. The key relevant points of the policy are explained to all students upon arrival and there are posters in each centre that reiterates this information. Key staff members and details of important safeguarding contacts are also displayed throughout the centres. Our policy and procedures are reviewed annually by the Designated Safeguarding Lead (DSL) and reported to and signed off by the Director of Schools.

#### A8) Roles and responsibilities

Responsibilities for the implementation of this policy are as follows:

U18s: Responsible for understanding the policy, looking out for each other and raising any concerns with adults if necessary.

Adults: Responsible for understanding the policy and pro-actively engaging with its requirements.

Designated persons: A Designated Safeguarding Lead is appointed in Infinity English College, whose role it is to oversee the standards and practices across the group, and to provide support for the DSPs in each centre. In each centre there are two Designated Safeguarding Person (DSPs) responsible for the implementation of the policies and procedures. They are responsible for the implementation of all procedures as laid out in this document. Their contact details are made known to all staff and students and are also available on the website. For these details please see section C of this document (Child Protection).

#### A9) Policy Availability & Formats

Infinity English College safeguarding policy is available on the Infinity English College website, with a hard copy also available within each centre's office. The policy is also provided to each staff member as an appendix to the staff handbook.

#### B) Code of Conduct

##### B1) Overview

Infinity English College recognises the importance of creating a safe school culture where trust is built between staff and under 18s and both are protected from any behaviour which runs contrary to this culture. We achieve this through adherence to the policies laid out in this document and a genuine environment of care fostered by robust procedures and recruitment and training activities.



## B2) Setting standards

The key elements of our code of conduct are interaction, appearance, intoxicants, IT and social networks, accommodation and transport. We expect all adults working on behalf of Infinity English College to provide an excellent role model for all students in their care and to cultivate a respectful, safe and secure environment for staff and students.

## B3) Interaction

- Maintain professional physical and relationship boundaries, and act in a way appropriate to your Duty of Care
- Do not make suggestive or inappropriate remarks to or about any adult or U18. Inappropriate remarks include innuendo, swearing and discussing their or your own intimate relationships.
- Other than in exceptional circumstances do not communicate directly with U18s via email or text messages and only then with prior consent from the child's parent or guardian.
- Do not engage in behaviour that may be construed as 'grooming' an U18 for example giving money, presents or favours or talking or behaving in an inappropriate or unprofessional manner.
- Avoid putting yourself in a situation where you are on your own with an under 18 as far as possible.
- Conduct all interactions in a calm manner, and avoid shouting at U18s wherever this is possible unless there is a Health and Safety risk.
- Ensure physical contact within clear boundaries to avoid any allegations of inappropriate touching.
- If you are required to be in a one-to-one setting with an U18, consider how this can be managed effectively i.e. Leaving a door open, using a room that has a window in the door, positioning yourself within sight of the door and considering if the one-to-one setting is really necessary.
- Do not socialise with U18 students outside of school organised events.

## B4) Appropriate appearance

Adults should present an appearance which:

- promotes a positive and professional image
- is appropriate to their role
- is not likely to be viewed as offensive, revealing or sexually provocative
- does not distract, cause embarrassment or give rise to misunderstanding



*Infinity English College*

- is absent of any political or otherwise contentious slogans
- is not considered to be discriminatory

#### B5) Alcohol, drugs and smoking

- Do not consume, or allow U18s to consume any alcohol, drugs, cigarettes or intoxicating substances on school premises
- Do not provide alcohol, drugs, cigarettes or intoxicating substances to U18s
- Do not work under the influence of any intoxicants or drugs

#### B6) IT and social networks

- Do not share your personal social media details with any under 18s
- Do not take any images or videos of under 18s on your personal recording equipment
- Abide by the rules as found in our E-safety policy and procedures

#### B7) Accommodation

- Abide by the developed accommodation rules and guidelines
- Do not enter private areas without first gaining the student's permission, or in the case of needing to search property, without informing them first and doing so in their presence.

#### B8) Transport

- Abide by the specific guidelines of your centre
- All transport providers, whether staff or contractors, to have appropriate suitability checks

#### C) Child Protection

##### C1) Overview

We meet our child protection responsibilities by:

- Creating policies and procedures to comply with all regulatory requirements and guidelines
- Reviewing these policies and procedures annually
- Training all staff to an appropriate level of awareness and procedural competence with periodic review
- Making all policies and procedures available to all stakeholders



## C2) Nominated/designated person

Each Infinity English College school has two Designated Safeguarding Persons (DSPs) who work with the two Infinity English College Designated Safeguarding Leads (DSLs) to ensure a safe environment for our staff and students. Nominated DSPs and DSLs for Infinity English College year-round schools can be contacted by email or telephone.

All DSPs and DSLs are undertaking during 2016, or have undertaken safeguarding training:

Michelle Budden 0866022987	safeguarding@ibcollege.com
Thomas Horgan 0868157522	safeguarding@ibcollege.com
Ronan McGrath 01 6975661	safeguarding@ibcollege.com
Cassie Beecham 01 6975661	safeguarding@ibcollege.com

Summer Young Learner Centre DSPs are the Centre Manager and the Director of Studies In the unlikely event that these officers are unavailable, the school emergency phone is in use 24 hours a day, and the overall DSL will be contacted if necessary. Infinity English College DSL: Michelle Budden 0866022987

All allegations and concerns are reported by the DSP/DSL to the local child safeguarding authority. In all cases, these bodies will advise on next steps and procedures.

Dublin South Social Work Department – 01 6637300

## C3) How to respond to concerns

Scenarios which may cause an adult to have safeguarding concerns about an U18 are:

- An U18 tells an adult they are worried about another U18
- An U18 tells an adult of an issue that concerns themselves
- Anyone from outside Infinity English College reports a potential issue
- An adult witnesses behaviours of another adult which cause concern
- An adult sees in an U18 non-verbal indications of safeguarding concerns

More detailed information is found in Appendix 1:



Abuse and possible symptoms of abuse

In the event of any one of the above adults should:

- Follow the Guidelines outlined in C5 (see below)
- Report immediately to the DSP
- Explain your concerns and the reasons behind them
- The DSP will advise you on the next step.

C4) Recognising symptoms of abuse

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child regardless of their age, gender, race or ability. Abusers can be adults (male or female) and other young people, and are usually known to and trusted by the child and family.

There are four main types of child abuse: physical abuse, sexual abuse, emotional abuse and neglect.

The abuser may be a family member, or they may be someone the child encounters in a homestay situation including during classes, sports and leisure activities. An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child.

There is no textbook list of signs and signals. Being alert to abuse means:

- Thinking about what you are seeing and asking if it is acceptable practice
- Taking seriously what you are told
- Responding to the stresses behind requests for help or other presenting problems
- Being alert to signals or non-verbal communication or challenging behaviour, and aware that this could indicate unacceptable practice is being deliberately hidden or denied.
- Reporting any doubts to the Designated Safeguarding staff



### C5) How to respond to a child or young adult telling you about abuse

When someone talks to you about alleged abuse, remember you are not investigating the situation, just listening. If a child discloses abuse, remember that this may be the beginning of a legal process, as well as of a process of recovery for the child. Legal action against a perpetrator can be seriously damaged by any suggestion that the child's words have been influenced in any way by the person they told.

The following guidance should be followed as far as possible:

- Rather than directly questioning the child, just listen and be supportive.
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish.
- Do not promise to keep the information a secret. Rather you must inform the child that you will have to share this with the person responsible for their safety.
- Using the Concern Reporting Form (Appendix 2) write an account of the conversation immediately afterwards, as close to verbatim as possible. Make a note of what they actually said, using his or her own words and phrases.
- Describe the circumstance in which the disclosure came about.
- Where physical harm is being reported use a body map to indicate the location of cuts, bruises and abrasions, noting the colour of any bruising.
- Hand your record to the designated senior person, who will contact the local children's social care office where appropriate.

### C6) Keeping Records

- All serious concerns communicated to the DSP will be responded to on the same day
- All information regarding allegations of abuse or safeguarding concerns is recorded in writing by the DSP. A reference is made and dated in the student's record on the database.
- Access to the safeguarding file only available to the DSP and the DSL, and any official outside agency as appropriate.
- Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person's confidential personnel file, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate.





It will provide clarification in cases where future disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

- The DSP/DSL will take advice from the police and local authority social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What if any information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if and when it should arise.

C7) If a staff member is accused The DSP/DSL will then work with the appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child.

C8) If an under 18 student or adult student is accused the DSP/DSL will work with the appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the child.

C9) Raised awareness of specific areas

Training sessions of Infinity English College staff run by DSPs include raising awareness of Child Sexual Exploitation (example of resources):

<http://www.devonsafeguardingchildren.org/childrenyoung-people/sexual-exploitation/>).

Radicalisation (<https://www.youtube.com/watch?v=GF01JWdEk5M&feature=youtu.be> ).

This is done through discussions.

D) Training

D1) Responsibility and D2) How training is delivered.

The Designated Safeguarding Leads has overall responsibility for ensuring all adults have appropriate training and that this is updated annually. Additional sessions will be organised where deemed appropriate by the Designated Safeguarding Person in consultation with the DSL.



- All adults employed by Infinity English College must attend a training session run by local DSP and be fully aware of the Infinity English College Safeguarding Policy.
- Staff with access to U18s must also be in possession of a recent Garda Vetting check and sign the Infinity English College Self Declaration where this is pending.
- DSPs (at least two regular members of staff in each centre) are expected to complete Safeguarding training co-ordinated by MEI.
- The Infinity English College DSL must complete the MEI safeguarding training course.

## E) Safer Recruitment

### E1) Overview

Every adult who is recruited by the school (including homestay hosts, Group Leaders and outside agencies) undergoes a process of suitability checking for work with U18s as appropriate to their role and status both through documentation check and the interview and selection process.

### E2) Recruitment materials

All Job Descriptions and publicity for vacancies contain a statement that members of staff need to actively engage in looking after U18s safely, that they must follow the safeguarding policy and procedures, and provide appropriate suitability documents.

E3) Recruitment stages for all roles with substantial access to U18s will include questions exploring the applicant's awareness of safeguarding. For example: 'Safeguarding is key to everything we do. What do you understand by this term, and can you give examples of how your role can contribute?' References are always followed up for new staff members. Every reference request contains a specific question asking if there are any concerns about this person working with U18s. Suitability checks for working with U18s are always sought. (Garda Vetting)

E4) Applicants are informed that: - References will be followed up - All gaps in CVs must be explained satisfactorily - Proof of identity and (where applicable) qualifications will be required - 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.

E5) In the event that a Garda Vetting check has not been completed by the start date of a new employee, commencement of employment can take place only with restrictions. The decision will be made by the Line Manager, with the agreement of the DSP and rationale must be completed and signed by both parties. This judgment will be based on an assessment of the risk compared to the consequences of the decision. If the employee does commence work, they must have signed a self-declaration and their access to U18s must be supervised at all times.



A Self-Declaration must be signed by all staff prior to working with U18s while the Garda Vetting check is being processed.

E6) Applicants with a criminal record In the event that a disclosure shows that a potential employee or member of staff has a criminal record, the situation will be judged by the DSP who, in consultation with the DSL will take into account the seriousness and nature of the offence, the nature of appointment, the age of the offence and the frequency of the offence. The disclosure will be discussed with the prospective employee and any decisions made must be in writing and signed by the recruiter and the DSP.

E7) Applicants where a criminal check is not possible.

For an Irish individual returning to Ireland after working overseas, a garda vetting will be completed for their time in Ireland. Extra care will also be taken during the recruitment process to check documentation and references. For overseas nationals, Infinity English College will document what action was taken to attempt a criminal check and why this has not been possible, and additional care will be taken to check documentation, employment history, and references. The decision will be made by the DSP, in consultation with the DSL.

E8) Recruitment of Homestays

Homestay hosts will agree to Infinity English College's rules, policies and procedures. The Main Host, who will always be present overnight when hosting under 18s, will complete the Garda Vetting process and complete a Self Declaration Form. A self-declaration form will also be completed by all individuals aged 16+ living in the home.

E10) Prohibited Lists

All Infinity English College staff are checked against 'Prohibited Lists.'

E11) Single Central Record

A single central record is kept. This will include checks done for Infinity English College staff, Group Leaders, and Homestay Hosts.

F) Welfare / Implementing Safeguarding

F1) Use of Risk assessments

The School Health and Safety Officer is responsible for monitoring the use of risk assessments. Risk assessments are completed for the following: -

All school buildings: The initial assessment is made by a full inspection of any buildings to be used. This is updated for any changes to the building or its use, and staff are informed of its contents. All appropriate details are passed on to students during their induction.



- All accommodation provision:

1. Homestay: Hosts complete an initial risk assessment form which is reviewed with them at the time of their house inspection. It must be updated on subsequent inspections or earlier if there are any changes to the building. Hosts include details of this in the student welcome upon arrival.

2. Young Learner Residence: See all school buildings - Classroom based activities in-house: any specific risks are assessed on the day and action taken is noted on the register. - Excursions and off site activities: The initial assessment is made through a site visit in advance. Specific risks are then updated and signed off on the day.

F2) Supervision ratios for U18s

The minimum supervision ratio for U18 students on Young Learner programmes is one leader per 15 students, and this must be respected at all times. In some circumstances Group Leaders may be included in this ratio, but this will be assessed according to the activity, location and circumstances, and will be recorded in relevant risk assessments. If any U18s attend an adult programme, additional supervision needs are addressed in risk assessments. Curfew times are given to staff, students and accommodation providers and enforced throughout the student's stay.

F3) Missing students

Should students go missing during transfers, on excursions or activities, after curfew times or during class, staff actions are taken as follows; DSL is informed

F4) Welfare provision

We provide general care for our U18s through the following means:

- 2 Designated Safeguarding Persons in each centre and an overall Designated Safeguarding Leads
- 24 hour emergency phone number given to all students and agents
- Safeguarding policy read and understood by all staff
- Constant safeguarding review and training updates
- Safeguarding as a regular item on the agenda in every meeting to do with U18s
- Inductions and training for all staff including welfare scenarios
- Safe recruitment procedures



#### F5) Fire Safety In all centres

The supervisors for the U18 students are responsible for ensuring the safety of those in their care following the appropriate fire regulations and procedures.

#### F6) First Aid and Medical

Infinity English College requires to be fully informed of any medical condition/disability of a prospective student in order to be able to provide appropriate care for the student. In the case of such information not being provided Infinity English College may have to refuse acceptance of the student and request that the student is returned home at his/her own expense.

Infinity English College staff and host families cannot be responsible for administering or safeguarding medicines. Students who are prescribed medication are asked to bring a letter from the doctor or prescriber with the name of the medicine, the dosage and frequency of taking it and the name of the condition for which it has been prescribed, clearly described in English. This is in case the student needs medical attention whilst in our care. In the event that a student is taking regular medication, the student must be responsible for the care and administration of her/his own medication. Infinity English College requires written confirmation from the student or parent/legal guardian to that effect prior to accepting the student.

Infinity English College retains the right to make decisions regarding the appropriateness of students' participating in certain activities if there is a medical condition and possible risks attached. In the event of illness, U18s are accompanied to the local Doctor's surgery or the hospital. If there is a Group Leader with the student, they accompany them, with a member of staff on call in case of translation difficulties. If the student is unaccompanied, Infinity English College member of staff ensures appropriate supervision, acting in liaison with the attending medical professionals. A Complete First Aid Kit is available in the office in each centre, and basic first aid kits are taken on all off site activities or provided by sports facilities providers.

#### F7) U18 Behaviour and discipline

Infinity English College insists on appropriate behaviours in all its activities. Students agree to abide by the college regulations and policies on enrolment. On arrival the code of conduct forms part of the induction, along with accompanying sanctions. In dealing with inappropriate behaviour, Infinity English College staff follow the code of conduct at all times and apply the local sanctions consistently and proportionately. In the case of bullying, staff follow the procedures as detailed. Students are informed of bullying in all its forms and what to do in response in the pre-course information as well as their welcome pack. This information is also displayed on our website.



#### F8) Airport transfers

U18 students are required to send details of who to contact in an emergency and, where possible, a contact number for the student themselves in advance of travel. We also require full details of the planned journey including flight information. Students are given the 24 hour emergency number prior to travel.

For students arranging their own airport transfer (only 16+): Infinity English College requires signed confirmation from a parent/ guardian outlining the journey including taxi bookings/train tickets and permission to travel. All accommodation providers are required to contact the Infinity English College emergency number if students are more than 3 hours later than expected.

For Infinity English College transfers:

Details of the transfer booked and procedures on the day are sent in advance to all students. This includes advice on what to do if they cannot find the meet and greet person, and specific information as to how they should identify their contact person. In the case of group arrivals, full personal details of the Infinity English College representative are sent in advance to the airline and the parent/guardian. The Infinity English College representative always carries a sign with the Infinity English College logo and the full name of the student/group to be met.

#### F10) Radicalization and Extremism

In Infinity English College, all staff and students are expected to have an acceptance and tolerance of a range of views and beliefs. Infinity English College staff receive training and discussion where they are made aware of what could potentially be viewed as an extremist or radicalized view and the process of referral if encountered.