

SAFEGUARDING AND CHILD PROTECTION POLICY

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Publication:	At least one copy will be available at each centre for reference. This policy is also available on our website and staff portal.

1. Introduction

Ardmore Language Schools provide residential and/or home stay language and activity courses for groups of students or individuals aged 9-17.

The following policy outlines Ardmore Language Schools' welfare procedures and approach to student safeguarding. It relates to all students in our care regardless of age, gender, ethnicity, nationality, disability or religion and is relevant to all adults working with or alongside Ardmore Language Schools. All Ardmore members of staff are required to read and implement our Safeguarding Policy without exception.

2. Application of Policy

The policy applies to all permanent, seasonal, contracted, agency or internship staff employed by Ardmore Language Schools. It is equally applicable to those providing homestay accommodation for our students, visitors, contractors and group leaders.

3. Statutory Guidance

Ardmore Language Schools acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring practice reflects statutory responsibilities, government guidance and complies with best practice and British Council requirements. The policy gives due regard to statutory guidance and complies with the following legislation:

- **Section 17 & 47 Children Act 1989** (please see <http://www.legislation.gov.uk/ukpga/1989/41/contents>)
- **Working Together to Safeguard Children (2013)** (please see <http://www.workingtogetheronline.co.uk/documents/Working%20TogetherFINAL.pdf>)
- **Duties of Social Care, Police and NSPCC**
- **UN Convention on the Rights of the Child 1989** (please see http://www.unicef.org.uk/Documents/Publication-pdfs/UNCRC_PRESS200910web.pdf)
- **Section 11 Children Act 2004** (please see <http://www.legislation.gov.uk/ukpga/2004/31/contents>)

4. Policy Statement

All children have the right to protection from any kind of abuse and to experience a safe and friendly environment whilst in our care; this is of paramount importance to us. Ardmore is committed to providing, as far as reasonably practicable, a safe and secure environment for all of our visiting students.

4.1 All children have the right...

- To be safe; no one should take this right away from them.
- To protect their own bodies; their body belongs to them.
- To say no; it is alright to say no to someone if that person tries to do something to them that they feel is wrong.
- To get help against bullies; tell children to enlist the help of friends, to say no without fighting and to tell an adult.
- To tell; you must assure children that no matter what happens you will not be angry with them and that you want them to tell you of any incident that frightens or confuses them or makes them unhappy.
- To be believed; when children are told to go to an adult for help they need to know they will be believed and supported. This is especially true in cases of sexual abuse; which children rarely lie about.
- Not to keep secrets; teach children that some secrets should never be kept, even if they promised not to tell.

4.2 Ardmore endeavour to safeguard both our students and staff by:

- Promoting and prioritising the safety and wellbeing of children.
- Adopting child protection guidelines through effective procedures and a staff code of conduct.
- Ensuring appropriate action is taken in the event of incidents/concerns of abuse and that support is provided to all parties.
- Following carefully the procedures for safer recruitment and selection of staff.
- Providing effective management for the staff through supervision, support and training.
- Sharing information about child protection and good practice with children, parents and carers, staff and any relevant third parties.
- Sharing information about concerns with the agencies who need to know, and involving parents and children appropriately.
- Reviewing our policy and best practice at regular intervals.

5. Relevant Terminology:

Child – The legal definition of a child in the UK is a person under the age of 18. As an organisation we understand that under 18s from overseas may not have the same knowledge of life and local customs as students from the UK, hence more vulnerable to harm. We are committed to meeting and exceeding our duty of care where possible towards all students and safeguarding them from harm.

Child protection – refers to the protection of children from direct, specified, harmful behaviour and how we act upon reports of abuse or neglect using a referral process to other agencies.

Safeguarding – is not the same as child protection, although they are highly intertwined. Safeguarding is the process of protecting children from abuse and neglect, preventing impairment of their health and development and ensuring that they are growing up in circumstances consistent with the provision of safe and effective care.

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 (omission). Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Type of Abuse	Possible Indicators
Neglect	
The persistent failure to meet a child's basic physical and psychological needs which is likely to result in serious impairments to their health and development. This may involve a parent or carer failing to provide food, shelter, clothing or a failure to protect from physical harm or danger or allow access to medical treatment.	Obvious signs of lack of care including: <ul style="list-style-type: none"> - Problems with personal hygiene - Constant hunger - Inadequate clothing - Poor relationship with peers - Emaciation - Untreated medical problems - Repetitive discipline issues, lateness, compulsive stealing
Physical Abuse	
Actual or likely physical injury or failure to prevent physical injury or suffering to a child including 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.	<ul style="list-style-type: none"> - Physical signs do not tally with the given account of the occurrence - Conflicting /unrealistic explanations of the cause - Repeated injuries - Bruising in usual places - Symmetry in injuries - Delay in reporting or seeking medical advice. - Unexpected covering up (e.g. long sleeves when previously short –sleeves were worn) - Reluctance to take part in activities requiring exposing body, e.g. swimming or some sports
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 or non-penetrative acts. 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.	<ul style="list-style-type: none"> - Sudden changes in behaviour - Displays of affection which are sexual and age inappropriate - Tendency to cling or need constant reassurance - Tendency to cry easily - Regression to younger behaviour (thumb sucking, acting like a baby etc) - Unexplained gifts or money - Wetting/soiling day or night

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent 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 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.

- Rejection
- Low self-esteem
- Being withdrawn/ isolation
- Rocking, hair twisting, thumb sucking
- Child being blamed for actions of adults
- Child being used as a carer for younger siblings
- Affection and basic emotional care giving/warmth persistently absent or withheld
- Being angry and aggressive
- Swinging between withdrawn and angry/aggressive in short space of time
- Self-harm (in extreme cases)

It is important for all staff to have **raised awareness** of more **specific areas** relating to child abuse:

Female Genital Mutilation:

Also known as Female Genital Cutting/circumcision, includes procedures that intentionally alter or injure the female genitals for non-medical reasons. This is considered to be a violation of human rights and is illegal in the UK.

Possible indicators FGM about to happen:

- Discussion of a special occasion or ceremony to 'become a woman' or get ready for marriage
- Knowledge of a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt

Possible indicators that FGM has already happened:

- Bladder/menstrual problems
- Difficulty in sitting still/ looking uncomfortable
- Appear withdrawn, anxious or depressed
- Secretive behaviour
- Mentioning someone did something to them that they cannot talk about/ ask for help, but may not be explicit about the problem due to embarrassment or fear
- Reluctance to take part in any physical activity

Child Sexual Exploitation:

Children in exploitative situations, manipulated or forced into taking part in a sexual act. This could be part of a seemingly consensual relationship or in return for something such as gifts, money or affection.

- Appearing with unexplained gifts or new possessions (particularly mobile phones)
- Suffering from sexually transmitted diseases
- Mood swings or changes in emotional wellbeing
- Drug and alcohol misuse
- Displaying inappropriate sexualised behaviour

6. Staff Roles and Responsibilities



(See **Annex A** for contact details for our Safeguarding Team)

6.1 Designated Safeguarding Lead (David Bridges, Operations Manager)

- Safeguarding Level 3 qualified.
- The Designated Safeguarding Lead has responsibility for the safeguarding and welfare of students, supported by all members of summer school staff.
- Providing advice and support to all staff on issues relating to child protection.
- Reporting children at risk to the Local Authority Designated Officer (LADO), Local Safeguarding Children Board (LSCB) and the police.
- Maintaining a complete and up-to-date record of all child protection-related concerns, issues, incidents, reports, referrals and complaints
- Ensure safeguarding standards are communicated to all staff and training is sufficient and appropriate.

6.2 Deputy Designated Safeguarding Leads (Martin Corr, Natalia Ventrella)

- Also Safeguarding Level 3 qualified.
- Responsible for supporting the Designated Safeguarding Lead in their daily duties and overall responsibilities.
- Ensuring that all staff training required and completed in relation to child protection is recorded and audited regularly to identify training needs and any recording gaps.
- Ensuring that all students have sufficient and appropriate means to report concerns, issues and incidents.
- Assume DSL duties and responsibilities in their absence, or handle any complaints or allegations against the nominated lead if appropriate.

6.3 Designated Safeguarding Person on Centre (Centre Director)

- Safeguarding Level 2 qualified.
- Overall accountability for the safeguarding and welfare of students lies with the Centre Director for each centre.
- Point of contact for all centre staff for welfare or safeguarding concern.
- Ensuring that all students receive a full induction and timely updates on matters relating to safeguarding and welfare.
- As line managers to individual centres, the DSP on Centre is accountable for ensuring Centre Managers, Welfare Officers and all members of staff implement the Safeguarding Policy.
- Responsible for the day to day functioning of the team.

6.4 Deputy Safeguarding Persons on Centre (HPC & Centre Management Team)

- Also Safeguarding Level 2 qualified.
- To assist the Designated Safeguarding Person on Centre with any safeguarding issue and support them in the training and implementation of the safeguarding policy amongst all staff, students, group leaders and visitors.
- The HPC will act as the first DSP on Centre in their absence, or if the concerns/accusations are against the DSP.

6.5 Safeguarding Support Team (Welfare Team)

- Safeguarding Level 1 trained (internal online training).
- Our Welfare Leaders are go-to people for students with everyday queries, needs or concerns relating to their welfare and are identifiable in white uniform.
- Welfare Leaders closely monitor and document student welfare and maintain accurate records of the issues of day to day issues and outcomes, reporting any issues to management that they feel are more serious.

6.6 All Staff members

- Level 1 Safeguarding (internal online training).
- All staff share a responsibility to protect students from harm, which includes being vigilant in identifying signs and symptoms of physical and psychological abuse and neglect and reporting any concerns in accordance with our policy.

7 Staff Training

All new and returning Ardmore Staff undergo training to ensure they are sufficiently prepared for their role and responsibilities, amongst which Safeguarding plays a key element.

7.1 Handbooks

All employees will be required to read Ardmore's Safeguarding policy as part of their induction process. The importance of safeguarding children is also included in each role specific handbook.

7.2 Online Training

All employees will receive our in-house, Online Training prior to their arrival. Online Training includes a comprehensive description of our policies, procedures, practices and provisions in relation to the safeguarding of our students. Staff must bring their Certificate of Successful Completion with them on their arrival at the centre, prior to commencing their duties.

7.3 Centre Arrival

The centre arrival induction is designed to reinforce the points above (and other training elements explicit in the online training, policies and handbooks) and provide centre specific information. All staff are required to sign their induction form to record that they have received and understood the training and documentation, which includes Safeguarding.

7.4 Continuous Development

If any areas are identified as lacking, staff will receive the necessary training. Head Office will also conduct Centre Checks whereby staff will be randomly selected and tested on their safeguarding knowledge.

8 Safer Recruitment

Our recruitment process aims to ensure that all reasonable steps are taken to ensure that unsuitable people are prevented from working with children through Ardmore. We, therefore, follow a strict policy of safer recruitment that includes the following:

8.1 Job Descriptions

- Job descriptions and advertisements clearly and accurately set out the duties and responsibilities of the job role, including the requirement for a suitable Enhanced DBS and/or police check from abroad.
- All job descriptions state that Ardmore Languages Schools is 'committed to safeguarding and promoting the welfare of children'. Candidates will be made aware that all their documentation will be subject to rigorous checks.

8.2 Online application

- Applications for employment will only be accepted via our online system to ensure uniformity and fairness to all applicants.
- Application forms specifically ask applicants to declare spent and unspent convictions where relevant.

8.3 Interviews

- Interviews will explore the applicant's ability to meet the job description and suitability for the role.
- It will also enable the recruiter to explore any gaps in the applicant's CV and to satisfy themselves the applicant meets standards and Safeguarding criteria.
- Questions asked in interview will be specifically designed to explore the candidate's attitude towards working with young learners.
- Previous disciplinary action/disclosures will also be addressed and considered at this stage to establish full circumstances of the individual case.

8.4 Verification of Documentation

- Upon job offer, candidates are made aware this is subject to satisfactory pre-employment checks and verification of documents. Candidates must upload copies of all supporting documents onto their online portal.
- Applicants with further academic or professional qualifications required for the position, and claimed in their applications, must be able to produce evidence of these.
- All applicants who are subsequently appointed are required to bring original evidence of their identity, eligibility to work in the UK, online training and relevant certificates to the centre upon arrival.

8.5 References

- Two full, professional/character references must be provided for each shortlisted candidate.
- The reference request will include specific reference to the suitability to work with children.
- The Recruitment Team will follow up any discrepancies, or seek clarification where necessary.

8.6 Enhanced DBS Certificate (Previous CRB)

- All new employees will require a new Enhanced DBS Check and/or police check prior to commencing work with Ardmore Language Schools.
- It is also our policy to recheck any returning employees already in possession of an Enhanced DBS if they have not worked for us for a period longer than three months and are not part of the Update Service.
- We actively encourage staff to sign up for the DBS Update Service.

8.6.1 Staff awaiting disclosure

- No one should be allowed to start work prior to a disclosure being received unless there are exceptional circumstances affecting the delivery of services, and all other alternatives have been considered and exhausted.
- In such cases, staff awaiting their disclosure results at the time employment commences will always be paired with a member of staff with a completed Enhanced DBS disclosure and will have limited and supervised access to students.
- Two full references must have been received and a check on the Children's Barred List (List 99) will be conducted prior to applicant starting work.

8.6.2 Overseas Checks

'Police Checks' or a 'Certificate of Good Conduct' will be required from the applicant's country of residence where the applicant has lived outside the UK. This may be in addition to the UK Enhanced DBS if circumstances apply.

8.6.2 Group Leaders

The provision of applicable Police Checks also applies to Group Leaders/adults accompanying our students. Whilst Ardmore does not require to see the original police checks of Group Leaders or accompanying adults who are entrusted by the organisation, we do require signed, written assurance (Group Leader Declaration) from an authorised person in the agency, prior to the arrival of the group leaders or accompanying adults. This confirms a police check has been carried out and that the documents have been seen by the authorised signatory, and that the signatory confirms the suitability of the Group Leaders and accompanying adults in question to accompany and work in close proximity to children. This may be received either as a letter or electronically as a PDF. Failure to provide such assurances will mean that group leaders and accompanying adults will not be allowed unsupervised contact with children.

8.6.3 Local Organisers & Host Families

The primary caregiver of each host family provider is subject to an Enhanced DBS check amongst other household requirements to safeguard our students. The DBS application must include a selection that the position involves 'working with children or adults at the applicant's home address' for the police to provide information on all adults residing at that address. Ardmore Language Schools works in agreement with all our Local Organisers to ensure they themselves have a valid DBS disclosure and that they are responsible for maintaining records and suitable checks on their host families which are available for inspection by the company.

8.6.5 Dealing with convictions

All staff must answer a declaration of suitability to work with children at application stage. Evidence or disclosure of a criminal record will not necessarily result in a candidate not being appointed to a position. Such cases will be dealt with on a case by case basis between the recruiter and (Deputy) Safeguarding Leads. The nature of the disclosure will be taken into account including but not limited to:

- The nature, seriousness and relevance of the offence
- How long ago the offence occurred
- Repetition or history of offences
- Changes in circumstances

8.7 Single Central Register

Ardmore maintains a single, central register to record and track the progress of all applications and relevant checks.

9 Staff Safeguarding Code of Conduct

Our organisation is committed to creating a safe environment in which young people can feel comfortable and secure whilst engaged in any of Ardmore's programmes. Staff should ensure that their conduct does not pose any risk to the safeguarding or welfare of students and should set them a good example. The onus is on the member of staff – not the students – to distance themselves from any potentially inappropriate situation. As well as to our students, we also have a duty to protect staff from false allegations or career-damaging mistakes. Staff must use common sense and professional judgment to avoid circumstances which could be perceived to be of an inappropriate nature but, in addition, we also impose the following strict guidelines:

9.1 Attitude

Staff should be committed to:

- Treating children and young people with respect and dignity.
- Always listening to what a child has to say.
- Valuing each child or young person.
- Recognising the unique contribution each individual can make, irrespective of ethnicity, attainment, age, disability, gender or background.
- Being aware that someone might misinterpret their actions no matter how well intentioned.
- Never drawing any conclusions about others without checking the facts.
- Never exaggerating or trivialising child abuse issues or making suggestive remarks or gestures about, or to a child or young person, even in fun.
- Respecting a young person's right to privacy.

9.2 By example:

Ardmore representatives should endeavour to provide an example, which we would wish others to follow:

- Use appropriate language with children and young people and challenge any inappropriate language used by a young person, child or an adult working with young people.
- Staff must not smoke or consume alcohol in front of or in the company of students or their group leaders, or allow any effects of these practices to affect them in any way.
- Wear clothing that is appropriate to their role and is not likely to be viewed as offensive, revealing or sexually provocative. This clothing should not distract, cause embarrassment or give rise to misunderstanding. Clothing should be absent of any political or otherwise contentious slogans.
- Staff who are involved in relationships with other members of staff should ensure that their personal relationships do not affect their role within Ardmore.
- Staff are expected to promote and praise positive behaviour in students, encourage them to follow rules, follow disciplinary procedures in cases of misconduct, set an appropriate example to students and help and encourage them to stay safe.

9.3 Communication and Interaction with Students

All Ardmore representatives must recognise and understand that they are in a position of trust. The legal responsibilities of people working with children extend past the end of any contract they have with Ardmore Language Schools. Please be aware of the potential dangers of personal contact (i.e. contact beyond what is reasonably expected in performing your duties) with students.

- Take care to avoid becoming personally involved in a student's personal affairs.
- Do not attempt to instigate any private contact with students of any age during or after the course.
- UK law prohibits any sexual, intimate, dating or other romantic relationship (even if consensual) between any Ardmore Representative (all of whom are in a position of trust) and any current or former student under the age of 18 in breach of the Sexual Offences Act 2003.

9.3.1 Social Media/ Electronic Communication

- Staff are expected to strictly follow our *Social Media Policy & Electronic Communication Policy*. This policy applies to the relationship between students and staff before, during or after a course.
- Staff must not distribute (by any means) images or information about students of any age. This includes use of the student images or details on blogs, social networking sites or message systems.
- Remember that your personal profiles can be viewed by anyone, and people working with children should be especially careful about their personal web presence.
- Where necessary, any electronic contact will preferably be with the Group Leader. Urgent contact with students must be through company provided centre mobiles. Staff must pay particular attention to use neutral, unemotive language that

will not be misconstrued. Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.

9.4 One to One contact

- Staff should not spend excessive amounts of time alone with children, away from others.
- In the event of having to meet with an individual child or young person, make every effort to keep this meeting as open as possible.
- If privacy is needed, ensure that other staff are informed of the meeting and its whereabouts. For these meetings there should be two members of staff present. Staff should never find themselves alone in a closed space with a child, especially of the opposite sex.
- Staff should never enter a student's bedroom alone without another member of staff present; if it absolutely necessary to do so, for example if the student is sick, you should call their GL to go in with you.
- Always be publicly open when working with children; avoid one to one situations where others don't see you.

9.5 Cultural Sensitivity

We encourage all of our staff and students to embrace the multinational nature of our community at Ardmore. All members of the summer school community are expected to take an active role in promoting equality and embracing diversity.

- Staff must take great care to respect cultural, political and religious sensitivities of our learners. Racial bias or stereotyping will not be tolerated.

9.6 Physical Contact

It is generally advised that Ardmore representatives refrain from any physical contact with students. Whilst there are exceptions to this, it is crucial that staff only do so in necessary and appropriate circumstances to their role. You must always remain conscious of the physical context of your actions and remember that even innocent actions can be misconstrued.

Staff should never:

- Physically chastise a child.
- Engage in sexually provocative or rough physical games, including horseplay.
- Do things of a personal nature for a child or a young person that they can do for themselves.
- Allow, or engage in, inappropriate touching of any kind.
- Avoid all contact with intimate parts of their body.
- Initiate any sort of physical contact. If a student does, e.g. a hug, allow it if in a public place and withdraw when possible.

9.6.1 First Aid

Staff should never feel constrained from acting immediately to prevent harm even when it involves body contact. Actions must have a first aid purpose and should not involve more contact than is necessary. Ensure there is open access to the environment and bear in mind the student's requirement for privacy and dignity.

9.6.2 Positive touch

Physical acts of communication to indicate approval, reassurance or sympathy should be avoided wherever possible. If a child is hurt or distressed, the Ardmore representatives will do his/her best to comfort or reassure the child without compromising his/her dignity or doing anything to discredit his or her behaviour.

9.7 Over familiarity/ favouritism

- Staff should not show favouritism to any individual or group. Overfamiliarity with a particular student or group can be misconstrued.
- Even if close in age to you, a student is still a student. Staff should never allow themselves to be drawn into inappropriate attention-seeking situations such as tantrums or crushes.
- *Staff should be friendly with students but always remember that students are not their friends.*

9.8 Whistleblowing

All staff have a legal responsibility to report to the Designated Safeguarding Person on Centre, any concerns they have about staff, group leaders or any other adults who are not following the Safeguarding Code of Conduct. Every staff member at Ardmore has the right to report concerns or suspicions about another staff member in confidence and free from harassment. There will be no detrimental action taken against staff who raise or are the subject of genuine concern that turns out to be unfounded.

10 Implementing Safeguarding/ Welfare Procedures

10.1 General Welfare Provisions

10.1.1 First Aid: At least two First Aiders will be at each centre, identifiable by a green lanyard. Centre Fact Sheets also provide details of local healthcare and emergency services for each centre.

10.1.2 Identification: Students are issued with an ID card and wristband detailing both the 24-hour emergency number and the centre emergency number upon arrival. Both must be worn at all times and actively monitored by all staff.

10.1.3 Fire Safety: Regular fire alarm checks and drills take place within our centres. As part of the student induction process, children are shown where the fire exits are located and where to meet if the fire alarm is activated. See also our *Health and Safety Policy*.

10.1.4 Welfare Team: Ardmore have a welfare specific staff team who undertake welfare specific duties such as break, meal and night time supervision and are specifically identified via induction, posters and in writing as key people to approach regarding welfare needs.

10.2 Student induction

All students receive an induction upon arrival at an Ardmore Centre to include:

- A presentation highlighting the rules, regulations, safety and communication systems on centre.
- Ardmore Language Schools' expectations of student behaviour.
- An explanation of who's who on centre and who they can contact for help or advice.
- A site orientation of where everything is; crucial meeting/fire points, out of bounds areas and important facilities.
- An outline of their programme.
- Any emergency procedure whilst on or off site.

10.3 Risk Assessments

Risk assessments will be carried out by management for all on-site and off-site activities fortnightly, or as appropriate, to remove and eliminate risk where possible. It is the responsibility of all staff to read and implement these Risk Assessments as well as to be vigilant in assessing the risks of their own work and activities.

10.4 Supervision

The Centre Director is responsible for the safeguarding and welfare of students whilst they are in residential boarding accommodation. The Centre Director is responsible for the safeguarding and welfare of students on and off site. Staff and homestay providers should know the whereabouts of all students during the summer school day and during the hours of curfew. Full details of supervision and monitoring can be found in our *Student Supervision Policy*.

10.4.1 Missing person procedures

If staff or homestay providers cannot account for the whereabouts of a student, our *Missing Persons Procedures* are immediately invoked. Early stages include attempting to contact the student and any known friends or local guardians, and searching summer school premises, including the student's bedroom, and surrounding areas, if applicable. If a student cannot be found, the situation is escalated to the Centre Director, their deputy or by contacting the person holding the emergency phone if neither are immediately contactable in person. The Centre Director will make the decision as to when the Police 101 should be telephoned and an official Missing Person Report made depending on his assessment of the situation.

10.5 Site security

10.5.1 Signage: Students must know how to find help in case they have a problem: this should be the supervising member of staff or GL in their building. Ardmore effectively signposts all of their centres to identify boundaries, facilities and highlight key people and policies.

10.5.2 Unidentified people on Campus:

All persons associated with Ardmore are identifiable by their uniform and an Ardmore Lanyard. Ardmore operates a policy of challenging any person on site who is not known or identifiable to staff - providing the staff member feels comfortable to do so and that there is more than one staff member present. Where there is concern, or if the unidentified person approaches any of the accommodation blocks, call the police and explain that you have young children on site. Fill out an incident report.

10.6 Accommodation

10.6.1 Residential: All of our host centres are requested to supply evidence of risk assessments, gas safety certificates, floor plans and safeguarding policies. In the absence of this evidence, confirmation that this is available at the centre upon inspection is required.

Allocations: Genders must be separated in accommodation. Students in Host families will always be separated by gender.

In residence, priority will be given in the following order where the accommodation permits:

- By accommodation block

- By accommodation flat
- By corridors, where males are accommodated on the lower floors.

Where the above is not possible the students should be separated as far as possible with adults stationed in between rooms.

Facilities: Bathrooms must be separated by gender and be signposted for the use of either Staff or Students. If necessary staff should be given set times to use facilities.

10.6.2 Host Families: Ardmore work in agreement with Local Organisers who are informed and trained by Ardmore in relation to the safeguarding and welfare of our students. They are responsible for ensuring Host Families comply fully with our standards. Full details can be found in our Local Organiser's Handbook.

Private Fostering Students under the age of 16 residing with a family that is not his/her own immediate family for more than 27 nights must be reported to the local authority, usually social care, at least six weeks before the arrangement starts.

10.7 Transport/ service providers

Before Ardmore engages any companies to provide services for our students, such as coach or car operators, they will be required to complete an agreement confirming that minimum requirements are met. This includes confirmation that all employees with unsupervised access to students have a full criminal records clearance details as well as evidence of adequate insurance cover.

10.7.1 Unaccompanied Minors

Students travelling alone will be supervised starting at their point of arrival. At the port of arrival airline staff will pass the child to an Ardmore Representative who will accompany the child to their destination and, similarly upon their return, to check in and security.

10.8 E-safety

Ardmore Language Schools recognises that e-safety is an area of growing concern. Our students increasingly use mobile phones on a daily basis and these functions are very susceptible to misuse. Whilst the summer school cannot exert full control over how students choose to conduct themselves online or how to use electronic devices, maximum effort is made to educate students about online safety. In addition, certain measures are put in place to prevent the use of electronic devices and the internet for specific potentially harmful purposes. Cyberbullying will not be tolerated and will be managed through our anti-bullying and disciplinary procedures.

10.9 Student provisions

Some students may be more vulnerable to harm than others, for example students with special educational needs, disabilities or chronic medical conditions or dietary requirements. All students and agents are requested to provide pre-arrival health information. Specific measures are also put in place for individuals who may need further support and guidance in the absence of a Group Leader.

10.9.1 Where a student is 18 or over

In the unlikely event that a student is 18 or over the following steps shall be taken:

- Students instructed to follow the same course rules as all other students, (e.g. no allowance made for them being old enough to buy alcohol or cigarettes).
- All staff are alerted to the fact that an 18-year-old student is on the course, how to identify him/her and to be vigilant about the student's behaviour and interaction with younger students.
- The person will be allocated accommodation next to a GL or staff member
- They will be given an allocated time to use facilities, separate to that of other students.
- They will only participate in activities with their own group.

10.9.2 Individuals

In the absence of a Group Leader, Ardmore recognise our individuals may be more vulnerable and in need of further support.

- All individual visiting students are identified to all members of staff.
- Individuals are met upon arrival by an Ardmore Representative and according to our Unaccompanied Minors Procedures.
- Individuals are inducted specifically by a member of the Welfare Team (HPC where possible) and receive a tailor made Welcome Letter.
- A member of the Welfare Team assigned to them who will check in with them daily and report to the HPC.
- Staff receive specific training, on site and in handbooks, relating to individuals.

10.10 Policy on Taking Photographs of Children

The taking of pictures of children and teenagers is restricted for legal reasons. There are two reasons for our policy as outlined below, firstly, the protection of children in our care, and secondly, data protection regulations.

Students are also instructed in their handbook about the policies surrounding taking photos/videos of other students. Students must not take any photos/videos of other students/GLs or members of staff without first asking permission. Any photos/videos taken with permission may not be uploaded onto any social networking site.

This policy refers to the use of film and digital cameras, including mobile phones:

- Only staff authorised by the CD or Head Office are allowed to take pictures of students and must be employees of Ardmore Language Schools Ltd
- Students must never be photographed alone, but always in pairs or groups
- No clues as to the identity of the student must be visible in the image
- Members of staff and/ or GLs of both gender must be present
- Students are to be asked their permission before taking the picture
- Only pictures of students in appropriate dress are acceptable, for example, taking pictures of students at poolside is not allowed
- Any person taking photographs must be in Ardmore Uniform and should let the person being photographed know whether or not the image will be retained for further use
- Images must be securely stored and only used by those authorised to do so
- Images must not be transmitted electronically, or printed copies distributed, unless authorised by Head Office
- Anyone suspected of capturing unauthorised or inappropriate images should be reported to the CD or immediately to Head Office
- Photos taken must not be stored on personal devices.
- Staff must not – by any means or in any circumstances – make, view or access illegal or inappropriate images of children.

10.11 Anti-bullying Policy

Every student should feel safe to learn and socialise. Every student should be safe from victimisation and discrimination at an Ardmore Centre. Their journeys to and from an Ardmore Centre should be free from fears and intimidation. No-one should suffer the pain and indignity that bullying can cause.

Ardmore views bullying as a serious matter and one that could warrant severe disciplinary action, possibly legal action. However, the intention is to create an environment where bullying is unlikely and where, if it does occur, the person being bullied will feel able to seek help and allow action to be taken early. Students are told about bullying in their centre induction and told to report it to the Welfare team or any other member of staff if it is happening to them or one of their friends.

10.11.1 What is Bullying?

It is behaviour, usually repeated over time that intentionally hurts another individual or group, physically or emotionally, by an individual or a group. There is a deliberate intention to hurt or humiliate with a situation imbalance that makes it hard for the victim to defend themselves.

Bullying can include: name calling; taunting; mocking; making offensive comments; physical violence; taking belongings; inappropriate touching; offensive graffiti; spreading hurtful rumours and untruths; leaving an individual out of groups.

Cyber bullying can include the above via: Instant messaging (IM) and chat rooms, e-mail, social networking sites such as Facebook, online gaming, mobile phones.

(Please see <http://www.childline.org.uk/Explore/Bullying/Pages/CyberBullying.aspx>)

Bullying can break the law, examples of types of behaviour which are illegal are:

- Violence or assault
 - Theft
 - Harassment and intimidation over a period of time including calling someone names or threatening them, making abusive phone calls, and sending abusive emails or text messages (one incident is not normally enough to get a conviction)
 - Anything involving hate crimes*, which is any incident that is perceived by the victim or any other person to be:
 - o Racist
 - o Homophobic
 - o Transphobic (discrimination against transsexual or transgender people)
 - o Due to a person's religion
 - o Due to a person's beliefs
 - o Due to a person's gender identity
 - o Due to a person's disability
- Please see https://safe.met.police.uk/hate_crimes/get_the_facts.html

10.11.2 Why is it important to respond to Bullying?

Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Students who are bullying need to learn different ways of behaving.

10.11.3 Responding to a child making an allegation of bullying

Anyone who hears an allegation or notices bullying behaviour against another child, must report the matter immediately to the Centre Director. This should be addressed according to the severity of the case and in line with our Student Disciplinary Procedure. If the Centre Director is unavailable, or involved in an allegation, the matter must be referred immediately to the (Deputy) DSL at Head Office.

10.12 Prevent

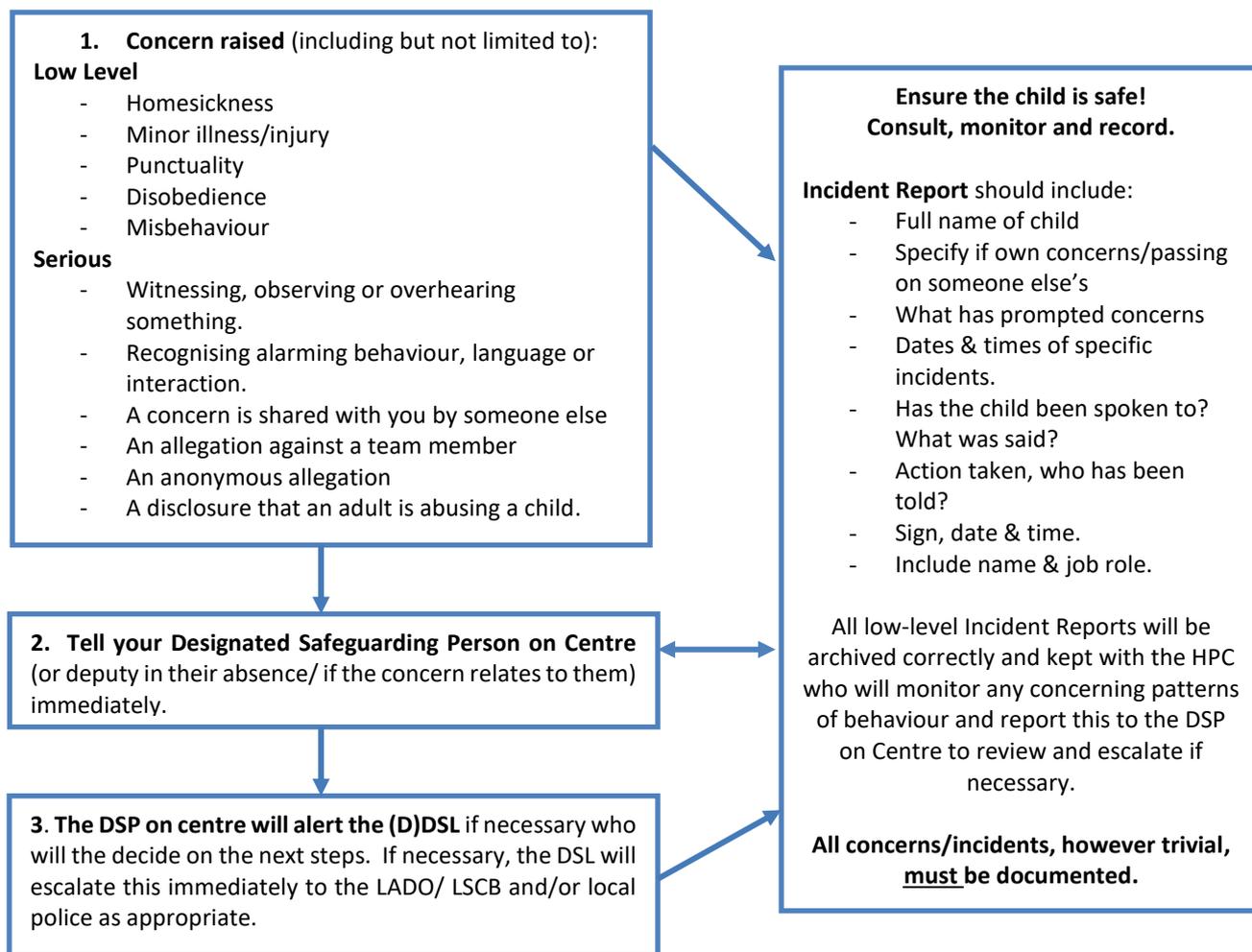
Ardmore recognises the positive contribution it can make towards protecting its students from radicalisation and exposure to violent extremism. To minimise the risk of this Ardmore promotes:

- mutual respect and tolerance of those with different faiths and beliefs.
- educating students to acquire an appreciation of and respect for their own and other cultures.
- an understanding and acceptance that other people having different faiths or beliefs to oneself should not be subject to discrimination because of this.
- The importance of identifying and combatting discrimination.

Please refer to Ardmore's *Tackling Extremism and Radicalisation Policy* for further details.

11. Raising and Reporting Concerns

All staff should be vigilant to potential risks to the welfare of students and report any concerns or incidents to an appropriate member of staff as soon as possible via the following steps:



- At no point should an attempt be made to investigate the situation. This will be undertaken by Social Services and/or the Police as necessary. Ardmore Language Schools is an agent of referral and not of investigation.

Remember: In every case, the child's wellbeing is our utmost priority. In an emergency, do not delay, dial 999.

12. Responding to a Child Making an allegation of abuse

If a child discloses any information to an Ardmore Representative suggesting that they have been abused in any way, the process outlined below should be followed. If this information is reported by a child to their host family, the host family should inform Ardmore as soon as possible using the emergency contact number.

12.1 Receive

- Listen to what is being said without displaying or expressing your reaction.
- Take what the child says seriously and allow for any difficulties with language.

12.2 Reassure

- Reassure the child that they are doing the right thing and listen carefully.
- You must not promise confidentiality; you have a duty to pass on information.
- Acknowledge how difficult it must have been to talk about it, reassure them.

12.3 React

- React calmly and listen carefully and patiently.
- Make sure that the child is safe and away from any immediate harm.
- Do not assume or make any speculations.
- Do not probe; keep questions to the minimum required to ensure a clear and accurate understanding, open questions are most suitable.
- Remember that an allegation of child abuse may lead to a criminal investigation, so **do not attempt to personally investigate any allegations** of abuse.
- Ensure the way you communicate is appropriate to the student's age and understanding. **Do not** ask the child to make a written statement.
- Explain what you have to do next and who you have to talk to.

12.4 Record

- Record in writing everything that was said as soon as possible, using the child's own words.
- Note date, time, and names of persons to whom the information was given. Ensure that the record is signed and dated by these persons.

12.5 Report *(refer to the flowchart in section 11)*

- It is the duty of Ardmore staff to report disclosures or allegations of abuse.
- Report immediately to the DSP on Centre who will contact the DSL (Operations Manager, David Bridges).
- **Do not** confront any person against whom an allegation has been made.

12.6 Remember

- Support the child, listen, reassure and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
- Seek support for yourself if needed.

12.7 Review (led by DSL)

- Has the action taken provided a good outcome for the child?
- Did the procedure work?
- Were there any deficiencies in the procedure, have these been remedied?
- Is further training required?

13. Supporting Staff and Students Involved in Cases or Allegations

Ardmore Language Schools takes its duty of care to all those who are involved in safeguarding issues seriously. If a staff member is the subject of an allegation, the company's primary duty of care must be to protect all students. It may therefore be considered necessary to transfer a staff member to alternative duties, or to suspend an individual, in the short-term, whilst a thorough investigation is undertaken. Where accused of inappropriate behaviour, staff will always be given the opportunity to explain the situation and their actions, and will be in contact with a member of the DSL Team who will provide them with confidential support and progress updates, where appropriate. If staff are subject to malicious allegations, then they can be assured that this will be dealt with under the disciplinary procedure.

In the case of a child being the subject of an allegation, a designated member of the welfare team will be appointed to support the student who has been accused of inappropriate behaviour.

We recognise that our students are more likely to need additional support due to the fact that the vast majority are a long way from home and experiencing a new culture and environment. Every effort will be made to ensure that the child's safety and wellbeing is paramount and to promote a community feeling for students. Provisions are put in place to accommodate individual needs and we ensure that opportunities to forge friendships with other students are plentiful and accessible. Staff should monitor for potential issues and report any concerns they have.

Staff and students can be assured that decisions will never be taken lightly.

14. Confidentiality and Recording Information

All staff must understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student and/ adult involved but also to ensure they do not compromise evidence. Staff should only discuss concerns with the (D)DSP on Centre who will report it to the (D)DSL. That person will then decide who else needs to have the information if necessary. All records, information and confidential notes are stored securely with restricted access only to the Deputy and Designated Safeguarding Leads.

Annex A

Safeguarding Team				
DSL Team	Designated Safeguarding Lead & Prevent Lead	David Bridges Operations Manager	The 24-hour emergency phone will always be carried by one of the Designated Safeguarding Lead or Deputies. 07983 358942	davidbridges@heardmoregroup.com
	Deputy Designated Safeguarding Leads	Martin Corr Commercial Director		Martin@heardmoregroup.com
		Natalia Ventrella Assistant Operations Manager		Natalia@heardmoregroup.com