



The Essential English Centre

Safeguarding Policy

The Essential English Centre is committed to a practice which protects children from harm. A child is defined by the Children Act 1989 as a person under the age of 18. Staff (which for the purposes of this policy includes all staff and homestays) in this organisation accept and recognise our responsibilities to develop awareness of the issues which may cause children, young people and vulnerable adults harm. Our policy applies to all staff working in the school setting, and to all people who have unsupervised access to children in the home setting. In some instances, the guidelines set out will also be applicable to over 18s, and staff are requested to use their judgement in these cases.

This policy is based on the following principles:

- The welfare of the child is paramount;
- All children, whatever their age, culture, disability, gender, language, racial origin religious beliefs and/or sexual identity have the right to protection from abuse;
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately;
- All staff (paid/unpaid) have a responsibility to report concerns to the designated person with responsibility for child protection.
- Staff are not trained to deal with situations of abuse or to decide if abuse has occurred.

We will aim to safeguard children by:

- Adopting safeguarding guidelines through procedures and a code of conduct for staff.
- Sharing information about safeguarding, child protection and good practice with children, parents and guardians, agents, homestay hosts and group leaders.
- providing a safe environment for children and young people to learn
- identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe
- Sharing information about concerns with agencies who need to know, and involving parents and children appropriately.
- Carefully following the procedures for recruitment and selection of staff.
- Providing effective management for staff through support, supervision, observations and training.
- We are committed to reviewing our policy and good practice regularly.

The following documents, websites and agencies have been consulted in the drawing up of this policy:

- Working Together to Safeguard Children (HM Government, July 2018)
- Keeping Children Safe in Education (Department for Education, September 2018)
- What to do if you're worried a child is being abused - a guide for practitioners (September 2015)
- Manchester Safeguarding Children Board (MSCB)
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, October 2015)
- Preventing and Tackling Bullying (Department for Education - July 2017)
- Care Act 2014 (HM Government)
- Greater Manchester Police - Prevent

This policy sets out agreed guidelines relating to the following areas:

- Indicators of Abuse and Neglect for staff
- Recognising Signs of Abuse
- What a staff member should do if he/she suspects that abuse may have occurred
 - Advice for staff members on responding to a child making an allegation of abuse
- What to do after a child has talked to you about abuse
- How The Essential English Centre will respond to an allegation received
- How The Essential English Centre will respond to allegations against a member of staff
- Recruitment procedures (staff, homestays, group leaders)
- Staff code of conduct
- Supervision of under 18s during scheduled lessons and activities
- Unsupervised time outside of school hours, lessons, and scheduled activities
- First Aid, medication, accidents and emergencies

1. Indicators of Abuse and Neglect

Staff are requested to make themselves familiar with the definitions and indicators of abuse and neglect as outlined below. Familiarity with these assists with the maintenance of a cohesive team, who work together to protect under 18 students and recognise potential signs of abuse. These definitions are based on those from **Working Together to Safeguard Children** (HM Government, July 2018), **Keeping Children Safe in Education** (Department for Education, September 2018) and **Preventing and Tackling Bullying** (Department for Education - July 2017).

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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, although it may occur alone.

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 assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

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

Bullying and Harassment

Although there is no legal definition of bullying in the UK, it can have a devastating effect on individuals. It can be a barrier to their learning and have serious consequences for the mental health of the child. Bullying may not only affect an individual during childhood but can have a lasting effect on their lives well into adulthood.

The Department for Education states that when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern under the Children Act 1989. If staff feel that bullying may be taking place, they should report this immediately to the DSL.

2. Recognising Signs of Abuse

The following signs may or may not be indicators that abuse has taken or is taking place, but where staff notice such signs, the possibility must always be considered.

Physical signs of abuse

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or games
- Unexplained bruising, marks or injuries on any part of the body
- Bruises which reflect hand marks or fingertips (from slapping or pinching)
- Cigarette burns
- Bite marks
- Broken bones
- Scalds
- Injuries which have not received medical attention
- Neglect-under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care
- Repeated urinary infections or unexplained stomach pains

Changes in behaviour which can also indicate physical abuse:

- Fear of parents, carers or teachers being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example, wearing long sleeves in hot weather
- Depression
- Withdrawn behaviour
- Running away from home
- Inexplicable crying

Emotional signs of abuse

The physical signs of emotional abuse may include:

- A failure to thrive or grow particularly if a child puts on weight in other circumstances e.g. in hospital or away from their parents' care
- Sudden speech disorders

- Persistent tiredness
- Development delay, either in terms of physical or emotional progress

Changes in behaviour which can also indicate emotional abuse include:

- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Being unable to play
- Attention seeking behaviour
- Fear of making mistakes
- Self-harm
- Fear of parent, carer or teacher being approached regarding their behaviour

Sexual Abuse

The physical signs of sexual abuse may include:

- Pain or itching in the genital/anal area
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home, place of residence or school
- Sexual knowledge which is beyond their age or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as over-eating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they can not tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way with adults
- A change in company during social periods.

Neglect

The physical signs of neglect may include:

- Constant hunger, sometimes stealing food from other children
- Constantly dirty or smelly
- Loss of weight or being constantly underweight
- Inappropriate dress for the conditions

Changes in behaviour which can also indicate neglect include:

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised

Other areas which may indicate abuse or harm of a child, including the coercion of a child into illegal activity

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Peer on peer abuse

This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

So-called ‘honour-based’ violence

So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Extremism and radicalisation

The Essential English Centre welcomes students from all over the world, from many different ethnic backgrounds, religions and belief systems. We strive to create an inclusive, welcoming school, in which students can achieve their personal and professional goals. Everyone involved school life (including staff, homestay providers and students) are entitled to have a safe and secure environment to work, study and reside, without extremist views infiltrating this in any way.

Under 18 students may be particularly vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk forms part of our safeguarding approach. More information can be found in our Extremism and Radicalisation Policy, available on our website.

Sexual violence and sexual harassment between under 18s

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special education needs and disabilities (SEND) and LGBT children are at greater risk.

As a school, it is our policy not to tolerate or dismiss sexual violence or sexual harassment as “banter”, or “just having a laugh”. Challenging behaviours (potentially criminal in nature), will be taken seriously. Our **Abusive or Threatening Behaviour** policy should also be consulted by staff.

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (staff should consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

3. What a staff member should do if he/she suspects that abuse may have occurred

He/she must report the concerns immediately to the DSL: **Bairbre Walsh**

If he/she feels that the under 18 student is in immediate danger, they must report their concern on the same day. They must not go home and wait until the following day. In this circumstance, if Bairbre Walsh is not immediately available, the concern should be reported to Jo Wilde. If Jo Wilde is not available, they should report it to Rebecca Hatton, or Gaelle Petit, who will immediately make sure that the DSL receives the information.

4. Advice for staff members on responding to a child making an allegation of abuse

In the event that a child chooses to disclose to a staff member an allegation of abuse, the member of staff is advised to:

- Where possible, request the presence of the DSL
- Set up the room appropriately, with the student sitting nearest the door. Sit at a 90 degree angle to the student.
- Make regular eye contact and use positive body language
- Stay calm, listen carefully to what is being said
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others. Do NOT promise to keep secrets
- Allow the child to continue at his/her own pace
- Ask questions for clarification only, and at all time avoid asking questions that suggest a particular answer
- Reassure the child that they have done the right thing in telling you
- Tell them what you will do next and with whom the information will be shared

Helpful statements to make

- I believe you (or showing acceptance of what the child says)
- Thank you for telling me
- It's not your fault
- I will help you
- You have done the right thing talking to someone

Do not say

- Why didn't you tell anyone before?
- I can't believe it!
- Are you sure that this is true?
- Never make false promises

5. What to do after a child has talked to you about abuse

1. Make notes as soon as possible (ideally within 1 hour of being told). You should write down exactly what the child has said and what you said in reply and what was happening immediately before being told (i.e. the activity being delivered). You should record the dates, times, when you made the record, and sign the document. All hand written notes should be kept securely.

2. You should report your discussion with the DSL as soon as possible. If the DSL is implicated you need to report to Jo Wilde. If both are implicated, report to Manchester Children's Services. Agency contact details can be found at the end of this document.

3. You should under no circumstances discuss your suspicions or allegations with anyone other than those nominated above.

Further government information and guidance for practitioners is available here 'What to do if you're worried a child is being abused' (HM Government, March 2015):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

6. How The Essential English Centre will respond to an allegation received

The DSL will assess the report, and make a decision as to whether the matter should be taken further. This will be usually be done where it is believed that there is a risk of significant harm to the student or harm to others; that a criminal act has taken place or that the student is at immediate risk or danger.

The role of the DSL is to:

- obtain information from staff, volunteers, children or parents and carers who have child protection concerns and to record this information.
- assess the information quickly and carefully and ask for further information as appropriate.
- where necessary, consult with Manchester Children's Services or MSCB clarify any doubts or worries.
- where necessary, make a referral to Manchester Children's Services, MSCB or the police without delay.

The designated person has been nominated by The Essential English Centre to refer allegations or suspicions of neglect or abuse to the statutory authorities.

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

Allegations of physical injury or neglect

If a child has a symptom of physical injury or neglect the DSL will:

1. Contact MSCB for advice in cases of deliberate injury or concerns about the safety of the child. The parents should not be informed by the organisation in these circumstances.
2. Where emergency medical attention is necessary it will be sought immediately. The DSL will inform the doctor of any suspicions of abuse.
3. In other circumstances speak with the parent/carer/guardian and suggest that medical help/attention is sought for the child. The doctor will then initiate further action if necessary.
4. If appropriate the parent/carer will be encouraged to seek help from Manchester Children's Services. If the parent/care/guardian fails to act, the DSL should in case of real concern contact MSCB or Manchester Children's Services for advice.
5. Where the DL is unsure whether to refer a case to Social Services, advice from the MSCB will be sought.

Allegations of sexual abuse

In the event of allegations or suspicions of sexual abuse the designated person will:

1. Contact Manchester Children's Services directly. The DSL will not speak to the parent (or anyone else).
2. Under no circumstances is the DSL to attempt to carry out any investigation into the allegation or suspicions of sexual abuse. The role of the DSL is to collect and clarify the precise details of the allegation or suspicion and to provide this information to Manchester Children's Services, whose task it is to investigate the matter under section 47 of the Children Act.
3. Whilst allegations or suspicions of sexual abuse should normally be reported to the DSL, their absence should not delay referral to Social Services.

It is the right of any individual to make direct referrals to the child protection agencies. If for any reason a staff member believes that the DSL has not responded appropriately to their concerns, they should contact the relevant child protection agencies directly:

Manchester Safeguarding Children Board

Tel: 0161 234 3330

Email: manchestersafeguardingboards@manchester.gov.uk

Manchester Children's Services

Tel: 0161 234 5001

Email: mcsreply@manchester.gov.uk

7. How The Essential English Centre will respond to allegations against a member of staff

We assure all staff that we will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child. Where there is a complaint against a member of staff, made by either a colleague or a student, there may be three types of investigation:

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

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

Action if there are concerns:

Concerns about poor practice

- If, following consideration, the allegation is clearly about poor practice; this will be dealt with as a misconduct issue.
- If the allegation is about poor practice by the DSL, or if the matter has been handled inadequately and concerns remain, it should be reported to Jo Wilde, who will decide how to deal with the allegation and whether or not the organisation should initiate disciplinary proceedings.

Concerns about suspected abuse

- Any suspicion that a child has been abused by either a member of staff should be reported to the DSL, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.
- The DSL will refer the allegation to Manchester Children's Services, who may involve the police, or go directly to the police if necessary.
- The parents or carers of the child will be contacted as soon as possible following advice from Manchester Children's Services.
- If the DSL is the subject of the suspicion/allegation, the report must be made to Jo Wilde, who will refer the allegation to Manchester Children's Services.

Internal Enquiries and Suspension

- The DSL will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries.
- Irrespective of the findings (where applicable) of Manchester Children's Services or police inquiries, the organisation will assess all individual cases to decide whether a member of staff can be reinstated and how this can be sensitively handled. This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by the police. In such cases, the organisation must reach a decision based upon the available information which could suggest that on a balance of probability, it is more likely than not that the allegation is true. The welfare of the child should remain of paramount importance throughout the process.

Supervisory arrangements for the management of The Essential English Centre's activities and services

We will aim to protect children from abuse and our team members from false allegations by adopting the following guidelines:

- We will keep a register of all under 18s attending our activities (inside and outside school)
- We will keep a register of all team members
- We will keep a record of all sessions including monitoring and evaluation records.
- Our team members will record any unusual events on the accident/incident form.
- Written consent from a parent or guardian will be obtained for every child attending our classes, taking part in activities and residing in our allocated accommodation during the booking procedure.
- Where possible our team members should not be alone with a child, although we recognise that there may be times when this may be necessary or helpful
- Team members on occasion, may be required to escort children of the same sex to the toilet but are not expected to be involved with toileting, unless the child has a special need that has been brought to our attention by the parent/guardian.
- We recognise that physical touch between adults and children can be healthy and acceptable in public places. However, our team members will be discouraged from this in circumstances where an adult or child are left alone. Further information is available in the staff Code of Conduct section.
- All team members should treat all children with dignity and respect in attitude, language and actions.

8. Recruitment procedures

Recruitment of staff

Our process for recruitment of staff (for the purposes of this section of the policy, ‘staff’ refers to teachers, non-academic staff and activity staff) is as follows:

- The EEC identifies the tasks and responsibilities involved in the particular role required, as well as the type of person most suitable for the job.
- The EEC draws up the selection criteria and puts together a list of essential and desirable qualifications, skills and experience.
- Upon advertisement of the role, all applicants should apply in writing and their application must include their personal details, previous and current work/volunteering experience.
- Each application will be measured against the selection criteria for the role in question. Candidates who are selected for an interview will be sent a copy of the Safeguarding policy, a pre-interview form and a Criminal Convictions and Suitability to Work with Children form, which they must complete and return to us. It is illegal for someone to complete a Criminal Convictions and Suitability to Work with Children form and *not* declare any convictions.
- On the day of interview, the candidate must present valid photo ID, proof of qualifications, proof of eligibility to work in the UK and (if applicable) any previous DBS certificate or police check from outside the UK (dated within the last 3 years) from another employer or organisation.
- At least two members of staff from The EEC will be on the interview panel. The interview will always contain a certain number of safeguarding-related questions in order to assess the candidates’ awareness of and experience in this area.
- The successful candidate will be offered the role subject to the following:
 - We will request two written references from people who are not family members or friends and who have knowledge of the applicant’s experience of working with children. We will ask the referee to also comment on their suitability for working with children.
 - A DBS check which will be applied for by The EEC. The only exceptions to us not applying for a DBS are:
 - if the candidate is on the DBS/PVG Update Service, and we see the original certificate and check online that there is ‘no change’ to their status. If there is a change, a new check will be applied for.
 - If the applicant has a DBS less than three months old for a similar role in the children’s workforce. In this case, a Barred List check will still be conducted by The EEC.
- If the candidate is required to start work before the criminal record check has been received by us, and if the exceptions above do not apply, particular measures should be put in place until the DBS has been returned:
 - The applicant should not be placed in a 1-1 class of any kind (under or over 18)
 - They should be placed in classes of larger student numbers, close to the DoS office, with the door open.

- No unsupervised activity of the applicant should take place, and a risk assessment should be drawn up and placed in the applicant's file, detailing how

If the DBS is returned with cautions or convictions, a discussion with Jo Wilde must take place before the applicant can be offered further work. Such instances must be examined on a case-by-case basis.

- If the applicant has worked in the primary or secondary education sector (state or private), The Essential English Centre must also do a check of the Prohibited List. This will determine whether the individual has ever been 'struck off' and deemed unsuitable to work with under 18s, and will not necessarily appear on a DBS check.

Recruitment of homestay hosts

Homestay hosts and their homes are inspected in detail before they are placed on our register. The following measures are followed in regard to the placement of under 18s:

- all members of the household over the age of 18 are subject to an enhanced DBS check by The EEC, except in the following circumstances:
 - if the host or member of household is on the DBS/PVG Update Service, and we see the original certificate and check online that there is 'no change' to their status. If there is a change, a new check will be applied for.
 - if the host or member of household is not on the update service, but has a DBS check that is less than three months old and is for a similar role in the children's workforce. In this case, a check with the Barred List is still required (For England and Wales only).
- Students will not be placed with a host until the DBS check has been received by The EEC
- If the host or other member of the household has worked in the primary or secondary education sector (state or private), The Essential English Centre will also do a check of the Prohibited List.
- Two references will also be requested, including a question about the host's suitability to work with or host under 18s.

Acceptance of Group Leaders to accompany groups

Group leaders accompanying groups must have a police certificate from their country. If the group is via an agent, the agent will confirm to The EEC that the leader or leaders have had suitable police checks conducted. If groups come directly to The EEC, the leaders must present a police certificate to the school either in advance, or upon arrival.

9. Staff Code of Conduct

Standards of behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.

Dress and appearance

Not all staff of The Essential English Centre have the same dress code, as roles differ, however they should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

Gifts, rewards, favouritism and exclusion

From time to time, and depending upon your work role, staff may be offered small gifts from suppliers/ students/agents that you have dealings with. In such circumstances common sense will apply and there are some important points to keep in mind to avoid any circumstance of misconduct. Employees will, in no circumstances, accept undue hospitality from a client (for example, students, group leaders, agents, students' parents) or supplier. This includes money, entertainment, the cost of recreation, holidays etc. as it could, rightly or wrongly, be construed as bribery.

Furthermore, this could lead to the giver to expect preferential treatment. There are occasions when students, agents and group leaders may wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

Similarly, it is inadvisable to give such personal gifts to students of any age but especially under 18s. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.

Staff should also exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when students are excluded from an activity.

Infatuations and 'crushes'

All staff need to recognise that it is not uncommon for younger students to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.

Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that an under 18 student has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the DSL. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

Social contact outside of school hours (on-site staff only)

Staff should not have contact with under 18 students under any circumstances, unless the contact forms part of an activity or event that has been organised by the school.

Communication with under 18s (including the use of technology)

Communication with under 18 students both in the 'real' world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat-rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web-cams and other hand held devices. (Given the ever changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

Staff must not request or respond to any personal information from children other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'.

Staff are also encouraged to take steps to privatise their personal social media accounts, so that it is less likely that their personal information or photographs can be accessed.

Staff must not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web based identities. If children locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to the DSL. The child should be firmly and politely informed that this is not acceptable.

Physical contact

It is crucial that physical contact between staff and under 18s take place only in ways appropriate to their professional role. Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, gender, ethnicity and background. Staff should therefore, use their professional judgement at all times. Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the DSL and recorded.

Sexual conduct

Any sexual behaviour by a member of staff with or towards a pupil is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a pupil under 18 years of age and sexual activity with a child could be a matter for criminal and/or disciplinary procedures.

Power and positions of trust and authority

As a result of their knowledge, position and/or the authority invested in their role, all those working with children in a school or education setting are in a position of trust in relation to the under 18 students with whom they have contact.

The relationship between a person working with a child/ren is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.

Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report and record any such incident.

Confidentiality

Staff may have access to confidential information about under 18 students which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the student's identity does not need to be disclosed the information should be used anonymously.

There are some circumstances in which a member of staff may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only by following The Essential English Centre's reporting process, as outlined in this policy.

Photography, videos and other images

Under no circumstances should staff use their personal equipment to take images of under 18 students of The Essential English Centre in any setting.

Exposure to inappropriate images

Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images.

Curriculum

16 and 17 year old students study in classes with those aged 18 or above. While the curriculum is designed not to include matters that are sexually explicit or overly politically sensitive, care should be taken by teaching and academic staff to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan.

For classes of students under 16, in circumstances in which conversation leads to unplanned discussion about subject matter of a sexually explicit, political or otherwise sensitive nature, teaching staff must display careful judgement. Guidance can be sought from the DSL on such an occasion.

Whistleblowing (making a disclosure in the public interest)

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The Essential English Centre has a whistleblowing policy which staff are encouraged to be familiar with.

10. Supervision of under 18s

This section categorises under 18s into two sections: 16 and 17 year old individuals on adult courses, and under 16s on group leader-accompanied group courses.

Supervision during school hours, lessons, and scheduled activities

16 and 17 year olds on adult courses

- All under 18 students have black lanyards (over 18s have purple lanyards) so that they can be easily identified to staff.
- Under 18 students are highlighted on registers for teachers' awareness.
- An attendance check is done promptly every morning by the Director of Studies. Any under 18 absences are reported to the Student Services Officer (SSO), who will contact any absent students by 9.30am. If the student does not answer their phone, the SSO will call the host or parent/guardian. If they do not respond, the SSO will contact the emergency contact, if different to parent/guardian details. In the event that the SSO cannot reach any of these contacts, they will inform the DSL. The DSL will then decide on the next course of action, which may include travelling to the address of the student to check on their welfare. If the DSL travels to the student's address, and the student cannot be located, and if the parent, guardian, homestay host or emergency contact can still not be reached, the police will be called.
- Where relevant, attendance checks are also done for afternoon classes, and the same escalation process is applied as for morning checks.
- Fire safety procedures are explained on the first day of school. Homestay hosts are requested to make student aware of fire escape routes.
- Any activities or excursions as organised by The EEC have a thorough risk assessment for each trip. The accompanying staff member(s) has a list of all students attending, with under 18 students clearly identified and the school emergency phone number. In rare occurrences of having more than 10 under 18 students on an organised activity, a specific staff member will be allocated. The ratio of staff supervision: number of under 18 students is 1:10.
- For excursions that are sub-contracted at weekends, the company in question (Smile Adventures) has a safeguarding policy in place that is known to The EEC, and DBS-checked (enhanced) guides. So that we know the student has arrived for the trip, we ask the student and host to communicate with each other to confirm they have arrived. If the host does not have confirmation of arrival, they must call the school emergency phone. Should a student not return to the coach when ready to depart in the evening, Smile Adventures will call the student in the first instance. If they cannot contact them, they will call the EEC emergency phone, and will begin a physical search. Once the EEC has been notified, the situation will be escalated as necessary. If we cannot make contact with the student, the emergency contact will be notified along with the local police.
- All on-site staff have a minimum Level 1 Safeguarding training and receive training in industry-specific issues that may arise.

Under 16s on group leader-accompanied group courses

- All under 18 students have black lanyards (over 18s have purple lanyards) so that they can be easily identified to staff.
- Group leaders to identify a meeting point for their students every morning to take them to school. Group leader(s) will work with the Director of Studies and SSO to identify any absences within the first 15 minutes of the class start time. Group leaders are responsible

for contacting their students to know their whereabouts, however the SSO will assist where necessary in contacting students. If students cannot be contacted using the routes above for 16/17 year olds, the situation will be escalated immediately, by the group leader travelling to the student's address by the quickest means of transport. Escalation routes may involve contacting the local police.

- Class start times for under 16s are staggered by either 15 or 30 minutes, and classrooms furthest away from adult classrooms will be used.
- Under 16 groups are always supervised during break times by group leaders and EEC staff, and should not leave school premises without the permission of their group leader(s).
- Under 16 groups cannot normally book lesson-only trips with The EEC. Where excursions will form part of the trip, these must be organised through the school. An experienced, DBS-checked EEC staff member or members will accompany all trips, at a ratio of 1 leader to 10 students. Only in certain circumstances can group leaders undertake trips without our staff. In this circumstance, a risk assessment must be drawn up and agreed between EEC staff and the group leaders.

In certain circumstances, the EEC will consider groups who wish to have lessons only. These are considered on a case-by-case basis and are appropriately risk assessed. Factors considered are: duration of programme, experience and ratio of group leaders:students, and familiarity of group leaders with the area. In such cases, all trips are to be agreed with the EEC group coordinator, and risk assessments agreed with all parties in advance.

- Where there are a range of ages in one group, 16+ students will normally enter into our scheduled adult lessons. Under 16s will form closed groups. If the group requests closed lessons only, efforts will be made to divide the students into 16+ and under 16. Where the group is small and requests to study together, a risk assessment will be drawn up to ensure the safeguarding of all students in the group, and parental consent will be requested from all parents, stating that they agree to all students studying together.

Unsupervised time outside of school hours, lessons, and scheduled activities

16 and 17 year olds on adult courses

1. During first day induction, students are made aware of: laws on smoking, drinking and illegal drugs; curfew time (10pm); personal safety awareness; to always have a charged mobile phone; to tell their host where they are and with whom they are spending time when not with homestay; to tell their host if they will not be home for dinner and why. If their host is expecting them for dinner and they do not return home, the host will call the student to check on their whereabouts - if they cannot contact them, the school will be notified, even if it is before curfew time. They will be made aware of the escalation process if we cannot locate them and they have not returned home after curfew time. Students sign a learner agreement outlining these rules which makes them aware that repeated rule violations may lead to removal from the course and arrangements made for them to return home.
2. A check is done on the first day for all students that they understand their bus or public transport route and how to get to and from their homestay
3. On their first day, all students receive a card to place in their wallet with homestay phone number, address and email address, along with the school office number, emergency phone number, and emergency services.
4. Where under 18s have booked lessons only, the parent, guardian or homestay with whom the under 18 is staying must come to school with valid photo ID, and sign an agreement stating that they have responsibility for that student outside of supervised school times. We must have the address at which the student will be staying, and written parental confirmation that they agree for their child to stay with the nominated person at that address. The DSL will be made aware of any such cases, and where they may be suspicious, this will be followed up by further checks. We reserve the right to cancel or refuse any bookings in which we are not confident of the safety of the student outside of supervised times.

5. The Director of Studies who also has a welfare role, will do regular verbal welfare checks on under 18 students, normally in an informal style to keep the student at ease.
6. The Accommodation Officer may call homestay hosts to check that their students are keeping to the curfew time.
7. If the school has been contacted by a host that their student has not returned home, the school will: a) try to contact the student b) if not successful, the school will contact the emergency contact of the student c) if not successful, the police will be notified.
8. Airport transfers must be booked via the school, or we must be satisfied that a responsible guardian will collect them. For students arriving in airports other than Manchester, these will be assessed on a case by case basis in terms of suitability and safety precautions necessary.

Under 16s on group leader-accompanied group courses

1. Numbers 1, 2 and 3 above apply, except that the curfew time for under 16s is 9.00pm (21.00).
2. All under 16s must return home for dinner to the host every night. The only exceptions to this are for agreed organised evening meals with group leader(s), which hosts will be made aware of in advance. If their host is expecting them for dinner and they do not return home, the host will call the group leader to check on their whereabouts - if the group leader is not aware of the student's whereabouts, the host is instructed to notify the school, even if it is before curfew time.
3. Particular care taken in choosing the host and location. They will be taken to the bus stop on the first day, and group leaders meet students at designated point each morning. Students must tell their group leader when they have returned home each day.
4. If the school has been contacted by a host that their student has not returned home by curfew time, the school will a) try to contact the group leader b) emergency contact and if no contact can be made, the police will be notified.

Homestay Allocations for Under 18s

16 and 17 year olds

- Allocations are on an individual room basis only, unless otherwise requested by the parents/guardians of the student.
- Alongside normal recruitment procedures, Under 18 hosts are specifically selected for their suitability in character to hosting younger students
- Recruitment procedures including DBS checking is followed in accordance with our process (section 8 of this policy)
- Under 18 students will not normally be placed with students of the opposite sex
- 16 and 17 year olds may on occasion be placed with over 18s. This is only done on a risk assessed basis, and factors including the following are considered:
 - The experience of the host
 - The other adults in the house
 - The layout of the bedrooms
 - Bathroom arrangements
 - Whether the host has children of their own in the home
 - Are the students culturally similar
 - Is there a big difference in age between the students

Under 16s on group leader-accompanied courses

Along with the above procedures for 16 and 17 years olds:

- Under 16s will not be placed in homestays with over 18s
- Youngest members of the group will be placed near in location to the group leader(s)

- Where possible, students will be grouped close to each other so travel to and from school can be done together
- Homestay hosts will provide full-board, unless specifically requested by group organisers. In this case, parental consent for a non-full board basis will be requested.

11. First Aid, medication, accidents and emergencies

The nominated First Aiders at The Essential English Centre are:

Gaëlle Petit
Rebecca Hatton

No other members of staff should administer first aid or medication to an under 18 student without first consulting the above-named First Aiders. Homestay hosts should consult the school before administering medicines of any kind to under 18s.

For accidents and medical emergencies involving under 18s, school staff will follow UK health guidelines and UK medical professional advice including but not limited to: calling the NHS Helpline, taking the student to a walk-in centre, taking the student to the doctor, or taking the student to the nearest hospital. School staff will also immediately contact the student's family or group leader.

12. Reporting allegations or suspicions of abuse

If you have any concerns about a child being abused you should inform the designated person detailed below.

Organisation

The Essential English Centre Ltd

Name

Bairbre Walsh

Address

Gainsborough House

109 Portland Street

Manchester

M1 6DN

England

Tel: 0044 (0) 161 236 2364

Email: bairbre@essentialenglishcentre.com

13. Important contacts outside the organisation

Manchester Safeguarding Children Board

Tel: 0161 234 3330

Email: manchestersafeguardingboards@manchester.gov.uk

Manchester Children's Services

Tel: 0161 234 5001

Email: mcsreply@manchester.gov.uk

NSPCC Child Protection Helpline 0808 800 5000

Samiya Butt

Manchester Prevent Coordinator

Telephone: 0161 856 9305

E-mail: s.butt@manchester.gov.uk

Counter Terrorism Policing North West have a number of divisional contacts, representing the City of Manchester, Stockport and Trafford:

DC Michael Holland - 18092 Mobile: 07469 037083 Work: 0161 8564251 Email: Michael.Holland@gmp.police.uk	DC Richard Gaffney - 11019 Mobile: 07392 136677 Work: 0161 8563947 Email: Richard.Gaffney@gmp.police.uk
DC Kim Parkinson - 12585 Mobile: 07900 709270 Work: 0161 8562369 Email: Kim.Parkinson@gmp.police.uk	DC Jason Robinson - 12725 Mobile: 07468 717971 Work: 0161 8565297 Email: Jason.Robinson@gmp.police.uk