


**International House London**  
**Main school**  
**Safeguarding and Child Protection Policy**  
**2024**





This policy covers all programmes taught at International House London main school premises including Young Learner Programmes run by International House London Young Learner Centres on site

**International House London**

**16, Stukeley Street,**

**Covent Garden,**

**London,**

**WC2B 5LQ**

Programmes run by International House London Young Learners at seasonal centres outside of London are covered in a separate policy

International House London is a founder member of EAQUALS, a member of English UK, and is accredited by EAQUALS, International House World Organisation and the British Council. It is under the Educational Oversight and subject to regular inspections by the Independent Schools Inspectorate (ISI). It is a provider of language and teacher training for students aged 16+. Students from overseas are accommodated in homestay and residential accommodation. It also provides seasonal junior programmes for 8-17 year olds in London and summer/spring centre at IH Oxford, IH Cambridge, and IH Frensham



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## 1.0 Key individuals involved in safeguarding and child protection at IH London

All members of staff employed by IH London receive appropriate safeguarding and child protection training so that they are aware of their responsibilities and know how to act on them. This forms part of their induction when they start work with the organisation and is organised by HR department. There are, however, key individuals, **Designated Safeguarding Persons (DSPs)** including **the Designated Safeguarding Lead (DSL)** to whom any safeguarding and specific child protection allegations and concerns should be reported. A DSP has received advanced (formerly level 2) or higher, safeguarding training.

The key individuals / DSPs are:

Name	Title / Role	Level	Phone Number	Email
Caroline Turner	<b>Designated Safeguarding Lead (DSL)</b> + Prevent Lead Director of Operations	3		<a href="mailto:Caroline.turner@ihlondon.com">Caroline.turner@ihlondon.com</a>
Drew Hyde	<b>Deputy Designated Safeguarding Lead (DDSL)</b> Customer Experience Manager	3	0207 611 2400	<a href="mailto:Drew.hyde@ihlondon.com">Drew.hyde@ihlondon.com</a>
Pauline Loriggio	Director of English	3	0207 611 2451	<a href="mailto:Pauline.Loriggio@ihlondon.com">Pauline.Loriggio@ihlondon.com</a>
Chaya Shetty	Human Resources Manager	2	0207 611 2439	<a href="mailto:chaya.shetty@ihlondon.com">chaya.shetty@ihlondon.com</a>
Elizabeth Arbuthnott	Director of Young Learner Programmes	3	0207 611 2471	<a href="mailto:alex.cann@ihlondon.com">alex.cann@ihlondon.com</a>
Joanna Stansfield	YL Operations Manager			
James Lattimer	Social Programme Organiser	2	07905 349 371	<a href="mailto:James.latimer@ihlondon.com">James.latimer@ihlondon.com</a>
Karin Fitzpatrick	Accommodation Co-ordinator / Welfare officer	2	0207 611 2409	<a href="mailto:karin.fitzpatrick@ihlondon.com">karin.fitzpatrick@ihlondon.com</a>
Maria Wozniak	Accommodation Co-ordinator / Welfare officer	2	0207 611 2400	<a href="mailto:maria.wozniak@ihlondon.com">maria.wozniak@ihlondon.com</a>

In addition, Mark Rendell (CEO) and Tita Beavan (Trustee) are Safeguarding trained for oversight purposes.

### **Out of hours**

Please use the 24/7 emergency contact number in the case of an urgent safeguarding issue: 07808 789541.

The member of staff at IHL receiving the call will inform the relevant team members or staff at YL centres as appropriate



## **2.0 Child Protection\* and Adults at Risk Policy Statement**

International House London is fully committed to safeguarding\* the welfare of all children\* and adults at risk\* in line with its statutory Duty of Care. It recognises its responsibility to take all reasonable steps to promote safe practice and to protect children and vulnerable adults from harm and abuse.

International House London acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

Paid staff and other adults\* will endeavour to work together to encourage the development of an ethos which embraces difference and diversity and respects the rights of all children and vulnerable adults.

\* child protection – protecting children from direct harmful behaviour


\* safeguarding – umbrella term meaning ‘looking after’

\*‘child/children’ refers to anyone under the age of 18

\* ‘adults at risk’ refers to any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support due to a number of factors such as: physical disability, mental health issues, cultural background, language ability

\*‘other adults’ refers to visitors, volunteers, group leaders and accommodation providers and any other adult (aged 18+) who comes into professional contact with IH students

This policy was updated in Dec 2023. It is to be reviewed at least every 12 months or as necessary following changes to staff or regulations with sign off required by the Designated Safeguarding Lead (DSL) after feedback from the DSPs. Safeguarding updates to be circulated through staff announcements and an annual report to be produced and distributed by DSL in December of each year.



## **In implementing this child protection and adults at risk policy, International House**

### **London will:**

- Follow safe recruitment procedures to check the suitability of all staff.
- Have clear codes of conduct in place for staff and other adults.
- Provide appropriate staff training, guidance and procedures to meet the academic and pastoral needs of international students.
- Ensure that all staff and visitors understand their legal and moral responsibility to follow this policy and its procedures and work at all times towards maintaining high standards of practice. This is achieved through induction training and visitors receive information when signing into the building.
- Ensure that all designated safeguarding staff have dedicated additional training and are aware of their responsibility to follow this policy and procedures.
- Arrange refresher training for all staff annually
- Provide opportunities for workers to develop their skills and knowledge in this area and to promote best practice.
- Ensure that parents, agents and accommodation providers are encouraged to be involved in the work of the organisation, and where appropriate follow this policy and procedures.
- Endeavour to keep up to date with national developments in this area and review this policy every 12 months.
- Ensure that the full policy is available to download on our website at <http://www.ihlondon.com/studying-with-ih-london/study-and-welfare/>
- Ensure that the policy (or a relevant condensed version) is sent out by email to all staff, group leaders and accommodation providers.



## **3.0 Code of Conduct**

### **Guidelines for conduct with students**

The code sets out a list of guidelines that International House London expects from staff and all adults. Please note that these guidelines are for your protection and that following them is requirement for all staff and other adults working with IH students.

#### **Definitions for the purposes of these guidelines:**

- a) Children – students aged under 18
- b) Adults at risk – any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support. Risk may be due to factors such as: mental health issues, physical disability. At IH it could include cultural background, language ability
- c) Adults – anyone over 18 who is contact with students

#### **General Guidelines**

##### General conduct

Appropriate attitudes, behaviour and demeanour towards students and colleagues are expected at all times. These guidelines are for the protection of both students and staff. Our general professional responsibilities do not stop in the classroom, and extend to all areas of school life, including dealings with administration, respect for the working environment and social interaction. Members of staff and other adults are to be excellent role models at all times.

Being drunk on duty or under the influence of illegal substances or legal highs is a very serious offence which will be treated as gross misconduct, which is likely to lead to disciplinary action, including dismissal.

##### Dress code

When in contact with students, all staff and adults are required to dress in a way that is appropriate to the professional and cultural context. For staff, smart, but not necessarily formal, dress is expected as the norm. We would expect staff to avoid clothes that are overly casual. For all adults, we would also regard clothes that expose too much flesh and have offensive slogans or words on them as unacceptable.

Location when delivering online lessons from home should be appropriate. Wherever possible have a virtual background or a completely neutral background. Lessons should be delivered in a common space and never delivered from a bedroom.

##### Whistle –blowing

Staff are reminded of their legal duty to report to a DSP or the DSL any concerns they have about

- a) the behaviour of colleagues who may be breaking the Code of Conduct
- b) any company practices that seem unsafe and concerns them

If this happens, the reporting staff member will be supported, the concern sensitively investigated, and confidentiality will be maintained.

If the issue relates to a colleague breaking the code of conduct relating to inappropriate conduct with a student under 18, more support can be found through the NSPCC whistleblowing Helpline 0800 028 0285.



## Guidelines for conduct with Children


**Please remember that any member of staff or other adults in a school are in a legal Position of Trust. To engage in sexual activity of any kind, or grooming to prepare the way for sexual activity, with a student under the age of 18 is an abuse of trust and against the law (Sexual Offences Act 2003) and could lead to prosecution**

These guidelines relate particularly to behaviours and conduct in relation to children. It is vital that all staff must understand these guidelines for dealing with U18s as we are in a position of trust and have a duty of care.

There are a number of things we ask you to consider to ensure the happiness and well-being of these groups and to protect yourself from any allegations.

Behave appropriately with students at all times and never put yourself in a situation which could be misconstrued:

- Staff and other adults must never initiate close physical contact with children.
- In certain circumstances, e.g. the delivery of first aid, the permission of the student should be sought in order to touch them, and they should be continually advised as to the treatment being given. It is important to communicate and ensure that permission continues to be given throughout.
- Staff and other adults should make themselves aware of what is acceptable/unacceptable behaviour in different cultures. When in doubt, staff and other adults should play safe and maintain a formal relationship with the student.
- Staff must not meet Children outside school (or the context in which you would normally meet them) for personal reasons on a one-to-one basis as this leaves the staff member or other adult open to allegation.
- 1-1 lessons with children should take place in the most visible classrooms (e.g. in busy areas with large window panels) and the door should be left slightly open
- Staff and other adults should be aware that different cultures have different sensitivities to various subjects. Staff and other adults should therefore use their discretion when selecting controversial topics.
- The next few points provide advice relating to technology when dealing with children and vulnerable adults. Generally speaking, whilst students are studying at IHL, staff and other adults are required to keep communications appropriate to their professional relationship i.e. not share passwords or other personal data.
- Mobile phones: Staff and other adults must not give out their personal telephone numbers to Children. However, in some instances this may be acceptable e.g. between the student and the homestay host for the purposes of 'checking in' or when leading a planned visit / activity as part of a lesson.
- Social Networking sites: staff and other adults should not engage with Children on social media. Children should never be accepted as "friends"
- Staff must not give Children their personal email addresses. If students wish to contact staff via email, they should use the main IH email, [info@ihlondon.com](mailto:info@ihlondon.com), from which emails will be passed onto teachers. It is strongly recommended that replies are in person but if an email reply is necessary it should only ever be from the staff members IH London email address, which can be monitored by IT.

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- When delivering online lessons all communications between staff and students'/children's parents should be through an IH email address only and a member of management should be copied in at all times. This ensures that Zoom links are secure.
  - When using the Self-access Centre with your class, teachers must identify their U18 students and regularly monitor any websites being accessed, to ensure they are not looking at inappropriate sites. Please also be alert to cyber bullying.
  - Permission to photograph or film Children in class will be sought using the Parent Permission Form, before the student arrives. Photos and videos will only be used:
    - a) To support learning
    - b) For promotional material
    - c) For training
  - If leading a group visit during a lesson, or a Social Programme activity, the responsible adult must complete the document used for visits and ensure that any under 18s are clearly listed.
  - The responsible adult must ensure that they have the mobile telephone number of any U18s in the group and the telephone number must be used for no other purposes and deleted immediately after the completion of the visit. The responsible adult should clearly explain the destination, the route and what to do should they be separated from the group.
  - It is against the law for any students under 18 to have alcohol. Staff, other adults or students (18 or over) must never provide alcohol, legal highs or illegal substances to these students, or any others. If the subject of alcohol or drugs comes up during conversations between staff and under 18 students, adults are required to treat this matter seriously and not make light of the topic.


#### Guidelines for conduct with Adults (18s and over)

These guidelines relate particularly to behaviours and conduct in relation to Adults (including vulnerable adults)

There are a number of things we ask you to consider to ensure the happiness and well-being of these students and to protect yourself from any allegations.

Behave appropriately with students at all times and never put yourself in a situation which could be misconstrued:

- Staff and other adults should not initiate close physical contact with a student, as this can be unwelcome and misconstrued.
- In certain circumstances, e.g. the delivery of first aid, the permission of the student should be sought in order to touch them and continually advised as to the treatment being given. It is important to communicate and ensure that permission continues to be given throughout.
- Staff and other adults should make themselves aware of what is acceptable/unacceptable behaviour in different cultures. When in doubt, staff and other adults should play safe and maintain a formal relationship with the student.

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- If meeting Adults outside school (or the context in which you would normally meet them) this should be in a group of Adults. Any 1-2-1 meetings, for school related business only, should be held in the school. This will avoid any allegation.
  - Staff and other adults should be aware that different cultures have different sensitivities to various subjects. Staff and other adults should therefore use their discretion when selecting controversial topics.
  - Advice relating to technology when dealing with Adults: generally speaking, whilst students are studying at IHL, staff and other adults are advised to keep communications appropriate to their professional relationship i.e. not share passwords or other personal data.
  - Mobile phones: Staff and other adults must not give out their personal telephone numbers. However, in some instances this may be acceptable e.g. in the day-to-day organisation of 1:1 lessons or when leading a planned visit / activity as part of a lesson. Telephone numbers must be used for no other purposes and deleted immediately after the completion of the activity.
  - If leading a group visit during a lesson, or a Social Programme activity, the responsible adult must complete the document used for visits.
  - The responsible adult must clearly explain the destination, the route and what to do should they be separated from the group.
  - Social Networking sites: staff and other adults should open a separate social networking site for student use or only allow students to see a limited profile. This must be for Adults, and not include any Children
  - Adult Students can be accepted as "friends" only after the course has ended.
  - Staff must not give students their personal email addresses. Whilst the student is registered at the school communication with a student should only be for professional purposes and only via the staff member IH email address.
  - When using the Self-access Centre with your class, we would ask that you always monitor students when they are accessing the internet to ensure that they are not looking at inappropriate sites. Please also be alert to cyber bullying.
  - In order to respect students' right to privacy, all staff and other adults must get adult students to sign a form giving written permission to photograph or film them before a camera/video camera is used. Staff and other adults need to be aware that some cultures are unwilling to be filmed and may be reticent about refusing permission. We advise that photos and videos should only be used for the following purposes:
    - a) To support learning
    - b) For promotional material
    - c) For training

## **4.0 ALLEGATIONS AND CONCERNS REPORTING PROCEDURES**

As a paid staff member, visitor, volunteer, group leader, accommodation provider or someone who has come to work with our students in any other capacity, it is important that you are aware of our child protection and vulnerable adults' procedures and that you know how and when to respond.

Please be aware of the following:

### **4.1 There are several categories of abuse**

<b>Abuse</b>	<b>Brief Description</b>	<b>Signs / things to be aware of</b>
Physical Abuse	<ul style="list-style-type: none"> <li>Where the victim is caused physical harm</li> </ul>	<ul style="list-style-type: none"> <li>Marks not easily explained</li> <li>Bruising (especially symmetric)</li> <li>Burns</li> <li>Flinching from or avoiding certain people</li> <li>Out of character aggressive behaviour</li> </ul>
Sexual abuse	<ul style="list-style-type: none"> <li>Forcing or enticing a young person to take part in (or watch) sexual activities. Can happen over the internet.</li> </ul>	<ul style="list-style-type: none"> <li>Inappropriate sexualised play</li> <li>Inappropriate needy attention seeking behaviour</li> <li>High incidence of teen abuse of other teens</li> <li>Online grooming</li> </ul>
Emotional abuse	<ul style="list-style-type: none"> <li>Making someone feel bad about themselves, often persistently (e.g. bullying)</li> </ul>	<ul style="list-style-type: none"> <li>Aggression or withdrawal (two extremes) in one day</li> <li>Self-harm</li> <li>Anorexia</li> <li>Inappropriate needy attention seeking behaviour</li> <li>Compounded by abuser making abused wary of help</li> </ul>
Neglect	<ul style="list-style-type: none"> <li>Leaving a child unattended or depriving them of basic needs</li> </ul>	<ul style="list-style-type: none"> <li>Most common away from home</li> <li>Unused to supervision</li> <li>Physical / medical needs ignored</li> </ul>
Child Sex Exploitation	<ul style="list-style-type: none"> <li>Exploitation of under 18s where they receive something (gifts, money, drugs, attention) as a result of sexual activity</li> </ul>	<ul style="list-style-type: none"> <li>Unexplained gifts</li> <li>Older boyfriends or girlfriends</li> <li>Missing school</li> <li>Associating with bad company</li> <li>Online grooming</li> </ul>
Female Genital Mutilation (FGM)	<ul style="list-style-type: none"> <li>The non-medical, partial or total, removal of external genital organs, typically done to young girls from African countries.</li> </ul>	<ul style="list-style-type: none"> <li>Disclosure of this happening to the student or a friend</li> <li>It is illegal if done in the UK.</li> <li>It is a legal duty on the professional adult to notify police if FGM has happened in the UK</li> </ul>

Other forms of abuse prevalent among teenagers include

- Peer-on-peer or relationship abuse
- Gender based violence - Revenge / hate crime or harassment, often using social media

### **Abuse in Adults**

In addition to some of the types of abuse above, Adults at risk may be subject to other forms such as

- Domestic Abuse
- Financial abuse
- Discrimination
- Self-neglect
- Forced marriage
- Trafficking / forced labour

### **When you need to respond?**

In any of the following situations you need to report to the DSP / DSL

- a) if you see anything that concerns you
- b) if another student or adult tells you about a concern
- c) if a student tells you directly about abuse (disclosure)

It may be that you are approached by a student who wants to talk to you about something that has or is happening to them. They will tend to choose someone that they trust or know well, and this will not always be their class teacher. It may be any member of staff or other adult with whom they have formed a good relationship.

There may however be occasions when you have cause for concern either about marks or bruises on a student, about something that they say or the condition that they are in at school, e.g. unwashed or hungry.

### **4.2 Procedure: Allegation of abuse**

**An allegation** is where someone has told you directly that something has happened i.e. they have seen it with their own eyes, or it happened to them. If you are simply worried or suspect something, then this is a 'concern' – see procedure 2 below.

### **Disclosure**

If you are approached by a student wanting to talk you should:

- 1) ensure **the child or vulnerable adult is safe from harm** – this is your first priority if you decide they are at immediate risk of harm.
- 2) **listen positively and reassure them.** If you can, try and ensure a degree of privacy, but this may not always be possible. Whilst this might be an alarming situation to find yourself in, it is important not to let the moment pass – for every child that does finally disclose information, evidence shows that they have tried up to 12 times before.

#### **Advice when helping the student when abuse is alleged**

- Be prepared to listen and comfort.
- Do not show revulsion or distress, however distasteful the events are.
- Stay calm and controlled.
- Let the student know at once that it was not his/her fault and restate if appropriate.
- Reassure the student that they have done the right thing to tell you.
- Do not make false promises, i.e. that you will keep the abuse a secret or that the police will not be involved. **Do not promise confidentiality.**
- Make them aware that disclosure will be reported to only those that need to know and can help.

- Do not question the student; try to limit your involvement to listening. **A child can be interviewed only once.**
- It is also important to remember that it is not your responsibility to investigate suspected cases of child abuse, only to report them to a DSP.

- 3) As soon as possible **tell a designated safeguarding person (DSP)** and **fill in a *Concern or Allegation Form*** –see Appendix 1 (or write down – see below) what was said and done.
- 4) It is vital that confidentiality is maintained at all times and the identity of the student and the person alleged to have harmed them must not be shared with anyone else.

#### **Next Steps to be taken**

- 5) It will be reported to the Local Safeguarding Children Board (LSCB), normally by the DSL or, in their absence, the DSP. If neither are available, the individual to whom the allegations were made directly can contact the LSCB (contact details of which are included in this policy).
- 6) The allegations will be recorded by the DSP / DSL.
- 7) After the above procedure: Be aware of your own feelings about abuse and find someone you can share those feelings with once the procedures have been completed, whilst maintaining confidentiality. Dealing with issues of child abuse can be distressing for the adult to whom the abuse is disclosed.

#### **Procedure: Allegation against a staff member**

Procedure if a child protection allegation is made against a staff member or adult connected with IH:

- DSL will follow guidance provided by local child protection authorities.
- If they advise that IH should investigate the allegation, the IH staff disciplinary procedure will be followed.
- Depending on the situation, the staff member / adult may be suspended during the investigation, and provided with support as outlined in the IH disciplinary procedure.

#### **Procedure: Allegation against another student under 18**

Procedure if a child protection allegation is made against another under 18 IH student:  
IH will appoint a suitable DSP to support the person who has been accused.


- The under 18s parents, (also group leader & agent if appropriate) will be informed of the allegation and kept informed at every stage of the developing situation
- DSL will follow guidance provided by local child protection authorities
- If other agencies become involved, e.g. police, the under 18 will be accompanied throughout the process by their DSP support
- If other agencies are not involved and IH need to carry out an internal investigation, the under 18 accused will be supported by their DSP and accompanied by them to any interviews.

#### **4.3 Procedure 2: Concern**

**If you or someone else has concerns about a student's welfare**

##### **Recognising and raising a concern:**

It may be that you have concerns about a student's well-being, but they have not actually said anything to you. If such a situation arises, you should speak to a Designated Safeguarding Person.



Abuse or neglect can have a damaging effect on a student's health, educational attainment and emotional well-being. If you have been in contact with a student or group of students over many weeks, you may see changes in behaviour. Such changes may not necessarily indicate that a student is suffering abuse or neglect. In some cases those changes may be as a result of homesickness, bereavement or symptoms of a hidden disability or undiagnosed medical condition, and the need to distinguish those cases reinforces the need for a careful and thorough assessment of the student and his/her needs when concerns are passed on.

It is important that you do not feel afraid about passing on your concerns. The information may be a small piece in a bigger jigsaw and help designated staff to get a better understanding of the student's predicament. Any concerns, however, seemingly trivial, should be passed on to the designated person.

It may be that you have a concern which feels very vague and would simply like to discuss your concerns with a DSP. Please feel free to do so.

### Low-Level Concerns

Low-level Concerns are about actions which are below the harm threshold but may be a sign of more serious issues. The actions could be harmless and unintentional and result from naivety, a lack of training or not following procedures. However, more rarely, they might constitute grooming and be an indication of future abuse

Examples of low-level concerns are

- Being over friendly with children and/or playing games with excessive physical contact
- Having favourites
- Giving out sweets and doing things to be popular
- Using inappropriate language
- Taking photos of children on a personal mobile
- Changing supervision arrangements or rotas for no obvious reason to be with certain children

You should report low-level concerns in the normal way

### Reporting a concern:

- 1) Fill out a *Concern or Allegation Form* (see Appendix 1). Forms can also be found attached to this policy on the S Drive in the Safeguarding folder and on our website
- 2) Report it as soon as possible to a DSP, ideally in person; if not possible, over the telephone or by email marked as urgent.
- 3) The DSP will consider further action but will always report it to the DSL.
- 4) The concern will be recorded by the DSP / DSL.
- 5) Advice may be sought from the Local Safeguarding Children Board (LSCB). The parties involved will be spoken to about the concern. This will be handled sensitively and diplomatically.
- 6) You may not be provided with feedback after the investigation.
- 7) All information is recorded throughout and included within the Annual Safeguarding Report.

If you have not got access to the correct form, make notes including:

- The nature of your concern

- What is the evidence that led to the concern?
- What the student said (if a discussion has taken place)
- What you said or did in response.

## **5.0 Welfare and Implementing Safeguarding Policy**

All areas are covered for IH London's main school and if different or enhanced procedures are in place this is indicated for the seasonal Younger Learner (YL) centres, closed groups (under 16) and online YL courses.

### **5.1 Risk assessments**

Risk assessments are done for all buildings and facilities.

#### **Main school**

- Under 18s are not permitted to join evening classes as there is less supervision then.
- Risk assessments are carried out for general Health and Safety on all social programme trips and on class trips organised by teachers. Additional risks are assessed for U18s if they are on these trips.

#### **YL Programmes and Closed Groups (Under 16)**

- Risk Assessments are carried out for general Health and Safety on all group social programme trips and risk assessments are discussed with Group Leaders. Additional risk assessments are completed for the premises to ensure that Under 16 students are managed separately from the rest of the school.

### **5.2 Accommodation**

Risk assessments are done as part of the accommodation visit.

#### **Main school**

- Adult students can stay in Student Residences, Homestay or privately sourced accommodation.
- Homestay accommodation can include the provision of breakfast only, breakfast and 4 meals, or 7 meals a week.
- Risk Assessments are carried out through an accommodation visit as follows:
  - a. Residences – at most every 12 months
  - b. Homestay – at most every 2 years
- As part of the risk assessment process, Fire Assessment and Gas Certificates are obtained by the accommodation provider and stored on the system record. These should be renewed annually.
- All 16- and 17-year-olds in the main school (under 18s) are normally placed in homestay, although some stay with family members in London.
- An enhanced DBS check is undertaken for all homestay providers that will host U18s and for these hosts we complete a Home-Based check, by using a 'working from home' check and ticking the box in question 66 of the check.
- Under 18s homestay providers will normally provide 7 hot meals a week in the evenings.
- Under 18s are required to exchange phone numbers with their host on the first day so that they are able to contact each other if necessary
- Students are required to inform their host if they are going to be late for their evening meal and U18 students must return home by 11.00pm. (It is possible for the U18 to agree an extension with the host but this should be restricted to twice in a week)
- If an U18 does not return of an evening this must be reported by the homestay provider immediately via the emergency number to the Designated Safeguarding Lead.
- If an U18 agrees to miss a meal on a given day, they must call the host at an agreed time (suggested 9.00pm) to confirm their whereabouts and that all is well. If this does not happen the host will call the student.

- If an U18 misses an agreed contact time, a call will be made to inform a DSP through the emergency contact within 2 hours. If the student has not made contact within a further 2 hours, the DSL will inform the parents or emergency contact.
- Due to the fact that under 18s are considered children, written permission in the form of a Parental Permission Form to do the following is required from the parent/guardian:
  - A) Stay in other types of accommodation or with other meal options
  - B) stay with friends / relatives / guardian or in a hotel during their studies,
  - C) arrange own transfer from/to the airport,
  - D) go on trips or excursions (within the UK or abroad),
  - E) stay out overnight with other family or friends.

When under 18s are involved in / request any of the above, welfare staff, in order to carry out proper Duty of Care, will provide parents and students with additional safety information (based on risk assessments) before parents/guardians sign the required Parental Permission Form. This is in the form of email advice.

For example, if they stay overnight, the address and location are recorded by the Welfare Officer and if any trips or excursions are not organised by IH, the organising company's risk assessment will be checked and IH will provide additional safety guidance as required.

- If IH staff consider any under 18s request to be unsafe or inappropriate, the student and their parents will be informed, and permission will not be given. In this event, IH staff will work with parents and the students to arrive at an acceptable alternative arrangement.
- There will be no private fostering situation i.e. no under 16s, or under 18s if disabled, will be allowed to stay in accommodation for more than 27 nights. Therefore, there will be no recourse to follow local authority private fostering regulations.
- All homestay families are asked to sign a contract every two years (normally at the same time as the re-visit) that requires them to have read and understood these Safeguarding policy and procedures.
- If an U18 wishes to take holiday from school, an email will be sent to seek permission from the parents for this holiday booking. Once confirmed, the host will be advised.


### **Closed Groups (Under 16)**

- Each Under 16 closed group will be provided with a bespoke programme, including accommodation, either homestay or residence
- Group Leaders must be on-site if the Closed Group is to stay in Residence accommodation.
- Risk Assessments will be carried out on all aspects of the accommodation chosen. In many respects these groups will be treated similarly to U18s:
  - a. 7 hot evening meals will be provided
  - b. The main host will have an enhanced DBS check, and the Home-based check option will be sought
  - c. Group Leaders will stay with or close to the accommodation and a clear plan established with the Group Leaders before they arrive as to the plan for safe (accompanied) travel to and from the school before and after lessons.

### **5.3 Supervision ratios**

#### **Adult groups**

- General English classes have a maximum of 14 students per class/teacher.
- Supervision ratios for the adult social programme activities, most of which 16 and 17 year olds can join, are 1 to 20. Most activities are therefore capped at 20 participants. For some of the weekend trips organised by IH the supervision ratios can be higher. The ratio may be lowered for some



activities following a risk assessment. A number of activities are unaccompanied by IH staff, and this is made clear on any promotional material.

- For trips or excursions that are not organised by IH, the ratio of guides to students will be checked and the information given to students.

### **Under 18s**

Classes specifically for under 18s or under 16s are also taught with a maximum of 14 students.

#### Supervision during offsite activities

On excursions, the staff to student ratio is a maximum of 1:18 for 12–17-year-olds and 1:15 for 8–11-year-olds. In reality, it is usually lower as the group will include the group leaders in addition to IH staff acting as guides.

#### Supervision during onsite activities

There is a staff to student ratio of a maximum of 1:18 for all activities for 12–17-year-olds and 1:15 for 8–11-year-olds.

### **Accommodation**

Where groups of under 18s are placed in residential accommodation, the maximum ratio of Group Leaders (supervising adults) to students will be:

- 1:15 for students aged 12–17
- 1:10 for students under 12.

However, some accommodation providers require a ratio of 1:10 for all ages

## **5.4 Missing students**

### **Main School**

#### From Class

- U18 students will be asked to sign a register each day when they arrive at school, by 9.30am at the latest. If the register is not signed, the Welfare Office has the responsibility to ascertain the whereabouts of the U18 using the following procedure: check if they are in class and, if not, will contact the student or homestay provider to find out why. Once this has been confirmed, a note will be added to the student's account on the system.
- If the whereabouts of the student cannot be established within 2 hours, their parents or emergency contact will be alerted by the Welfare Officer.
- If the absence continues and no contact is made within a further 2 hours, the DSL is informed and will review the situation and further actions are considered e.g. contacting the police.

#### From afternoon excursions

- If an U18 student is expected to arrive for an afternoon excursion, the person responsible for the excursion will advise the Welfare Officer who will attempt to contact the student.
- U18s on trips are given clear information about what to do if they are lost and reminded that they must carry their ID cards at all times. They are provided with the dedicated phone number of the person leading the trip. There is no unsupervised time during these trips. The U18 must remain with the supervisor at all times.
- The staff member leading the excursion must have a list of student contact details. They are responsible for regularly checking that all students are present. If an U18 is missing and not contactable, the staff member calls the school, or out of hours emergency phone. The person responding to the call will try to contact the accommodation, and/ or the parent/ guardian. If the student is not successfully located, the police are contacted.



From accommodation

- Accommodation providers must report missing U18 students by calling the school, if an agreed contact has been missed by 2 hours. If out of hours, the emergency phone number should be used.

### **YL Programmes and Closed Groups (Under 16)**

From Class

- Open classes for Under 16s have supervised breaktimes and YLs are not permitted to leave the building for any reason.
- Group Leaders are expected to escort these students to and from the classroom every day (and supervise the students at break times). If IH London staff become aware that a student is missing at any point of the day the Group Leader will be informed on their mobile and they will attempt to contact the student.
- The Welfare Officer will be advised at this stage.
- If the whereabouts of the student cannot be established within 1 hour the Group Leader will alert their parents or emergency contact.
- If the absence continues and no contact is made within a further 2 hours, the Welfare Officer is informed and will review the situation with a DSP (or the DSL) and the Group Leader and further actions are considered e.g. contacting the police.

From afternoon excursions

- Staff ratios have been outlined for excursions, which could include Group Leaders and Staff.
- The students are given clear information about what to do if they are lost and reminded that they must carry their ID cards at all times. They are provided with the dedicated phone number of their Group Leader. There is no unsupervised time during these trips. The Group must stay together all times.
- If an U16 is missing and not contactable on an excursion the staff member informs a DSP or the DSL and contacts the accommodation provider to see if they have returned home. If they have not appeared within 1 hours the DSP is informed (through the emergency contact number, if necessary) and further actions are considered e.g. contacting the police.

From accommodation

- Group Leaders are responsible for their groups within residential accommodation, and they must report missing students to the Welfare Office, DSP or DSL soon as possible.
- If they are not found within 1 hour the Group Leader should advise the parents or emergency contact.
- If the absence continues and no contact is made within a further 1 hour, the Welfare Officer is informed and will review the situation with a DSP (or the DSL) and the Group Leader and further actions are considered e.g. contacting the police.

### **5.5 Online courses**

From English lessons

- Online classrooms are password protected and will be locked 10 minutes after the class has started. Only authenticated users (those who have signed into Zoom) displaying the student's full name will be permitted to join classes
- Parents of children absent from the class will receive an email from the teacher after the lesson.

From Social programme

- The online social programme is optional.



## **5.6 Welfare provision**

### **Main School**

- A named Welfare Officer is identified to all students on arrival and their name, photograph location and email are shown on posters around the centre to help students. The Welfare Officer will meet all Under 18s during their first day and will outline our responsibility to them and the importance of adhering to the rules.
- For all U18s, separate Parent Permission letters are sought for accommodation, overnight stays, transfers and trips where relevant or requested.
- Weekly (Friday) reports are run indicating all U18 students who will be in the school from the following Monday. This report is circulated by email to all DSPs and DSL, as well as other departments within the school.
- All staff who are using the school database will be aware of students U18 as a pop-up note will appear indicating they are looking at an U18 student's record and on all online registers an U18 symbol appears next to their name.
- All staff have welfare and safeguarding responsibilities with some staff having key roles. (Please see section 1). There are posters around the building identifying key staff including the Designated Safeguarding Persons and the Designated Safeguarding Lead. These are also all made known to staff members.
- Welfare Officer or Welfare Officer Support is available for consultation with any student through Reception or the email address: [welfare.officer@ihlondon.com](mailto:welfare.officer@ihlondon.com)

### **Closed Groups (Under 16)**

- The Welfare Officer will introduce themselves to the Group Leaders and a meeting held with the DSL / a DSP to outline their responsibilities in this area.
- For all U16 Closed Groups, a separate Parent Permission letters are sought for accommodation, overnight stays, transfers and trips where relevant or requested. This will be amended on a case-by-case basis if the Closed Group has specific requirements.
- Weekly (Friday) reports are run indicating all U18 students who will be in the school from the following Monday. This report is circulated by email to all DSPs and DSL, as well as other departments within the school.
- All staff who are using the school database will be aware of students U18 status as a pop-up note will appear indicating they are looking at an U18 student's record and on all online registers an U18 symbol appears next to their name.
- All staff have welfare and safeguarding responsibilities with some staff having key roles. (Please see section 1). There are posters around the building identifying key staff including the Designated Safeguarding Persons and the Designated Safeguarding Lead.
- Welfare Officer or Welfare Office Support is available for consultation with any student through Reception or the email address; [welfare.officer@ihlondon.com](mailto:welfare.officer@ihlondon.com)
- Closed Groups Under 16 will be housed on the E or 4<sup>th</sup> floors only and will be instructed to use the individual toilets facilities on their floor
- Break times for the groups will be staggered so as to avoid the break time of the main school. This will be agreed with the Group Leaders who will be supervising the students during this time.

## **5.7 Fire safety**

### **Main School and Closed Groups (Under 16)**

- A number of staff are trained as fire marshalls
- Regular fire drills are organised throughout the year and the alarm is tested every Thursday at 9.30. Evacuation routes are displayed in each room.

- There are no additional fire procedures for U18s for the main school.
- Wherever possible, Students with mobility difficulties are classed on the first floor and an action plan is created for their care. There is an evacuation chair by the lift on the first floor.

## **5.8 First Aid and medical**

### **Main school**

- For U18s, all students must have their joining documents including full medical information (illnesses, allergies, any medication etc) and signed (by parent or guardian) consent forms in case of emergency medical treatment. This information is included on the Parent Permission Letter
- For U18s, prescribed medicines will be kept in a locked place (in the school or homestay) unless needed for emergency use (e.g. epi pens, inhalers etc.) and identified to the responsible person (homestay provider, first aider) on arrival. Untrained staff are not allowed to administer any prescribed medicine to any student at any time.
- Those students that are 16 or 17 will be able to self-administer prescribed medicines if approved by the parents on the Parent Permission Letter
- Any U18 student taking prescribed medicines to have a medicine record sheet on arrival and the responsible person must record times, dates and medication taken.
- Any U18s needing medical attention will be accompanied by a responsible adult e.g. homestay provider or IH staff.

### **YL Programmes and Closed Groups (Under 16)**

- For U16s, the Group Leader should be fully aware in any illnesses (including mental health), allergies and medication for each of their students.
- For these groups and YLs on mixed nationality programmes, however, a Parents Permission Letter will be required to be completed and returned to the Welfare Officer. This will include medical information (illnesses, allergies, any medication etc) and signed (by parent or guardian) consent forms in case of emergency medical treatment.
- For U16s the Group Leader will be offered the opportunity to keep prescribed medicines in a locked place unless needed for emergency use (e.g. epi pens, inhalers etc.).
- Prescribed medicine should be identified to the responsible person (nurse, homestay provider, first aider) on arrival. Untrained staff are not allowed to administer any prescribed medicine to any student at any time.
- Any U16 student taking prescribed medicines to have a medicine record sheet on arrival and the responsible person must record times, dates and medication taken.
- Any U16s needing medical attention will be accompanied by a responsible adult e.g. Group Leader, homestay provider or IH staff at all times.


## **5.9 U18 behaviour and discipline**

### **Main school**

- In the induction information, given to all students on the first day, there is a code of conduct. Information regarding harassment and bullying is also included. The presentation to new students on their first day also includes reference to these issues and what to do if you are aware of them.
- The Parent Permission Letter provides the web link to allow parents to access our policies, including Safeguarding.

### **Closed Groups (Under 16)**

- Any matters of discipline will be discussed with the Group Leader and the student

- 
- Expulsion is a rare and last resort, but if the student commits numerous breaches of discipline that are not resolved, this will be the final outcome (in consultation with the Group Leader and the student's parents).

### **5.10 Airport transfers**

#### Main School

- International House recommends that all students under the age of 18 book an airport transfer arranged by International House unless they are met/dropped off at the airport by a relative or friend. If students decide not to book an airport transfer, the parent/guardian is asked to notify us of the alternative arrangement. It will also be highlighted to them that there may be difficulties on arrival with UKVI authorities if an under 18 is travelling alone and there is no adult to meet them. It is also highlighted that there is the potential for things to go wrong and a possibility of the student endangering their own safety and therefore giving them a negative first impression of the UK.

#### **Closed Groups (Under 16)**

- Closed Groups will travel together and will be accompanied by an agreed number of Group Leaders.
- Arrangements for the transfer may be made by IH London and this will be in the form of a coach transfer, utilising the nominated transfer company. Coach drivers will never be alone with an Under 16 as they will be accompanied by Group Leaders at all times.

### **5.11 Safety and Security**

At the welcome talk on the first day, students are given information on safety and security

This includes

- Details of fire procedures
- How to reduce the risks of theft
- The risks from phone and other scams
- Safety using mobile phone and cashpoints
- Care when crossing the road

### **5.12 E-Safety and Internet Security**


The school has procedures in place to protect students from unlawful, extremist, sexual or otherwise potentially harmful content on the internet. We have a system of internet filtering that restricts access to certain sites and content.

We have two levels of filtering.

Level 1 is done by our ISP who deny access to any websites listed by the Internet watch Foundation:  
<https://www.iwf.org.uk/>

Level 2 is managed by our own security systems (which reside within our corporate firewall appliance). We have chosen to deny access to websites which the security system identifies as being in the following categories:

- security threats (such as phishing and malware).
- pornography
- Cults
- Hacking
- Tasteless

- 
- Illegal drugs
  - Violence
  - Illegal software
  - Child abuse images
  - Criminal activity
  - Hate and intolerance
  - weapons
  - peer to peer

We also have the ability to deny or allow any individual websites / domains.

These filtering restrictions are in place anywhere that students (or guests) can access the internet such as the classroom computers, SAC computers and student and guest wi-fi networks.

Students can access the internet either through individual shared student access or through one of the supervised library or self-access school desktops.


#### Main School

- There is information on the student portal about keeping safe online.
- U18s will receive information before the course starts about staying safe online and awareness of dangers and how to minimise them.

### **5.12 Safer Recruitment and Training**

International House London takes safer recruitment very seriously, by ensuring that:

- All job advertisements notify prospective candidates that we only employ people who have an enhanced DBS check and 2 suitable references. All candidates who apply will be advised that they should review this safeguarding and child protection policy document on our website, before they attend the interview.
- Applicants are advised that we will ask safeguarding and child protection related questions at the interview stage, based on our safeguarding and child protection policy.
- Referees are asked to confirm whether they have any reason to be concerned about the applicant's suitability to work with under 18s, and whether they are aware of any allegations, sanctions and/or disciplinary action taken against the applicant. These questions must be answered on every reference form.
- We run all members of staff through an enhanced DBS check and make sure this DBS check is renewed every three years.
- We encourage staff to join the DBS Update Scheme.
- Job offers are made 'subject to receipt of a satisfactory DBS check and references'.
- All members of staff are trained in Basic Awareness Safeguarding Training (formerly Level 1) in safeguarding and child protection and are asked to do refresher training with follow-up questionnaire annually.
- There are enough members of staff trained to Advanced Safeguarding Training for Designated Staff (formerly Level 2) in safeguarding and child protection.
- No member of staff may start work, even if supervised, without receiving a full DBS report. This is because the legislation states that all employees carrying out regulated activity need to have this in place before there is any opportunity for them to come into contact with under 18s.
- In the event of a prospective employee having a criminal record that is disclosed on the DBS check, this will be discussed with the prospective employee. Verification must be made that the information contained does indeed relate to the person concerned. The discussion will aid the decision-making process and should focus on the seriousness and nature of the offences, the nature of the appointment, age of offence and any concealment of offences at the application



process. Based upon the findings of this discussion, a decision and rationale will be formed by HR and the DSL on the suitability of the prospective employee with the DSL having the final say. The decision to employ or not will be recorded, including any rationale but without stating the nature of the offence(s).

- For applicants who have lived overseas, we will endeavour to obtain a police check. These will be required for any applicants who have resided or worked in a country for a minimum of 6 months in the last 3 years. This is also true for all our group leaders accompanying students on our programmes. We will refer to the following government advice on these: <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>
- If a Police Check from countries where the applicant has resided / worked is not available the candidates application form will be reviewed by HR & a DSP and additional references will be collected from the countries where no police check is available, including at least one verbal reference, preferably with someone who has seen the candidate working with under 18s.
- Disqualification by association will not apply to us as we will not accept students under the age of 8 on any of our programmes.
- Details of staff employed within the organisation will be recorded on a Central Register (held in Human Resources) which includes:
  - a. Name
  - b. Date of Joining
  - c. ID evidence, e.g. Passport  
(NB: it is acceptable to be shown the original document during a Skype interview; however, the original must be seen and copied when the new team member begins their employment)
  - d. Role in Organisation
  - e. Confirmation of teaching qualifications, as appropriate
  - f. DBS Certificate: type of DBS check; date of certificate and disclosure number
  - g. Barred List Check
  - h. Police Check Information, if no DBS available
  - i. Prohibited List Check
  - j. Confirmation of References received
  - k. Right to work in the UK

#### Accommodation providers


- An enhanced DBS check is undertaken for all homestay providers that will host U18s and for these hosts we complete a Home-Based check, through ticking the box in question 66, this checks for any criminal records recorded at that address.
- For new hosts we accept DBS checks from other schools if conducted within the last three months
- References are obtained for all homestay providers and two are required for those taking under 18s
- Agencies and other accommodation suppliers are asked to demonstrate that they follow the same procedures

### 5.13 Radicalisation and Extremism - PREVENT

International House supports the following core values identified by the government:

- Democracy
- Rule of law
- Individual liberty
- Mutual respect and tolerance for those with different faiths and beliefs

As an organisation we understand that students may face the following issues which may lead to them becoming radicalised and extreme:

- 
- A lack of identity and sense of belonging
  - Loss or bereavement
  - Isolation/exclusion
  - Personal crisis
  - Mental health
  - Sense of injustice
  - Victims of hate crime or discrimination
  - Global events
  - Inspirational speakers
  - Peer pressure
  - Media bias
  - Extremist material

All of which can be exacerbated by the internet and social networks. International House staff might notice the following in a student who is becoming radicalised or extreme:

- Change in attitude
- Intolerant/closed minded
- Isolated
- Overt new religious practices
- Fall in work standard – disengagement/poor attendance
- Accommodation changes
- Asking questions about certain topics

Staff responsibilities are to:

- Get to know all students well
- Observe and be vigilant
- Contact the DSP (designated safeguarding person) to raise any concerns – confidentiality will be assured

**For more information, please refer to:**

Keeping Children Safe In Education 2023 - Part 1 for all staff

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1181962/Keeping\\_children\\_safe\\_in\\_education\\_2023\\_-\\_part\\_one.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181962/Keeping_children_safe_in_education_2023_-_part_one.pdf)

Keeping Children Safe in Education 2023 (Full version)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1181955/Keeping\\_children\\_safe\\_in\\_education\\_2023.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf)

NSPCC website and whistleblowing Helpline 0800 028 0285

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

## **7.0 Improving Safeguarding of children and vulnerable adults at International House London, and at YL centres**

We are always looking to improve our safeguarding and welfare procedures.

If you have any queries, suggestions or worries regarding the information contained in this policy, or require further clarification of any points, please do not hesitate to contact, **the DSL or any one of the DSPs.**

**Appendix 1**

## Concern OR Allegation Form

Please see procedure in the policy document and complete if you have any (Safeguarding) concerns about an under 18 student or vulnerable adult. You must complete the boxes in bold; the other information can be filed in by DSP later if you do not know.

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

**Response to Concern.**

This section is to be filled in by the DSP.

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

<b>Response</b>	<b>By whom (full name)</b>	<b>When (Date &amp; Time)</b>

## Referral Form – (information to be sent to LSCB)

Date & Time (form submitted)	
Name of School	
Referrer's name and contact details	

### Details of staff/other adult or student involved

Full name	
Date of birth	
Gender	
Nationality	
Any disability	
Role/connection with school	
Home address	

### Details of Student under 18 involved

Full name	
Date of birth	
Gender	
Nationality	
Any disability	
Home address	
Parents name	
Is student known to be at risk?	

### Details of Alleged incident

Date and Time of incident	
Place of incident	
Brief circumstances of incident	
Name of potential witnesses	
Any other information?	

### Nature of allegation

Category (Physical/sexual)	
Was technology involved	
If yes, what type	

Signed (by person submitting referral)	
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## **Appendix 2: Local Safeguarding Children Boards (LSCB) Contact Details**

A DSP or accommodation provider needs to contact the LSCB to report and refer an allegation. Please see procedure 1 for Allegations and contacting LSCB but if in doubt use them as advisory service.

### **For IH London**

Camden Safeguarding Children Board

Telephone: 020 7974 3317

(9.00am- 5.00pm)

Out of hours: 020 7974 4444

Email:

CSCP@camden.gov.uk

Secure Email: LBCMASHadmin@camden.gov.uk.cjsm.net

For allegations against a member of staff contact the Local Authority Designated Officer (LADO)

For Camden the LADO is Sonia Forbes

Email: LADO@camden.gov.uk

### **For all accommodation providers please contact the homestay borough's LSCB**

Contact details for all LSCBs for each London borough can be found at:

<http://www.londonscb.gov.uk/london-safeguarding-contacts/>