



Safeguarding for Under 18-year-olds & Vulnerable Adults

Overall and final responsibility for Safeguarding at Berlitz Manchester is that of Mark Harrington, the Managing Director.

Day to day responsibility for ensuring that this policy is put into practice is delegated to the **Designated Safeguarding Lead (DSL), Russell Hall** & the **Designated Safeguarding Person (DSP), Emma Taylor**.

Please speak to Russell or Emma, or any other member of staff if you have any concerns, or wish to make or report an allegation.

General Safeguarding & Safe Recruitment Policy Statement

Berlitz Manchester believes that it is **always** unacceptable for a learner to experience abuse of any kind & recognises its responsibility to safeguard the welfare of all learners by commitment to practice that protects them while attending the college; while staying in homestay, residential or other accommodation provided by us; & at all other times during their stay in the UK. This is particularly the case when dealing with children under the age of 18 & vulnerable adults.

Students at Berlitz Manchester are predominantly aged 18 & over, but at any given time there may be a number of 16- & 17-year-old students enrolled on adult courses. Children under 16 occasionally attend the college for 1-to-1 lessons. (The policy & code of conduct pertaining to the latter are outlined in a separate document.)

The college recognises that:

- Safeguarding is not limited to child protection (i.e. protecting children from direct harmful behaviour), but extends to creating an environment in which the welfare of the learner in broader terms is considered paramount.
- All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- Working in partnership with our learners & with other agencies (e.g. LCSB, NSPCC & Police) is essential in promoting a safe learning environment.

The purpose of the policy is to:

- Provide protection for the learners at Berlitz Manchester.
- Provide staff, volunteers, homestay hosts & anyone else who might come into contact with children with guidance & training on procedures they

should adopt, & to whom they should report, in the event that they suspect a learner may be experiencing, or be at risk of, harm.

- Promote Safeguarding policies, given that it has an impact on all aspects of the operational life of the school.

This policy applies to all staff, including senior managers; paid staff; volunteers & work experience staff; students; host families; or anyone else working on behalf of the school who might find themselves in contact with children.

This policy will be reviewed on an annual basis, or as & when necessary in the light of new legislation or other developments. This review will also involve relevant feedback from the adults & children to whom this policy is directed. The Managing Director will have ultimate responsibility for signing it off.

A separate policy outlines the code of conduct relating to the use of IT, the Internet & other technologies.

We will seek to safeguard children under 18 (& all learners) by:

- Nominating a DSL (Designated Safeguarding Lead) & one or more DSPs (Designated Safeguarding Persons) to whom any concerns or allegations should be reported. (DSLs & DSPs undergo Level 3 & Level 2 Safeguarding training respectively.) **Currently the DSL for Berlitz Manchester is Russell Hall, the Director of Studies. Emma Taylor, the Assistant Director of Studies, is a DSP.**
- Valuing them, listening to them, respecting them, & involving them in the review & development of safeguarding issues.
- Adopting safeguarding guidelines through procedures & a code of conduct for staff, volunteers, homestay hosts & other adults who might be working with children.
- Making all adults aware which students are under the age of 18 by communicating this fact to all adults likely to come into contact with the child when such students arrive at the college, & highlighting the fact on weekly class registers so that regular attendance can be monitored more effectively.
- Making all adults aware of the circumstances in which they should have safeguarding concerns about an under 18-year-old, & what they should do in that event. They would need to respond if noting something themselves or if told something by another adult, as well as follow a specific procedure (see below) if an under 18-year-old disclosed something to them.
- Putting all adults in a position to recognize possible symptoms of abuse, which are classified into four areas: physical, sexual, emotional & neglect. (Information on these will be provided via training & inductions, with written information being made available in handbooks & on the college's website.)

- Providing step-by-step guidance for all adults on how to respond correctly if an under 18-year-old decides to disclose to them that they are being abused by an adult, or another child, respectively. (Information on these will be provided via training & inductions, with written information being made available in handbooks & on the college's website.)
- Keeping confidential & secure records concerning allegations of abuse.
- Adopting a policy for the safe recruitment of staff, homestay hosts & all adults who may be working with children.
- Raising awareness of specific areas such as child sexual exploitation (grooming), female genital mutilation & forced marriages.
- Sharing information about eventual concerns with relevant agencies (e.g. LCSB, NSPCC & Police), & involving learners (& their parents/carers in the case of children under the age of 18) appropriately.

Code of Conduct

This code of conduct must be followed by all Berlitz Manchester staff, including senior managers; paid staff; volunteers & work experience staff; students; host families; or anyone else working on behalf of the school, over the age of 18, who might find themselves in contact with children. It has been created with a view to building a climate of trust & a safe school culture. Although predominantly aimed at ensuring the welfare of children under 18 & vulnerable adults studying at the college, it also serves to help both adults & under 18s to avoid any behaviour or actions that might be misconstrued.

Dos & Don'ts of Working with Children

Do:

- Remember the child comes first
- Behave professionally, acting as an excellent role model
- Treat everyone with respect & communicate at their level
- Listen to children
- Be aware of policies & procedures
- Report any concerns or allegations following Berlitz Manchester guidelines
- Be aware, approachable & understanding

Do not:

- Touch inappropriately
- Use inappropriate language
- Harm or frighten a child
- Be alone with a child, if avoidable
- Threaten, shout or act aggressively
- Mistreat, demean, ignore or make fun of a child
- Force a child to do something they do not want to do
- Let a child expose him/herself to danger
- Take photos of children with prior consent

All adults have a strict duty never to subject any child to any form of harm or abuse. Failure to adhere to this will be regarded as gross misconduct. The following are examples of unacceptable behavior:

- Shouting at a child or using derogatory language
- Touching a child except in special circumstances such as providing first aid
- Doing things of a personal nature that they can do for themselves, including going to the toilet with a child unless another adult is present
- Allowing or engaging in sexually suggestive behaviour within a child's sight or hearing, or making suggestive remarks that might be overheard by a child
- Giving or showing a child anything that might be regarded as pornographic
- Socialising with a child outside of the college without the full prior knowledge & consent of the parents/guardians
- Seeking or agreeing to any electronic form of contact (e.g. exchanging personal email addresses) with a child during or after their stay at Berlitz Manchester without the full prior knowledge of Berlitz Manchester & the child's parents/guardians

Incidents that must be recorded/reported

If any of the following occur, you should report this immediately to the Managers at Berlitz Manchester and record the incident. The Managers will make the necessary contact with the student's parents and offer advice on the most appropriate course of action to follow:

- If you accidentally hurt a student.
- If the student appears distressed in any manner.
- If the student behaves in a sexually inappropriate manner towards you, other students or indeed other people.
- If a student misunderstands or misinterprets something you have done/said and is unwilling to accept your explanation and wishes to make a complaint.

Use of Photographic/Filming Equipment

Some people use their position of trust to take inappropriate photographs or film footage of children and young people. All staff should be vigilant and any concerns should be reported to the DSPs/Managers at Berlitz Manchester.

It is important to note, that photographing students must only be done once approval from the student and his/her parents/carers has been sought. Involving students in a host family's life is a crucial and important part of the whole experience, and as a consequence, photographs may be taken at events/special occasions recorded etc. All staff must ensure that the student is fully aware and in agreement to being photographed/filmed and any usage by the employee other than for legitimate purposes, would be looked upon seriously and appropriate action taken.

Recruitment of Staff and Volunteers

Berlitz Manchester recognises that individuals may apply for positions within the organisation with the primary aim of having contact with students. Berlitz Manchester therefore takes all reasonable measures to ensure unsuitable people are prevented from working with our students.

Pre-Selection Checks must include the following:

- (a) All host families and staff complete a declaration. The declaration will elicit information about an applicant's past and a self-disclosure about any criminal record.
- (b) Consent will be obtained from an applicant to seek information from the Criminal Records Bureau. As the Vetting and Barring procedures are rolled out by the Independent Safeguarding Authority, Berlitz Manchester commit to engaging with this process and ensuring all future host families and staff are registered and checks undertaken in line with the revised guidelines.
- (c) References are required for all staff, including one which will be from a previous employment if the applicant worked with children and young people. These references must be taken up and confirmed through telephone contact.
- (d) Evidence of identity should be provided, for example, passport or photograph driving licence.

Interview and Induction

All employees and volunteers will be required to undergo an interview carried out to agreed protocols. All employees and volunteers should receive a formal or informal induction, during which:

- (a) A check should be made that the declaration has been completed in full (including sections on criminal records and self-disclosures).
- (b) Their qualifications should be evidenced.
- (c) The job requirements and responsibilities should be clarified.
- (d) They should sign up to Berlitz Manchester Code of Conduct.
- (e) Child protection procedures are explained and training needs are identified.

Training

We will seek to ensure a comprehensive safeguarding culture by:

- Requiring all staff to complete the **Education & Training Foundation** online **Level 1** Safeguarding course, including the assessment module. This should take place immediately upon acceptance of the position.

<http://www.foundationonline.org.uk/>

- Requiring staff involved in recruitment to complete the **Education & Training Foundation** online **Safeguarding & Safer Recruitment** course, including the assessment module. (This being in addition to the standard Safeguarding course mentioned above.)
- Requiring DSPs to undergo **Level 2** training. ELT specific training is provided by **English UK**, which at least one DSP must have attended. Subsequent training can be provided by that DSP.
- Ensuring all adults receive a copy of the safeguarding policy, plus details on how to access more detailed information, associated policies & any other relevant information.
- Including information on safeguarding matters in meetings & in-house training sessions on a regular basis.
- Attending external courses given by **English UK** & the **Manchester Safeguarding Children Board (MSCB)**.

<http://www.englishuk.com/en/training>

<http://www.manchesterscb.org.uk/>

Responding to Disclosures of Abuse

Abuse by Berlitz Manchester staff/volunteers/homestay hosts – Should a student disclose that they have been hurt, harmed or abused in any way by a member of staff employed or working voluntarily with Berlitz Manchester, then in the first instance, you must speak to a DSP. He/she 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 student as this evidence may be called upon at a future date.

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

Berlitz Manchester will make contact with the Manchester Safeguarding Children Board and seek advice and guidance from them. The Local Authority has a duty to comply with the Working Together to Safeguard Children 2006 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. Berlitz Manchester offers a commitment to comply with this requirement. Further information on this can be obtained by following this link:

http://www.nspcc.org.uk/Inform/cpsu/HelpAndAdvice/Organisations/lscbs/lado_wda68916.html

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

Allegations of Abuse from Others – Should a student disclose that they have been abused by someone outside of the Programme, whether adult or child, then these allegations must be responded to seriously. Initial advice and guidance can be sought from the Managers, who will have a responsibility to inform the Police and the Local Authority Children's Services Department.

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 student, will be taken seriously and honoured.

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, Berlitz Manchester will follow the procedures as detailed above and report the matter to the Police or the Local Authority Children’s Services Department. This is because other children, either within or outside of the Programme, may be at risk from this person. Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children.

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).

Bullying

If bullying is suspected, the same procedure should be followed as outlined earlier in terms of responding to abuse. Berlitz Manchester will take all signs of or allegations of bullying very seriously. All students will be encouraged to speak about and share their concerns. Worryingly, statistics show that up to twelve children per year commit suicide as a result of bullying, so if any student talks about or threatens suicide, seek advice immediately.

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 students on the Programme 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 the host family and the school/training 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 Children’s Services Department should be informed.

Host Families

Host families are recruited to provide a safe, nurturing and supportive environment for all students during their stay on the Programme. Host families need to be aware of the ways in which they must protect themselves from allegations of abuse by students. It is important that host families consider the following:

- Host families must not enter a student's bedroom, unless they are granted permission to do so by the student and only when the student is dressed and not in bed. The host family should not then close the door behind them, but ensure the door remains as wide open as possible. If the student wishes to discuss issues confidentially, another more open area within the house must be found. It is also vitally important that all students are given space and privacy when bathing and that no member of the host family should compromise this.
- Equally, students must not be invited into the host family's bedroom. Hosts may also wish to adopt a similar rule whereby students are not permitted to enter the bedrooms of their own children, and vice versa.
- Host families include students 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 at parties/social gatherings, communal bathroom facilities and undertaking social/sporting activities.
- It is important to be aware of intimate contact – some students may feel comfortable with hugs and personal touch of this kind, however, host families should be aware of the risk of this being misinterpreted. Hugs and physical contact should only be instigated by students 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 hosts own children and the students staying at the home. Jealousy, rivalry and dislike may result in conflict between them; however, it is important at the outset to ensure this issue is discussed openly and the action that would be taken should conflict arise. Your own children need to be aware that any violent, abusive or aggressive behaviour displayed by them to visiting students, may jeopardise your position as host family provider.

Teachers/Educators/Tutors

Teaching is undertaken within a confined, classroom environment, which can create some potential risks.

- Staff must ensure they are positioned at an appropriate place in the classroom to ensure their physical closeness to the students is not uncomfortable for either and that any risk of physical contact is avoided.
- Members of staff are not permitted to allow students to travel in their vehicles as a matter of course.
- There should be no instances whereby Teachers/Tutors etc are permitted to allow students to their own homes. This can leave the members of staff very vulnerable to allegations.
- Situations whereby individual students are alone in the classroom with a member of staff are to be avoided. If the student requires specific 1-to-1 tuition, arrangements should be made for this to be undertaken in an environment where they are visible to other people.

SUMMARY

Child protection is everyone's business!! All those staff employed by Berlitz Manchester, whether paid or unpaid, has a responsibility to ensure they respond swiftly and appropriately to any allegations that a student has been hurt, harmed or in any other way abused by others. The college commits to providing a workforce that is suitable to work with children and young people, and which is suitably qualified to fulfil its functions and responsibilities. Throughout all of the Programmes with Berlitz Manchester, the welfare, safety and protection of all students is of paramount importance and this message is clearly communicated to all the staff, the students and partner companies. Berlitz Manchester prides itself on a service which places the student 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.

Safeguarding students who are vulnerable to extremism

- Since 2010 when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard young people and families from extremist groups which attempt to radicalise vulnerable people to hold extreme views justifying political, religious, sexist or racist violence.
- Berlitz Manchester values freedom of speech and the expression of beliefs/ideology as fundamental rights. Both students and staff members have the right to speak freely and voice their opinions. However, such free speech is subject to laws and policies governing equality, human rights and community safety.
- The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in activity in support of terrorism. The normalisation of extreme views may also make some young people more vulnerable to future manipulation and exploitation. Berlitz

Manchester recognises that such exploitation and radicalisation should be viewed as a safeguarding concern.

- Berlitz Manchester seeks to protect all learners against the messages of all violent extremism
- When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism they should speak with the designated Safeguarding Lead.

INDICATORS OF VULNERABILITY TO RADICALISATION

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism

Extremism refers to (Crown Prosecution Service) the demonstration of unacceptable behavior by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs
- Seek to provoke others to terrorist acts
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts
- Foster hatred which might lead to inter-community violence

There is no such thing as a “typical extremist”; those who become involved in extremist actions come from a range of backgrounds and experiences. Students may become susceptible to radicalization through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities.

Indicators of vulnerability include:

- Identity crisis – the student is distanced from their cultural/religious heritage
- Personal Crisis – the student may be experiencing family tensions; a sense of isolation and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends.
- Personal circumstances – migration, local community tensions, events affecting the student’s country or region of origin
- Unmet aspirations
- Experiences of criminality
- Special educational needs

More critical risk factors could include

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element

- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behavior
- Experiencing a high level of social isolation

STATEMENT ON VULNERABLE ADULTS

Berlitz Manchester does not knowingly accept vulnerable adults (according to the definition below), as our staff are not specifically trained to work with them.

In the unlikely event that a vulnerable adult enrolls on a course without Berlitz Manchester's knowing, Berlitz will not be able to allow them to join any classes. Berlitz will contact the relevant next of kin, who would then be responsible for ensuring their safe passage home, or to a suitable alternative destination.

Berlitz may, on occasion, assess applications from students with special educational needs and disabilities on a case-by-case basis. Some of these applicants could be perceived as having a degree of vulnerability; however, Berlitz would liaise closely with the student and/or agent to determine whether or not a suitable course and homestay can be provided to accommodate the student's needs.

Definition of Vulnerable Adult

According to regulations, "vulnerable adult" means a person aged 18 or over who is receiving services of a type listed in paragraph (2) below and in consequence of a condition of a type listed in paragraph (3) below has a disability of a type listed in paragraph (4) below.

(2) The services are—

- (a) accommodation and nursing or personal care in a care home;
- (b) personal care or nursing or support to live independently in his/her own home;
- (c) any services provided by an independent hospital, independent clinic, independent medical agency or National Health Service body;
- (d) social care services; or

(e) any services provided in an establishment catering for a person with learning difficulties.

(3) The conditions are—

- (a) a learning or physical disability;
- (b) a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
- (c) a reduction in physical or mental capacity.

(4) The disabilities are—

- (a) a dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions;
- (b) severe impairment in the ability to communicate with others; or
- (c) impairment in a person's ability to protect himself from assault, abuse or neglect.

The Police Act 1997 (Enhanced Criminal Records Certificates) (Protection of Vulnerable Adults) Regulations (2002). Retrieved June 2012 from:
(<http://www.legislation.gov.uk/uksi/2002/446/regulation/2>)

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

Declaration

As an adult working for or in association with Berlitz Manchester, I, the undersigned, declare that I have read the college's Safeguarding Policy, & commit to taking all necessary steps to ensure it is adhered to. (Please sign both copies. Detach the second copy & hand it to the Director of Studies.)

Signed:		Date:	
Print Name:			
Position within Berlitz Manchester:			

Signed:		Date:	
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Print Name:	
Position within Berlitz Manchester:	