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# **Safeguarding Policy & Guidelines**

## **2019**

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## 1. Policy Statement

The aim of these guidelines is to promote best practice in safeguarding and child protection in all our centres & to set out a procedural framework to ensure that the highest standards are upheld.

Safeguarding – The duty of care that MLI has to children (aged under 18) and vulnerable adults, ensuring that they are kept safe, and always appropriately looked after. This includes all pastoral care, supervision and child protection procedure policies being annually updated, and shared clearly to all stakeholders.

Child protection - The duty of Care that MLI has to children (aged under 18) to protect them against abuse.

- We protect all children regardless of; age, race, gender, disability, religion or belief, gender reassignment or sexual orientation, that are under our care, at all times.
- MLI staff are equipped to make informed and confident responses to specific child protection issues.
- MLI management are equipped to make appropriate decisions in the event of a specific child protection concern arising.

These guidelines apply to all employees, volunteers and third parties connected with the services offered by MLI International Schools, and who are expected to act to ensure MLI students are safe. The term "child" is defined as any individual who has not yet reached their 18th birthday, irrespective of the age of majority in their home country. In Scotland a "child" is defined as any individual who has not yet reached their 16<sup>th</sup> birthday.

MLI International Schools also implements a number of extra policies to complement this main Safeguarding Policy, such as Internet Safety and Codes of Conduct.

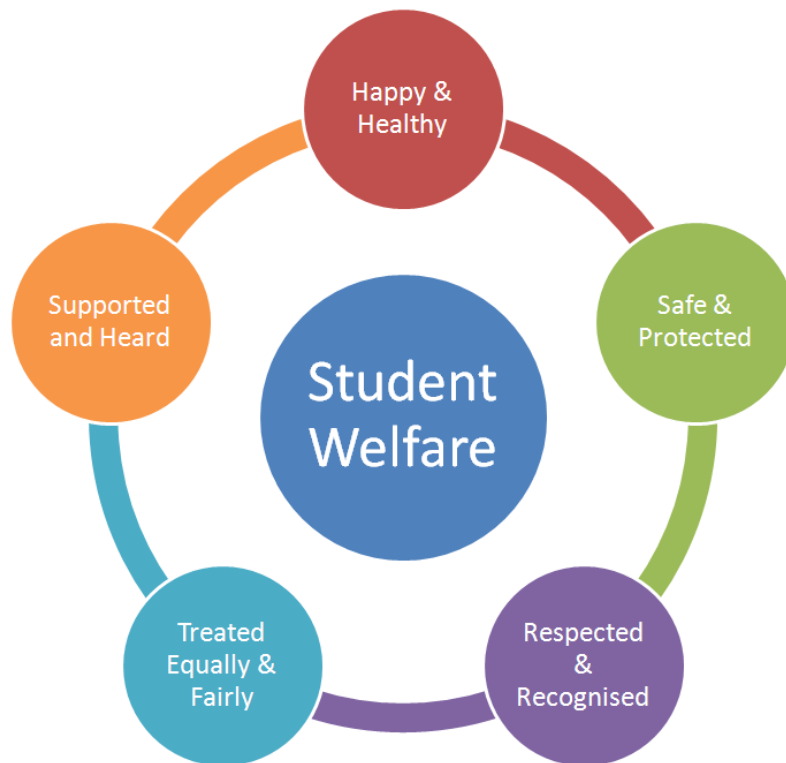
These guidelines were amended and adopted by MLI International Schools on 1<sup>st</sup> March 2019. The guidelines are reviewed on an annual basis and updated in the event of any safeguarding incident or new legislation. The annual review is carried out by MLI International Schools Senior Management Team, following end of course feedback from students and staff members.

The Designated Safeguarding Lead for MLI International Schools Ireland with responsibility for the implementation of these guidelines is Therese Dillon, MLI Regional Manager Ireland.

## 2. Mission Statement

In our work with children/young people, MLI international schools shall be guided by the Principle of Paramountcy. This requires that the welfare of the child should be the paramount consideration.

Our safeguarding policy seeks to support the child's development in ways that will foster security, confidence and independence. It is central to the well-being of the individual and is therefore an intrinsic part of all aspects of MLI International Schools programme of school and activities.



### **3. Code of Conduct**

The MLI International Schools Code of Conduct is in place for the protection of both students and the adults in charge of their care. By implementing this policy, MLI International Schools is ensuring that there are clear guidelines for the behaviour and interaction of staff, students and third parties.

All MLI International Schools Staff must

- Remain professional at all times
- Act as excellent role models for all students
- Prioritise student safety and welfare at all times
- Work hard to ensure all students leave with happy memories of their stay with MLI International Schools

#### **3.1 Adult and U18 Interaction**

- Contact with students must be appropriate and professional at all times. For example, use verbal praise to a student rather than physical encouragement.
- Physical contact between adults and U18s is usually not acceptable, except in some special cases. Examples of these could be an injury or during sports, this will also be explained in more detail at the staff induction.
- Staff should not favour any one student above other. They will treat all students equally.
- Do not mistreat, demean, ignore or make fun of any students.
- There should be no socialising between staff and students outside of the MLI UK programme.
- There should be no socialising between staff and group leaders outside of your professional capacity
- Staff members must not be alone with a student at any time. If a student wishes to talk to them in private, they must only do so in open view of others. If they go to a classroom, ensure the doors are left open. Staff must never enter a student's bedroom without a colleague present.
- Staff must always use appropriate language with students. Do not swear or use inappropriate names to address students.
- Staff must not use a raised voice or threatening behaviour/language to discipline a student. If they are unable to deal with a situation, it must be passed on to senior management.
- Staff must not take photos or videos of or with our students.
- Staff must not discuss matters of an inappropriate nature with students. For example, alcohol, drugs, personal matters, relationships, sex, violence, religious belief. This list is not definitive.
- Staff must always remember the position of trust that you hold over a student. Students will generally idolise staff and hold onto their every word. This position of trust must never be abused.
- Staff should not enforce specific beliefs or lifestyle choices onto students. Including political views, religious beliefs, dietary, lifestyle or sexual persuasions.
- Staff must remain professional at all times.

### **3.2 Appropriate Appearance**

- Staff members must dress professionally at all times. Flip flops, revealing clothing, swim wear or clothes with inappropriate images or messages are not acceptable.
- Insure high levels of personal hygiene are adhered too. This includes having clean clothes and looking professional.
- Staff members must wear their MLI International Schools uniform during all activities and excursions; or at all times when on-duty where applicable.

### **3.3 Alcohol, Drugs and Smoking**

- Alcohol and drugs are prohibited on campus at all times. Any violation of this rule will lead to disciplinary procedures and possibly result in the termination of your employment with MLI International Schools.
- Staff must not be under the influence of alcohol whilst on duty.
- When off-duty, staff members must only consume alcohol off campus. On their return to campus, they must conduct themselves in a sober and professional matter. Failing to do so will result in disciplinary action.
- Smoking is permitted in designated areas and must always be out of the sight of students.

### **3.4 IT & Social Networks**

- There shall be no sharing of email addresses and/or social media (Facebook, Instagram, Twitter, Snapchat, LinkedIn, etc.) contact details between staff and students at all.
- If a student tries to connect with staff on social media, they must decline and explain to the student that it is against the law. The same applies regarding email addresses. This then should be declared to their line manager.
- This includes gaming platforms. Staff should not play online games with students in any circumstance.

### **3.5 Accommodation**

- Unless in the event of a serious emergency, staff members should not enter a student's bedroom alone. If they need to enter a bedroom while a student is present, they always must ensure they have another staff member or the student's group leader accompanying them.
- Before entering a room, staff should always knock and wait for a response. When doing a light out checks, students must come to the door. Staff must not enter a room.
- MLI International Schools will take appropriate measures to ensure that male and female students do not enter each other's bedrooms. In the Wembley, Portsmouth, Loughborough and Liverpool centres all rooms are single rooms, separated by apartments. Male and females will be placed in different apartments. In Edinburgh male and female students will be separated in different dorm blocks.
- Students are aware that there will be random checks of accommodation blocks. There is also a lights out patrol every evening to ensure students are in their apartments or bedrooms.

### **3.6 Transport**

- MLI International Schools only works with coach and taxi companies with police checked drivers. Written confirmation of this is received from said companies.
- All coach and taxi drivers should adhere to the same code of conduct expected of MLI International Schools' staff when interacting with students.
- Staff should never use their own cars to transport students. If there is an emergency, contact the emergency services immediately.

## **4. Child Protection**

MLI International Schools meets its child protection responsibilities through the implementation of this safeguarding policy, safe recruitment, codes of conduct, risk assessments and other complementary policies and procedures.

### **4.1 Designated Safeguarding Lead (DSL)**

The DSL's for MLI International Schools UK are;

Luke Hart – UK Operations Manager > [Operationsuk@mli-group.com](mailto:Operationsuk@mli-group.com). +447496 091 623.

Address– MLI International Schools, Newhaven Enterprise Centre, Denton Island, Newhaven, East Sussex, BN9 9BA.

Rebecca Stead – Regional Manager UK> [rstead@mli-group.com](mailto:rstead@mli-group.com). + 447939 382 358.

Address– MLI International Schools, Newhaven Enterprise Centre, Denton Island, Newhaven, East Sussex, BN9 9BA.

Each MLI International Schools Centre will have two members of staff who are Designated Safeguarding persons.

- Centre Manager – Designated Safeguarding Person
- Activity Co-ordination – Designated Safeguarding Person - Welfare officer

Each DSL has received Specialist Safeguarding Training Level 3. Each DSP has completed Level 1 Safeguarding Training, followed by further Level 2 training by the DSL during the staff induction process. All other staff will complete the level 1 safeguarding training online.

The DSL offers continuous support and advice to the DSPs in each centre for the duration of the summer. There will be a weekly meeting at each centre between the DSL and DSP to discuss any concerns. This will be either via telephone or face to face.

Each DSP is available 24/7 for any child protection issues. Contact details for each DSP are available to all students on the welfare noticeboards and in student handbooks. The Welfare Officer in each centre will also have designated office hours for students to talk to them if they have any particular concerns. They are still contactable outside of office hours.

DSPs will deal with concerns identified by both staff and students. If any members of staff have concerns, or are alarmed by a behaviour or incident, they should talk to the DSP in their centre. If this DSP is not available, or cannot be contacted, then the incident should be reported to the DSL. If a concern is regarding your DSP or DSL at your centre, please contact another DSL based in Ireland.

#### **4.2 Responding to Concerns**

Safeguarding concerns can be identified in a number of ways:

- Concern over a child's appearance, behaviour or physical condition.
- A child may volunteer information
- Another child may tell you about what has happened to a friend
- An adult may bring something to your attention

In an instance like this, staff must react in a professional manner:

- Listen to what is being said
- Take what is said seriously
- At the earliest opportunity make notes especially actual words used
- If you are not the DSP, you should report the concern to the DSP in your centre straight away. Any information disclosed to you must be treated with the upmost confidentiality.
- Once this has been passed on you must complete a Concern (& Disclosure/Allegation) Form, which must be kept on file by HO.

#### **4.3 Recognising Symptoms of Abuse**

Detection of abuse is seldom straightforward and rarely clear cut. It is important therefore, to share concerns with the Designated Safeguarding Person in your centre, as detailed in this policy document. Below are some of the physical and behavioural indicators of abuse.

**However, it must be stressed that, none of these indicators either singly or in any combination prove conclusively that a child has been abused.**

**It is the responsibility of health & social care professionals to decide whether abuse has occurred.**

**As a DSP, the role is to inform the DSL, who's role it is to inform the LADO or emergency services.**

<b>NEGLECT</b>
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Neglect can be a difficult form of abuse to recognise yet have some of the most lasting and damaging effects on children.

#### **Physical Indicators:**

- Constant hunger, sometimes stealing food from other children
- Constantly dirty or "smelly"



- Loss of weight, or being constantly underweight
- Inappropriate clothing for the conditions
- Lack of emotional awareness around others
- May display behaviours well above or below their age

**Behavioural Indicators:**

- Complaining of being tired all the time
- Not requesting medical assistance
- Having few friends
- Mentioning being left alone or unsupervised

<b>PHYSICAL ABUSE</b>
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Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given or visible on the “soft” parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern, although this can be more complicated with burns, as these are often delayed in presentation due to blistering taking place sometime later.

**Physical Indicators:**

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises – in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks
- Multiple burns with a clearly demarcated edge

**Behavioural Indicators:**

- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour

<b>SEXUAL ABUSE</b>
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Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Usually, in cases of sexual abuse it is the child’s behaviour that may cause you to become concerned, although physical signs can also be present. In all cases, children who tell you about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

**Physical Indicators:**

- Pain or itching in the genital area
- Bruising or bleeding near genital area
- Sexually transmitted disease

- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

**Behavioural Indicators:**

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Acting in a sexually explicit way towards adults

<b>EMOTIONAL ABUSE</b>
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Emotional abuse can be difficult to measure, as there are often no outward physical signs. Even so, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

**Behavioural Indicators:**

- Neurotic behaviour e.g. sucking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress

<b>PEER ON PEER BULLYING</b>
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Bullying is not always easy to recognise as it can take a number of forms. A child may encounter bullying attacks that are:

- Physical: pushing, kicking, hitting, pinching and other forms of violence or threats
- Verbal: name-calling, sarcasm, spreading rumours, persistent teasing
- Emotional: excluding, tormenting, ridiculing, humiliating.
- Online: abuse or threats via social media. The sharing of private or intimate photos or videos on social media platforms or messenger apps.

**Persistent bullying can result in:**

- Depression
- Low self-esteem

- Shyness
- Poor academic achievement
- Isolation
- Threatened or attempted suicide

**Signs that a child may be being bullied can be:**

- Torn clothes
- Asking for stolen possessions to be replaced
- Falling out with previously good friends
- Being moody and bad-tempered
- Sleep problems
- Anxiety
- Becoming quiet and withdrawn
- Reluctance to attend school or take part in activities

**4.4 Discipline procedure for Bullying:**

Any form of bullying, including cyber-bullying, is not tolerated at MLI International Schools.

If people are aware of bullying they will talk to the victim and the bully, either separately or together depending on the situation. They should explain why it is wrong to bully others, the bully should apologise to the victim and promise it will not happen again. The Group Leader will be informed.

If the bullying does happen again, the parents of the bully will be informed, and the bully may be sent home.

**4.5 Awareness in specific areas**

The DSL and DSPs will not only be fully versed in MLI International Schools specific Safeguarding Policy but will also be aware of other associated areas of child protection including the below;

<b>FEMALE GENITAL MUTILATION</b>
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The illegal practise of removing, either partially or fully, the external female genital organs. This will usually not be a medical procedure, but usually carried out by family members or relatives. It is also illegal for a UK resident to be taken out of the UK for the purpose of having this procedure done.

<b>SEXUAL VIOLENCE AND SEXUAL HARASSMENT</b>
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Overwhelming, this is experienced more by females. The terms Sexual Violence and Sexual Harassment cover a comprehensive range of abuses. They include sexual abuse, as above. But also; Spying, stalking, unwanted physical contact i.e. grabbing chest etc, penetrative activity without consent, 'up skirting', posting of sex tapes of private photos.

## TEENAGE RELATIONSHIP ABUSE

Children can also suffer the traits of domestic abuse. The abuse usually starts with a couple who are in a consensual relationship. One member of the relationship may become more invested or needy than the other and begin to dominate and manipulate the other person.

### Physical Indicators:

- Forced sexual activity or public intimacy
- Physical abuse (as above)
- Verbal insults in private, but also in front of peers. This would include “put downs”

### Behavioural Indicators:

- One partner is controlling the other i.e. what they wear, where they go, who they talk with
- Controlling their mobile phone or social network accounts
- One partner being very cautious not to cause the other upset over small matter

## CHILD SEXUAL EXPLOITATION

The exploitation of under 18's for sexual activity in return for gifts, money, drugs, alcohol, clothes, computers, attention, to name some. The child is approached by an abuser who is in a position of power, usually in terms of age, gender, social economic status, physical attributes, intelligence. The abuser will use threatening or intimidating behaviour to trap the child into thinking they no longer have an option to say no.

### Behavioural Indicators:

- Student starts to miss lessons or school
- They spend time with people a lot older than themselves.
- Student has unexplained and expensive gifts that they often show off to friends.

## HONOUR BASED VIOLENCE

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. This can also include forced marriages.

### Behavioural Indicators:

- Lack of interest in school or often absent
- Aggressive behaviour to a specific demographic of peers
- Controlling or intimidating behaviour from family members

Radicalisation is the process where someone is leading to adopt extreme political, social and religious ideals and aspirations. Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family

**Behavioural Indicators:**

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use.

All staff will have basic prevent training to identify potential signs of radicalisation.

**4.6 A Child Telling an Adult (disclosure of information)**

If a child does approach you with an allegation or concern regarding abuse, the following guidelines should be followed:

**ACT PROMPTLY!** Listen to the child without interrupting or showing your surprise. Get the child to tell you what happened in his/her own words. Do not ask leading questions. Do not ask "why" or "how" questions. Make the child aware that you know it is not his/her fault and that he/she has no reason to feel guilty. It is your job to listen.

Take the allegation seriously. Support the child for telling you.

Explain that you have an obligation to refer the matter to a colleague in order to seek help for the child.

Do not make promises that you cannot keep.

Do not give the child a guarantee of total confidentiality regarding the disclosure. This is not within your power - your obligation is to refer the matter to Designated Safeguarding Person (DSP) as detailed.

Do not investigate.

Do not dwell too much on the alleged perpetrator. Avoid a "whodunit" approach. The pursuit of evidence is the work of the police and welfare professionals.

Do not be judgmental about information supplied by the child. Do not pre-suppose that the experience was bad or painful.

At the earliest opportunity make a written record of what happened. Where possible write down the actual words used. Do not write as the child talks to you. Give your whole attention to the child.

Refer the matter to the Designated Safeguarding Person (DSP) in your centre.

## 4.7 Keeping Records

Immediately after speaking with a child about a safeguarding allegation or concern, you must report to the Designated Safeguarding Person (DSP) and file a report. Ask your DSP for the centre's Concern (& Disclosure/Allegation) Form and complete with details of your meeting with the child. You must use the student's exact words giving only facts and record time, date, place etc. If the student's language level is low, state that in your report.

This report should be handed to the DSP who will ensure it is filed in a secure and confidential place. Once you have handed the matter over to the DSP and completed and filed your report, and you know the student is being looked after (it may be appropriate to go and see the student again to make sure they are OK), make sure you look after yourself. Being told information about child abuse is often very upsetting.

**It is not for staff to decide if the allegations are true or not. Their role is only to listen, report as accurately as possible and allow the official procedure to then take over.**

## 4.8 What to do if an allegation is made

This may be made directly to the DSP or to any other adult and passed to the DSP

- Make sure the child is safe and supported/reassured. Remain calm
- Inform the DSP and DSL immediately
- If/when safe and appropriate, try to return the child to their normal routine
- Ensure that a clear written record has been made (using the Concern Form), signed and dated by the person who made the allegation/heard the allegation from a child
- If the allegation refers to one of the DSPs in your centre, refer to the second DSP or contact the DSL, and give a clear written record.
- The DSP or DSL must contact the Local Safeguarding Children's Board (England and Wales only) or the Child Protection Committee (Scotland) immediately.
- The Local Authority Designated Officer (LADO), should also be informed.
- No decision must be made without referring to the LSCB

Contact details for LSCB's, CPC's and LADO's are below;

### Edinburgh Centre

Social Care direct Telephone number - 0131 200 2327. (in Emergency 0131 200 2324 or 0800 731 6969)

[socialcaredirect@edinburgh.gov.uk](mailto:socialcaredirect@edinburgh.gov.uk)

### Liverpool Centre

Address:

Jacqui Taylor

LSCB Administrator

Liverpool Safeguarding Children Board (LSCB)

5th Floor

Cunard Building

Water Street

Liverpool

L3 1DS

Tel: 0151 233 0493/0510  
Email: Jacquelyn.taylor@liverpool.gov.uk

LADO - Telephone 0151 233 3700

### **Loughborough Centre**

Leicestershire and Rutland Safeguarding Children Board and Safeguarding Adults Board, The Safeguarding Boards Business Office, Room 100, County Hall, Glenfield, Leicestershire, LE3 8RA.

Call the Boards on: 0116 305 7130.

Leicester City Council LADO  
Local Authority Designated Officer (based in the Safeguarding Unit) Jude Atkinson / Elisha Ward

Tel: 0116 454 2440 or email [Lado-allegations-referrals@leicester.gov.uk](mailto:Lado-allegations-referrals@leicester.gov.uk)

Secure email: [Lado-allegations-referrals@leicester.gcsx.gov.uk](mailto:Lado-allegations-referrals@leicester.gcsx.gov.uk)

### **Wembley Centre**

Principal Child Protection Advisor/ LADO on 020 8937 4834 or the Child Protection Team administrator on 0208 9373783. LADO enquiries can also be directed to [brent.lado@brent.gov.uk](mailto:brent.lado@brent.gov.uk) or through the Brent Family Front Door Telephone: 020 8937 4300 - Option 1, Email [family.frontdoor@brent.gov.uk](mailto:family.frontdoor@brent.gov.uk)

Brent Local Safeguarding Children Board: Address - Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Telephone: 020 8937 4300

Email  
[brent.lscb@brent.gov.uk](mailto:brent.lscb@brent.gov.uk)

Website  
<http://www.brentlscb.org.uk>

### **Portsmouth Centre**

Portsmouth Safeguarding Children Board  
Email: [PSCB@portsmouth.gov.uk](mailto:PSCB@portsmouth.gov.uk)

Telephone: 023 9268 1540

Portsmouth LADO- Hayley Cowmeadow  
EMAIL - [lado@secure.portsmouthcc.gov.uk](mailto:lado@secure.portsmouthcc.gov.uk)  
Telephone - 023 9288 2500

## **4.9 What happens next?**

**Background** – The LSCB's/CPC's role is to provide advice and guidance to schools dealing with allegations and, if necessary, to liaise with the police and other agencies and to monitor the progress of cases to ensure they are dealt with quickly and consistently.

Employers have a duty of care to their employees; Therefore, they need to provide adequate support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

If the person accused is under-18, MLI will support the student during each step of the process. In the absence of the student’s parents, the student will be assigned a DSP for support while the investigation takes place. The student’s group leader will also be involved in this.

In each MLI centre there are two DSPs, meaning that both the accuser and the accused can be provided with the necessary support.

**Initial discussion** – There will be an initial discussion between the DSP/DSL and the LSCB, at which some actions will be agreed:

- Immediate action to protect the student
- When and what parents should be told
- What should be said to the adult/child facing the allegation and should s/he be suspended

**Possible suspension** – Suspension is not an automatic response and should only be considered where children are at risk of serious harm or the concern is so serious it would result in immediate dismissal. If the person is suspended, the reason must be communicated to them within one day.

<b>Possible outcomes from initial discussion</b>	<b>What to tell / do with accused person, always agreed with LCSB</b>
1) Strategy Meeting - usually held within 3 days	Tell person about allegation, using minimum detail. Inform of possible/likely courses of action. School appoint named person to support accused. Advise accused to contact professional organisation.
2) Referrals to Social Care and/or Police for investigation	As above
3) No Further Action	School decides what internal action to take, possibly disciplinary action and certainly an investigation by a senior manager.

#### 4.10 Confidentiality

The school must maintain confidentiality regarding the accused. Until any investigation, either internal or external has been completed; the identity of the accused must not be released. The senior manager and DSP need to manage the situation particularly thinking of gossip and leaks to the media. Staff should not discuss any part of the investigation with colleagues or friends and family.

Remember – Safeguarding trumps GDPR. If you genuinely have a concern or allegation about an individual, you need to report it to your designated person.

#### 4.11 Terminology for possible outcomes to investigation.



<b>Definition</b>	<b>Meaning</b>
Substantiated	There is sufficient identifiable evidence to prove the allegation
False	There is sufficient evidence to disprove the allegation
Malicious	There is clear evidence to prove there was a deliberate act to deceive and the allegation is false.
Unfounded	There is no evidence which supports the allegation. It could be that the person making the allegation misinterpreted the incident or did not know all the circumstances
Unsubstantiated	There is insufficient evidence to prove or disprove the allegation (it is not the same as 'false'). Accused could be guilty or innocent

#### **4.12 Resolution of allegations and action by school**

<b>Resolution</b>	<b>Action by school</b>
Allegation substantiated, leading to prosecution and dismissal	Inform DBS; record kept on file for 10 years or until retirement age, whichever is longer. This information should be kept separate to their staff file.
Allegation substantiated, leading to disciplinary action or dismissal	May need to inform DBS; record kept on file for 10 years or until retirement age, whichever is longer. This information should be kept separate to their staff file.
Allegation unsubstantiated or unfounded	Summary report kept in staff file for future clarification and reduce need for reinvestigation; copy given to accused
Allegation malicious	Report removed from file. Disciplinary action required against perpetrators of malicious story.

**\* Malicious, unfounded or unsubstantiated allegations must not be referred to when writing references**

**\* If allegation is unsubstantiated, unfounded or malicious, school must support the member of staff on return to work, especially if they have been suspended.**

#### **4.13 Whistle blowing**

If you see or find out about something you think is wrong at the MLI international schools, you should report it. You should go first to your line-manager or any other senior person. If you cannot or do not wish to do this for any reason you should contact the Director Therese Dillion.

Raising concerns about wrongdoing can be one of the most difficult and challenging things to do in a work environment. MLI is committed to keeping high standard throughout all of its operations, therefore we will fully support an employee if they have concerns.

### **What types of concerns can be raised by whistle blowers**

The Public Interest Disclosure Act (PIDA) 1998 provides protection for workers who reasonably believe that they are acting in the public interest and where the disclosure falls into one of more of the following categories;

- A criminal offence that has, is being, or is likely to be committed
- Unauthorised or inappropriate disclosure, misuse or loss of confidential, personal and / or sensitive information
- A miscarriage of justice
- Risk or damage to the environment
- A danger to the health and safety of employees or others
- Attempts to suppress or hide information relating to wrongdoing.

The concern can be about an incident that happened in the past, is happening now or that you believe is likely in the future.

As long as you hold a reasonable belief that the information is true then you will be covered by The Public Interest Disclosure Act (PIDA) 1998, regardless of whether you are mistaken, or the matter cannot be proved.

To contact the Whistleblowing Advice Line.

Call 0800 028 0285

Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Whistleblowing does not cover concerns where there is no public interest element such as a concern about your own employment or related matters.

## **5. Training**

MLI International Schools ensures that all staff complete the Level 1 basic awareness Safeguarding training before their employment term begins. The MLI UK Operations Manager sends out the link to the online training with all contracts. Staff then complete this and present their certificates to MLI before or on their first day. All copies of certificates will be kept on file.

In the case of any late starting staff, the Level 1 basic awareness Safeguarding training will be completed once employment with MLI has already begun.

The Designated Safeguarding Lead (DSL) is trained to Specialist Level 3. They will conduct this training with Centre Management staff at the MLI Management Induction weekend. The Centre Management staff will then in turn train other centre staff at location.

All staff are given a copy of the MLI International Schools Safeguarding Policy at the time their contracts are issued and there is a further copy available in the Safeguarding Folder in each centre.

All staff receives safeguarding training at the beginning of each summer. Refresher training is given throughout the summer if/when there are any policy changes.

## **6. Safer Recruitment**

### **6.1 Staff**

During the recruitment process it is clearly stated that MLI International Schools is fully committed to safeguarding and the welfare of their students. This begins with the job advertisements where we state the following:

*'MLI International Schools is fully committed to the safety of the children who take part in our programmes. All contracted staff are asked to complete DBS or PVG check and all applicants are required to provide two references. Reference requests will ask specifically whether there is any reason that you should not be engaged in situations where you have responsibility for, or substantial access to, persons under 18. You will need to explain any gaps in your CV.'*

Applicants who are invited to interview are further informed about the importance that MLI International Schools places on the care of under-18s and safeguarding. Interviews will be conducted via skype due to the nature and location of centres. Skype interviews are overseen by a 2<sup>nd</sup> person in head office.

All offers of employment are made on the basis of an acceptable DBS or PVG check and two satisfactory references being received. On the first day of employment, all staff must show their line manager an official form of identification, typically a passport, driving license or ID card.

Any staff based outside of the UK, are informed that they must provide us with a Police Certificate of Good Conduct from their country of residence. This must be officially translated into English if necessary.

MLI International Schools has the following guidelines in place for those staff members still awaiting the results of their DBS or PVG checks at the start of their contract:

- They will not be allowed any unsupervised contact with students
- When the role is of an Activity Leader they will be accompanied at all times on all excursions and activities by another fully checked staff member
- When the role is of a teacher, they may give classes only if their classroom is adjacent to the office of the DOS and with the classroom door kept open at all times
- In all instances, potential staff not in possession of DBS or PVG certificate will initiate the process of achieving one prior to them joining the MLI staff

## **6.2 Group Leaders**

Each Agency/Group must provide a Police Certificate of Good Conduct for their group leaders and any additional adults travelling with the group. If for any reason they are unable to obtain Police Clearance for a member of their group, a company letter must be provided stating that the agency in question will accept full responsibility for any over 18's travelling. This clearance must be provided before the group arrives in the UK at their chosen MLI centre.

MLI International Schools also requires that all adults accompanying a group adhere by the following Group Leader Code of Conduct:

- Contact with students must be appropriate and professional at all times. For example, use verbal praise to a student rather than physical encouragement
- Remember the position of trust that you hold over a student. Students will generally idolise staff and hold onto their every word. This position of trust must never be abused.
- Group leaders should favour no one student above any other. You should treat all students equally

- Alcohol and drugs are prohibited on campus at all times. Any violation of this rule will result in MLI contacting your agent/employer
- Smoking is permitted in designated areas and must always be out of the sight of students
- There should be no socialising between MLI staff and group leaders, outside of your professional capacity
- Group leaders should not enter the bedroom of a student without another colleague or a member of MLI staff accompanying them. Group leaders should never enter the room of a student who they are not responsible for. If you have an issue with any other students, speak to the centre manager directly, who will deal with the situation.
- Group leaders must not discipline any students outside of their own group
- Group leaders must always use appropriate language with students and staff. Do not swear or use names that are not professional.
- Group leaders must dress professionally at all times. Unsuitable clothing will not be permitted on campus and while in the presence of students
- Group leaders are responsible for the supervision and behaviour of their students. They must make sure that all MLI rules are adhered to at all times.
- Group leaders must not leave campus without their students without a good cause. If a group leader must leave for an emergency, they should inform the Centre Manager immediately.

### **6.3 Third Parties**

All taxi and coach drivers working with MLI International Schools have been DBS or PVG checked. They are also required to adhere to the following Taxi/Coach Driver Code of Conduct: This code of conduct is sent to taxi/coach companies prior to services being provided.

- Contact with students must be appropriate and professional at all times. Avoid physical contact with the students unless formally requested or instructed to assist a less able-bodied student
- When transporting only one or two students, the student/s must always sit in the backseat, never in the front passenger seat
- Do not take photos or videos of or with our students
- Do not share email addresses and/or social media (Facebook, Instagram, Twitter etc) contact details with students
- Do not discuss matters of an inappropriate nature with students. For example, alcohol, drugs, personal matters, sex, violence. This list is not definitive
- Do not mistreat, demean, ignore or make fun of any students
- Think about the language that you use and avoid using any form of swear words
- Remember our students are non-native speakers of English and may have difficulty understanding you. Please speak clearly and slowly and be patient
- Do not consume alcohol, drugs or medication that may affect your driving, before or whilst transporting our students
- Do not smoke at any time whilst in the vehicle or on the centre campus
- Be clean and presentable
- Remain professional at all times

Any other third parties involved in the MLI International Schools summer programmes are asked to provide Garda Vetting. If this is not possible, they are supervised at all times when in the presence of our students.

## **7. Welfare/Implementing Safeguarding**

### **7.1 Risk assessments**

MLI International Schools produces bespoke risk assessments for each centre. This covers both on-site activities, site-specific hazards and all excursions, including free time on excursions.

All staff members are aware of these risk assessments and are required to read them prior to conducting activities/excursions. Each centre has a Risk Assessment Sign-off Sheet for staff to confirm the risk assessments have been read.

**7.2 Emergency Policy** – MLI International schools has a specific emergency response and crisis management policy. This covers what to do in the case of a major incident either on site and a centre, or off-site if on excursions.

### **7.3 Safe Refuge plan during excursions**

For each excursion destination, there will be a safe refuge location in case of a serious accident or terror attack. Activity staff will inform all students of the safe refuge location prior to excursions. HO staff will also be aware of the Safe Refuge location. In the event of serious accident or terror attacked a HO staff will set up a crisis centre to deal with all issues. The Off-site activity - Emergency response to major incident form will aid activities in how to deal with a situation where a safe refuge location is needed.

### **7.4 Missing Students**

All MLI students have an MLI wristband for the duration of their course. This wristband is printed with the centre address and emergency number.

The following steps are taken to ensure all students are present during English lessons:

1. Attendance is taken by teachers at the beginning of each lesson.
2. If someone is missing the teacher will put their name on a post-it note and stick it to their door. If everybody is present, the note will say 'all present'
3. Ten minutes after the start of lessons, the DOS and ACO visit each class to check that all students are present.
4. If a student has not arrived at class the Group leader is alerted and asked to explain the reason for their absence. If the student is an individual and does not have a group leader, they should be contacted directly by telephone or WhatsApp message, using the MLI company phone.
5. If necessary, the CM along with another member of staff and/or the group leader, can go to the student's bedroom to check if they are they.
6. If there a student cannot be found, the CM/ DOS and group leader should conduct questionings with his/her room/class mates to investigate.
7. If the student is still not located follow steps A and B below.
8. All absences are recorded in the DOS register.

The following steps are taken to ensure all students are present during Activities:

1. The activity leaders will be provided with a list of their students by the ACO.
2. At the beginning of the activity (before leaving campus if activity is off-site), the activity leader must check that all their students are present.
3. If they are not present, they must inform the ACO and the Group leader immediately.
4. If the group leader gives permission for a student to not partake in an activity, this must be fed back to centre management staff, so they can arrange supervision.
5. If the Group leader has not given their permission, and the student is still missing, follow steps A and B below.
6. All absences are recorded in the incident report log.

The following steps are taken to ensure all students are present during Excursions and off-site activities:

1. The activity leaders will be provided with a list of their students by the ACO, this list will include the students telephone numbers
2. On the journey to excursion, the activity leaders will give students the safe refuge plan brief.
3. Activity leaders will give students a maximum 1-hour 30mins free time at a time.
4. If a student goes missing during an excursion or does not arrive back to a meeting point, the group leader will be contacted immediately by the Activity Leader.
5. If the group leader is not contactable, Activity leaders should contact the students directly.
6. If the group leader is unable to contact the missing student, the Activity Leader and group leader will remain at the meeting point to wait for the missing student. At this point the Activity Leader will also contact the CM to make them aware of the situation.

*The remaining students will complete the excursion as planned while one of the Activity Leaders and the missing student's group leader follow steps A and B below, until the missing student is located: if there is only one activity leader with the group, the students should stay with the activity leader while the group leader continues the search for student.*

- A) The Activity Leader will remain at the meeting point while the Group Leader goes in search of the student/s, keeping in contact with the Activity Leader by mobile at all times
- B) If after 45 minutes of the original meeting time and still no contact with the missing student/s has been made, the Activity Leader will proceed to contact police/any visible security people to ask for further assistance in locating the missing students. The CM will be kept fully informed at all times and the crisis response team will be notified.

## **7.5 Welfare Provision**

Each centre will have a designated Welfare Officer who will also act as one of the Designated Safeguarding Person's. The Welfare Officer will play a primary role to ensure that all efforts are being made to provide excellent general care for under-18's.

The Welfare Officer will be made known to all students and there will be dedicated office hours in which students can talk to them if needed. Welfare Officers can also be approached out of office hours and via the MLI emergency number.

Any individual students that are not on the course as part of a group will also have a designated Activity leader that will be their leader through-out the course of their stay. Welfare officers will also have weekly tutorials with individual students.

## **7.6 Supervision outside of Scheduled Programme**

Outside the scheduled programme and during free time hours, students are permitted to engage in certain activities on-site. During this time, MLI staff will conduct half hourly supervisory checks, as will the student's own group leaders.

If a group leader wishes to take a group off-campus at any time, they are required to complete the Off-Site form, which requires group leaders signing the group in and out of the centre and taking direct responsibility for the students in their care. They must also read the MLI risk assessments for off-site activities.

### 7.7 First Aid & Medical

Every centre will employ at least one member of staff who has undertaken a First Aid training course. This member of staff will be made known to all other staff and students at induction and through the Welfare Board at each centre.

On every excursion there will be at least one First Aid Kit available.

Each centre has the details of the nearest GP and/or hospital for cases where students may require professional medical help.

### 7.8 E Safety

MLI International Schools highlights the importance of internet safety to all students. We do this through a specially designed lesson and further guidance within the MLI International Schools Student Diary. This also includes gaming and cyber-bullying.

We encourage all students to adhere to the following internet safety code:



# Click Clever, Click Safe!

### 7.9 Radicalisation & Extremism

Each MLI International Schools centre brings together a wide variety of students and staff from different countries, cultures and backgrounds.

We strive to educate students by example and through the Code of Conduct and core values about the acceptance and tolerance of a range of views, that people think differently and believe different things – all of which is OK as long as it is reasonable, and belief doesn't extend to hurting/denigrating those with different beliefs.

### **7.10 Ratios**

An appropriate number of MLI Staff Members and Group Leaders will accompany each Group on the School Outings. The usual ratios of Adults to Students will be 1:15.

In residential accommodation, the usual ratio of supervising adults to students will be at least 1:20 for students aged 12-17 and 1:15 for students under 12. As well as MLI Staff, Group Leaders will act as part of the adult to student ratio.

### **7.11 Contextual Safeguarding**

At MLI, we understand the importance of considering wider environmental factors when safeguarding is involved. This will be represented in our Centre Risk assessments. They will include environmental risks at each location, such as beaches or busy pedestrian areas. In addition to this, they will include social and community factors such as conflicting sports team, or frequently visiting public groups i.e.. Navy personal in Portsmouth, Sports teams at Wembley stadium.

### **7.12 Student Buddy system**

At the first day induction meetings, students are explained about MLI's buddy system. During free time, activities and excursions, should will pick a 'buddy' who they will stay with. This is to ensure that no student is left alone.





## Group off-site sheet

Please fill in and sign this off-site form before taking your students out of the Centre. You are not allowed to take your students away from the centre without signing this form first.

You must then sign you and your group back in on your return.

Group Name: \_\_\_\_\_

Group Leader Name: \_\_\_\_\_

Date: \_\_\_\_\_

Number of students: \_\_\_\_\_

Where are you going? \_\_\_\_\_

Time leaving campus: \_\_\_\_\_

*I ..... confirm that I am taking my group away from the MLI campus and take full responsibility for the safety and welfare of my students during this time.*

*I have received a copy of and read and understood the MLI Risk Assessments for offsite activities.*

Group Leader signature: \_\_\_\_\_

Centre Manager signature: \_\_\_\_\_

### **Please inform us when you return to the centre.**

\*to be completed when arriving back at centre

Time returned to campus: \_\_\_\_\_

Group Leader signature: \_\_\_\_\_

Centre Manager signature: \_\_\_\_\_

## TEMPLATE - Concern (& Disclosure/Allegation) Form

Please complete if you have any (Safeguarding) concerns about an under-18 student. You must complete the boxes in bold; the other information can be filled in by the DSP later if you do not know.

<b>Date</b>	
<b>Student first name</b>	
<b>Student family name</b>	
<b>Gender</b>	
Date of birth	
Nationality	
Group/individual	
Student ID	
<b>Name of person noting concern</b>	
<b>Role/connection with the school</b>	
<b>Date and time concern noted</b>	
<b>Location</b>	
<p><b>Concern</b> (please provide as much detail as possible)            NB: If reporting a disclosure/allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more.</p>	
<b>Signed</b>	

**Response to concern.** This section to be filled in by the DSP.

Do parents / group leader / agent / other need to be informed?

<b>Response</b>	<b>By whom</b> (full name)	<b>When</b> (date and time)