This policy is available on our website. It is given and explained to staff during induction and hard copies are available for students to read in the ‘Information for Students’ folders at the school.

The condensed version of this policy is included in the Student Handbook and hard copies can and is displayed for visitors to read in the Reception area.

The condensed version of this policy is sent to ETO’s and accommodation providers (including pointer on where to find the full version).



**SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY**

|  |  |
| --- | --- |
| **Aim** | Islington Centre for English aim to:   * Ensure that all students are protected from potential abuse from hosts, staff and other suppliers and fellow students. * Inform ICE staff of their responsibilities when working with children and vulnerable adults in order that staff can implement this policy using the guidelines provided. This will protect the safety and well-being of children attending courses and staff employed to work on courses at ICE. * Practice our commitment to safe recruitment, selection and vetting of staff, accommodation providers and other suppliers. * Ensure that all members of staff are aware if any student is under 18 and that staff are also aware of any consequent special procedure(s) which are applicable. |
| **Purpose** | The Islington Centre for English is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment. |
| **Scope** | This policy includes all information around safeguarding for all staff, agency workers, contractors, volunteers and internships. |
| **Review date** | June 2019  The Company reserves the right to modify any part of this policy at its discretion and in accordance with any required legislation changes. We are committed to actively consulting with our employees, and any changes will be communicated, and will apply to both existing and new employees. |

# CONTENTS

1. Introduction
2. Definitions
3. Child Safeguarding Procedures
4. Our Responsibilities
5. Specific Safeguarding Issues
6. Allegations of Abuse or Inappropriate Behaviour involving Staff
7. Allegations of Abuse or Inappropriate Behaviour involving Students
8. Whistle-blowing Policy
9. Recording Information

Appendix A: Code of Conduct – Good Practice for Staff and Volunteers Appendix B: Code of Behaviour for Young People & Vulnerable Adults Appendix C: Recognising Abuse

# INTRODUCTION

Islington Centre for English firmly believe in having detailed and rigorous control measures in place to safeguard children and vulnerable adults.

Our policies aim to follow relevant legislation and guidelines, including:

* The Education Act (2002) Section 175
* The Children Act (1989 and amendments) and The Children Act 2004
* Sexual Offences Act 2003
* Aimsafer: A Framework for Safeguarding Children & Young People in Higher Education Institutions 2005
* Safeguarding Vulnerable Groups 2006
* Protection of Freedoms Act 2012
* Information Sharing 2015
* National Minimum Standards for Private Fostering
* Counter-Terrorism & Security Act 2015
* Sexting in schools and colleges (UKCCIS) – August 2016
* Keeping Children in Education Safe Updated September 2016
* Serious Crime Act 2015 (Commencement No 6) Regulations 2017
* Children & Social Work Act 2017
* Working Together to Safeguard Children (Revised 2018)
* Searching, screening and confiscation (January 2018)
* Sexual Violence and Sexual Harassment (May 2018)
* Keeping Children in Education Safe (Updated September 2018)

At ICE we are committed to safeguarding children and vulnerable adults and we expect everyone who works in our schools to share this commitment.

We recognise that safeguarding is of paramount importance. ICE & its entire staff have a legal duty of care to those under the age of 18. So, teachers, office staff, IT staff and absolutely anyone employed by ICE shares in this responsibility.

We are responsible for taking all reasonable steps to promote safe practice and to protect children and vulnerable adults from harm and abuse. We have a duty to act appropriately to any allegations, reports or suspicions of abuse.

This includes:

a) SAFEGUARDING. This is the school’s duty of care to look after children and help them to achieve their potential

b) CHILD PROTECTION. This involves protection from abuse.

ICE is mainly a school for over-16s studying in mixed nationality, adult classes. Students under the age of 16 are taught in closed groups. We take the welfare of these students very seriously and are committed to always acting in the best interest of the child. To be clear, any student under 18 years old is considered a minor though students 16 years old or more can be integrated into mixed, adult groups. At ICE we understand that all minor students, irrespective of disability, gender, race, nationality, religious belief, sexual orientation, identity or any other consideration, are entitled to protection under the terms of this policy and the laws that guide it.

ICE no longer places individual students under the age of 18 in accommodation unless they are coming as part of a group accompanied by Group Leaders.. Adult students may arrange their own accommodation or may be placed in house/flat shares or student residences as well.

All staff members and stakeholders who are in contact with students through the school are required to read, understand and follow this policy and to share our organisations commitment to safeguarding. All staff at the school are trained to at Least Level 1 in Safeguarding and should be ready to report any concerns and allegations and know who to contact within the organisation and outside.

This policy and procedures are based on the following principles:

* The welfare of young people and vulnerable adults is of primary concern.
* All young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identify have the right to safeguarding from abuse.
* It is everyone’s responsibility to report any concerns about abuse to the Designated Safeguarding Lead, and the responsibility of the Social Services Department and the Police to conduct, where appropriate a joint investigation.
* All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
* ICE has a duty to refer to the appropriate person any person who has
  + Harmed or poses a risk of harm to a child;
  + Satisfied the ‘harm test’ (i.e. no action or inaction occurred but the present risk that it could be significant); or
  + Received a caution or conviction for a relevant offence.
* ICE will foster a culture where safeguarding is taken seriously through regular staff training and commitment to safeguarding procedures.

# DEFINITIONS

### Children

The Children Act 1989 states the legal definition of a child is “a person under the age of 18” (The Children Act 1989 and the Vetting and Barring Scheme 2009).

### Vulnerable Adults

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

### Safeguarding

### Refers to our obligation to look after all the children’s and young students welfare in every way in order to promote all aspects of their safety and well-being throughout their time at ICE, including travel to and from the school on arrival and departure.

### Child Protection

### Part our safeguarding policy, and refers to our duty to protect children from abuse, such as emotional, physical or sexual abuse or neglect. We recognise that abuse may come from adults or other children.

### Prevent

### An important tool in safeguarding learners, is a government strategy to reduce the likelihood of people becoming involved in violent extremism and/or in supporting terrorism. It applies to all forms of extremism, including racism, far-right ideology, religious extremism or homophobia

### Concern

### Anything that causes us to suspect that a child’s safety and welfare might be compromised in some way

### Allegation

### An accusation that a person or persons have harmed a child in some way

### Disclosure

### Refers to the act of telling others about abuse a person has been subjected to.

### Designated Safeguard Lead (hereafter referred to as ‘DSL’)

### Has lead responsibility for safeguarding and Safeguarding and Child Protection.

ICE recognises that although our customers do not meet this definition of ‘vulnerable adults’ as English is not our students first language, we consider them to be vulnerable as they may be slower or find it harder to communicate. Therefore we will ensure that our staff appropriately communicate with all students regardless of their age.

### Definition of Abuse

Abuse is any behaviour towards a person that deliberately or unknowingly causes harm, endangers life or violates their rights. Abuse may be:

* Physical
* Sexual
* Psychological – repeatedly being made to feel unhappy, humiliated, afraid or devalued by others
* Financial or material – stealing or denying access to money or possessions
* Neglect
* Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender, disability or cultural background

Abuse may involve one or a combination of these factors. Please see Appendix C Recognising Abuse.

Types of Abuse and Neglect can also be found in “Keeping Children Safe in Education (2016 – revised September 2018).

# CHILD SAFEGUARDING PROCEDURES

Where under 18s are concerned there are statutory responsibilities for any organisation to follow regarding the safety of young people.

All members of staff working closely with under 18s have to be alert to possibilities of abuse and any concerns about the behaviour of any adult with respect to that student should be reported to the DSL who will decide what further action to take.

It is the duty of staff to inform only not to investigate – this is the role of the Police and Social Services.

If staff, in the course of their work at ICE, have a child safeguarding issue brought to their notice, this must be treated as a priority over all other work.

Guidance with regard to a specific incident may be obtained from the DSL. All school staff must contact the DSL, their Deputy or the School Director if they have any cause to believe the student or young person involved in any activity at ICE, covered by this policy is in any way at risk. The DSL, their Deputy or the School Director will follow the relevant procedures.

An oral, and then written report should be provided to the DSL who will keep a confidential record of any such incidents.

Records will be kept of all such incidents and their outcomes and held by the DSL in accordance with the Data Protection Act 2018 and GDPR.

All staff should be aware that in accordance with statutory requirements where safeguarding issues are involved, it is not possible to offer confidentiality to any person regardless of age as any disclosures must be reported.

If a member of the safeguarding team or any other staff member decides a concern needs to be escalated, or referred directly to Childrens Social Care they know to contact Islington Children’s Services Contact Team (CSCT) - the single point of contact for all referrals and requests for services for vulnerable children and young people in the borough.

Allegations should always be immediately escalated to the Local Designated Area Officer at the Local Children Safeguarding Board (LCSB)

**Children's Services - 020 7527 8102**

Or (for urgent referrals at any time)

**Tim Djavit - Local Authority Designated Officer (LADO) 020 7527 7400**

Details of other useful contacts can be found on the website of the Islington Safeguarding Children Board ([www.islingtonscb.org.uk](http://www.islingtonscb.org.uk)).

The Local Authority Safeguarding procedures area available in full on the Islington Multi-Agency Safeguarding Hub (MASH) website and can read here-

<http://www.islingtonscb.org.uk/SiteCollectionDocuments/Islington%20Multi%20Agency%20Safeguarding%20Arrangements%202019.pdf>

**Guide for staff- How to respond to a child if abuse is disclosed**

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

# OUR RESPONSIBILITIES

**U18 STUDEN ABSENCE**

It is our responsibility to monitor the attendance of all students however we have a particularly rigorous procedure in regards monitoring the attendance of junior students.

All Under 18’s are highlighted on class registers so that the teacher is aware of who they are.

Under 18’s are required to sign in at reception everyday before going to class. If students have not signed in within 15 minutes of the start of their class we will attempt to contact them by phone. If we are unable to contact the student directly we will try to contact the person responsible for them in London.

If we are not able to contact either the student or the person responsible for them we will follow the procedure as described in the document ‘Policy on following up absent U18’s’.

## ROLE OF THE DESIGNATED SAFEGUARDING LEAD (AND DEPUTY IN THEIR ABSENCE)

The Designated Safeguarding Lead (DSL) and deputy will have Specialist Safeguarding for Safeguarding Lead training (formerly known as Level 3).

The role of the DSL is:

* To receive information from any staff, volunteers, children, parents or carers who have safeguarding concerns and record it.
* To assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.
* To consult initially with a statutory child safeguarding agency to test out any doubts or uncertainty
* To make a formal referral to a statutory child safeguarding agency or the police
* To record statements from any member of staff who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.



The role of the deputy safeguarding lead is to conduct the role of the DSL in their absence. For this reason, the DSL and the deputy will not be authorised leave at the same time, unless when another person is trained to cover the role.

Safeguarding meetings are held throughout the year by the Safeguarding team whenever any issues are flagged by any staff member or when the DSL or any other member of the safeguarding team have updates that need to be shared. Meetings are also held prior to, and shortly after, the arrival of any groups of young learners so that any potential issues may arise are considered in full and pre emptive steps are taken to mitigate potential risks.

The DSL is signed up to the NSPCC update service which means that they are kept up to date with relevant changes in the law and current best practice.

**Contact Details for ICE Safeguarding Team**

|  |  |  |  |
| --- | --- | --- | --- |
| DSL | Olivia McCarty | [office@letslearnenglish.org](mailto:office@letslearnenglish.org) | 07475267114 |
| Deputy DSL | Tim Shoben | [tim@letslearnenglish.org](mailto:tim@letslearnenglish.org) | 07540696505 |
| Staff members  (Level 2) | Paula Hanna  Joanna Piotrowska | [paula@letslearnenglish.org](mailto:paula@letslearnenglish.org)  [enrol@letslearnenglish.org](mailto:enrol@letslearnenglish.org) | 0207 278 5553 |

## STAFF

All ICE staff are required to take shared responsibility for the safeguarding and safety of any young people and vulnerable adults in school. Staff who are in a position of trust, in particular those staff who teach, support, guide or in any way interact with students, young people and vulnerable adults visiting the school should be aware of the significance of this position. It is incumbent on all staff to be aware of this policy and to act accordingly at all times.

### SAFER RECRUITMENT

ICE has a rigorous recruitment process that includes safeguarding measures to ensure that candidates have been suitably vetted.

To ensure that employees working for ICE are suitable for work with children, the following procedures will be followed:

All staff must submit a C.V. Proof of qualifications will be required, all gaps in CVs must be explained satisfactorily, and references will be followed up. The reference request will ask if the referee has any reason to believe that the employee is unsuitable for work with children. Staff will be required to affirm that there is no reason why they should not be employed in situations where they have responsibility for, or substantial access to, persons under 18.

In accordance with Part 3 of “Keeping Children Safe in Education” (2018) all staff are asked to agree to an enhanced DBS check and provide references.

This being the case, we encourage all applicants called for interview to provide details of any criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to a designated person within the school, and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process. Unless the nature of the position allows ICE to ask questions about a person’s entire criminal record, we only ask about ‘unspent’ convictions as defined in the Rehabilitation of Offenders Act 1974. In some cases, the school may be able to proceed with an appointment on a provisional basis pending clearance being obtained. In all cases new members of staff must sign a declaration stating that there is no reason, legal or otherwise, that they should not be deemed suitable to work with students under 18.

Having a criminal record will not necessarily bar someone from working with ICE. This will depend on the nature of the position and the circumstances and background of the offences. At the same time, if a DBS check subsequently reveals matters which materially affect the suitability of a person for employment with ICE, the school will discuss matters with the employee and reserves the right to withdraw any provisional offer of appointment or to terminate a contract under the Disciplinary Procedure for misrepresentation or failure to disclose material facts during the job application/interview process.

Further details of ICE’s policy on Disciplinary and Grievance procedures are to be found in the Staff Handbook and Contract of Employment.

Before recruiting any new members of staff, the employer must check on the official Barring list whilst the full DBS is waiting to be submitted. DBS reports should not be retained by ICE. Instead, the DBS number is kept for online reference.

During the recruitment and induction process new members of staff are informed about the schools Codes of Conduct. Staff meetings, which are held on a regular basis, serve as an opportunity to remind and update staff on the importance of these codes.

**Procedure for handling delayed suitability checks**

Until we have received the DBS check staff will not be permitted to teach or have unsupervised contact with students aged under 18.

### STAFF INDUCTION

As part of staff induction, the following will be undertaken

* Making known to all staff the policies and procedures in place that promote the safety and welfare of children including: health and safety, Prevent Extremism and Radicalisation policy, anti-bullying, the code of conduct of staff.
* All staff will meet with the DSL or Deputy on their first day (where possible) for a safeguarding induction (see checklist – Appendix E)
* DSL will confirm the difference between a concern (something that seems not to be right but is of no immediate danger to the under 18) and a serious issue (where the under 18 could be in danger of harm/abuse and an urgent response is required).

### STAFF TRAINING

In accordance with good practice ICCE will ensure that the DSL, officers deputed to act on their behalf and other staff likely to be in regular contact with under 18s and vulnerable adults receive appropriate training provided within our sector.

All staff are expected to have Basic Awareness training (previously Level 1) - usually the BSC Basic Safeguarding & Prevent Online Training. Designated staff have Advanced Safeguarding (previously Level 2) – delivered via external training. The DSL and their deputies must have specialist training (formerly Level 3). This is delivered by via external training.

The DSL holds a record of when and where all staff members have received training and to what level.

All training will be recorded against the staff member’s record for future reference.

### EXPECTATIONS OF STAFF IN RELATION TO SAFEGUARDING

All staff should understand that safeguarding students is paramount and takes priority over any other workload.

* All staff must be familiar with ICE’s Codes of Conduct for Staff attached as Appendix A.
* All staff must be familiar with ICE’s Code of Behaviour attached as Appendix B.

All staff must be familiar with the concept of “Position of Trust”. It should be noted that whilst a young person in the UK can consent to sexual activity once they reach the age of 16, the Sexual Offences Act 2003 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under 18 where the adult is in a position of trust

Staff are expected to maintain a professional working relationship with students at all times regardless of their age.

## CONSENT FROM PARENTS OR GUARDIANS

All parents/guardians of a student under the age of 18 will be asked to provide written consent for their child to attend an Islington Centre for English Course. For individual students parents/Guardians will also be required to sign a parental agreement form outlining acceptable behaviour for students.

## ACCOMMODATION

## ICE no longer places Under 18’s in accommodation. Students under the age of 18 studying at ICE (who are not part of a group with a group leader) are usually already permanently residing in London or are visiting a family member from abroad. As this is the case they are treated as ‘day students’ and their parents/guardians are responsible for them outside of school hours.

## We arrange accommodation for individual adult students in homestays, flat shares and residences through our accommodation Partners Hosts International and Britannia Student Services, these agencies are registered with the British Council.

## SOCIAL PROGRAMME

The managerial responsibility for any programme or activity rests with, firstly, the Social Programme Coordinator who also organises and supervises the activity. At present the Social Programmed coordinator is Marco Berni.

ICE does not organise Social activities or events for students Under the age of 16 years.

Students aged 16-18 can sometimes join the social program, provided it is deemed suitable (i.e. - day time or early evening cultural activities where alcohol will not be served.

Members of staff involved in social programmes are expected:

* To ensure that the activity is planned, organised and delivered in accordance with the Safeguarding Children and Vulnerable Adults Policy.
* To arrange the checking, training, induction and guidance for all other staff and volunteers involved in the social programme activity
* To complete a health and safety risk assessment for each activity.
* To ensure there is appropriate levels of supervision as outlined in the risk assessment.
* To ensure that students are familiar with 24 hour emergency telephone number and that they know to call this number at any time if a concern arises.
* To make sure that any 16-18 year olds have an emergency contact number and to be aware of their travel plans for getting home (particularly important for evening activities).

## YOUNG LEARNERS (AGED 11-16)

ICE welcomes closed groups of students under the age of 16 but with a minimum age of 11. When welcoming these groups, the school will apply the following:

* The group will be accompanied by a group leader or teacher with a minimum ratio of one leader per 15 students
* ETO’s sending Group Leaders to accompany students will be required to provide a signed agreement stating that they hold records of current police checks or certificates of good conduct for Group Leaders from their country of domicile.
* Group Leaders will share activity plans with ICE so that we can advise on suitability/viability (as ICE staff have local knowledge).
* The group leader will be available to assist school staff and communicate school policies and procedures to the students.
* The group leader will assist as a supervisor on any external trips and activities for their group and will not be requested to assist with any other activity for students not from their group.
* Students under 16 will not be accommodated with those over 18s.
* Students under 16 will not be placed in the same classes as those with over 18s. Closed groups of U16s will be placed in classes with different break times to regular classes so students do not mix in the common areas or if break times are at the same time, they will be kept in a separate area away from adult students.
* Under 16s are not allowed unsupervised free time. They will either be at school, at their accommodation, on an organised activity or travelling between the school and home/activity.

# SPECIFIC SAFEGUARDING ISSUES

## RADICALISM & FUNDAMENTALISM

Should individual students exhibit intolerance or prejudice against other students or staff based on race, culture, gender, religion, socio-economic status, age, or sexuality, their behaviours will be addressed by the school disciplinary policy. As part of the Counter Terrorism and Security Act 2015, schools have a duty to prevent people being drawn into terrorism ‘Prevent Duty’.

Early indicators may include (this list is not exhaustive)

* + - Showing sympathy for extremist causes;
    - Glorifying violence, especially to other faiths or cultures;
    - Making remarks or comments about being at extremist events or rallies outside school;
    - Evidence of possessing illegal or extremist literature;
    - Out of character changes in dress, behaviour and peer relationships
    - Intolerance of difference, including faith, culture, gender, race or sexuality.

Should a member of staff suspect that any student or staff member is the focus of attempts to radicalise them to a set of fundamentalist religious or political beliefs, the staff member should inform the School Director and DSL immediately who will report the suspicions to the relevant authorities. At present the Director of Studies is the Prevent lead.

**CHILD SEXUAL EXPLOITATION (CSE)**

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

Indicators of CSE may include (this list isn’t exhaustive):

* + - Acquisition of money, clothes, mobile phones etc without plausible explanation;
    - Gang-association and/or isolation from peers/social networks;
    - Exclusion or unexplained absences from school, college or work;
    - Excessive receipt of texts/phone calls;
    - Inappropriate sexualised behaviour for age
    - Evidence of/suspicions of physical or sexual assault;
    - Concerning use of internet or other social media
    - Increasing secretiveness around behaviours.

Potential vulnerabilities include (this list is not exhaustive):

* + - Recent bereavement or loss;
    - Social isolation or social difficulties
    - Having a physical or learning disability;
    - Lack of a safe/stable home environment, now or in the past
    - Sexual identity.

Should a staff member suspect a student is at risk of CSE they should inform the DSL or School Director immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy – Appendix D)

## SEXTING

Whilst professionals refer to the issue as “sexting” there is no clear definition of “sexting”. However in general “sexting” can be considered as when someone sends or receives a sexually explicit text, image or video. This includes sending ‘nude pics’, ‘rude pics’ or ‘nude selfies’. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

Should a staff member become aware of a sexting issue, they should inform the DSL or School Director immediately who will then follow Safeguarding Reporting procedures .

## PEER ON PEER ABUSE

There are many forms of abuse that may occur between peers and this list is not exhaustive.

Should a staff member suspect a student is a victim of peer on peer abuse they should inform the DSL or School Director immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy – Appendix D)

## PHYSICAL ABUSE E.G BITING, HITTING, KICKING, HAIR PULLING

Physical abuse may include: hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidently before considering the action or punishment to be undertaken.

## SEXUALLY HARMFUL BEHAVIOUR/SEXUAL ABUSE (E.G. INAPPROPRIATE SEXUAL LANGUAGE, TOUCHING)

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards.

Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.

The “Sexual violence and sexual harassment between children in schools and colleges” was updated and republished May 2018.

## BULLYING

Bullying is unwanted, offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient that involves a real or perceived power imbalance. The behaviour may be repeated over time or a one-off incident. Both young people who are bullied and who bully others may have serious, lasting problems. Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.

The term prejudice-related bullying (harassment) refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or

marginalised, and which is connected with prejudices around belonging, identity

and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Bullying includes actions such as making threats, harassing, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

It is important that staff remain vigilant and consistent and do not wait to see if the “victim” will complain.

## CYBER BULLYING

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone similarly to the above.

It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour. If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the school will have no choice but to involve the police to investigate these situations.

# ALLEGATIONS OF ABUSE OR INAPPROPRIATE BEHAVIOUR INVOLVING STAFF

Allegations involving a member of staff and a student should be reported to the Line Manager and to the DSL. If the allegations involve the DSL, then the School Director must be informed.

All allegations will be followed by an investigation which may lead to disciplinary action including gross misconduct. For full details on the process please see the Disciplinary Policy. Consideration will be given as to whether the situation falls within the definition of abuse. If the School Director and Designated Safeguarding Lead believe that the allegations constitute abuse, they will contact the Local Authority Designated Officer immediately and follow their instruction.

# ALLEGATIONS OF ABUSE OR INAPPROPRIATE BEHAVIOUR INVOLVING STUDENTS

Allegations between students should be reported to the School Director or DSL.

Consideration will be given as to whether the situation falls within the definition of abuse. If the School Director and DSL believe that the allegations constitute abuse, they will contact the Local Authority Designated Officer (LADO) immediately and follow their instruction. These allegations are to be kept completely confidential by all staff involved at all times.

# WHISTLE-BLOWING POLICY

Whilst ICE encourage open communication with staff, we understand that some people may not wish to disclose a concern to management. Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

The NSPCC runs a whistleblowing helpline on behalf of the Home Office, the number is 0808 800 5000.

# RECORDING INFORMATION

All personal data will be processed in accordance with the requirements of the Data Protection Act 2018 and General Data Protection Regulation 2018. Safeguarding data will be collected by the DSL or deputy and recorded via a Safeguarding Log.If appropriate the DSL or deputy may pass the relevant information on to the Police or other relevant government authority. The record of the data will include the nature or detail of the concern and whether any action was taken.

# APPENDIX A: CODE OF CONDUCT - GOOD PRACTICE FOR STAFF AND VOLUNTEERS

Staff should at all times show respect and understanding for the individual’s rights, safety and welfare, and conduct themselves appropriately.

In accordance with the Sexual Offences Act (2003) all staff (including volunteers and interns) are aware that any person in a Position of Trust engaged in sexual activity of any sort (kissing, touching etc) with students under the age of 18 is breaking the law (even though legal age of consent is 16).

Guidelines for all ICE Staff

Attitudes. Staff should be committed to:

* Treating children and young people with respect and dignity.
* Always listening to what a child or young person is saying.
* Valuing each child and young person.
* Recognising the unique contribution each individual can make.
* Treating all students fairly
* Encouraging and praising each child or young person.
* Not accepting expensive gifts from students

Staff 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.
* Respect a young person’s right to privacy.

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, one male and one female, present. Staff are strongly advised against meeting a child alone in a closed space, especially of the opposite sex.

Physical contact

Staff should never:

* 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.

Electronic contact with students under 18

This is defined as the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment and computers. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.

This policy applies to the relationship between students and staff before, during or after a course. Staff must request permission from the employer for any electronic contact with a student under 18 years old, which is of a non-professional nature before, during or after a course. This may be necessary when needing mobile phone numbers from students for an excursion but social-networking on Facebook etc is strictly prohibited.

In any electronic contact with students, staff must pay particular attention to use neutral, un-emotive language that will not be misconstrued. Staff must not exchange any information with a student that they would not be happy to share with the child’s parent or carer.

General

Staff should:

* Be aware that someone might misinterpret their actions no matter how well intentioned.
* Never draw any conclusions about others without checking the facts.
* Never allow themselves to be drawn into inappropriate attention
* Seeking situations such as tantrums or crushes.
* Never exaggerate or trivialise child abuse issues or make suggestive remarks or gestures about, or to a child or young person, even in fun.
* Never socialise with U18’s outside of school.
* Never smoke, drink alcohol or use drugs in the presence of U18’s.Failure to adhere to this policy will result in the staff member being called to a meeting with the DSL and a potential disciplinary procedure in the event of repeat offence. (If the subject of smoking, drinking alcohol or drug use are brought up by students staff should give aim to educate students on the subject rather than to make light or joke about these subjects.

## UNDER 18S SEEKING PERSONAL CONTACT WITH STAFF

* If an under 18 seeks to establish personal contact, the member of staff should be aware that such social contact could be misconstrued. Staff should inform their line manager if a student is seeking social contact with them OR If a student is seeking social contact with a staff member, the staff member should direct the student to this policy to explain why the contact is unnecessary and against company policy.
* Staff should be made aware that it is an offence to engage in sexual communication with a child. The offence covers both online and offline communication, including through social media, e-mail, and letters with adult groomers facing up to two year in prison and being automatically placed on the sex offenders register in England and Wales.
* Appropriate professional contact (on behalf of the business via a business device or work environment)
* Staff must maintain neutral, friendly relationships with students while avoiding exclusivity or overfamiliarity.
* Staff must resist any attempt by a student to develop an overfamiliar or exclusive social relationship.
* If a student confides sensitive personal information staff have a duty to listen and respond in a professional manner in accordance with organisational guidelines.
* Staff have a duty to report to the employer any actual or perceived inappropriate development of the relationship between student and staff, electronic or otherwise.

## ELECTRONIC CONTACT INCLUDING SOCIAL NETWORKING SITES

* In any electronic contact with students staff must pay particular attention to use neutral, non-emotive language that will not be misconstrued.
* Staff must not exchange any information with a student that they would not be happy to share with the child’s parent or carer.
* Staff must avoid the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.
* Staff must not initiate or agree to ‘friendship’ requests or similar with pupils that will result in the sharing of personal information, photos, status updates, etc. For example, if staff receive Facebook friend requests from a current student they should inform their line manager or the DSL so that there is complete transparency and they should not accept the request.
* Staff should be particularly cautious about their public web profiles and privacy settings.

## FAILURE TO COMPLY

* Non-compliance with the above policy will result in disciplinary procedures. In the instance where it is deemed that the non-compliance falls under gross misconduct, ICE will follow the appropriate procedures as outlined in the ICE Disciplinary policy. Examples of gross misconduct which may render an employee liable to summary dismissal include, but are not limited to, the following:
  + 1. Insulting, aggressive or abusive language and/or behaviour
    2. Indecent or immoral behaviour
    3. Deliberately withholding information about other employees who break Company rules and procedures, regardless of their status
    4. Discrimination, harassment, victimisation or other unlawful discrimination against other employees, students or suppliers.
* Employers have a duty to remove an individual from regulated activity where there is risk of harm to children.
* Employers have a ‘duty to refer’ to external authorities\* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children. (\*ISA, police, local child protection authorities

# APPENDIX B: CODE OF CONDUCT FOR YOUNG PEOPLE & VULNERABLE ADULTS

All students at Ice are expected to be polite and show tolerance and respect when interacting with one another and staff.

* All students must r espect the rules of ICE which include:
  + Purchase, sale and consumption of alcohol, recreational/nontherapeutic drugs and substances for abuse is forbidden.
  + Smoking is banned in all buildings.
  + All rules and safety/emergency procedures such as fire drills must be followed
  + Inappropriate physical intimacy among participants is not permitted.
  + Serious incidents of misbehaviour such as fighting, racial/sexual abuse, damage to property, indecent language and failure to obey instructions will normally lead to expulsion from ICE .

Disrespectful behaviour of any kind will not be accepted in our school. If a student is found be have been physically or verbally offensive (shouting, hitting or being rude/offensive) to another student or staff member, ICE reserves the right to ask the student to leave immediately. Our procedure for this is:

1. The student has a meeting with Director of Studies or Director to discuss the problem.
2. If the student continues to be offensive, he/she will have a 2nd meeting which is his/her last chance to improve.
3. If it does not improve, the student will be told at the 3rd meeting that he/she must leave the school.

# APPENDIX C: RECOGNISING ABUSE

Abusers can be anyone and anywhere. An abused person is someone, who has suffered physical injury, neglect, emotional or sexual abuse. In many cases, an abused person will suffer more than one type of harm, for example physical injury and emotional abuse. Importantly, abuse can result in the individual suffering significant harm and at worst, can lead to death. Definitions of abuse vary across time, culture and geography. We know more about abuse now but there are no reliable figures from previous generations to compare with today’s figures. Abuse is NOT the abused person’s fault. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Individuals may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another U18 or U18s. Often the abuser is known to the individual, such as a member of the family, neighbour, or family “friend”.

Abusers may be anyone:

* Any age
* Male or female (including sexual abuse)
* From any social class, culture or faith
* ‘Nice’ people
* Professionals such as teachers, religious leaders or social workers
* Related to the U18
* Other U18s
* Those in a position of power or trust

What are the Types of Abuse?

* Sexual Abuse
* Physical Abuse
* Emotional Abuse
* Neglect

Abusers can use a combination of different types, physical and sexual abuse

## SEXUAL ABUSE

Sexual activity with or directed toward a person under 18 by an adult who is in a position of trust with under 18 year olds is a criminal offence (Sexual Offences Act 2003)

Some arrive in a job with a pre-meditated desire to abuse children; others develop it while in the job. Therefore safer recruitment alone is not enough to provide adequate safeguarding for children.

A sexual abuser typically goes on a journey:

* Feeling emotionally connected to children and having few adult relationships / pastimes
* Overcoming his/her own conscience, by, for example, seeing that child porn is available on the Internet so it must be OK and/or by re-interpreting children's behaviour to be sexual and flirtatious when it isn't
* Grooming adults so they see the abuser as normal / respectable / responsible
* Grooming children, especially those in need, testing their boundaries in minor ways at first, so that should there be any complaint, it would be easy to explain away.
* Slowly develop a relationship with the child, pushing the boundaries of sexual behaviour gradually further

Sexual abuse involves forcing or enticing an U18 to take part in sexual activities, not necessarily involving a high level of violence, whether or not the U18 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 U18s in looking at, or in the production of, sexual images, watching sexual activities, encouraging U18s to behave in sexually inappropriate ways, or grooming an U18 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 U18s.

Physical Signs of sexual abuse include:

* Repeated, inappropriate, masturbation
* Presence of sexually transmitted disease
* Young children with age inappropriate sexual knowledge, e.g. penetration, ejaculation, oral sex
* Explicit sexual drawings
* Pain, soreness or itching in the genital or anal areas or mouth
* Recurrent genital or urinary infections.
* Pregnancy

Behavioural Signs of sexual abuse include:

* Disclosure from a child (to another child or an adult)
* Young children acting out sexual behaviours, e.g. simulating intercourse, grabbing genitalia etc.
* Young children displaying sexually inappropriate knowledge or behaviour
* Persistent bedwetting, nightmares and sleep problems
* Anorexia, bulimia, self-harm or excessive ‘comforting’ eating
* Fear of a specific person
* Running away from home
* Substance abuse
* Child having unexplained gifts, including money
* Children having ‘secrets’ that an adult says they are not allowed to tell
* Secrecy around internet use and webcams etc.

## PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to an U18. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in an U18. Physical abusers:

* Are not usually pre-meditated (unless sadists) but are usually reactive abusers.
* They typically lack self-restraint and don’t have appropriate strategies for managing
* Conflict and/or difficult children

Physical Signs of physical abuse include:

Everyone can have accidents and may have bruises from time to time. The U18 or his or her parents/guardians will usually tell you how the injuries occurred and what happened. However, if they do not tell you or do not give you an adequate explanation of what happened, you need to consider whether the injuries are a possible sign of physical abuse. Sometimes an U18 can be physically abused without easily identifiable signs of injury, so it is important to act on concerns so professional assessments can be made.

Injuries not adequately explained including: fractures, bruises, burns, bite marks, slap marks and implement marks (e.g. belt mark).

Other signs of abuse include

* Grip marks - may indicate shaking
* Slap marks - cheeks, buttocks, limbs (may leave a hand imprint)
* Soft tissue marks
* Long marks
* Symmetrical bruising
* Bruising in unusual places e.g. bruises on ears
* Teeth / bite marks
* Burns with outline, e.g. outline of an iron
* Cigarette burns
* Fractures or other injuries
* Injuries which haven’t been treated properly and there is delay in seeking medical attention

Behavioural Signs of physical abuse include:

* U18 appears frightened of others e.g. parent(s) or carer(s)
* U18 doesn’t want to go home, or runs away
* U18 flinches when approached or when someone stretches a hand towards them
* U18 reluctant to get undressed e.g. for games or sport activity
* U18 very passive or very aggressive
* Frozen watchfulness - U18 sits very still watching what’s going on (waiting for the next hit)
* Equally could appear overly “happy” and “eager to please”

## EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of an U18 such as to cause severe and persistent adverse effects on the individual’s emotional development. It may involve conveying to them 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 U18 opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age developmentally inappropriate expectations being imposed on U18s. These may include interactions that are beyond the individual's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing U18s frequently to feel frightened or in danger, or the exploitation or corruption of U18s. Some level of emotional abuse is involved in all types of maltreatment of an U18, though it may occur alone. Be aware that:

* All sexual abusers are emotional abusers
* Other forms of emotional abuse include failing to provide support to children needing it, and through constantly directing negative attention to a particular child.
* Bullying is the classic form of emotional abuse

Physical Signs of emotional abuse include:

* Physical, mental and emotional developmental delay / late developer with no obvious medical reason
* Sudden onset speech disorders, e.g. suddenly developing a stammer

Behavioural Signs of emotional abuse include:

* Acceptance of punishment which seems excessive
* Over-reaction to mistakes
* Continual self-deprecation
* Excessive fear of new situations
* Inappropriate emotional response to painful stimuli
* Excessive behaviours, e.g. rocking, head banging, pulling own hair out
* Self-harm and/or eating disorders
* Compulsive stealing/scavenging
* Excessively sad, depressed, withdrawn,
* Low self-esteem
* Very poor relationship with parent/carer

## NEGLECT

The persistent failure to meet an U18’s basic physical and/or psychological needs, likely to result in the serious impairment of the U18’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once an U18 is born, neglect may involve a parent or carer failing to:

* provide adequate food, clothing and shelter (including exclusion from home or abandonment);
* protect an U18 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, an U18’s basic emotional needs.

Physical Signs include:

* Looks excessively thin or ill
* Well below average weight and height, failure to thrive,
* Recent unexplained weight loss.
* Complains of hunger; lack of energy
* Untreated conditions/injuries
* Repeated accidents, especially burns
* Left home alone inappropriately
* Repeatedly unwashed, smelly or dressed inappropriately for the weather
* Supervision/carers inappropriate (e.g. 8 year old looking after other children)
* Badly decayed teeth
* Unhygienic and/or unsanitary living conditions

Behavioural Signs include:

* Poor level of concentration
* Constantly hungry or ’stealing’ food from others/from bins
* Not keeping Doctor or Hospital appointments
* Frequently not at school or persistent lateness
* Reluctant to go home from school