

**IJ Tours Ltd t/a “International House Manchester or IH Manchester”**

**Safeguarding Policy**

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## Introduction

### Policy statement

IJ Tours Ltd, trading under the name of “International House Manchester”, is a private college offering face to face tuition at our Manchester centre as well as online tuition. The minimum age for classes is 16, with the exception of online private lessons where the minimum age is 12. The Manchester centre is located at International House Manchester, Arthur House, Chorlton Street, Manchester M1 3FH, and online tuition takes place on Zoom (<https://zoom.us/>) and Microsoft Teams (<https://teams.microsoft.com/>).

This policy has been written to ensure the optimum safety, welfare and protection of all students involved with the programmes offered by IH Manchester. It addresses the philosophy and values which underpin the ethos of the company in terms of children’s welfare and protection as well as the active measures undertaken to ensure their effective implementation.

### Terminology

‘Children’ refers to those under the age of 18 years, as defined in the Children Act 1989.

‘Safeguarding’, as defined in the government’s statutory document Keeping Children Safe in Education, means protecting children from maltreatment; preventing impairment of student’s health or development; ensuring that students grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all students to flourish and to achieve their full potential as people and members of the school and of the wider community. ‘Safeguarding’ refers to promoting the welfare of children and is a broader term than ‘Child Protection’.

‘Child protection’ is part of this definition and refers to activities undertaken to prevent children suffering, or likely to suffer, significant harm as a result of abuse.

‘Child abuse’, according to the NSPCC, is any action by another person, adult or child, that causes significant harm to a child. There are several main forms of abuse (NSPCC definitions):

- **Physical Abuse** – physical abuse is deliberately hurting a child, causing injuries such as bruises, broken bones, burns or cuts.
- **Emotional Abuse** – Children who are emotionally abused suffer emotional maltreatment or neglect. It is sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them.
- **Sexual Abuse** (including child sexual exploitation) – a child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact, and it can happen online.
- **Neglect** – neglect is the ongoing failure to meet a child's basic needs. It's dangerous and children can suffer serious and long-term harm.

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- **Bullying** – it can happen anywhere – at school, at home or online. It’s usually repeated over a long period of time and can hurt a child both physically and emotionally.
- **Radicalisation** may also be seen as a form of abuse. It is defined in the government’s strategy, Prevent, as ‘the process by which a person comes to support terrorism and forms of extremism leading to terrorism’.

## Policy aim

This policy provides staff (owners, teachers, coaches, admin staff, volunteers and homestays) with the guidance they need to keep students safe in our school and online and informs parents and guardians how we safeguard their children whilst on a course with us. IH Manchester promotes safe practice and professional conduct to safeguard students and to avoid the potential for misunderstandings. Staff understand the importance of students receiving the right help at the right time to address risks and prevent issues escalating.

There are three main elements to the school’s Safeguarding policy:

**Prevention:** the school aims to provide a positive and safe environment, careful and vigilant teaching, accessible pastoral care, positive adult role models and support to students. Our safer recruitment procedures include rigorous checking and recording of the suitability of staff and volunteers to work with students.

**Protection:** Staff are trained and supported to respond appropriately and sensitively to safeguarding concerns following our agreed procedures. They identify and act on early signs of abuse and ensure that allegations, concerns and complaints against staff are dealt with promptly, and in accordance with national and local guidance and legislation. They keep accurate records and share relevant information quickly in order to challenge inactivity. Additionally, the school takes all practical and appropriate steps to ensure that our school premises are as secure as possible.

**Support:** The school supports students who may be at risk of any harm, including how staff respond to their concerns and implement action that may be required. Staff also aim to support students who have been abused. We seek to address both the mental and emotional welfare of students and families through the provision of pastoral care and by facilitating the referral of students to appropriate external services when required. Additionally, we operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse.

All students have the right to respect and protection from abuse, regardless of age, gender, ability, language, religion, race, nationality, sexuality, culture or disability. In preparing this policy IH Manchester has been attentive to the nature, age range and other significant features of the school in the provisions made for safeguarding. We realise with children and young adults there is the potential scope for problems relating to mental health issues, body image, eating disorders, self-harm, peer-on-peer abuse (child on child), radicalisation and extremism.

Protecting students from the risk of radicalisation is seen as part of IH Manchester’s wider safeguarding duties, and is similar in nature to protecting students from other forms of abuse, whether these come from within their family or are the product of outside influences. Staff are alert to changes in students’ behaviour which could indicate that they may be in need of help or protection. Specific background factors may contribute to vulnerability to being radicalised which are often combined with specific influences such as family, friends or online. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. IH Manchester considers the level

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of risk of students identified as being at ‘risk of radicalisation’ and make an appropriate referral, which can include Channel or Children’s Social Care. For further information, please refer to the Prevent Duty section of this document.

## Contacts

Title	Contact details	Role
Designated Safeguarding Lead and Prevent Officer	<p><b>Claire Bouédo</b></p> <p>Telephone: +44 (0) 7572 467787</p> <p>Email: <a href="mailto:claire.bouedo@ihmanchester.com">claire.bouedo@ihmanchester.com</a></p>	<ul style="list-style-type: none"> <li>● lead responsibility for child protection and safeguarding</li> <li>● responsible for the prevention of radicalisation, extremism and being drawn into terrorism</li> </ul>
Welfare and Accommodation Manager	<p><b>Claire Bouédo</b></p> <p>Telephone: +44 (0) 7572 467787</p> <p>Email: <a href="mailto:claire.bouedo@ihmanchester.com">claire.bouedo@ihmanchester.com</a></p>	<ul style="list-style-type: none"> <li>● responsible for pastoral guidance and ensuring the safety and well-being of minors on course</li> </ul>
Principal	<p><b>John O’Leary</b></p> <p>Telephone (school hours): +44 (0)7455 563 392</p> <p>Email: <a href="mailto:john@ihmanchester.com">john@ihmanchester.com</a></p>	<ul style="list-style-type: none"> <li>● managerial oversight</li> <li>● deputises for the DSL and Prevent Officer in their absence</li> </ul>

## Framework - legislation and related documents

As well as following all relevant legislation, IH Manchester abides by guidelines outlined by Accreditation UK.

There is supporting documentation that can be referred to alongside this Policy, specifically:

- Homestay Handbook
- Student Handbooks (programme dependent)
- Staff Handbook
- Anti-bullying and Harassment Policy
- Code of Conduct and Exclusion policy
- Health and Safety policy
- Airport Transfer Policy
- Online Safety Policy

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- Attendance, Holiday and Withdrawal Policy
- Under 18 Excursion Policy

Each of these documents outlines in more detail, the specific ways in which IH Manchester endeavours to protect all children enrolled on our programmes. Some of the above policies are available to view [online](#). Other policies are made known directly to relevant staff and can be requested from the school office.

## Promoting Good Practice

### Good practice guidelines

This Policy has been sectioned to reference the different environments in which employees of IH Manchester are required to work. For example, the role of a teacher is very different to that of a homestay host, not just in regard to the environment in which the relationship occurs, but also in terms of the responsibilities and expectations of each role. There are however, general good practice guidelines that all adults involved with the organisation should follow:

- Maintaining professional boundaries at all times and avoiding behaviours which could be misinterpreted by others.
- Ensuring that the welfare of the child is paramount. All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children.
- Maintaining a safe, nurturing, and appropriate relationship with each child, which should be based on honesty, openness, and mutual respect.
- Being an excellent role model and exemplifying core British values.
- Reporting any concerns about a child following the appropriate channels.
- Giving children enthusiastic and constructive feedback, rather than negative criticism.
- A recognition that the peer-on-peer abuse is an ever-present concern whether there are reported incidents or not, and that it should never be downplayed.
- Maintaining a zero-tolerance approach to all forms of abuse.

### Behaviours to avoid

As there are general good practice guidelines that ought to be followed, there are equally general guidelines on behaviour that all employees, homestay hosts and volunteers should avoid and challenge.

- Engaging in any form of intimacy with a child, whether of a platonic or romantic nature. It is important to remember that according to UK law, teachers are classed as a *position of trust*. Therefore, it means that it is against the law for them to engage in sexual activity of any nature with a child student, even if that child is over the age of consent (16 or over).
- Making or encouraging others to make sexual remarks to, or about, a child
- Using inappropriate language to or in the presence of children or allowing children to use inappropriate language.

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- Making (or encouraging others to make) unprofessional personalised comments which intimidate, threaten, coerce, or undermine children, or might be interpreted as such.
- Socialising with children outside working hours or befriending children on any form of social media via a personal platform
- Making physical contact with a child.
- Except in exceptional circumstances, being alone with a child.
- Allowing allegations made by a child to go unchallenged, unrecorded, or not acted upon.
- Doing things of a personal nature for children that they could do themselves.

### Specific for in-school staff

- Teachers must ensure they are positioned at an appropriate place in the classroom to ensure their physical closeness to the children is not uncomfortable for either and that any risk of physical contact is avoided.
- Since situations whereby individual children are alone in the classroom with a member of staff are to be avoided. If a child requires specific one to one tuition, arrangements should be made for this to be undertaken in an environment where they are visible to other people.
- Social events including children and (a) member(s) of staff held away from the school environment should only be approved by the school and not privately arranged by staff and children.

### Specific for online teaching staff

- Sessions are to be held in a professional setting e.g., home office, study.
- Teachers must ensure that everything students see in background is appropriate.
- Teachers must think of the space for online work as the same as a classroom; it is a company /public area. Appropriate online behaviours should be like one-to-one working, e.g.:
  - Switch off/mute mobile phone
  - Always have professional appearance i.e., the same as in a physical classroom
  - Stick to lesson content and avoid sharing personal information or inappropriate topics
  - Attend class in an appropriate environment, i.e., preferably not in bed
  - Switch the video and audio off when temporarily leaving the class i.e., going to the kitchen or bathroom
- For more information, please see our Online Safety Policy.

### Specific for Sports Coaches/Social Activity Assistants

For children on football courses or attending school-lead social activities, there are a range of situations that need to be considered where the members of staff may be left vulnerable if safety mechanisms are not in place.

- When children are in the communal shower and bathroom areas, staff members are to be aware that remaining in that environment may compromise the students' privacy and leave staff vulnerable to



allegations. Members of staff should avoid being in those areas at the same time as children, and if it unavoidable for a member of staff, they should be accompanied by another member of staff.

- Any physical contact with the children should always be avoided. Examples of when this may be permitted is during a coaching/training session where advice/guidance on the child's physicality and training programme is required (e.g., in the gym). Such physical contact is not permitted in any other circumstances.

## Specific for homestay hosts

Homestays are recruited to provide a safe and supportive environment for all children during their stay. They need to be aware of the ways in which they must protect themselves from allegations of abuse by children, as well as ensuring that all children in their care feel as safe as possible in their home. It is important that homestays consider the following:

- Homestay hosts must not enter a child's bedroom unless they are granted permission to do so by the child and only when the child is dressed and not in bed. The host should not then close the door behind them, but ensure the door remains as open as possible. If the child wishes to discuss issues confidentially, another more open area within the house must be found. It is also vitally important that all children are given space and privacy when bathing and that no member of the household should compromise this.
- Equally, children must not be invited into the host's bedroom. Hosts may also wish to adopt a similar rule whereby children they are hosting are not permitted to enter the bedrooms of their own children, and vice versa.
- Homestay hosts include children they are hosting in their everyday life, as much as is possible, however, it is important that they are aware of the need to not put themselves in potentially vulnerable situations, either inside the home or elsewhere. This may include parties/social gatherings, communal bathroom facilities and undertaking social/sporting activities.
- It is important to be aware of intimate contact, especially for greetings and when saying goodbye – some children may feel comfortable with hugs and personal contact of this kind, however, homestay hosts should be aware of the risk of this being misinterpreted. Hugs and physical contact should only be instigated by children and only when the host is comfortable with this. Any other type of physical contact should be avoided at all times.
- Consideration must be given to the relationship between the host's own children and the students staying at the home. Jealousy, rivalry, or dislike may result in conflict between them; however, it is important to ensure any issues arising are discussed openly and action taken should conflict arise. The host's own children need to be aware of the consequences of any violent, abusive, or aggressive behaviour inflicted by them on visiting children.

## Student conduct

The school recognises that peer-on-peer abuse (in school and online) is an ongoing concern and its prevention and handling is paramount to the maintenance of a child's safe and rewarding environment. For our up-to-date code of  
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conduct, please see the Code of Conduct and Exclusion Policy and the Anti-bullying and Harassment Policy. Students in breach of the code of conduct may be removed from classes, temporarily or permanently.

## Implementing safeguarding on our programmes

### Information before course starts

In addition to the general welcome information sent to all students before their course starts, IH Manchester takes a series of specific measures to make sure the staff can look after young learners throughout their course in the most effective manner possible. Students are sent a welcome letter and/or a handbook, a school timetable, and if relevant, information about their homestay host including information regarding meals, the area and approximate travel costs and information.

Both parents must complete and sign an under-18 booking form and provide at least one contact phone number and email address. This will be the only contact accepted for parental permission during the course. The form includes the under-18 rules and is signed by both parents (when possible) or legal guardian and the student. The booking form also makes it clear that the parents are agreeing to their child (aged 16 or 17) being in group class and potentially homestay accommodation with adult students.

Parents must also disclose whether the child has any medical condition the staff should be aware of, whether they take any medicine or if they have any specific dietary requirements.

For face-to-face students, parents must also sign a parental permission letter, which the student carries with them to the UK in order to show airport immigration that the parents have given permission for their child to travel to the UK alone. The school requests and keeps a copy of this signed letter.

### Arrival at the airport

For face-to-face students, arrival and departure transfers are automatically included for students under the age of 18 to minimise stress and ensure the safety of our younger students on arrival or departure. On arrival, the driver will meet the student in the arrivals lounge of the airport, train or coach station and take them to their final destination by taxi, minibus or coach. They will hold a sign with the name of the school on it.

On departure, the driver will collect students from their accommodation and take them to the airport, train or coach station. If the student is taken to the airport, the driver will take them to the check-in desk and then to the security gate and make sure that the student gets in the right queue. If taken to the train or coach station, the driver will accompany the student to the right platform or gate – or as far they can possibly go and make sure that they board on to the right coach or train when possible. When this is not possible, the driver will explain to the student clearly and show where to wait for and board the train or coach.

Parents can choose to opt out but it is strongly recommended that they do not. Should they opt out, they will be asked to sign a waiver stating that they understand the risks as stated in our Airport Transfer Policy.

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## Induction

All children receive an induction on their first week. During this, they receive essential information relevant to their programme.

- Face to face students receive wristbands with the emergency number, which also helps staff to identify them as under-18s. They are required to wear these at all times. Important aspects such as wellbeing, curfew, emergency procedures and school policy in relation to cigarettes and alcohol are explained to children and their understanding of these is checked. All students are then taken on a brief tour of the school and are shown the emergency meeting points and facilities.
- Online students get introduced to the Welfare and Accommodation Officer as the main point of contact for pastoral issues. Students are also explained how and when to contact them.

## Keeping children safe on site

The building reception desk on the ground floor is staffed during the school opening hours. If the receptionist is away from the desk, the front door is then locked from the inside to prevent access from intruders. On school premises, visitors are required to sign in on arrival, using either the over-18 or under-18 sign in book. There is always a member of staff in reception in school, who is required to challenge any unidentified adult in the school.

## E safety

All computer equipment and internet access within the school is subject to internet safety rules. A web content filter is in place to prevent students from accessing unsavoury content. Please also refer to our online safety policy.

## Attendance

Underage students must attend all of their classes. Under 18s are clearly identifiable on the class registers. Attendance of underage students is taken twice a day. Any under-18 missing from class is contacted immediately. If unable to contact the student, school contacts the homestay host or parent and if the child still cannot be located then, the relevant authorities might be contacted. For further details on attendance, please refer to our Attendance Policy.

Teachers are also required to inform front of house if any under 18 is missing from their class. Teachers are also informed of the arrival of new underage students at weekly academic meetings which are held every Friday.

## Involving parents

To keep parents involved, the school commits to:

- Sending parents a template schedule of online lessons.

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- Being available for parents if they have any concerns about lessons. Welfare meetings are available for all students and parents with the Welfare Manager, Claire Bouédo or the Principal in her absence. See “key personnel” section above for contact details.
- Reporting repeated absence to parents.
- Reporting poor performance or other classroom issues.
- Providing reports on request

If necessary, parents can be contacted either via agents if applicable or via the approved contact details provided in the student’s application form.

## Content monitoring and class observations

All class content is overseen and managed by the academic management team and carefully checked for appropriacy. Teacher development sessions are offered to all teachers once a fortnight and regularly focus on delivering online lessons. Finally, IH Manchester operates an open-door policy in terms of class observations. It means that academic managers regularly join classes to carry out formal observations as well as informal checks.

## Homestay Placements

IH Manchester follows the guidelines set by Accreditation UK with regard to underage student placement.

## Social activities

Special procedures apply to excursions outside school including children. The maximum ratio of students to adults in an activity including under 18s is fifteen to one. Please see Junior Excursion Policy for more details.

## Safer recruitment

IH Manchester recognises that individuals may apply for positions within the organisation with the primary aim of having contact with children. IH Manchester therefore takes all reasonable measures to ensure unsuitable people are prevented from working with our children. Staff involved in recruitment receive appropriate Safer Recruitment training.

## Advertisement

Applicants will be informed that the work, either paid or voluntary, involves working with young people. Advertisements must feature a safeguarding statement and stress that the identity of the candidate, if successful, will need to be checked thoroughly.

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Our school will assess each potential vacancy that includes details of the post's responsibilities, degree of (un)supervised access to the children and key skills required. Information provided to candidates must explain that the post is exempt from the Rehabilitation of Offenders Act 1974. Plus, in line with the Disclosure and Barring Service (DBS) code of practice, it also explains the employer's policy on the employment of ex-offenders.

## Pre-Selection measures

- Applicants are required to complete an application form when replying to an advertised position. In cases where the school receives an unsolicited CV, these applicants are also asked to complete an application form. The forms are scrutinised and any gaps identified.
- Prospective homestay hosts are also required to complete an application form detailing their relevant experience and background.

## Pre-employment checks

- All staff, homestay hosts and volunteers complete a self-declaration. The declaration will elicit information about an applicant's past and a self-disclosure about any criminal record.
- The Welfare and Accommodation Officer will ensure all relevant employees, volunteers and homestay hosts accommodating children are vetted through the Disclosure and Barring Service (DBS). Any members of staff who are not employed directly by IH Manchester but who are responsible for provision on any of the programmes will be required to provide evidence that they have a satisfactory DBS certificate registered on the Update service. For more information, please see our Recruitment policy.
- DBS checks done by previous employers are not valid, unless the applicant is on the Update Service. In the absence of a valid DBS check, staff will not be permitted to carry out regulated activities for children such as teaching classes or conducting training sessions unsupervised but may still work in the school, including teaching adult only classes, provided all other pre-employment requirements have been fulfilled.
- Two references are required for each staff, homestay host and volunteer. For staff this will include one from a previous employment where the applicant worked with children and young people or vulnerable adults. These references must be taken up and may be confirmed through telephone contact.
- Evidence of identity should be provided, for example, passport or photograph driving licence. In the case of homestay hosts, identity will be checked at inspection but no copies of passport will be kept on file. Furthermore, evidence of any professional qualifications must be obtained and stored securely on the individual employee's staff file. For staff and volunteers, CVs must be robustly screened and any gaps in employment history explained.
- All employees and volunteers will be required to undergo an interview carried out to agreed protocols.

## Induction

All employees and volunteers should receive a formal or informal induction, during which:

- A check should be made that the declaration has been completed in full (including sections on criminal records and self-disclosures).
- Their qualifications should be evidenced.
- The job requirements and responsibilities should be clarified.
- They should be provided with a copy of the Staff Handbook and main points highlighted.
- Safeguarding Policy provided and training needs are identified.

## Training

In addition to pre-selection checks, safer recruitment procedures include training after recruitment to help staff, volunteers and homestay hosts to:

- (a) Analyse their own practice against established good practice, and to ensure their practice is likely to protect them from false allegations.
- (b) Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- (c) Respond to concerns expressed by a child.
- (d) Work safely and effectively with all children.

For that purpose, each member of staff in school and homestay hosting children must undertake basic safeguarding awareness training every three years. Staff must also read the following document at induction: “Keeping Children Safe in Education. Part 1: Information for All School and College Staff”.

In addition to this, every member of staff at school must undertake the Home Office’s online Prevent training course, in order to give them knowledge and confidence to identify students at risk of being drawn into terrorism, challenge extremist ideas and know how to refer students for further help. Homestay hosts are made aware of their duties via the Homestay Handbook.

## Dealing with concerns and allegations of abuse

### How to respond to disclosures of abuse

Where a young person discloses abuse or neglect, staff should follow the sequence of events below:

- Creating a safe environment by offering the student a private and safe place if possible. Staying calm, reassuring the student and stressing that they are not to blame and that they know how difficult it must have been to confide in them.
- Listening to what the student has to say and taking them seriously; reassuring the student but advising that they cannot promise to keep a secret. Not making promises they cannot keep. If there is a

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requirement for immediate medical intervention, assistance should be called for. Telling the student what is going to be done next.

- When talking to the student, keeping questions to a minimum. Encouraging the student to use their own words and not asking leading questions, interrupting or making assumptions which might give particular answers. Not repeating the disclosure over and over to the student. Not displaying shock or disbelief.
- Recording in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the student and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. Recording the student's name, address and date of birth along with the student's behaviour and emotional state.
- Not taking responsibility for investigating the allegation. Instead, immediately consulting our Designated Safeguarding Lead so that any appropriate action can be taken to protect the student if necessary. Only telling those people that it is necessary to inform; the Designated Safeguarding Lead will consider the information and decide on the next steps. Not approaching or informing the alleged abuser.

## Dealing with disclosures of abuse

**Abuse by IH Manchester staff/volunteers/homestay host** – Should a child disclose that they have been hurt, harmed or abused in any way by a homestay host or member of staff employed by or working voluntarily with IH Manchester, then in the first instance, you must speak to the Designated Safeguarding Lead (DLS). They will ensure that your concerns are listened to and responded to appropriately. It is essential, that there is a record of all discussions, including the initial allegation made by the child as this evidence may be called upon at a future date.

IH Manchester will make an immediate decision about whether any individual accused of professional abuse should be temporarily suspended or put 'on hold' pending further inquiries, including those undertaken by the Local Authority or the Police.

IH Manchester will contact the MCC Designated Officer (formerly known as the LADO - Local Authority Designated Officer) and seek advice and guidance from them. The Local Authority has a duty to comply with the Working Together to Safeguard Children (July 2018) guidance from the Department of Health, to have in post, a Designated Officer whose responsibility it is to co-ordinate and respond to allegations of professional abuse. IH Manchester offers a commitment to comply with this requirement. Further information on this can be obtained by following [this link](#).

Irrespective of the findings of the Local Authority or Police, IH Manchester directors will assess all individual cases to decide whether a member of staff, volunteer or homestay host can be reinstated and how this can be sensitively handled. As has been clearly stated at the beginning of this document, the child's welfare is paramount and should not over-ride any other priorities.

**Allegations of Abuse from others** – Should a child disclose that they have been abused by someone outside of the organisation, whether adult or child, then these allegations must be responded to seriously. The first instance is to speak to the Designated Safeguarding Lead who may have a responsibility to inform the police and the local authority (when appropriate).

In either of these situations, liaison and discussion will also take place with the child/young person's parents throughout these processes. Their wishes and feelings, as well as those of the child, will be taken seriously and respected.

**Allegations of Historical Abuse** – Allegations of abuse may be made some time after the event (e.g., by an adult who was abused as a child or by a member of staff who is still currently working with children). Where such an allegation is made, IH Manchester will follow the procedures as detailed above and report the matter to the Police or the Local Authority. This is because other children, either within or outside of the organisation, may be at risk from this person.

**Support to deal with the aftermath of abuse** – Consideration should be given to the kind of support that children, parents and members of staff, volunteer and homestay hosts may need. For further information, contact the British Association for Counselling, 1 Regent Place, Rugby, CV21 2PJ. Telephone: 01788 550899, Fax: 01788 562189, or email: [bac@bacp.co.uk](mailto:bac@bacp.co.uk). Further information can be obtained from the website [www.bacp.co.uk](http://www.bacp.co.uk).

**Confidentiality** - Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only. It is important to ensure that all information should be stored in a secure place with limited access for designated people, in line with the data protection laws (e.g., that information is accurate, regularly updated, relevant and secure).

**In the case of bullying** - If bullying is suspected, the same procedure should be followed as outlined earlier in terms of responding to abuse. IH Manchester takes all signs or allegations of bullying very seriously. All children will be encouraged to speak about and share their concerns. If any child talks about or threatens suicide, seek advice immediately from the Designated Safeguarding Lead.

Staff will speak individually with the victim of the bullying and those who are alleged to have been perpetrating the bullying. Reassurance must be offered to the victim that action is being taken, and explain specifically what this will entail. All discussions and actions must be recorded and stored safely. All children on programmes run by IH Manchester have signed up to and understand that bullying will not be tolerated and that if they are discovered to be behaving in this way, they may be expelled from the course and returned home.

Of course, bullying may also occur away from home and the school environment. This should still be responded to with the same urgency. Once information is known, a decision will be made, collectively, whether the Police or the Local Authority should be informed.

Please refer to IH Manchester's Anti-bullying and Harassment Policy.

**In the case of low-level concerns** - IH Manchester promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This should help the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of IH Manchester. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegation threshold or is otherwise not considered serious enough to consider a referral to the MCC Designated Officer. If a low-level concern is raised, the same procedure should be followed as

Reviewed April 2022– Next review October 2022 or in the event of staffing, policy, or legislative changes.

outlined earlier in terms of responding to abuse. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the MCC Designated Officer, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Principal or by the DSL. All low-level concerns are recorded and assessed for signs of patterns of concerning behaviour, the identification of which may result in a referral to the MCC Designated Officer.

## Summary

Safeguarding children is everyone's business. All those staff employed by IH Manchester, whether paid or unpaid, as well as all homestay hosts, have a responsibility to ensure they respond swiftly and appropriately to any allegations that a child has been hurt, harmed or in any other way abused by others. The organisation commits to providing a workforce that is suitable to work with children and who are suitably qualified to fulfil their function and responsibilities within the school. Throughout all the programmes with IH Manchester, the welfare, safety and protection of all children is of paramount importance and this message is clearly communicated to all the staff, the children, their parents, and partner companies. IH Manchester prides itself on a service which places the child at the heart of the process and anything that compromises this will be highlighted and addressed to ensure the protection of the student is achieved.

IH Manchester requires all members of its workforce to have sight of this policy and commit to its implementation.