



international schools

Safeguarding Policy & Guidelines

2024

Contents

1. Policy Statement	3
2. Mission Statement	3
3. Code of Conduct	4
4. Child Protection	5
5. Training	12
6. Safer Recruitment	13
7. Welfare/Implementing Safeguarding	15

1. **Policy Statement**

The aim of these guidelines is to promote best practice in child protection in all our centres & to set out a procedural framework to ensure that

- We protect all children, regardless of race or gender, 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.

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

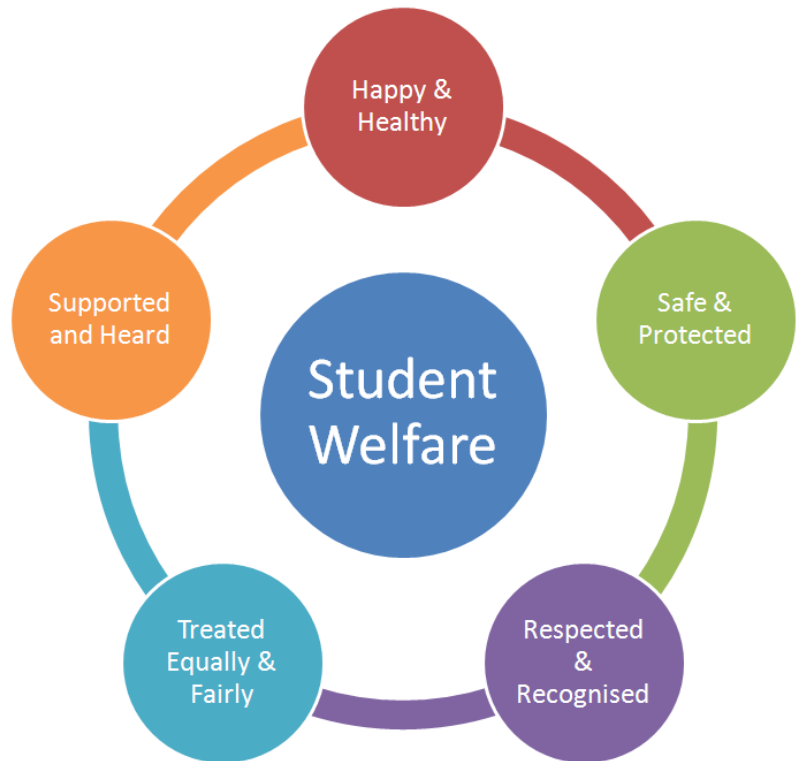
These guidelines were amended and adopted by MLI International Schools on 3rd June May 2018. The guidelines are reviewed on an annual basis by the MLI International Schools Senior Management Team, following feedback from students and staff members.

The Designated Liaison person for MLI International Schools with responsibility for the implementation of these guidelines is Mrs. Inge Otto.

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.

The child protection programme 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

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 will be explained in more detail at induction.
- Staff should favour no one student above any other. You should 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.
- Staff members must not be alone with one student at any time. If a student wishes to talk to you in private, only do so in open view of others.
- You must always use appropriate language with students. Do not swear or use pet names with or in front of students.
- Do not take photos or videos of or with our students.
- Do not discuss matters of an inappropriate nature with students. For example, alcohol, drugs, personal matters, sex, violence, religious belief. This list is not definitive.
- Remain professional at all times.

Appropriate Appearance

- Staff members must dress professionally at all times.
- Unsuitable clothing will not be permitted on campus and while in the presence of students.
- Staff members must wear their MLI International Schools uniform during all activities and excursions; or at all times when on-duty where applicable.

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.
- When off-duty staff members are away from campus they are free to drink alcohol. However they must conduct themselves in a sober and professional manner on their return to campus.
- Smoking is permitted in designated areas and must always be out of the sight of students.

IT & Social Networks

- There shall be no sharing of email addresses and/or social media (Facebook, Instagram, Twitter etc.) contact details between staff and students at all. If a student tries to connect with you on social media, you must decline and explain to the student that it is against the law in the UK. You should explain the same regarding email addresses.

Accommodation

- Unless in the event of a serious emergency, staff members should not enter a student's bedroom alone. If you need to enter a bedroom while a student is present, always ensure you have another staff member or the student's group leader accompanying you.
- MLI International Schools will take appropriate measures to ensure that male and female students do not enter each other's bedrooms.

Transport

- MLI International Schools only works with coach and taxi companies with Garda vetted 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, in any circumstances

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.

Designated liaison Person(DLP) and Designated Safeguarding Person (DSP)

The DLP for MLI International Schools Ireland is Mrs Inge Otto, Client relationship manager.

Each MLI International Schools Centre will have two members of staff also acting as DSPs:

- Welfare Officer
- Centre Manager

The DLP offers continuous support and advice to the DSPs in each centre for the duration of the summer.

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. 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 one of the DSPs in their centre. If this DSP is not available, or cannot be contacted, then the incident should be reported to the DLP.

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**

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.

NEGLECT

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

Behavioural Indicators:

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

PHYSICAL ABUSE

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

SEXUAL ABUSE

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

EMOTIONAL ABUSE

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

BULLYING

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.

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

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.

A Child Telling an Adult

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 direct questions. Do not ask "why" 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 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.

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.

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.

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 DLP 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 DLP
- The DSP or DLP must contact the LSCB (**Local Safeguarding Children's Board or Tusla**) immediately
- No decision must be made without referring to the LSCB/Tusla

What happens next?

Background – The LSCB’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/DLP 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.

Possible outcomes from initial discussion	What to tell / do with accused person, always agreed with LCSB
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.

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.

Terminology for possible outcomes to investigation.

Definition	Meaning
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

Resolution of allegations and action by school

Resolution	Action by school
Allegation substantiated, leading to prosecution and dismissal	Inform Garda Vetting section record kept on file
Allegation substantiated, leading to disciplinary action or dismissal	May need to inform garda vetting section; record kept on 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.**

Awareness in specific areas

The DLP 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, such as Child Sexual Exploitation and FGM (female genital mutilation).

5 Training

MLI International Schools ensures that all staff complete the Safeguarding training before their employment term begins. The MLI 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.

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

The Designated Liaison person (DLP) is trained to Level 2. She will conduct this training with Centre Management staff .

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

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 a garda 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.

All offers of employment are made on the basis of an acceptable Garda 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 Garda 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 an Garda or Police Suitability Check will initiate the process of achieving one prior to them joining the MLI staff

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
- 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 not under their supervision
- Group leaders must always use appropriate language with students and staff. Do not swear or use pet names
- Group leaders must dress professionally at all times. Unsuitable clothing will not be permitted on campus and while in the presence of students
- Remain professional at all times

Third Parties

All taxi and coach drivers working with MLI International Schools have a Garda check. They are also required to adhere to the following Taxi/Coach Driver Code of Conduct:
15

Updated 15th March 2023

- 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 checks. If this is not possible, they are supervised at all times when in the presence of our students.

7 Welfare/Implementing Safeguarding

Risk assessments

MLI International Schools produces bespoke risk assessments for each centre. These

cover 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.

Missing Students

All students will be given emergency details and contact number(s) at their induction.

English lessons: Attendance is taken at the beginning of each lesson. The DOS checks the attendance and, if a student is missing, the student's group leader is contacted immediately and asked to bring their student to class or explain the reason for their absence. All absences are recorded in the DOS register.

Activities: If students are not attending activities, the Activity Leader will report this back to the Activity Co-ordinator who will then follow this up with the student's group leader. They will be reminded that students should be fully participating in all on-site activities. In order to identify missing students, Activity Leaders take attendance before the activity starts.

Excursions: If a student goes missing during an excursion, the group leader will be contacted immediately by the Activity Leader. If the group leader is unable to make contact with 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 Centre Manager 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 continue to follow the relevant steps until the missing student is located:

- 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
- 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 make contact with 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.

Welfare Provision

Each centre will employ a Welfare Officer who will also act as one of the DSPs. The Welfare Officer's primary responsibilities will be to ensure that all efforts are being made to provide excellent general care for under-18s.

The Welfare Officer will be made known to all students and they will keep office hours in which students can talk to them if needed. Welfare Officers can also be approached out of office hours and will have a 24-hour mobile number.

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.

First Aid & Medical

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

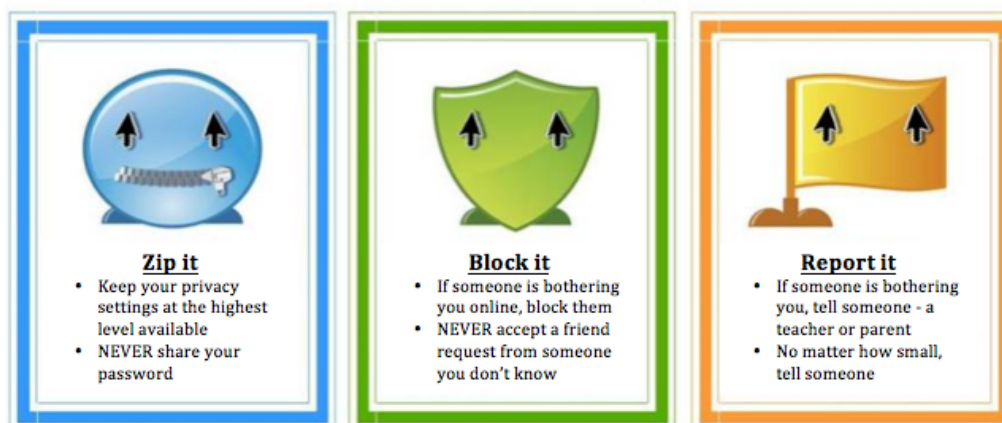
On every excursion there will be at least one First Aid Kit available.

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

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!

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 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.



international schools

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 (Group Leader), 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 Assessment.

Group Leader signature: -

Centre Manager signature: -

Please inform us when you return to the centre too.

Time returned to campus: -

Group Leader signature: -

Centre Manager signature: -
