SAFEGUARDING (CHILD PROTECTION) POLICY

Why does LISC have a safeguarding policy?

- It helps to create a safe and positive environment for students
- It clarifies what is required of LISC in relation to the protection of students
- It is a statement of intent that demonstrates LISC’s commitment to safeguard students from harm.

The Safeguarding Officer (SO) for LISC is the Co-principal responsible for the welfare of students, Mr Andrew Sutherland. As the SO, he takes specific responsibility for safeguarding matters within LISC.

Our prime responsibility is the welfare and wellbeing of all students in our care. As such we believe we have a duty to the students, parents/agents, tutors and staff to act quickly and responsibly in any instance of concern that comes to our attention. LISC has a duty to report any suspicions of abuse and neglect to the Local Authority who have a duty to investigate such matters. The college will follow the child protection procedures laid out by the local authority and will seek their advice on all steps taken subsequently.

It is rare for students to lie about abuse which has occurred. If the student is young, he or she does not have the language or experience to make up stories about abuse, particularly sexual abuse. They may, however, later deny that abuse took place to protect someone they love or because they are afraid. Students may also get the details confused because of the traumatic nature of what happened. When dealing with students, question gently and minimally along the lines of “tell me what happened”, but do not interrogate or ask leading or suggestive questions.

LISC strives to create an atmosphere of trust in which students know they will be listened to and believed. They will then be encouraged to share their concerns and thus potentially harmful situations can be avoided.

It is the policy of LISC to ensure that all staff are familiar with child protection issues and procedures and regularly review and update this policy.

DEFINITION OF ABUSE

Whilst child abuse falls under universal jurisdiction law, in the UK it relates to the ill treatment or neglect of any individual less than eighteen years of age. A child who has suffered from physical injury, physical neglect, or a failure to thrive may well fall within the spectrum of physical abuse. Records demonstrate that emotional or sexual abuse has in very many cases occurred when a person who has custody, charge or care of the child, either himself or herself commits the abuse or knowingly fails to prevent it. Some of the following descriptions sometimes relate more appropriately to the younger child but it is important to remain inclusive when addressing this subject in order to achieve the highest level of safeguarding.

- **Abuse and neglect** – Somebody may abuse or neglect a child by inflicting harm, or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, a stranger.
• **Physical abuse** – Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, near drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes the ill-health of a child whom they are looking after. This situation is commonly described using terms such as fictitious illness by proxy or Munchhausen’s syndrome by proxy.

• **Emotional abuse** – Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may feature age-related or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

• **Sexual abuse** – Sexual abuse involves physically forcing, coercing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape or buggery) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

In this context tutors should at all times be aware of their status and never abuse their position of trust by engaging in any sexual activity with students.

• **Neglect** – Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

• **Organised abuse** – Organised or multiple abuse may be defined as abuse involving one or more abusers and a number of related or non-related abused children. The abusers concerned may be acting in concert to abuse children, sometimes acting in isolation, or may be using an institutional framework or position of authority to recruit children for abuse. Organised and multiple abuse occur both as part of a network of abuse across a family or community and within institutions such as residential homes or schools.

A child may suffer more than one category of abuse.

**SIGNS OF CHILD ABUSE**

**THE CHILD WITH AN INJURY**

a) **BRUISES** – on any part of the body, but especially on the head or face and trunk. Sometimes a finger pattern is visible, which could indicate that the child has been gripped tightly and possibly violently shaken.

b) **WEALS** – on any part of the body, often linear indicating abuse with a whip, belt or other edged implement; when raised and white, are relatively easy to identify, but when older may be seen as faint linear bruises.

c) **BITE MARKS** – human bite marks can be differentiated from animal bites. Typically, human bites form two hemispherical lines on the skin.

d) **BLACK EYE** – often without gross bruising of the forehead.

e) **BURNS AND SCALDS** – these may be severe and tend to occur in older children.

f) **INJURIES ABOUT OR INSIDE THE MOUTH** – especially to gum margin, or to the frenulum inside the upper lip, or under the tongue.
INJURIES TO EARS - especially when there is bleeding from the entrance to the ear or bruising around or behind the ear lobe(s) indicating injury by pulling.

INJURIES TO LIMBS – tender swollen joints or suspected fractures in any part of the body.

INJURIES TO GENITAL AREA – especially where bleeding is reported, or a child is walking awkwardly or bruising of any kind is noted.

FALLS & ACCIDENTS
Falls or accidents produce one bruise on a single surface, usually on a bony protuberance. A student who falls downstairs generally sustains one or two bruises. Bruising caused as a result of accidents is usually found on the front of the body as a student generally falls forward. In addition there may be marks on a student’s hands if these have been used to break a fall.

SCARS
A large number of children have scars, but note should be taken of an exceptionally large number of different aged scars, especially if coupled with current bruising, unusually shaped scars, or large scars resulting from burns or lacerations that have not received medical treatment.

FRACTURES
Fractures should be suspected if there is pain, swelling and discoloration over a bone or joint. The most common non-accidental fractures are to the long bones i.e. arms, legs, ribs.

BURNS & SCALDS
It can be very difficult to distinguish between accidental and non-accidental burns, but as a general rule, burns or scalds with clear outlines are suspicious as are burns of uniform depth over a larger area. Burns can be caused by a student being forcibly held close to or being placed on a source of heat when the burns may take on the shape of the object involved. Scalds or ‘dunking’ injuries can occur when, for instance, a limb is dipped into very hot water. Typically, a ‘tidal mark’ pattern occurs.

DIAGNOSIS
It cannot be sufficiently stressed that on no account should non-medical personnel attempt to diagnose physical injury. The role of non-medical personnel is to ensure that the student receives prompt and thorough expert medical assessment and treatment.

PHYSICAL NEGLECT
A student’s growth and development may be impaired through receiving insufficient food, care and concern, praise and encouragement, or stimulation. A student who is subject to physical neglect or who is failing to thrive may display some of the following characteristics:

- short stature and underweight for chronological age (so called 'infantile proportions');
- cold and mottled skin with pinkish or purplish colouring at the extremities;
- swollen limbs with pitted sores which are slow to heal;
- especially poor skin condition with excoriation (peeling) and discomfort in evidence;
- dry, sparse hair, alopecia (hair loss) and general physical debility;
- 'pot-belly' and loose stool, the causes of which may be poor diet, irregular meals and tension;
- diarrhoea;
- voracious appetite/eating disorders;
- an ability to thrive away from the home environment;
- unresponsiveness;

THE SICK CHILD
There is no injury but the child is definitely ill with no obvious diagnosis.
a) A listless, apathetic or restless child.
b) Pallor, failure to thrive, loss of weight and signs of poor nutrition – perhaps with sores about the mouth and on the skin leading to a poor growth rate.

THE EMOTIONALLY DEPRIVED CHILD
Emotional abuse occurs when a student's need for love, security, praise and recognition is left unmet. Such abuse can exist in the absence of physical ill-treatment. Students who grow up in an emotionally abusive or rejecting environment find their needs are met with indifference, hostility or perhaps in an inconsistent and unpredictable manner. Parents may be verbally hostile and their attitudes encompass ridicule, sarcasm, shaming, belittling, frightening, threatening, tantalising etc. The results can cause damage to a student's self-esteem, with serious implications for any subsequent relationships made by the student.

In the most extreme cases, students are subject to cruel treatment and punishments, such as being locked up in cold, dark surroundings, or becoming household drudges having to perform heavy and/or inappropriate tasks. Basic needs such as food, drink and warmth may be withheld or required to be 'earned'. In some families, one child in particular may be scapegoated and subjected to hostility and ostracism. Where emotional abuse is suspected, it is advantageous to obtain expert assessment and opinion through the psychological and psychiatric services.

A variety of behavioural patterns may be seen in the emotionally abused child. Some present as naughty, overactive, demanding, restless, disobedient and unduly aggressive.

Others may be withdrawn and apathetic, unable to participate in play and with an impaired capacity to enjoy life.

“Frozen watchfulness” sometimes describes the appearance of an unhappy young student.

SEXUAL ABUSE
Some cases of child sexual abuse come to light through direct reporting to an agency such as the police, Social Services, general practitioners, schools or other child care workers, but in many cases recognition of child sexual abuse depends on persons being responsive to certain physical and behavioural indicators, and being alert to the possibility of child sexual abuse.

Listed below are features which may indicate that a student is being sexually abused. Suspicion of sexual abuse increases when several factors are present together. These indicators might be reported to us either by a student or a doctor.

EXAMPLES OF PHYSICAL INDICATORS

(a) Bruises, scratches, bite marks, or other injuries
(b) torn, stained or bloody clothing
(d) pregnancy in teenagers especially when the identity of the father is vague or kept secret;
(e) recurrent urinary infections;
(f) difficulty walking or sitting; complaints of pelvic pain;
(g) psychosomatic features such as recurrent abdominal pain or headaches, etc. or hysterical seizures or fainting fits sometimes misdiagnosed as epilepsy.

BEHAVIOURAL INDICATORS
None of the following are definite indicators of sexual abuse, and may be features of normal development or
evidence of other causes of disturbed behaviour. Suspicion increases when several occur together or seem age inappropriate.

**General**
Many of these are common features of emotional disturbance of all kinds, but occasionally indicate sexual abuse.

(a) Lack of trust in familiar adults, or marked fear of men, especially in female children / students who may have been abused under threat or with force;
(b) Inappropriate displays of affection between fathers and daughters or mothers and sons, including overtly flirtatious or seductive behaviour reminiscent of that between lovers rather than that between a parent and child;
(c) Social isolation, or sudden poor peer group relationships. The student withdraws into a private/fantasy world;
(d) Regressive behaviour e.g. sudden immature behaviour;
(e) Sudden change in mood or behaviour e.g. becoming quite, sad, sullen, withdrawn;
(f) Changes in eating pattern such as a loss of appetite, ‘faddiness’, excessive pre-occupation with food;
(g) Loss of self-esteem and desire to make self unattractive, depression, frozen responses;
(h) Pseudo-mature or overtly compliant behaviour, often masking distress and anger.

**BEHAVIOUR IN OLDER CHILDREN**
(a) Anti-social behaviour, delinquency, or sexually precocious behaviour, including promiscuity and, in some cases, prostitution;
(b) truancy or persistent attempts to run away from home;
(c) self-mutilation, suicidal feelings/attempts, e.g. overdoses;
(d) abuse of alcohol or drugs (both illegal and legal substances);
(e) hysterical attacks.

**THE SAFEGUARDING (CHILD PROTECTION) POLICY**

**Definition of terms**
For the purposes of this Safeguarding Policy (SP), all references to ‘child’ or ‘children’ - whether singular or plural - are used and are taken to refer to students enrolled at LISC.

‘LISC personnel’ means any full time member of staff or tutor having any responsibility for a child as defined in their contract during that contractual period. This may also refer to any personnel at LISC, whether paid or unpaid, whether under a contract of service or apprenticeship, under a contract for services, or otherwise than under a contract, who has similar responsibility for a child and may be interacting with children for or on behalf of LISC. The normal duties of LISC personnel include caring for, supervising or being in sole charge of children; they also involve unsupervised contact with children under arrangements made by a responsible person within LISC.

**Need for and scope of policy**
A safeguarding policy helps to create a safe and positive environment for children. Although no standards or processes can offer complete protection for children, the risk of abuse against children can be minimised by implementing such a policy and following the standards enshrined in it.
This safeguarding policy clarifies what LISC requires in relation to the protection of children. It sets out standards of behaviour for LISC personnel when they are around children and what to do if they notice, or are told about, inappropriate behaviour in others.

This safeguarding policy is a statement of intent that demonstrates LISC’s commitment to safeguard children from harm. It will help LISC’s personnel to undertake best practice in this area and deter those who would wish to abuse children from joining LISC as a member of its personnel.

This policy also provides a basis of protection for LISC’s personnel and persons acting on behalf of LISC.

Aims of the policy
The welfare of children enrolled in LISC is of paramount concern to LISC. It is incumbent upon all who work in association with LISC to do everything possible to ensure that children are protected from harm at all times.

This Safeguarding Policy sets out:
1. LISC’s principles for the protection of children.
   LISC recognises that child protection is not only a legal obligation but also essentially a moral responsibility of both the institution and the individual.

2. LISC’s expectations in terms of behaviour and good practice for working with children.
   LISC upholds that everyone involved must accept responsibility and take precautions to help create a safe place for children and their protection. This, in turn, requires that everyone be well informed and aware of child protection issues. Likewise, children, their parents and homestay families should know that there is always a responsible adult within LISC whom they can approach if they are worried or in difficulty. LISC works to maintain an ethos where children feel secure and are encouraged to talk and are always listened to.

3. LISC’s guidelines for responding appropriately if abuse of a child is alleged, disclosed, discovered or suspected.
   LISC encourages openness about concerns relating to child protection matters because child abuse thrives on secrecy. The guidelines in this policy explain what should be done about those concerns.

The role of the Safeguarding Officer (SO)
The Safeguarding Officer is the Pastoral Principal and responsible for ensuring that all reasonable steps have been taken to safeguard and promote the welfare of every child.

The Safeguarding Officer takes specific responsibility for Child Protection matters within LISC. This person is responsible for:
- being conversant with all legislation including regulations relevant to the law of Child Protection.
- holding and being fully conversant with the Guidance and Regulations of the Children Act 1989, or any legislation subsequent to that Act.
- briefing LISC personnel on the contents of the guidance and procedures and on the procedures. This includes the briefing of new LISC personnel as part of their induction after joining LISC.
- ensuring the procedures below are followed within LISC.
- liaising with the Social Services Department on child protection procedures
- receiving reports of alleged or suspected child abuse within LISC or reported by a child relating to incidents at the homestay or outside LISC, contacting the Social Services Department and taking other action in response, as set out below.
- ensuring that all records of concern about a child, even if there is not a need to take any immediate action, are kept confidentially and securely.
The role of LISC and its personnel

LISC and all its associated personnel should be aware of the need to report allegations or suspicions of child abuse to LISC’s SO. All personnel should be alert to the fact that children often tell other children rather than the personnel of an educational institution or other adults such as, in our case, the Sutherland Education homestay family, about abuse.

LISC should keep accurate and unchanged/unchangeable records of alleged or suspected abuse, even if such abuse is only a minor incident.

The SO has responsibility for receiving complaints of abuse, investigating those complaints and reporting any complaints to the appropriate authority.

Lines of communication beyond LISC

The Co-principals must ensure that the children in LISC’s care have a line of communication with a party or parties beyond both the personnel engaged or employed by LISC and the parents of the child. The following advice and information are provided by the Children’s Commissioner:

“If you are a student under the age of 18 who needs advice or assistance, you can call the Children’s Commissioner’s on the free phone number **0800 528 0731** or send an email to advice.team@childrenscommissioner.gsi.gov.uk. If your enquiry involves an urgent concern about a child protection issue, you should contact your local police or social services. Adults can also call the **NSPCC child protection helpline on 0808 800 5000**. Students under 18 can also call **Child line on 0800 1111**. We would recommend that you try to get your questions answered by adults who work directly with you first.”

Lines of communication within LISC

There should, at all times, be routine contact between a LISC appointee and the child, the homestay and Sutherland Education, Sutherland Education and LISC, and LISC and the child’s parents, as a preventative measure against child abuse.

Allegations of abuse made by a child should be reported as follows:

- A child should speak to a member of the LISC personnel or one of the adults of the homestay family about any abuse that is taking place
- If the alleged abuser is a member of the LISC personnel, the child should know that the first port of call is the Co-principal (or Safeguarding Officer), or otherwise any other member of the LISC personnel on the basis of the person considered by the child most approachable
- If the alleged abuser is the Co-principal (and SO), the child should initially report it to another member of LISC’s personnel. This individual should then report the matter to a senior member of staff (other than the other Co-principal) or (or and then) to the Social Services Department, whichever is appropriate.

Any person responsible for the welfare of a child has a duty under English law to report any suspicions of abuse to the relevant authority.

Parents, in a similar way, should report alleged abuse to one of LISC’s personnel or the Safeguarding Officer or one of the adults of the homestay, depending on who the alleged abuser is.
How LISC’s personnel should respond to any suspicion of abuse
Any member of the LISC personnel who is told of any incident or has strong suspicion of physical or sexual child abuse must report the information to the SO. (In the absence of the SO, an immediate report should be made to the next most senior member of staff).

If a child or group of children disclose the fact that they are upset or worried, or if a child or group of children give the appearance of being upset, every effort should be made to keep the individual or group of individuals calm and not distressed. It is not appropriate to try to force conversation whilst there is an emotive atmosphere. The individual(s) concerned should be taken to a private place where, if the situation warrants it, a second responsible adult should be asked to be present. The following guidelines should be observed:

- Confidentiality should never be guaranteed. LISC personnel should guarantee that they will only pass on information to the minimum number of people who must be told to ensure that the proper action is taken to sort out the problem, that they will never tell anyone who does not have a clear ‘need to know’ and that they will personally take whatever steps they can to protect the informing child/children or LISC personnel from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

- Any questioning should be limited to the minimum necessary to seek clarification only, strictly avoiding ‘leading’ the child or adult who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened. (Questions such as, ‘Did he do X to you?’ should not be used; instead a minimum number of questions of the ‘Tell me what happened?’ type may be asked).

- The alleged perpetrator should not be criticised because the child’s emotions may already be horribly mixed. The child should not be asked to repeat everything that s/he has already disclosed to another member of the LISC personnel.

- As soon as the child or adult has disclosed that he or she believes that something abusive has happened to him or her, or to someone else, no further questions should be asked of him or her. Further questioning could cause more damage and prejudice possible criminal proceedings.

- The informing child or adult should be asked what steps s/he would like taken to protect him/her now that the allegations have been made and should be given an assurance that LISC will try to follow these wishes.

- The matter should be referred immediately, with all relevant details, to LISC’s SO. The adult to whom the disclosure has been made should make a written record as soon as possible of what s/he has been told. The record should not include the writer’s own assumptions and interpretations but solely what s/he has heard and seen. Original notes should not be destroyed, even if the record may be written up more neatly and fully at a later stage. The record should comprise dates, times, places, plus any non-verbal behaviour as well as words used, including sexual words (if any used). If injury is apparent, a diagram should be appended in order to give exact location.

- An allegation of abuse should never be discounted simply on the grounds of the child’s location or because the alleged abuser is someone well known to and trusted by the individual to whom the disclosure has been made.

Action by LISC
When LISC’s SO receives an allegation of physical or sexual abuse s/he will:

- Take any steps needed to protect any child involved from risk of immediate harm. Furthermore, LISC must take any necessary steps for the longer-term protection and support of each child who has made allegations of abuse, or who is alleged to have suffered from abuse, taking his or her wishes fully into account. This may involve the child receiving continuing support and protection from a member of LISC’s personnel chosen by him or her, or changing accommodation, or returning to his or her parents temporarily.
b) Not interview or investigate the allegation further but refer the matter immediately to local Safeguarding office, **the Local Authority Designated Officer (LADO)** when an allegation is made against LISC member of staff or volunteer and it must report within 24 hours. In Kingston the LADO is **Ms Vivien Rimmer** and her direct line is **020 8547 4609**. Alternatively, **SPA** (the Single Point of Access) should be informed on **0208 547 5008**.

c) The SO should speak personally to the LADO or SPA and not rely on leaving a message. If advice is sought, a staff member may first call SPA to discuss the matter.

d) If the report involves an allegation of a criminal act, a report will also be made to the Police and the college will fully co-operate with any investigations they carry out. The College will act on all reports of alleged abuse regardless of whether they are recent, are reported to have taken place in the past, have taken place on college premises.

e) Whilst LISC has a duty first and foremost to the child, it must at all times respect the rights of parents and keep them informed of all matters relating to the child.

f) If necessary, cease to actively engage, pending investigation, any member of LISC’s personnel who is alleged to have abused a child or children. LISC will not hesitate to cease to engage any member of its personnel, without prejudgement of guilt and as a precautionary measure, where there is a concern about possible abuse.

g) Take any necessary steps to protect and support a child who is alleged to have abused another and inform his/her parents immediately.

h) Ensure that any child being interviewed by the police has available supportive LISC personnel of his or her own choice to accompany him or her if this becomes necessary.

i) Make arrangements, where feasible, for any child who has been the subject of abuse to receive any necessary continuing counselling and support, by agreement with his or her parents where appropriate.

### Allegations against a member of staff

Any allegation against a member of staff will be treated seriously and investigated immediately. The Manager and Proprietor will work with the LADO/SPA to take appropriate action as quickly as possible. An initial investigation will take place to determine the exact nature of the allegation. Advice will be sought from LADO and from the Senior Management Team. If appropriate, in accordance with the LISC procedures for staff conduct, the member of staff will be suspended pending the final outcome of the investigation. All investigations will take place in accordance with LISC procedures, and with the safety of children as paramount. Following the preliminary investigation, if there is evidence to substantiate allegations, disciplinary action will be taken. If the allegations made are found to be unsubstantiated, all relevant parties will be informed and it shall be made clear that the member of staff is exonerated.

Any allegations against a member of staff will be reported to LADO or SPA and Safeguarding and they will be kept informed of the outcome of any investigations.

We take child protection issues extremely seriously. It should therefore be noted that action will be taken against any persons making allegations that are found to be malicious, mischievous, vexatious or spurious.

### Allegations of abuse against a member of LISC’s personnel or anyone in their household

Following investigation, LISC will consider taking, and if necessary, will take the appropriate measures to safeguard the child against any member of its personnel, where it believes children are at risk of abuse from that member of the LISC personnel or of their household, even in cases where there may be no criminal prosecution. Cessation from a role within LISC’s personnel (without prejudice) may be necessary to protect all concerned, including the member of LISC’s personnel or his/her household member.
LISC will make its own assessment of whether a child’s welfare is at risk, whatever the outcome of a police or safeguarding investigation may be. The level of evidence needed for criminal prosecution is likely to be higher than that which may trigger valid and appropriate precautionary proceedings taken by LISC.

Appropriate precautionary proceedings and grounds for concern over its children’s welfare may therefore be based on ‘balance of probability’, rather than on evidence ‘beyond reasonable doubt’.

In any instance of an allegation of child abuse LISC will, after reasonable investigation and if satisfied on a balance of probabilities that there is substance to the allegation, immediately terminate any contract or other arrangement with that member of the LISC personnel or other person. LISC has a duty to terminate any possible contact between the child and that person and report the alleged abuse to the Disclosure Barring Service.

Where LISC has ‘low level’ concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the Co-principal or designated member of staff will discuss these with the LADO/SPA.

Recruitment and screening
It is an undertaking of LISC to make all its personnel aware of this safeguarding policy and to request them to sign a Safeguarding Declaration. LISC will seek to take up not fewer than two references as to the character and suitability of any person under their control and their suitability to have contact with a child.

All applicant LISC personnel must declare any history, criminal or civil, of child abuse. Enhanced Disclosure Barring Service checks must be sought to confirm this. Permission to interact with children is dependent upon a judgement of these declarations and the results of an enhanced DBS check.

If any member of LISC’s personnel is considered to be a risk to children, s/he needs to understand that s/he will not be allowed to work with children again in LISC or any allied organisation/agency.

All LISC personnel, when using outsourced services (e.g. taxi firms) whose personnel may have contact with a child, must obtain a written assurance from the service provider that all such personnel have been subjected to enhanced Disclosure Barring Service checks (DBS checks) and other relevant checks have also been done according to any other legal requirements or LISC guidelines.

Complaints and abuse
The SO needs to ensure that key people who deal with complaints and concerns are fully aware of this policy document and that there is the possibility of certain complaints understating an allegation of abuse and therefore any such complaints should be routed via the appropriate channels.

Staff concern that action is not being taken
Although extremely unlikely, it is possible that staff may feel that the Safeguarding Officer is not taking appropriate action, which as a consequence is exposing students to potential harm. If a member of staff believes this to be the case, despite having made the Safeguarding Officer aware of their concerns for a student, then they should regard themselves as having responsibility to raise the issues directly with the Proprietor, immediately advising the Manager that they have done so.

False alarms
It is important to realise that adherence to the Children Act will inevitably lead to some investigations being triggered which do not substantiate the allegations made, as well as those that do and to entirely false allegations. It is a basic assumption that it is better to accept some false alarms than to fail to initiate the
specialist investigation of instances of real abuse. The Safeguarding Authorities will work with the Co-principal of LISC, LISC personnel, parents, tutors and children involved in any false alarm investigation to assist in recovery from the incident, as well as working with LISC to assist in ‘living through’ and recovering from a substantial investigation.

**Whistleblowing**

We recognise that children cannot be expected to raise concerns in an environment where adults fail to do so. All adults involved in LISC’s provision of care should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of other adults. Please see Whistleblowing policy below.

**Advice on one-to-one contact with children**

All staff and tutors must ensure that there are always two adults at the premises whenever there are any students present. LISC personnel should be wary of placing themselves in situations where they are open to accusations of inappropriate conduct. Essentially this involves exercising common sense.

- If in conversation with a child in a room or a car, for example, a respectful distance should be observed. LISC personnel or a member of the homestay household should never be alone with a child in a bedroom with a closed door. If any member of LISC’s personnel is involved in corrective and personal guidance of a child, it is advisable to take precautions: e.g., if inside, by leaving the door to the room open, remaining seated at a reasonable distance from the child, ensuring there is a witness when appropriate or that there is another responsible adult in proximity where possible.
- On occasions it may be unavoidable that a single child has to be transported in a member of a LISC personnel’s personal vehicle. It is prudent on such occasions to ensure that the child passenger sits in the rear seat to reduce the possibility of accidental contact, which might be misconstrued.
- It is good advice not to make physical contact with a child. This is most important advice in a one-to-one situation between a member of LISC’s personnel and a child. LISC personnel should note that, in one-to-one discussions, confidentiality should not be promised to the child.
- Exclusive one-to-one situations with a child that could either arouse undue suspicion or lead to misinterpretation and false allegations should always be avoided.

**STUDENT/CHILD PROTECTION INDUCTION**

**TUTOR TRAINING PROCEDURE**

**NEW TUTOR:** All new staff and tutors must have a Student Safeguarding Induction meeting with the Safeguarding Officer (or a person designated by him/her), where they will go through a general checklist of topics that will be discussed. They will also be issued with a copy of our Student Safeguarding Procedure.

**EXISTING TUTORS:** All existing tutors must have attended an Induction to Student Safeguarding. Staff must also be made aware of any changes to the Student Safeguarding Procedure. Regular training will be arranged for tutor meetings as a refresher for all. Further training courses will be made available for any tutors who wish to widen their knowledge on Safeguarding.

**Procedures for Ensuring Supervision of Staff with DBSs in Process**

Anyone working with younger students must have a DBS confirmed clearance. This is a legal requirement and must be adhered to.
Any staff/people who do not have a DBS - as their application is in process - will be placed under supervision. This includes volunteers, work experience people, trades people and new staff. Until clearance has been given a new member of staff cannot be left alone with a student. Tutors may be allowed to start work but risk assessments must be in place and additional supervision in the form of lesson observations and monitoring will take place as well as their lessons will be located in classrooms with glass door panes. All tutors waiting for DBSs must sign a child protection safeguarding declaration prior to starting to work.

Mobile Phone/Social Networks/Private E-mail Policy

Tutors are not permitted to use their mobile phones whilst on duty, and if they need to use them in their break time, they must take calls in the teacher’s room or outside the building.

Tutors must not take any photos of the students on their mobile phones or regular cameras.

LISC expects its tutors to act professionally and abide by safeguarding guidelines at all times. As a part of child protection and data protection, tutors are not allowed to communicate with current students using personal email, social networking sites or personal phones, including mobiles. All communication and class arrangements must be done through the LISC office.

Policy on Photography

By registering a student with us at the college, parents agree to our terms and conditions and agree to us taking photographs of their children to be used for displays and promotional purposes. Every parent has the right to refuse this request, in which case no photos of the child can be used for display or promotional purposes. Where pictures are taken of the whole student population (for example on the day of the visit of Portrait Photographers or Police), the parents of children who have opted out of having the child photographed will be contacted to allow them to make an exemption in this particular case. If they do not, their wish will naturally be respected.

Staff are not permitted to take any photos with their private cameras, mobile phones, etc. The study camera must be used at all times and no photos (hardcopy or digital) can leave the premises. No visitors are permitted to take any photos of LISC students.

Website Policy

The aims of the LISC web site are:

- To provide parents/guardians and prospective students with information
- To promote LISC
- To celebrate the student’s work

1. Editorial responsibility will be held by an appointed website designer and the principals to ensure that content is accurate and quality of presentation is maintained.
2. The college’s guidelines for publications will be agreed by the Senior Management team.
3. The Web Site will comply with the college’s guidelines for publications.
4. As the Web Site can be accessed by anyone on the Internet the safety of the students and staff must be carefully considered.
   - Group photographs will be used in preference to individual images
   - Names will not be used anywhere on the Web Site
   - Full names will not be used anywhere on the Web Site
   - Written permission will be sought from parents before photographs or work is published on the college web site
5. Home addresses, information, telephone numbers or e-mail identities will not be published.
6. The Web Site should reflect the ethos of the college.
WHISTLEBLOWING POLICY

LISC has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

Protection from Reprisal or Victimization

No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblower procedures.

Elements of the Policy

LISC’s policy on whistleblowing is intended to demonstrate that the School:-

• will not tolerate malpractice;

• respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;

• will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;

• will invoke the Centre’s disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations;

• will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

Procedure

This procedure is separate from the College’s adopted procedures regarding grievances. Employees/contractors should not use the whistleblowing procedure to raise grievances about their personal employment situation. This procedure is to enable members of staff and tutors to express a legitimate concern regarding suspected malpractice within the Centre. Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

Confidentiality

Employees/contractors who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will be informed in all cases.

The Investigation

A member of staff will be at liberty to express their concern initially to the HR Coordinator (Wioletta) or either of the Principals.
Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action, where appropriate, will be pursued. The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the Resolution.

**External Procedures**

Where all internal procedures have been exhausted, a member of staff has a right of access to Public Concern at Work, an independent whistleblowing charity, which offers confidential advice to individuals (telephone 020 7404 6609).

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the employee reasonably believes:-

- that exceptionally serious circumstances justify it;
- that the College would conceal or destroy the relevant evidence;
- where they believe they would be victimised by the Centre;
- where the Secretary of State has ordered it.

**Malicious Accusations**

False, malicious, vexatious or frivolous accusations will be dealt with under the Centre’s Disciplinary Procedure.

**Related policies:**

- Inclusion
- Behaviour