

Safeguarding and Child Protection Policy and Procedures 2019

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Introduction

Frances King operates a variety of courses at a number of locations throughout the year. This safeguarding policy is designed to cover all students under the age of 18 on any course at Frances King and includes:

- The Frances King Family Programme – where children aged 6 – 16 are taught on seasonal courses. Some summer classes and those on the spring and winter programme take place in buildings shared with adult learners.
- The Frances King Teenager Programme – a programme that operates for 6 weeks each summer offering classes, activities and accommodation for both residential and day students aged 12 – 17.
- Adult courses – students aged 16 and above are accepted on adult courses throughout the year. Students aged 16 and 17 are therefore studying alongside students that might be considerably older.
- One-to-One classes – students of any age can be accepted for private one-to-one or two-to-one classes by arrangement at any time of the year.

This policy is designed to outline the school's responsibilities, the measures it takes to prevent harm and the actions to be taken in the event of an incident occurring.

General Statement

Frances King recognises that it has special duties of care towards students under the age of 18 and vulnerable adults and is committed to protecting them from harm.

Frances King is also committed to ensuring that all members of its staff are not placed in situations where abuse might be alleged.

Frances King understands the importance of staff having safeguarding awareness and being alert to possible concerns being raised in the school and trains all staff who come into regular contact with students under the age of 18 to the required safeguarding level. All staff may raise concerns directly with Children's Social Care Services. All Frances King centres have a designated safeguarding lead with sufficient status and authority to act when concerns are raised.

If there are any safeguarding concerns about vulnerable adults in the school, these should be made to the Designated Safeguarding Lead or the Academic Manager of that particular centre.

Frances King takes every reasonable step to safeguard students under the age of 18 by adopting child protection guidelines through a code of behaviour, and following procedures for vetting and training people who work directly with young people and in accordance with the document.

Policy review and distribution

This policy is reviewed and updated regularly by senior management. An updated printed copy of this policy will be displayed in all staffrooms and offices and a digital copy will be sent to new employees, Homestay suppliers and made accessible to partners, potential students and parents on the school's website.

Definitions

Duty of Care

Duty of Care Is the legal responsibility that adults who are working with children have towards children they are looking after, supervising and who are dependent on them for their safety and well-being. The duty extends both within and outside the school.

Safeguarding

Safeguarding can be summarised as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Safeguarding is not just about protecting children from deliberate harm. It relates to aspects of school life including:

- pupils' health and safety
- the use of reasonable force
- meeting the needs of pupils with medical conditions
- providing first aid
- educational visits
- intimate care
- internet or e-safety
- appropriate arrangements to ensure school security, taking into account the local context.

Safeguarding can involve a range of potential issues such as:

- bullying, including cyberbullying (by text message, on social networking sites, and so on) and prejudice-based bullying
- racist, disability, and homophobic or transphobic abuse
- radicalisation and extremist behaviour
- child sexual exploitation
- sexting
- substance misuse
- issues that may be specific to a local area or population, for example gang activity and youth violence
- particular issues affecting children including domestic violence, sexual exploitation, female genital mutilation and forced marriage.

Child Protection

Child protection is the means of protecting individual children from significant harm as a result of abuse or neglect and identifying those at risk. It involves all measures undertaken to prevent and respond to abuse.

Abuse

Abuse is any form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. For details of types of abuse see page 20.

Bullying

Bullying is seen as a form of abuse by mental, physical or verbal actions, by either individuals or groups, which are intended to exploit or intimidate others and which, by a reasonable person, would be seen as unacceptable behaviour.

Child / Children / Juniors / Under 18s

Students that have not yet reached their 18th birthday. References to “juniors” in certain Frances King documents and policies refers to students aged 6 – 16 on the Frances King Junior Programme. “Under 18s” refers to students aged 16 or 17 on adult programmes.

Vulnerable Adult

Vulnerable adults are people who are at greater than normal risk of abuse, a vulnerable adult is aged 18 or over who receives or may need pastoral care because of a disability or illness and who is or may be unable to take care of themselves or protect themselves against significant harm or exploitation. These vulnerable adults are most at risk of abuse: If they are isolated and don't have much contact with friends or family If they have difficulty communicating with others If they have learning difficulties, physical disabilities or mental illness. The list above is not exhaustive and there may be other signs of vulnerability. Even though these students are adults Frances King should be aware that any suspected cases of vulnerability should be immediately reported to the Senior Designated Safeguarding Lead or Welfare Officer by following the safeguarding procedure flow chart at the end of this policy.

DSL- Designated Safeguarding lead

The named person is responsible for Safeguarding within the organisation including and a point of contact for all staff. Duties include; overseeing the school's policy and provision, training, contact with external bodies, and recording incidents. The DSL is a key part of the Welfare Team. The position is currently held by Ita Hennesey who is also the designated Welfare Officer.

Regulated Activity

Regulated activity is the term most commonly used to describe roles where a suitability/criminal records check is required by law or 'roles involving responsibility for or substantial access to under 18s'.

In broad terms regulated activity is any position that has direct contact with children, or a position which manages staff who work with children.

Regulated activities most applicable to ELT providers are teaching; leisure programme supervision; general care or supervision (e.g. by a group leader,

homestay host or residential staff); when they are carried out frequently (once a week or more), intensively (4 times or more in a 30 day period) or overnight. Regulated activity also includes any activity of any kind carried out by an individual visiting a school frequently or intensively, for or in connection with the school, and which gives the individual opportunity to have unsupervised contact with children.

Welfare Officer

The member of staff who has day to day responsibility for the monitoring the health of all students and responding to issues as they arise, as well as advising staff and students on appropriate action. The Welfare Officer is a key part of the team that considers all aspects of Safeguarding.

2.0 Safety Measures at Frances King **Informing and Educating staff**

All Frances King staff must attend an induction prior to commencing work.

- All Frances King staff are required to read and sign all centre policies and procedures regarding child protection, staff conduct and health and safety prior to commencing work.
- All Frances King staff are subject to a Garda vetting check.
- Introduction to safeguarding forms part of the Frances King induction process for new staff
- All staff responsible for First Aid must produce a valid First Aid certificate.

Code of Conduct

The following guidelines are designed to protect both the staff and the children in our care.

- At no time should there be any physical contact of any kind between teachers and students. This includes during games/activities, when helping students to cross the road, or if they are distressed.
- Teachers must not give out personal email address or phone number to any students under 18 and never communicate with them by email, phone, text or social network sites.
- Staff to avoid being on their own with any student in a room with the door closed. If there is a need to speak to a student alone, to do it with the door open in view of others.
- Not to comfort a distressed student alone – ask another member of staff to assist.
- Maintain a professional relationship with students at all times and not court popularity, avoid being over friendly, showing favouritism or spending excessive amounts of time with any one student in comparison to others.
- To report any inadvertent, inappropriate accidental conduct as soon as possible. Not to put themselves in a compromising position by keeping silent.
- No alcohol or drugs are permitted on site at any time.
- To always use appropriate language and material in class. Never swear in front of students or teach swear words. Be aware of content of songs / videos before playing them to a class. To remember that some topics / exercises might be inappropriate for younger learners.

- Frances King forbids any inappropriate fraternisation between its staff and any student under the age of 18. Staff who feel that colleagues are behaving inappropriately are instructed to report this to the management team immediately. Frances King also requires that all members of staff avoid any one-to-one situations with students under the age of 18 if at all possible.
- Frances King discourages any fraternisation between staff or group leaders which could in any way embarrass students, staff or clients or interfere with the successful running of the programme.
- Staff should never touch a student in any way unless this is appropriately associated with teaching, supervision or safety. On no account should there be any physical contact as part of any disciplinary procedures.
- Teachers with students under the age of 18 in their class should be aware of references to alcohol, drugs and sex in lessons and should exercise extreme caution when dealing with those subjects. Certificate 18 films must not be shown to students under the age of 18 and class parties / celebrations should not include alcohol.

Dress Code

The Company expects employees to dress conventionally and appropriately. Our customers have very high expectations of us in many areas, and one of the most important is the appearance of the people who work in schools. All staff are at the forefront of the Company's contact with our customers and we require that the appearance of all our employees is professional and to a high standard at all times. At Frances King, casual clothing may be worn, but it must be clean and smart. For men this means for example that a shirt rather than a t-shirt should be worn. An extra degree of moderation is required when teaching under 18s and applies to staff both in the classroom and on activities, and when off duty but on site.

Below is a list of things that are not considered acceptable.

- Nose / lip / tongue / eyebrow studs or rings
- Not shaving (unless you have a beard)
- See through clothing
- Scruffy trainers / beach shoes
- Shorts
- Exposed tattoos
- Bare midriff
- Faded Jeans
- Dirty / creased / ripped clothes
- Exposed cleavage
- Dirty / untidy hair

Recruitment Procedures

Frances King is committed to the safeguarding of children and vulnerable adults, to this end we have in place policies to support managers in recruiting the most suitable candidates to join the organisation. We currently have in place a Recruitment Guidelines Policy as well as a Safer Recruitment Guidelines document, these documents are available to all members of staff and sets out our recruitment process

as well as our dedication to promoting the welfare of children and vulnerable adults in the organisation. The documents can be found at [FrancesKing F:\HR DOCS](#).

All the staff members at Frances King who work directly with children and young people are subject to checks, a few of which are listed below but more detailed explanations can be found in the recruitment documentation.

- All staff members at Frances King must sign a declaration of their suitability to work with children and young people and that they have no previous convictions or barring prior to commencing work.
- All teachers, activity leaders and support staff who have direct contact with students under the age of 18 must undergo an enhanced Garda check if requested by Frances King.
- References will be requested from previous employers as to the applicant's suitability to work with children and young people.
- Any gaps appearing on CVs are investigated at interview stage.
- The Child Protection Policy has high profile in the Frances King centres.
- All new staff are briefed on the Child Protection Policy.
- Existing staff are reminded of the Child Protection Policy at regular staff meetings.
- A central register for all staff is kept by HR containing for each employee;
 - Proof of identity – name, D.O.B, address with evidence and date
 - Role in organisation
 - Qualifications – signed copies of originals with date taken
 - References – written or in case of phone reference signed and dated notes
 - Right to work in Ireland – evidence shown with dated copy
 - Start date
 - Garda check – (if applicable) with disclosure number
 - Bared list check – (if applicable) with evidence of check and date
 - Prohibited list – (if applicable) with evidence of check and date

Safer recruitment guidelines

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children and vulnerable adults in education.

Frances King, in keeping with all organisations which employ staff or volunteers to work with children, adopts a consistent and thorough process of safer recruitment in order to ensure that people who are unsuitable to work with children and young people are prevented from doing so.

Safer recruitment practice includes those persons who may not have direct contact with children or vulnerable adults, but because of their presence and familiarity in certain settings will still be seen as safe and trustworthy.

In order to help safeguard and promote the welfare of all its students, the School is committed to a thorough and consistent Safer Recruitment Policy.

Aims and Objectives

The aims of the Safer Recruitment policy are to help deter, reject or identify people who might abuse students or are otherwise unsuited to working with students by having appropriate procedures for appointing staff.

The policy objectives are to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation.

Below are guidelines which all recruiting managers should consider before during and after the recruitment process to ensure our safer recruitment aims and objectives are met.

Pre-interview

1. Short term or long term staff shortage identified
2. Specific job description for position created, reviewed or amended (as necessary)
 - A job description is a key document in the recruitment process, and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role.
3. Essentials and desirables for role discussed and decided upon □ The qualifications and experience needed for the role.
 - The competencies and qualities that the applicant should be able to demonstrate.
 - How these will be tested and assessed during the selection process
4. Position advertised internally and externally on websites such as guardian jobs
5. Include statement on safer recruitment and dedication to safeguarding practises and how this relates to rigorous selection practises
6. CVs arrive in response to advert
7. CVs screened by relevant line manager to select applicants who meet criteria
8. Applicants who meet criteria contacted to arrange interview 9. Interview arranged and candidates notified about the following:
 - They will need to bring their passport
 - They will need to bring originals of any qualifications they have (if necessary)
 - They will need to provide details of two referees
 - That there will be an interview task (if necessary)
10. Interview confirmed
11. Candidates will be asked to give a full history of employment, both paid and voluntary, since leaving school, including any periods of further education or training. This should include:
 - a. Start and end dates,
 - b. Explanations for leaving, and
 - c. Reasons for any gaps in employment

Post Interview

12. Interviewer evaluates strengths and weaknesses and completes interview feedback sheet
13. If 'no', a rejection letter will be sent to the candidate this can be found on SAKER/BE/HR/Recruitment
14. If successful, the following steps are taken
15. Candidate contacted and offer letter sent to confirm
16. Candidate responds with acceptance (or decline)
17. Stated referees are contacted for reference
 - a. Wherever possible references should be obtained prior to interview so that any issues of concern raised by the reference can be explored further with the referee and taken up with the candidate during interview.
 - b. References should contain objective, verifiable information and in order to achieve this, a reference with questions relating to the candidate's suitability to work with children and young people should be provided.
18. Garda check is carried out (if applicable)
 - If an enhanced Garda disclosure has not returned before the start of a new contract, then recruitment of that person should be done only in exceptional and justifiable circumstances for employment to commence prior to receiving criminal clearance. This decision should only be taken if it is unavoidable.
 - If this decision is taken for employment to start before a suitable criminal check is returned, then there must be a record of the decision, including the decision being signed off by a senior manager, to ensure audit and accountability of the judgement.
 - The judgement should be based on an assessment of the risk versus the consequences of the decision.
 - The key questions for consideration are:
 - a) What are the reasons for considering commencement of employment prior to receiving clearance?
 - b) What are the consequences to service delivery, of waiting until clearance is received?
 - c) If the employee commenced in their role, what would be their normal level of access to children i.e. unsupervised or supervised access to children?
 - If a new starter does commence employment prior to clearance being received, they must sign the declaration of fitness to work with juniors and the safeguarding briefing, their access to juniors and vulnerable adult should be supervised at all times; they must not be left alone with children and vulnerable adults. In addition the supervision manager should provide a clear record of what alternative risk mitigation has been put in place to cover this period. The new starter should never commence employment prior to the submission of their completed application or paperwork to obtain criminal clearance.
19. Pending satisfactory response, the candidate is emailed a copy of the contract with start date to sign, employee handbook, Health & Safety Policy, Safeguarding Policy and other new starter documents (pay details, emergency contact template etc.)

Further information on Criminal checks and procedures

What we do if a potential member of staff already has a Garda check. If the check is less than two years for Garda Vetting, is enhanced and we have no other reason for concern then it is ok to accept. Further to this, we must see the original and keep appropriate records.

What we do if a check hasn't come back by the time the person needs to start working

If we approve someone to commence employment that will have regulated contact with children and vulnerable adults and a disclosure has not come back then there should be exceptional and justifiable circumstances for this, this decision should only be taken if it is unavoidable. We **must** ensure there is record of this decision, including this decision being signed off by the relevant senior manager, this is to ensure audit and accountability of the judgement. Some key questions for consideration are:

- a) What are the reasons for considering commencement of employment prior to receiving clearance?
- b) What are the consequences to service delivery, of waiting until clearance is received?
- c) If the employee commenced in their role, what would be their normal level of access to children i.e. unsupervised or supervised access to children?

If employment does commence prior to clearance being received, the employee must sign the declaration of fitness to work with children and their access should be supervised at all times; they must not be left alone with children. There should be a clear record of what alternative risk mitigation has been put in place to cover this period.

What we do if a prospective member of staff has been living outside Ireland.

We ask for a police certificate of good conduct from the country of most recent residence and Irish Garda vetting disclosure is also recommended for Irish nationals even if they have been living overseas for a long time. A police certificate of good conduct is a general term covering the documentation available as a result of criminal records checked outside Ireland. Identity checks, exploring employment history and obtaining proper references are also important.

What we do if a record check is not possible

If the prospective employee is a Irish national returning to the Republic of Ireland after working overseas where the authorities have refused to provide a record check because they are an Irish national, you can request a Garda check for their Irish records and should take additional care with the other recruitment checks: checking identification and qualifications and obtaining proper references, and supervision.

If the prospective employee is an overseas national, we document what action has been taken to obtain a check and why this has not been possible, take additional care with identity and qualification checks, exploring employment history and

obtaining references. Based upon our findings, a judgement is then made with regard to suitability for the role and the level of supervision.

What we do if a disclosure shows an applicant (or existing member of staff) has a criminal record

An applicant's suitability to work with children should be judged on a case by case basis and in light of the results of the relevant pre-appointment checks carried out on him or her. The fact that a person has a criminal record does not automatically make him or her unsuitable to work with children. Employers must make a judgement about suitability taking into account only those offences which may be relevant to the particular job or situation in question. In deciding the relevance of convictions, a number of points should be considered

- *Seriousness and nature of offence/s* – in general, serious convictions for sexual, violent or drug offences will be particularly strong contra-indicators for work with children. This includes assault and violence against a person, affray, riot and violent disorder, aggravated criminal damage, arson, drink and drug induced driving, drug offences, robbery and sexual offences.
- *Nature of appointment* – will help to assess the relevance of the conviction. For example, serious sexual, violent, drug or drink offences would give rise to particular concern where a position involves the care or supervision of children or teaching, training or instruction of children. Driving or drinking offences would be relevant in situations involving transport of children.
- *Age of offence/s* – offences which took place many years in the past may often have less relevance than recent offences. However, convictions for serious violent or sexual offences are more likely to give cause for concern than for instance an isolated case of dishonesty committed when the person was young. The potential for rehabilitation must be weighed against the need to protect children.
- *Frequency of the offence/s* – a series of offences over a period of time is more likely to generate cause for concern than an isolated minor conviction.

General Guidelines

Frances King recognises its duty to safeguard and promote the welfare of students under the age of 18 within our care. In order to do so, the following guidelines should be followed at all times:

- All Frances King staff are required to read and sign all centre policies and procedures regarding child protection, staff conduct and health and safety prior to commencing work.
- Introduction to safeguarding forms part of the Frances King induction process for new staff
- All staff responsible for First Aid must produce a valid First Aid certificate.
- Ensure that any member of staff whose normal duties include regular contact, caring for or supervising a young person under the age of 18 is vetted and subject to Garda enhanced checks.
- Situations where there is only one staff member present with a young student should be avoided. On the occasions when a confidential interview or one-to-one

meeting is necessary, these should be conducted in a room where the exit is clearly visible and where possible, the door to the room is left open.

- Meeting with any young student outside of the normal environment should be avoided. Where such meetings cannot be avoided, another staff member should be informed that they are taking place.
- Intimate or sexual relationships between staff and students under the age of 18 are an abuse of trust which may constitute a criminal offence.
- In situations where young students may be providing information of a particularly sensitive nature, staff should be careful not to probe for details which could be construed as unjustified intrusion.
- Unnecessary physical contact with young people/children should be avoided, (e.g. gestures such as regularly putting a hand on the shoulder/arm) despite the fact that those gestures may be well intentioned, such acts could be misinterpreted.
- In situations where it is necessary for staff to restrain a young person/child in order to prevent self-injury, injury to others or damage to property, only the minimum force necessary must be used. Any action taken must be only to restrain.
- Staff required to administer First Aid should ensure wherever possible, that another member of staff is present.
- Staff should be careful in their use of language/terminology and must not make unnecessary comments which could be interpreted as having a sexual connotation;
- There will be occasions when younger students are placed in settings outside their normal place of study. This may be a visit/excursion/off-site activity. Organisers must ensure that policies and procedures (risk assessments) are in place to protect young people from harm in these situations, focussing greatest protection on settings when they may be most at risk.
- The personal telephone number, email, home address, full name or social networking information of staff members should not be given to any young student.
- In the case of any student making a disclosure or where there is cause for concern, the information will have to be referred on. All allegations or suspicions of abuse will be reported. Please see reporting procedures flow chart at the end of this document.
- If a member of staff feels that they may be at risk of being the subject of or exposed to unwarranted allegations/accusations in connection with students they should alert their Line Manager or Designated Safeguarding Lead.
- Any deficiencies or weaknesses in regard to child protection arrangements are remedied without delay.

Social Media

Frances King has created a closed what's app group where people can only request to be a member. The administrator has the admin rights of the group and knows who the under 16 students are.

Frances King Activity Programmes

Frances King operates a number of different Activity Programmes. Risk assessments are conducted for all activities.

On the Family programme we arrange 2-3 activities per week to places that are suitable for and of interest to juniors and their families. All families are welcome to join but due to supervision restrictions we do not accept juniors without a parent/guardian.

Frances King runs an Activity Programme in conjunction with adult courses which students are welcome to join. Events that are unsuitable for students under the age of 18 are clearly identified on the programme and on other publicity and those under 18 are not permitted to join. On other activities the leader of each event will ascertain at the start of each event whether there are any students under the age of 18 attending the event, and will pay particular attention to the safety and wellbeing of those individuals. At the end of the event the leader will give them extra attention to ensure that they know how and are able to get home safely.

Safety in our buildings

All buildings used by Frances King have high standards of safety. This includes:

- Risk assessments
- Regular testing and maintenance of fire equipment such as smoke detectors, alarms and extinguishers, and regular checking of emergency exits, and sixmonthly fire drills
- Routine Electrical appliance testing
- Routine inspections for hazards
- Appointment of Fire marshals and floor fire officers

The school regularly reviews the number of First Aid trained staff at each building and time of day and organises context specific training as required. [For further details see the *Frances King Health and Safety Policy 2019*]

Monitoring Under 18s

Under 18 students are highlighted on the arrivals form in pink so that they are given the appropriate welcome pack and lanyard on arrival. Teachers are responsible for checking the daily attendance of students and to report the non-attendance of any students under the age of 18 (marked by a code on the register) immediately. Staff are also required to report any concerns about welfare or behaviour that they notice, or any incident that gives rise for concern to the Welfare Officer and /or Safeguarding lead. A member of the Welfare Team will meet all students under the age of 18 in their first week at the school in order to

- Introduce themselves and how they can be contacted,
- explain what support the school offers
- give the student specific guidelines including the Under 18s Student Guide
- check that we have all relevant details about the student such as mobile phone number, and living arrangements if not in Frances King Accommodation.
- check that students are happy in their homestay and classes.
- see if they have made friends and to make suggestions as to how they can introducing them to other students of a similar age if required.

- See if they've read the under-18 student guide. They are asked 3 questions to check they've read the guide: How old do you have to be to smoke/drink in the Ireland? What should you do if you're ill or unhappy? What's your host/guardian's phone number?

Additional safety measures for juniors on the family programme

At registration the parents/guardians of all students on the junior programme are required to complete a medical questionnaire and give contact details whilst they are in London or Dublin.

Teachers take an attendance register daily and alert the Academic Manager of any absentees, the Academic Manager will then contact the student's family to ascertain the reason of absence and confirm the acknowledgement of the parents/guardians. Juniors on the family programme are monitored at all times while in our care. During break times they are supervised and staff are positioned at exits to prevent children from leaving the building.

Under 18s in Frances King Accommodation

Frances King manages a number of different accommodation options. The accommodation is managed directly by the school with our own inspectors visiting the property and meeting the homestay provider.

The main adult carer living in a homestay that accepts students under the age of 18 is subject to an enhanced Garda check. From April all adults normally resident at property will be checked.

Specific guidelines for dealing with students under the age of 18 are included in the guideline booklet given to all hosts who accept Frances King students (see *Frances King Homestay Guidelines*)

Students who are under the age of 18 and staying in homestays, are also issued with guidelines when their booking is confirmed.

In the first quarter of 2015, the school intends to introduce a contract of understanding to be signed by the parents of unaccompanied students under the age of 18. This contract will outline an expected code of conduct for students under the age of 18 during their stay.

- *Before placing an under-18 in homestay accommodation, the main carer (i.e.: the host) is vetted to ensure their suitability to host young students. They will also be required to undertake additional supervisory and welfare roles so that your son/daughter is safe and well during their stay. It is important that your son/daughter treats their host and all other members of the household with respect.*
- *Our hosts will have specific household rules. This will be explained to your son/daughter upon arrival. They will also have a set time for breakfast and dinner. It is important that your son/daughter advises their host if they expect to be late for their meal.*
- *During their stay with a host, your son/daughter will need to observe a curfew of 10.00pm from Sunday to Thursday and 12.00am (midnight) on Friday and Saturday. If your son/daughter is reported not to have returned home at the allocated time, the school will contact you immediately.*

- *We will require written consent from you if your son/daughter chooses to stay overnight with their friends or travel.*
- *It is vital that your son/daughter advises their host of their class timetable and any social programme activities they are likely to participate in.*

HOSTING UNDER- 18S (SAFEGUARDING GUIDELINES)

Before an unaccompanied under-18 is placed in homestay accommodation, the main carer in the homestay will be required to complete an enhanced Garda check. The host will be able to accommodate under-18s. Should the disclosure contain adverse information, the school reserves the right to request a copy of the certificate and a decision will then be made in regards to the host's suitability to accommodate under-18s.

The Garda Vetting certificate will need to be renewed once every two years. When hosting under-18s, hosts will be required to adhere to a code of practice, as laid out below:

- *Hosts will be required to accompany the student to the nearest tube/train station or bus stop on the first day of school.*
- *Particular care and attention will be provided in explaining the rules of the household. This includes the use of the bathroom and kitchen facilities and other common areas.*
- *Under-18s will normally be required to book half-board. The host will ensure that their student is catered for accordingly and is eating well. Arrangements will usually be made by the school for their lunches. Alternatively, we may request packed lunches from the host (further details including rates of pay will be provided at the time of the booking).*
- *The host will ensure that the student does not use any electrical appliances in the kitchen or elsewhere in the household unsupervised.*
- *If the host chooses to let their student use their washing machine, the host will supervise the first set of washes to ensure their student understands how to use it correctly.*
- *The host will ensure that under-18s do not have unsupervised contact with students over the age of 18 in their homestay.*
- *The host will monitor the use of the internet in the homestay – a parental block should be put in place to ensure that students do not have access to forbidden material.*
- *The host will implement a curfew (10:00pm between Sunday to Thursday and 12.00pm on Friday and Saturday). If the student is to go out in the evening, the host will be expected to obtain a telephone number or address of where they can be contacted in case of an emergency. If the student does not return home at the allocated time, the school should be contacted immediately. Out of office hours, the school can be reached on their emergency number: 00353 (0)83 4488469. In cases like these, the school will attempt to contact the student at least three times. Failing this, they will try to contact the parent or guardian of the student at least three times. If they are unable to make any contact, the school will agree on a plan of action, the following working day. The host will be kept updated at all times.*
- *The host will notify the school if their student wishes to stay out overnight with friends or arrange their own holidays with friends. In instances like these, written parental consent will need to be obtained by the school.*

- *The host will ensure that their student is attending their classes at school. If the student is likely to be absent from school, the host will notify the office immediately. A copy of the student's class timetable can be provided if requested.*
- *If the student falls sick, appropriate care and attention should be provided. This may involve accompanying the student to the nearest walk-in clinic or emergency care centre. The Student Welfare Officer should be contacted and advised accordingly.*
- *If there are any concerns relating to the welfare of the student (mental and/or emotional), the school will be notified immediately. Both the host and the school will work together sympathetically to resolve any concerns.*

The Homestay Contract

Frances King operates a **Homestay Code of Practice** to which all hosts are required to subscribe. This code, outlined below, sets standards for the benefit of both students and hosts. All hosts are required to sign a document agreeing to these conditions.

- *The host will welcome the student; make him/her feel at home and part of the family rather than a paying guest. Please ensure that there is an adult available to receive students on their arrival.*
- *The host will respect the student's different cultural background and be sensitive to the particular needs of the student.*
- *The host will show due concern for the welfare, safety and security of the student during his/her stay.*
- *The host will encourage the student to speak English as much as possible in the home.*
- *The host will not accommodate students of the same native tongue at the same time unless by prior agreement with the students and their schools.*
- *The host will provide a clean and comfortable student room which meets the physical requirements:*
- *Provide a clean and comfortable student room which meets the following physical requirements:*
 - *table/desk and chair for private study*
 - *adequate hanging and drawer space for clothes*
 - *change of bed linen weekly*
 - *change of towels weekly*
 - *good supply of blankets*
 - *a laundry service or clearly explained laundry arrangements*
 - *sufficiently spacious bedroom, naturally lit and adequately equipped*
 - *a proper state of cleanliness and repair throughout the home*
- *Provide a home environment in which it is possible for the student to carry on his/her English studies properly.*
- *Provide the student with a balanced diet and provide the meals and services agreed with the school.*
- *Give the student reasonable and regular access to bathroom and laundry facilities.*

- *Maintain close contact with Frances King School of English in order to help resolve any problems that the student may encounter during his/her stay.*
- *Do not exceed three students in a homestay.*

Frances King Teenage Programme

All students on the Teenager programme that are not brought to the school by a parent/guardian are met at the airport by a member of staff and driven to and from the airport by taxi.

All students stay in homestay accommodation walking distance to Loreto Abbey Dalkey.

All students required to attend breakfast.

If a student is feeling unwell they are asked to inform the host. The host will inform the emergency phone holder so that a record can be made of sickness and teacher informed.

Teachers are required to contact the Academic Manager by 09:15 with the names of any absent students.

Before afternoon excursions, all students are gathered in the garden and checked off the register for their groups. These groups are then checked against the register on arrival at the transport point, once on public transport, once off and again when they arrive at their designated meeting point on the trip. At least one AL remains at the meeting point to deal with any students enquiries/problems or for students returning early.

Students issued with emergency contact details for the emergency phone held by one of the ALs on each excursion.

RESPONDING TO ISSUES

Recognising signs of abuse

Abuse and neglect are forms of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or by failing to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or by a stranger, for example, via the internet. They may be abused by an adult or adults, or another child or children. Child abuse can have major long-term effects on all aspects of a child's health, development and well being. The main forms of maltreatment are:

Physical Abuse

Physical abuse is deliberately causing physical harm to a child. This might involve punching, kicking, biting, burning, scalding, shaking, throwing or beating with objects such as belts, whips, or sticks. It also includes poisoning, giving a child alcohol or illegal drugs, drowning or suffocation. Physical harm may also be caused when a parent or carer fabricates the symptoms of illness in a child. In pregnancy an unborn child can be harmed by domestic violence.

Emotional Abuse

Emotional abuse is where repeated verbal threats, criticism, ridicule, shouting, lack of love and affection causes a severe adverse effect on a child's emotional development. It includes conveying to children that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person. Emotional abuse may include not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature inappropriate expectations being imposed on a child, over protection and limitation of exploration and learning, or preventing the child from taking part in normal social interaction. It may involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of children, or it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. This may involve physical contact including penetrative sex, oral sex, masturbation, kissing, rubbing, or touching outside of clothing, or it may involve non-contact activities such as involving children in watching sexual activities, producing or looking at sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Abusers can be men, women or other children.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger. It also includes failure to ensure access to education or to look after a child because the carer is under the influence of alcohol or drugs. In pregnancy neglect may occur as a result of misusing alcohol or drugs.

Possible signs of abuse

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.

Signs of possible physical abuse

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games
- Injuries which have not received medical attention
- Reluctance to change for, or participate in, games or swimming
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation
- The child gives inconsistent accounts for the cause of injuries
- Frozen watchfulness

Signs of possible sexual abuse

- Any allegations made by a child concerning sexual abuse
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age
- Sexual activity through words, play or drawing
- Repeated urinary infections or unexplained stomach pains
- The child is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations □ Eating disorders such as anorexia or bulimia.

Signs of possible emotional abuse

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not mixing well with other children
- Sleep or speech disorders
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity
- Running away, stealing and lying

Signs of possible neglect

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to
- Frequently hungry
- Overeating junk food

Possible effects of abuse

The sustained physical, emotional, sexual abuse or neglect of children can have major long-term effects on all aspects of their health, development and wellbeing. Children can grow up to feel worthless, unlovable, betrayed, powerless, confused, frightened and mistrustful of others. They might feel, wrongly, that the abuse is their fault.

Possible effects of physical abuse

Physical abuse can lead directly to neurological damage, physical injuries, disability and in extreme cases death. Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural problems and learning difficulties.

Possible effects of emotional abuse

If a child suffers sustained emotional abuse there is increasing evidence of adverse long-term effects on their development. Emotional abuse has a significant impact on a developing child's mental health, behaviour and self-esteem. It can be especially damaging in infancy and can be as important as the other more visible forms of abuse, in terms of its impact on the child. Domestic violence, adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse.

Possible effects of sexual abuse

Disturbed behaviour including self-harm, inappropriate sexual behaviour, sadness, depression and loss of self-esteem have all been linked to sexual abuse. Its adverse effects may last long into adult life. The severity of the impact on the child is believed to increase the longer the abuse continues, the more serious the abuse, the younger the child at the start, and the closeness of the relationship to the abuser. The child's ability to cope with the experience of sexual abuse, once recognised, can be strengthened by the support of a non-abusive adult carer who believes the child, helps the child understand the abuse, and is able to offer help and protection. Some adults who sexually abuse children were themselves sexually abused as children.

Possible effects of neglect

Neglect can seriously impair a child's health, physical and intellectual growth and development, and can cause long term difficulties with social functioning, relationships and educational progress. Extreme cases of neglect can cause death.

Procedure for dealing with alleged abuse

Students

If students are found to be involved in bullying or harassment then action must be taken.

In the first instance they should be spoken to by their activity leader/class teacher and informed that they must cease such behaviour. (This should be reported to their house parent who should then record the incident and report it to a member of management-if residential).The teacher should report to their Line Manager/Welfare Officer/HR. The individual(s) involved should be informed that if this behaviour continues then further steps will be taken. All communication relating to the incident should be filed together with the incident report form. **It is important that all incidents of bullying are recorded.**

If the behaviour continues then the individual(s) involved should meet with (their house parent if applicable) and a member of management and be informed of the consequences of their actions in line with the disciplinary procedures of the school. It

should also be made clear that should their behaviour continue, more serious consequences will result and they may be sent home.

Staff

In a situation where a member of staff is being accused of bullying and harassment, that member of staff will be dealt with through the staff disciplinary procedure. Where there is a serious allegation of bullying and harassment, the appropriate personnel will be contacted.

Sexual Exploitation

Staff must record all incidents of what they consider to be sexual harassment between students and report them to the management team. They should report immediately if they think that any under-age students are at risk of inappropriate sexual conduct.

In a situation where a member of staff is being accused of sexual exploitation of a student, that member of staff will be dealt with following staff disciplinary and grievance procedures.

Harassment and Bullying Policy

'The act of systematic and/or continued unwanted annoying actions of one party or a group, including threats and demands.'

The definition of harassment or bullying sees either of those two forms of abuse as mental, physical or verbal actions which, by either individuals or groups, are intended to intimidate or exploit others, and which, by a reasonable person, would be seen as unacceptable behaviour in a Frances King school environment.

Frances King find all forms of bullying and harassment unacceptable from staff, students and any other persons involved or encountered during the stay at the school. Outlined below are examples of actions that constitute harassment or bullying, and the appropriate procedures for dealing with such instances. The examples are not all- encompassing and should be seen in the light of a definition of bullying and harassment.

Examples

- The use or threatened use of physical action/violence.
- Social exclusion.
- The use of disparaging names, phrases, sounds or language that could be considered offensive by targeted individuals.
- Persistent and deliberately wounding remarks.
- Repetitive actions or sounds intended to provoke , anger or upset targeted individuals.
- Actively spreading malicious gossip, rumours or hurtful remarks about targeted individuals.
- Fostering an atmosphere of distrust and actively encouraging such an atmosphere so as to cause hurt and disruption to the target individual in their everyday activities.
- Any form of mental or physical abuse.

These are intended only as examples of unacceptable behaviour. It is not a comprehensive list.

Advice for young people on cyber-bullying

- Not to give out personal details online.
- Not to forward abusive texts or emails or images to anyone.
- Not to give out passwords to your mobile or email account at any time.
- To remember that sending abusive or threatening messages is against the law.
- To keep and save any bullying texts or emails and note any details of the sender.

If a student feels that they are being bullied by email, text or online, they should talk to someone they trust and contact the welfare officer.

Students who are victims of bullying will be supported by the Welfare Team, Client Services staff and teachers in addition to members of the management team. Any member of staff who is victimised will be supported by the organisation in line with staff grievance procedures.

Reporting

It is the policy of Frances King that staff should record any incident involving harassment, abuse or bullying and report to a member of management. Staff should feel confident that any comment or complaint will be dealt with seriously. Staff also have the option of directly contacting the local Child Protection and Safeguarding Board.

Should a situation arise where an incident or cause for concern involving a member of the management team is reported, it should be to the Director of Human Resources.

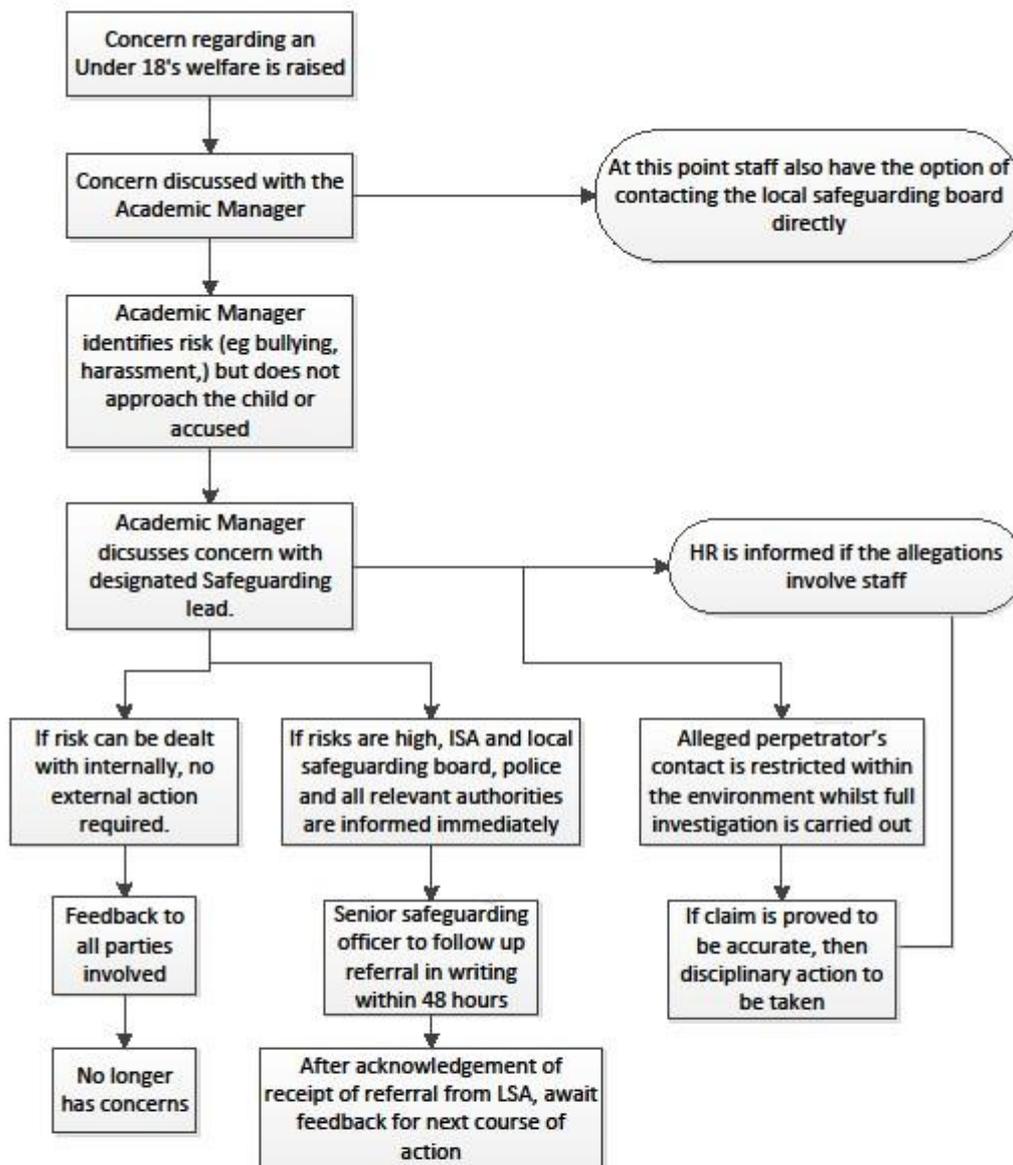
Other areas of concern

Staff should also be aware of the following issues for children and speak to the designated safeguarding lead if they suspect a problem or have any concerns □ Allegations against other pupils – where allegations of abuse, bullying or sexual harassment are made against other students the school will react quickly in response, following guidelines below.

- Preventing radicalisation and extremism – staff should be aware of and report any expressions of fundamentalism, radicalisation or extremism and not allow such ideas to be expressed in class
- Female genital mutilation (FGM)
- Child sexual exploitation – staff should be aware of the issue any report any suspicions that young students are being groomed or befriended by adults.

If at any point there is risk of immediate serious harm a referral should be made to the appropriate authority. **Anybody can make a referral.**

Safeguarding Allegations' Flow Chart This diagram illustrates what action should be taken and who should take it when there are concerns about a child or a vulnerable adult



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