SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

A) POLICY STATEMENT

A1 Context

Twin offers progression opportunities for UK residents, international students, individuals and groups. This includes education, travel, work experience, volunteer opportunities and employment both in the UK and internationally.

Twin English Centre London (ECL) runs English language programmes for both adults and children throughout the year. Under 16s normally come as part of a group with a responsible adult, although individual children are accepted during the summer. 16/17 year olds may also come as individuals and join an adult programme, although it is appreciated that students aged 16/17 require a different level of care to those aged 18+.

We usually provide accommodation and sometimes provide an activity programme for under 16s in groups, and we offer an afternoon social programme for individual juniors. We often provide accommodation for over 16s as well as an optional social programme. Both residential and homestay accommodation are on offer, although individual students under 18 are usually in homestays.

Twin English Centres also offer online teaching and tutorials for students.

A2 Terminology

Safeguarding
The promotion of the welfare of students under the age of 18 and their protection from any potential maltreatment.

Child Protection
The processes involved in protecting children from direct harmful behaviour or abuse either physical or psychological.

Child / Children
In accordance with The Children Act 2004, and therefore in accordance with law, Twin Group shall regard any person below the age of 18 as a child. People aged 18 and over may in some circumstances be regarded as vulnerable and may therefore fall within the remit of the policy.

Vulnerable Adult
Section 115(4) of the Police Act 1997 states that a person can be considered to be vulnerable if they are "substantially dependent upon others in performing basic physical functions, or his ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result, he would be incapable of protecting himself from assault or other physical abuse, or there is a potential danger that his will or moral well-being may be subverted or overpowered".

Group Leader
An assigned adult from the students' home country who accompanies them and has joint responsibility for them whilst in the UK.

Staff
Everyone who is employed by, or provides services for, Twin Training International, and has contact with children. This includes teachers, administrators, managers, cleaners, activity leaders, taxi drivers, and homestay hosts among others.

Designated Safeguarding Lead (DSL)
The designated member of staff responsible for the implementation of this policy and related training.

Designated Safeguarding Staff (DSS) – designated people who look after day to day matters, training and recording systems.

Local Childrens Safeguarding Board (LCSB) – a multi-agency body set up in every local authority to safeguard and promote the welfare of children in the area.

Prevent Duty - responsibility under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism

A3 Statement

Twin is fully committed to safeguarding the welfare of all students under 18 and vulnerable adults studying at our centres.

We are passionate about our students' learning experience and strive to ensure we provide a safe and appropriate learning experience. We recognise our responsibility to promote safe practice and protect children and vulnerable adults from harm, abuse, exploitation and radicalisation.

In implementing this policy Twin will abide by the following principles:

- Make a commitment to safe recruitment: selection and vetting of staff, accommodation providers and other suppliers
- Ensure parents/legal guardians, homestay hosts and any other partners of Twin are acquainted with the relevant sections of this policy
- Ensure the school has a trained Designated Safeguarding Lead (DSL) and that staff are aware of the procedures involved for reporting any concerns
- Foster a culture where safeguarding is taken seriously through regular staff training and commitment to safeguarding procedures
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately. In these cases, Twin will work in connection with the appropriate Local Safeguarding Children Board, and where necessary the Police and Social Services (See Appendix 1 for details of the appropriate Local Safeguarding Children Board)
- All personal data will be processed in accordance with the requirements of the Data Protection Act 1998
- Ensure all adults working with students under 18 and vulnerable adults know their legal and moral responsibility to protect them from harm, abuse and exploitation
- Ensure all adults working with students under 18 and vulnerable adults understand their responsibility to maintain standards set out in the policy and to make Twin a safe and caring educational environment
- Ensure adult students are protected against allegations of misconduct towards juniors
- Meet its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism (Appendix 6)
- Ensure that the organisation is ready to respond in case of a major incident (Appendix 7 + 8)

A4 Under 18s' entitlement

All under 18s and vulnerable adults have the right to safeguarding from abuse, regardless of their age, gender, disability, racial origin, religious beliefs, sexuality, language, socio-economic status or appearance.

A5 Adult's responsibilities

All staff have a legal duty of care and responsibilities to safeguard the children in their care, including the responsibility to provide a safe environment, to identify children who are suffering from, or likely to suffer from, abuse, and to report any concerns about welfare to a DSS or the LCSB immediately. The DSS will deal with the concern following the procedures documented in this policy.

All staff will follow (the relevant version of) this policy and have appropriate training.

A6 Associated policies

The policies associated with this one are:
Staff code of conduct (Appendix 3)
Student code of conduct (Appendix 4)
Prevent Policy (Appendix 6)
Emergency Response Policy (Appendix 7)
Schools E-safety Policy (Appendix 9)
Health and Safety Policy (Available on request)
Whistleblowing Policy to Safeguard and Promote the Welfare of Children (Appendix 11)
SEND policy (Appendix 12)

A7 Policy Review

This policy and all associated procedures will be regularly monitored and reviewed:

- In accordance with changes in legislation and guidance on the safeguarding of children and vulnerable adults or any changes within Twin
- Following any issues or concerns raised about the safeguarding of children or vulnerable adults within Twin
- If the DSL or any of the DSS leave the company
- In all other circumstances, at least annually.

This policy will be reviewed by the DSL, and feedback will be sought from the DSS. It will be signed off by the DSL.

A8 Structure, Roles and Responsibilities

Specific responsibilities are as follows.

Designated Safeguarding Lead (DSL):
- Oversight of the Safeguarding Children and Vulnerable Adults' Policy and any relevant documents and files
- To support and advise the DSS and Student Services team in the day-to-day implementation of the policies
- To receive information from any staff, volunteers, children, parents or carers who have safeguarding concerns and record it
- To keep staff updated regarding training and policies
- To consult initially with a statutory child safeguarding agency to test out any doubts or uncertainty
- To make a formal referral to a statutory child safeguarding agency or the police
- To record all information in writing in accordance with the Data Protection Act
- To ensure the Prevent Duty is met
- To be ready to respond to any major incidents
- To be available to respond to any safeguarding concerns 24/7 or assign a member of the DSS to be so
- To ensure any partners working with must have a satisfactory safeguarding policy in place

Deputy DSL:
- Delivering training
- Deputising for the DSL

Designated Safeguarding Staff (DSS):
- Review and implementation of all aspects of the safeguarding policy.
- Dealing with any safeguarding concerns following the procedures documented in the safeguarding policy.
- Maintaining accurate records.

Principal of Greenwich School:
- Safer recruitment of all school staff.

Accommodation team:
- Safer recruitment of all homestay hosts.

Operations Team:
- Safer recruitment of all Activity Leaders.
- Before or on arrival in the UK, it is the responsibility of the Operations Team to ensure a signed parental consent form is provided (Appendix 2).

Receptionists:
- All visitors are required to report to reception when they enter the school. Should they need to enter another part of the school, they will be escorted by a member of Twin staff.
- Under 14s are not allowed to leave the school unaccompanied.

A9 Under 18s' Involvement

- Students under the age of 18 are encouraged to play an active part in their own safeguarding, both by looking out for each other and by raising concerns with adults.

A10 Documents/ Legal Framework

Legal acts and official documents used to help produce this policy are:
The Sexual Offences Act 2003
Counter Terrorism & Security Act 2015
Obscene Publications Act 1959
Safeguarding Vulnerable Groups Act 2006
Public Interest Disclosure Act 1998
Data Protection Act 1998
Keeping Children Safe in Education

A11 Designated Team Working Methods

The designated team meet annually to review policy, and to plan and deliver training, and as often as required to discuss any incidents or concerns. The team are responsible for implementing the code of conduct, training, safer recruitment, and welfare, and are given time during their usual working hours to fulfil these duties. Dealing with a safeguarding concern should take priority over all other work.

A12 Policy Availability and Formats

The full policy is available on the English Centres website and is provided to all staff at induction. There are also two simplified versions:
1) For students and Group Leaders, provided at induction
2) For Local Organisers and homestay hosts, provided on appointment

B) CODE OF CONDUCT

B1 Overview and Principles

ECL has clear codes of conduct for both staff and students (Appendix 3 and 4). Staff receive the code of conduct on appointment, and the main points are covered in their induction. Students receive the code of conduct at the time of booking, and it is also covered at induction.
The purpose of the codes of conduct is to create a safe school culture, and to protect both students and staff members from behaving in a way that may be misconstrued.

B2 Position of Trust

As per the Sexual Offences Act 2003, it is a criminal offence for anyone working in an education setting to have a sexual relationship with a student under the age of 18.

B3 Setting Standards

All staff must provide an excellent role model to children by following the guidelines below.

B4 Staff-U18 Interaction

In order to protect the U18s in your care, and at the same time to protect yourself from allegations of abuse, please follow this guidance.
- Always work where you can be seen by others
- Avoid working in isolation with children if possible
- Never give out personal contact details such as mobile phone numbers or private e-mail addresses
- Do not give children lifts home in your car (unless this has been specifically agreed by senior management)
- Do not arrange to meet children outside of business hours
- Physical contact between adults and U18s is usually unacceptable. When physical contact is deemed necessary, for example to comfort a young child, it must be in response to their needs at the time, of limited duration and

appropriate to their age, stage of development, gender, ethnicity and background. Staff should use their professional judgement at all times.
- Do not use physical force or restraint unless such action is identified as absolutely necessary to prevent significant harm.
- Be even in your treatment of U18s. For example, if two different students break the same rule, make sure they receive the same punishment.
- Use positive reinforcement to encourage good behaviour
- Always address the behaviour, not the student
- Always use appropriate language. Never swear or use derogatory or insulting terminology. Avoid sarcasm and irony.
- Do not discuss inflammatory subjects with students.
- Challenge radical or extremist views in any context.
- Promote the core British values of: (i) democracy, (ii) the rule of law, (iii) individual liberty
(iv) respectful tolerance of different faiths or beliefs.

B5 Appropriate Appearance

Staff must dress appropriately at all times when working with under 18s. What is classed as appropriate will depend on the role and situation. However, the following should always be avoided:
- T-shirts with inappropriate slogans/ pictures
- Clothing that is too revealing
- Clothing that is overly tight or baggy

Remember that it will be difficult for some students to respect you if you do not present yourself appropriately.

Students should also follow the guidance above. Cultural sensitivity is important as what is acceptable in one culture may not be acceptable in another. Staff are asked to report cases of students dressing inappropriately to management.

B6 Alcohol, Drugs and Smoking

Staff must never use drugs or drink alcohol in front of under 18s, and smoking should be avoided as far as possible. This also applies to homestay hosts. Alcohol, drugs and smoking should not be in any way promoted. It is better to educate under 18s about addictive substances rather than to joke about them.

It is illegal for U18s to buy alcohol or cigarettes (including e-cigarettes). If you suspect a child is taking drugs or drinking alcohol, you should report it to a DSS.

B7 IT & Social Networks

School staff must not invite, accept or engage in communications with students in any personal social media whilst in employment at Twin. The following guidelines should be adhered to:
- Staff should not use personal email accounts or mobile phones to make contact with any current student of any age or any ex–student under the age of 18, nor should any such contact be accepted. Staff are advised not to use personal email accounts or mobile phones to make contact with other staff, or any members of Twin's community, for work-related purposes.
- Staff should not accept any current student of any age or any ex–student under the age of 18 as a friend, follower, subscriber or similar on any personal social media account
- Any communication received from students on any personal social media sites must be reported to a DSS
- If any member of staff is aware of any inappropriate communications involving any students in any social media, these must be reported immediately
- If any member of staff is aware of anyone accessing extremist/ terrorist websites or using social networks to exchange extremist/terrorist views, this must be reported immediately.
- Staff are strongly advised to set all privacy settings to the highest possible levels on all personal social media accounts
- Staff are advised to avoid posts or comments that refer to specific, individual matters related to Twin and members of its community on any social media accounts

- Staff should not post photographs or videos of students on any social media accounts

There are many legitimate uses of social media for marketing purposes and to support student learning. For example, Twin has an official Twitter account. When using social media for marketing or educational purposes, the following practices must be observed:

- Staff should set up a distinct and dedicated social media site or account for educational purposes. This should be entirely separate from any personal social media accounts, and ideally should be linked to an official school email account.
- The URL and identity of the site should be notified to the Principal before access is permitted for students
- The content of any Twin sanctioned social media site should be solely professional and should reflect well on the company
- Staff must not publish photographs or videos of students without the consent of parents/carers (given in the parental consent form), identify by name any student featured in photographs, or allow personally identifying information to be published on school social media accounts
- Care must be taken that any links to external sites from the account are appropriate and safe
- Any inappropriate comments on or abuse of Twin sanctioned social media should immediately be removed and reported to the Principal
- All social media accounts created for educational purposes should include a link to the school website. This will indicate that the account is officially sanctioned by Twin,

B8 Accommodation

- Homestays are organised through either the Twin Accommodation department or a Local Organiser (LO).
- LOs must have satisfactory safeguarding policies and practices in place, including safer recruitment for hosts
- Students under 16 will not be accommodated with students over 18 years old
- A responsible adult will be present overnight when hosting students under 18
- Students under 18 will not be mixed with other genders
- The curfew times are as follows:
  14-15 years 7 pm
  16 -17 years 10 pm
- Hosts are required to pick up under 14 year olds in the evenings and also drop them off in the morning at a designated place assigned by the school
- Students aged 14 + are allowed to make their own way to school and this has been thoroughly risk-assessed. All homestays are revisited at least every 2 years to ensure standards are maintained
- Homestay accommodation that is alleged to fall below the British Council required standard, or fails to adhere to Twin's policies, will be reported to the relevant LO, and "blacklisted" by Twin
- All complaints relating to homestay are investigated immediately. In the case of a serious complaint, or if information is passed to the school giving cause for concern, it will be reported to the relevant authorities immediately
- In case of any emergency, both students and homestays are provided with the accommodation emergency number
- Any residential accommodation used must have satisfactory safeguarding policies and practices in place

B9 Transport

Twin requires written confirmation from all taxi/ coach companies used that all drivers are DBS checked.

B10 Adult student -U18 interaction

Twin recognises its responsibility to educate adult students regarding the safeguarding of children. There is guidance in the student handbook regarding appropriate behaviour and protecting oneself from allegations. It is highlighted in the adult student induction that it is illegal for an adult to have a sexual relationship with a person under the age of 16.

Twin English Centre London shares its premises with Twin Employment and Training (TET). TET uses the facilities to provide training and services for jobseekers and young people aged 16+. There are procedures in place to ensure that under 18s on programmes at ECL are safeguarded from any potential risks posed by TET students (Appendix 13).

B11 Favouritism & Gifts

It is important that staff treat all students equally and do not show any favouritism, as this can make other students feel left out and could leave the staff member open to allegations. For this reason Twin would advise that staff avoid meeting any students outside of the work place, regardless of their age.

It is Twin's policy to actively discourage the acceptance by employees of gifts from students, Group Leaders, or suppliers. Any approaches should be politely declined or, if they become persistent, referred to a member of management. Any employee found to have accepted a gift may have disciplinary action taken against them. The only exceptions to this rule are cards and calendars.

B12 Whistleblowing

Staff have a legal obligation to inform management of any concerns about colleagues not following the Code of Conduct. Staff who report this (or any other problems) will (a) not be penalised and (b) their report will remain confidential. Please refer to the Whistleblowing Policy (Appendix 11) for more information.

Students are informed that they must report inappropriate adult behaviour and of the pathway for doing so at induction and in the student handbook. They are reassured they won't get into trouble for doing so.

C) CHILD PROTECTION

C1 Overview

Twin meets its child protection responsibilities by employing a Designated Safeguarding Lead, Designated Safeguarding Staff, and a Student Services team; providing a clear procedure as to how to report concerns; and keeping accurate and detailed records.

- Any concerns regarding the welfare of under 18s must be reported to the DSL immediately and the relevant course of action will be taken
- Any incidents and outcomes will be recorded by the DSL in line with the Data Protection Act
- All staff should be aware of the appropriate responses and actions when a student volunteers information to them All staff should be aware that in accordance with statutory requirements where child safeguarding issues are involved, it is not possible to offer confidentiality to a person under 18 as any disclosures must be reported

Vulnerable Adult Procedures
- Before students start at the school, any information regarding potential vulnerability has to be provided by agents or the individual, and Twin will assess whether the appropriate measures can be put into place to meet the potential student's needs
- Twin staff members will work together to identify any students, Group Leaders or staff members they believe to be a vulnerable adult. If there are any concerns, the DSL should be contacted immediately and the appropriate support measures will be put into place
- Any special arrangements and concerns will be recorded by the DSL in line with the Data Protection Act

C2 Nominated/Designated Persons

Twin English Centre London's DSL is
Sarah Morse (Executive Head)
smorse@twinuk.com
020 8269 5669

Twin English Centre London's Deputy DSL is
Daniela Hierzer (Summer Centres Senior Activity and Welfare Manager)
dhierzer@twinuk.com
020 8269 5666

If unavailable, the following DSS can be contacted (all have specialist or advanced training):

Pamela Nwogbe (Head of Student Services)
pnwogbe@twinuk.com
020 8269 5667

Joanne Sayer (Operations and HR Director)
jsayer@twinuk.com
020 8269 5680

Mariola Rzeszowska (Head of Seasonal Schools)
mrzeszowska@twinuk.com
020 8269 5675

Outside of office hours, please call the emergency phone: **020 8269 5788**.

C3 Situations when adults need to respond

Any of the following scenarios may cause you to have concerns about a student under 18:
A student discloses an incident to you
A student tells you they are worried about another student
A staff member tells you they are worried about a student
You observe signs of abuse yourself
You observe a staff member acting inappropriately

If you have a concern, you must not keep the information to yourself. The DSL should be informed immediately to ensure as much information is recorded as possible. Vital information could be missed if this is not done.
- It is the duty of staff to inform only, not to investigate - this is the role of the DSL and, where appropriate, the Police and Social Services
- In the event that the DSL is not available, any concerns should be directly addressed to another DSS
- Safeguarding issues will take priority over any other work a person has
- All concerns will be recorded by the DSL and kept in accordance to the Data Protection Act
- The DSL will consult the relevant authorities if they need any advice or support

C4 Recognising symptoms of abuse

A child/ vulnerable adult may be abused or neglected by having harm inflicted upon them or by a person failing to act to prevent harm. A child may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger.
There are four main types of abuse:
- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Please see Appendix 5 for other types of abuse, definitions, and possible symptoms.

C5 A child telling an adult

A student under 18 may choose any adult to confide in - this could be a teacher, a homestay host, or other trusted member of staff. If a student discloses significant personal problems to you, they should be acknowledged and taken seriously. Follow this procedure:
- Explain to the student that you may have a legal obligation to pass this information on, to protect both them and possibly other people. The following wording may be used:
  "I will keep our conversation secret but not if you tell me something that might be dangerous for you or that is illegal. I will tell you if I am going to tell other people and what I will tell them."
- Listen, do not ask any questions.

- Write down the details, if appropriate ask the student to write it down. If it is not appropriate to write the details down while the student is talking to you, do it as soon as possible after the conversation.
- Contact the DSL immediately and pass on all of your records and notes, no duplicates of these should exist.
- The DSL then has the responsibility to decide what further action should be taken.

C6 Confidentiality

Any child protection information must be treated with the strictest confidence – the 'need to know' principle must be employed. Confidentiality about both the victim and the accused must be maintained.

C7 Difference between concern and serious issue

A concern is when something seems to be not right; however there is no immediate danger to U18. All concerns should be reported to the DSL or one of the DSS as soon as possible.

A serious issue is when a child is in immediate danger or is at risk of harm. In this case. a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, they should be informed as soon as possible.

C8 Identifying vulnerable students & early help

Vulnerable students are more susceptible to abuse. There are several factors that might make a student vulnerable, for example Special Educational Needs and Disabilities (SENDs), or coming from difficult home situations. Designated safeguarding staff have a responsibility to pay close attention to these students.

Quick reporting of any concerns to the designated team allows for early help, which reduces the chances of things becoming more serious.

C9 Record Keeping

Records should:
- state who was present, time, date and place
- use the child's words wherever possible
- be factual/state exactly what was said
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation

All concerns are kept private and confidential and recorded in line with the Data Protection Act

C10 If an adult is accused

The DSL will respond to any allegations following this procedure:
- Where appropriate, see the student is offered support
- Decide what action to take based on the allegation
- If necessary, contact the Local Safeguarding Children Board or the Local Prevent Lead (see Appendix 1), and follow the advice and suggested actions they provide
- Whilst a complaint is being investigated, the member of staff will be suspended, and if the complaint is upheld, they will be dismissed and any relevant authorities informed immediately
- Keep the student informed
- Give feedback as to the outcome to the member of staff who raised the concern

C11 If the DSL/ Senior Manager is accused

The procedure outlined in C10 should be followed, with the concern being reported straight to the LSCB instead of the DSL.

C12 If a child is accused

The DSL will respond to any allegations following this procedure:

- Where appropriate, see the that both the victim and the accused are offered support
- Decide what action to take based on the allegation
- If necessary, contact the Local Safeguarding Children Board or the Local Prevent Lead (see Appendix 1), and follow the advice and suggested actions they provide
- Whilst a complaint is being investigated, the child should be closely supervised, and if the complaint is upheld, they will be excluded and any relevant authorities informed immediately
- Keep the victim and the accused informed
- Update the accused's and the victim's parents/ Group Leader/ Agent as appropriate
- Give feedback as to the outcome to the member of staff who raised the concern

D) TRAINING

D1 Responsibility

The DSL is responsible for ensuring that training is provided to everyone who is employed by Twin Training International and has contact with children. All staff are required to have basic awareness safeguarding and Prevent training; all DSS advanced; and the DSL specialist. All staff are required to attend an annual in-house safeguarding training session which includes Prevent.

D2 How training is delivered

- All staff are provided with the relevant version of the safeguarding policy and part one of Keeping Children Safe in Education prior to commencing employment.
- It is compulsory for all staff members working with children to take online basic awareness safeguarding training prior to commencing employment, including homestay hosts and Local Organisers.
- It is compulsory for all staff members working with children to have Prevent training, either in person or online, prior to commencing employment.
- DSS must complete at least advanced training at least every 2 years.
- The DSL must complete specialist training at least every 2 years.
- In-house training is delivered annually to all staff by one of the DSS, and includes the Prevent Duty. In-house training may also occur if there are any changes to policy/ legislation, or if a serious incident occurs.

D3 Ensuring understanding

The online basic awareness safeguarding training concludes with a written test. Trainees will only receive their certificate if they pass the test.
The in-house training sessions always conclude with a quiz or similar to confirm understanding.

D4 Recording training

All certificates from external or online training sessions are saved in staff files. Records of in-house training are kept detailing (i) date of training (ii) who completed training (iii) content of training (iv) evidence that it was completed and understood.

E) SAFER RECRUITMENT

E1 Overview

Twin's commitment to safeguarding begins at the recruitment stage. Twin's recruitment procedures aim to prevent the appointment of people who may pose a risk to children. Safe recruitment is carried out in the following ways:

- Applicants are informed of our commitment to safeguarding in the job advertisement, the invitation to interview, and during the interview.
- At interview, some questions are asked regarding care of under 18s.
- At interview, any gaps in CVs are questioned.
- References are followed up.

- DBS or criminal record checks are performed on all successful candidates.

E2 Recruitment materials

In both the job advertisement and the invitation to interview, our commitment to safeguarding is stated and the following points are detailed:
- References will be followed up with specific questions as to applicant's suitability to work with persons under 18
- All gaps in CVs must be explained satisfactorily
- Proof of identity and qualifications will be required
- Successful candidates will be required to undertake a DBS check or equivalent police check from overseas
- Successful candidates will be required to complete safeguarding and Prevent training prior to commencing employment
- Successful candidates will be expected to actively engage in the safeguarding of under 18s

E3 Interviews

During the interview, the candidate is reminded of the company's commitment to safeguarding, and several questions are asked regarding care of under 18s. Two interviewers are always present and a consensus must be reached as to the applicant's suitability.

E4 Recruitment of homestays

Twin has different means of recruiting homestays. These include newspaper/magazine advertisements, leaflets, mailshots, and posters in local newsagents.

Safe recruitment is carried out in the following ways:

- All recruitment materials state our commitment to safeguarding
- Potential hosts are given an application form, which includes some questions regarding care of under 18s
- If the application form is judged to be suitable, a visit is arranged
- A thorough inspection takes place and the host is briefed as to what is expected
- All paperwork is signed (including DBS form)
- Pictures are taken and sent back to the office
- References are followed up
- DBS checks are performed on all adults in a homestay. A host may not take under 18s until acceptable checks are received.

E5 Applicants awaiting DBS/ police checks

New starters may only commence employment without receiving criminal clearance in exceptional and justifiable circumstances. A record of the decision is kept and signed off by the relevant senior manager. The judgement is an assessment of the risk versus the consequences of the decision.
If a new starter does commence employment prior to clearance being received, they must sign a self-declaration. A record of what alternative risk mitigation has been put in place to cover this period must be kept. A new starter must never commence employment prior to the submission of their completed application or paperwork to obtain criminal clearance. The barred list must also be checked - it is against the law to allow somebody to start regulated activity with under 18s without doing a Barred List check.

Homestay hosts may never commence employment without receiving criminal clearance.

E6 Applicants with a criminal record

As an organisation using the Disclosure and Barring Service (DBS) checking service to assess applicants' suitability for positions of trust, Twin undertakes not to discriminate unfairly against any subject of a DBS/ police check on the basis of a conviction or other information revealed. Having a criminal record will not necessarily prevent applicants from working for

Twin. An assessment will be undertaken to assess the relevance of any conviction to the particular post; the assessment will include consideration of the nature of the work and the working environment.

A 'satisfactory' check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. Should the school be informed of a previous conviction which could be considered as relevant to the post but does not indicate an obvious direct threat to the safety of the students, the staff member or homestay host will be interviewed to obtain more information.

Twin will consider any convictions which have been recorded in terms of the following:
- Nature, seriousness and relevance of the offence
- How long ago the offence occurred
- If the offence was a one-off or part of a history
- Circumstances of the offence being committed
- Country of conviction
- Decriminalisation

The disclosure will be discussed with the prospective employee, and the discussion will also aid the decision making process. The DSL and HR/Ops Director will make the final decision; the Local Safeguarding Children Board may be consulted if necessary. If it is considered there is no threat, a rationale will be provided and kept on file stating the reasons. This record will not contain details of the offences.

Employees must report any subsequent criminal convictions to their Line Manager immediately, who will then pass the information on to the DSL. Failure to do so will result in disciplinary action being taken.

E7 Background checks on group leaders

All Group Leaders are asked to show their identification on arrival. Agents are asked to provide a Working with Minor Declaration for any group leaders that travel with U18s. We also randomly request copies of the police checks done in country.
If it is not possible to obtain a check, two references are requested. A judgement is then made with regard to suitability for the role and the level of supervision.

E8 Single Central Record

A spreadsheet is kept with required headings to ensure that nothing is missed when recruiting staff/homestay hosts.

E9 Prohibited Check List

A Prohibited List check is carried out on teachers/ managers who have worked in an EEA country's primary or secondary education (state or private). Appearing on the list will prevent applicants from working for Twin.

F) WELFARE/ IMPLEMENTING SAFEGUARDING

F1 Use of risk assessments

There is a general risk assessment for the premises and another for lessons and breaks. Risk assessments are also produced for all social or educational activities that take place on or off site.

Groups may have a social programme provided by Twin, which may or may not include a Twin Activity Leader. If they do not book a Twin social programme, this is organised independently by the Group Leaders, in which case they are required to provide the Twin Operations team with the programme, who will then create and share corresponding risk assessments.

Individual students aged 16/ 17 may choose to take part in the Twin adult social programme. Some events on this programme are accompanied by a Twin Activity Leader, while others are not. All are risk assessed and any necessary information is shared with the participants.

In summer, a separate social programme is run for individual junior students, including those on the Parent and Junior programme. The parents may opt to take part, and their participation forms part of the risk assessment. Junior groups may also opt to take part. All junior events are accompanied by a Twin Activity Leader.

Any student may be taken on a class outing by their teacher as part of their tuition programme.

The person leading any of the activities mentioned above is responsible for adding any additional risks to the assessment and sharing the information with all participants. Special attention must be paid to any extra risks for under 18s. All risk assessments must include major incidents.

The risk assessment should then be signed, dated and filed.

F2 Supervision ratios

There must be at least one adult per fifteen students under 16. During lessons this ratio is made up by Twin teachers. During break times, free time, excursions and airport transfers, Group Leaders may be asked make up the supervision ratios or supervise their own students. For offsite activities with students under 14, there should always be a minimum of 2 adults present in case of emergency.
Group leaders are provided with guidelines regarding supervision of students during induction and through the Group Leader Handbook. The adults responsible for supervising the students at any given time must familiarise themselves with the relevant risk assessments.
Students aged 14-15 are allowed to make their own way to school and this has been thoroughly risk-assessed. They can also leave the school during their breaks, but not the premises. They are allowed up to one hour of free time during excursions. Parental consent is required for each of the above.

F3 Missing students

- In class: Under 18s are highlighted on the registers, and teachers are instructed to report their absence to the Head of Student Services after 15 minutes. The Head of Student Services will try to contact the student, the group leader, the homestay host, and/ or the parent/ guardian to ascertain the reason for absence. If they cannot be accounted for, the police are contacted immediately.
- During excursions: The group's activity leader is responsible for regularly checking that all students are present. If a student goes missing, the activity leader should try to contact the missing student directly. If unsuccessful, they must call the school, or out of hours the Twin emergency phone. The person responding to the call will try to contact the homestay host, and/ or the parent/ guardian to check if they have any news of the student. If appropriate, the group's activity leader will leave the group with the group leader in order to search the surrounding area. If unsuccessful, the police will be contacted.
- Homestay: The host is responsible for checking the students are home by curfew. If a student is late, or at any point goes missing, they are instructed to ring the emergency phone immediately to inform the school. The person responding to the call will try to contact the student or next of kin. If unsuccessful, the police will be contacted
- In all cases, the police should be informed within half an hour of the student's disappearance if no contact has been made with them.

F4 Major Incidents

Twin English Centre has a separate Emergency Response Policy (Appendix 7). The procedure for lock downs is provided to staff but is not included as an appendix to this policy as it is a confidential document. All staff conducting off-site visits should be familiar with the Emergency Procedure (Appendix 8).

F5 Welfare provision

Twin English Centre employs a Head of Student Services who is responsible for student welfare.

The following extra provision is made for the welfare of under 18s:
<u>Students in groups</u>
- Group leader induction on arrival, including:

Provision of group leader handbook
Provision of safeguarding policy
Signing of Group Leader declaration
- Student induction

<u>Individual students</u>
- Separate student induction
- Weekly welfare tutorials
- All individual U16s must sign in every morning

<u>Under 14s</u>
- Supervision before class and during breaks

Students wear different coloured lanyards depending on their age as follows:
10 – 13 red lanyards
14 – 15 purple lanyards
16+ white lanyards
This enables staff to quickly identify students requiring a higher level of supervision.

There is a separate document detailing all procedures for Under 18s in Appendix 10.

F6 Accommodation implementing safeguarding

U18 students travelling alone or with a group will be placed into Homestay accommodation with DBS checked hosts and a clear curfew policy. All hosts are provided with a safeguarding policy upon inspection and are required to undertake safeguarding training. Groups may request residential type accommodation, in which case we use preferred providers whose policies and practices pertaining to student welfare and safeguarding align with ours. These would include - but not limited to – ensuring all students from the group are situated on the same floor and block, ages and genders aren't mixed and staff are DBS checked. Leaders of the group must also be accommodated in the same residence as well as the same section and floor as the students and provide the first level of safeguarding. Independent students over 16 and under 18 may also request student residence accommodation. Twin will use only those residences for U18s that adheres to Twin's standards for U18 student welfare including ensuring only DBS checked staff are in contact with the student, having in place appropriate curfew times and ensuring the non-mixing of genders and U18s with over 18s. We continually review and assess residences for their suitability for hosting students under 18.

F7 Fire Safety

Please refer to Twin's Fire policy.

F8 First Aid and Medical

Please refer to Twin's Health and Safety policy.

F9 U18 Behaviour and Discipline

Students are provided with the code of conduct (Appendix 4) at the time of booking, and reminded of this again in the induction. It is also displayed in the classrooms. Cases where a student fails to comply with the code of conduct must be reported to the Principal, who will decide an appropriate punishment. In some cases, this may be termination of the student's course.
Staff must set a good example by conforming to the staff code of conduct (Appendix 3).

F10 Airport transfers

Twin works with designated companies to provide transfers to and from airports on arrival and departure of students; these companies must be licenced to operate by the local council, and drivers are required to have a DBS check. Individual students under the age of 18 travelling without a parent or guardian are strongly encouraged to book an airport transfer with Twin. A booking reference number is provided for the transfer, as well as the company's contact details. On dropping off the

student at the homestay, the driver is instructed to wait until the student enters the house. The host will be at home when the student first arrives. If the student is under 16, the driver will accompany the student into the house. Similarly, on departure, the host must be present when the driver collects the student. In the case of the student's flight being cancelled, Twin will place the student into appropriate accommodation and book a transfer from the airport to their accommodation.

Twin can facilitate a transfer and a meet and greet service for every group from the airport to the meeting point if the client books this service. The agent is provided with the Twin representative's contact number in advance.

F11 E-safety

Twin is committed to ensuring that all students will be able to use all technologies safely by providing the following guidelines in the student code of conduct:

- Do not give any user names, passwords, or any other personal information to anyone.
- Do not use another person's user name or password.
- You must not enter, create, share or keep any illegal or unsuitable material.
- Be polite when you communicate with others online.
- Report any unpleasant or unsuitable material or messages that make you feel upset or unhappy.
- Do not take, send or share on social media, pictures of anyone without their permission

Twin employs the following monitoring strategies and systems to ensure student safety online:

- All staff web traffic goes through a web filter (Barracuda security gateway) that blocks websites that are not safe for work, hate speech etc. It also logs all web browsing activity.
- The PCs in the student area are on a separate network for security purposes, and all web traffic is filtered and all inappropriate websites are blocked. The same filter applies to our school Wi-Fi so any personal device that connects to our Wi-Fi is subject to the same restrictions.
- Having web filtering systems in place to filter and block inappropriate websites.
- Where possible, having staff directly supervise children whilst using technology.
- Investigating and intervening promptly in case of any incident or breach alert of the filtering system.

Twin recognizes the inevitable use of the internet and social media by students and the challenges of monitoring it. In addition to the above, staff are therefore trained to identify signs of cyberbullying and/or any online abuse.

For more information, please see the E-safety policy (Appendix 9)

F12 Radicalisation and Extremism Prevent

Twin is committed to preventing radicalisation. Students are educated about democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs during their induction, in class, and through the student handbook.

Staff are trained on signs to look out for and how to respond.

For more information, please see the Prevent policy (Appendix 6)

F13 Parental Consent

A signed parental consent form must be received for all U18s either before or on arrival at the school (Appendix 2).
It is the responsibility of the Operations Team to ensure that these are received, and the section "For students under the age of 16" has been completed where appropriate.

F14 Provision for those more vulnerable

Twin English Centre makes special provision for more vulnerable students, for example those with Special Educational Needs and Disabilities (SENDs), or coming from difficult home situations. Twin English Centre has a SENDs Coordinator, and teachers are trained to recognise and support students with SENDs.

For more information, please see the SEND policy (Appendix 12)

F15 Private Fostering

If a student aged under 16 (under 18 if disabled) stays with a homestay host for more than 27 nights, it is considered as private fostering. It must be reported to the local authority at least six weeks before the arrangement starts.

F16 Online face-to-face teaching / tutorials

Twin English Centres also offer online teaching and tutorials for students. This is similar to staff working one-to-one in a closed room with students; therefore, sensible safety measures, including guidance on appropriate staff online behaviour, are in place as follows:

- All sessions take place on Zoom using pro school accounts.
- All sessions should be timetabled officially by the school and not the teacher. If the student needs to change times, that is done via the school and not direct with the teacher.
- Sessions not to be held in bedroom of teacher, and ideally also not of student.
- Teacher to ensure that everything student will see in background is appropriate, e.g. no dirty underwear, nude pictures/sculptures.
- Random 15-minute safeguarding checks to take place:
  During first online lesson for all teachers
  Monthly for every teacher

The following guidelines apply to both teacher and student:
- Switch off mobile phone
- Always have professional appearance
- Keep hands in view on table
- Stick to lesson content (avoid discussing teacher's home or personal life)
- Should the student begin to display inappropriate behaviour, teacher to end session quickly and inform line-manager what has happened and why

Staff and Student Codes of Conduct for online delivery can be found in appendices 13 & 14.

Parents are involved as follows:
- parents sent schedule of online lessons
- parents sent online code of conduct (appendix 14)
- parents invited to 'meet the teacher' in first lesson
- parents told who to contact if they have any concerns about online lessons

All staff involved in online work, e.g. teachers, technicians and welfare:
- to be DBS checked
- to be properly trained in safeguarding online

Individual U18s have a welfare tutorial every week. A record is kept, and any problems must be addressed immediately.

If a safeguarding concern arises, the procedures in section C, CHILD PROTECTION, should be followed. The school's local authority can still be contacted even if the student is overseas.

List of Appendices

APPENDIX 1

Contacts

Designated Safeguarding Lead

Sarah Morse (Executive Head)
smorse@twinuk.com
020 8269 5669

Deputy Designated Safeguarding Lead

Daniela Hierzer (Summer Centres Senior Activity and Welfare Manager)
dhierzer@twinuk.com
020 8269 5666

Designated Safeguarding Staff

Pamela Nwogbe (Head of Student Services)
pnwogbe@twinuk.com
020 8269 5667

Joanne Sayer (Operations and HR Director)
jsayer@twinuk.com
020 8269 5680

Mariola Rzeszowska (Head of Seasonal Schools)
mrzeszowska@twinuk.com
020 8269 5675

Local Safeguarding Children Board

Greenwich Safeguarding Children Board, First Floor, The Woolwich Centre, 35,Wellington Street,
London SE18 6HQ
Tel: 0208 921 4477
email: safeguardingboard@royalgreenwich.gov.uk or safeguardingtraining@royalgreenwich.gov.uk
web: http://www.greenwichsafeguardingchildren.org.uk/site/index.php
LSCB Independent Chair: Nicky Pace, nickyjpace@gmail.com
Acting LSCB Manager: Dan Timariu, dan.timariu@royalgreenwich.gov.uk
LSCB Administrator: lorraine.harry, lorraine.harry@royalgreenwich.gov.uk

Local Prevent Lead

Safer Communities Team, 4th Floor, The Woolwich Centre, 35 Wellington Street, SE18 6HQ
Prevent Coordinator: Adam Browne, adam.browne@royalgreenwich.gov.uk
Tel: 020 8921 8324
Mobile: 07791 701 077

APPENDIX 2

Parental consent form individuals

Under UK law, all people under the age of 18 are regarded as children. For this reason, we require all students who are under 18 years old to obtain consent from a parent or guardian before studying at Twin English Centre.

<u>**Letter of Consent to Travel for Individual Students**</u>

Name of student: …………………………………….. **Date of birth:** ………..……. **Passport Number:** ………..………

Full name of Parent/Guardian:….…………………………………………………………….….…….……………………..

Parent/Guardian telephone number (including country code):…….…………………………………………….……..

Parent/Guardian passport/ID number:....….……………………………………………………………….…………...

Address:…………………………………………………………………………………………………….…………….

Country:……..……..

Email:…………………………………………………….Mobile Phone:……………………………………………………

Does parent/ guardian speak English?   Yes/ No

Medical conditions
Parents must inform the school of any mental or physical conditions, allergies, disabilities, problems with sight/ hearing, or special educational need (for example dyslexia or attention deficit hyperactivity disorder). Please give full details below.

Medical condition ……………………………………………………….…................…………………………………….
Medication your child takes ……………………………………………….…................………………………………..
Special requirements ……………………………………………………….…................…………………………………

I consent to my child attending Twin's [Course-Header.txtPriceItemName/1]. Please sign to indicate that you agree to the following:
My child can travel to the UK to study English at **[School.txtAddress1] -** [School.txtAddress2], [School.txtTown], [School.txtPostalCode] from [Enrolment.dteFromDate/1] until [Enrolment.dteToDate/1].

Please check all boxes that apply:
I understand that if my child does not follow the code of conduct, they may be
excluded from the school and removed from their accommodation.   ☐
I understand that Twin English Centre has no control over accommodation that
has not been arranged by the school .   ☐
I understand that my child will not be supervised by Twin Staff outside of lesson times.   ☐
I understand that my child will not be accompanied to/ from school if under 14.   ☐
I agree for my child to receive first aid from a trained First Aider, and/or for medical
treatment to be arranged in the event of accident, injury or illness.   ☐
I understand that 16/17 year olds will regularly mix with students aged 18+   ☐
I agree for photographs of my child to be used in Twin's publicity materials   ☐

Please check one box:
The student will be collected from a UK airport by a taxi arranged by Twin.   ☐
The student will travel independently from a UK airport to their accommodation (age 16+)   ☐

Signature: …………………………………………………… (Parent or Guardian)   **Date**:…..…………………

For students under the age of 14

My child will be accompanied to and from school by a responsible adult known to me. My child will not be left at school before 08.45, and will sign in at the Student Services Office on arrival each day.

Name of adult: …………………………………….. **Date of birth:** ………..…… **Passport Number:** ………..……

Parental consent form groups

Under UK law, all people under the age of 18 are regarded as children. For this reason, we require all students who are under 18 years old to obtain consent from a parent or guardian before studying at Twin English Centre.

Letter of Consent to Travel for Students in Groups

Name of student: …………………………………….. **Date of birth:** ………..…… **Passport Number:** ………..……

Full name of Parent/Guardian:…..……………………………………………………………………………………..

Parent/Guardian telephone number (including country code):…………………………………………………………..

Parent/Guardian passport/ID number:...…………………………………………………………..…………....

Address:…………………………………………………………………………………………….…………..

Country:…………………………………………………………………………………………….……....

Email:……………………………………………….Mobile Phone:……………………………………………

Does parent/ guardian speak English?Yes/ No

Medical conditions
Parents must inform the school of any mental or physical conditions, allergies, disabilities, problems with sight/ hearing, or special educational need (for example dyslexia or attention deficit hyperactivity disorder). Please give full details below.

Medical condition ……………………………………………………………...

Medication your child takes …………………………………………………………….................................

Special requirements ……………………………………………………………...

I consent to my child attending Twin's [Course-Header.txtPriceItemName/1]. Please sign to indicate that you agree to the following:

My child can travel to the UK to study English at **[School.txtAddress1]** - [School.txtAddress2], [School.txtTown], [School.txtPostalCode] from [Enrolment.dteFromDate/1] until [Enrolment.dteToDate/1].

Please check all boxes:
I understand that if my child does not follow the code of conduct, they may be
excluded from the school and removed from their accommodation.   ☐
I understand that my child will not be accompanied to/ from school if 14 and over.   ☐
I agree for my child to receive first aid from a trained First Aider, and/or for medical
treatment to be arranged in the event of accident, injury or illness.   ☐
I understand that 16/17 year olds may mix with students aged 18+   ☐
I agree to my child (aged 16-17) providing their own lunch
I agree for photographs of my child to be used in Twin's publicity materials   ☐

Signature: ……………………………………………………… (Parent/Guardian)   **Date**:…..…………………

APPENDIX 3

Staff code of conduct

The way we do business

Acting in a professional manner. Conducting business with integrity. Treating people and the environment with respect. Acting in an ethically and socially responsible manner. Working together as a team and being innovative. Upholding our and our customers' reputations. This is the way Twin does business and is expressed in our code of conduct...

Code of conduct*

* Principles, values, standards and rules of behaviour that guide the decisions, procedures and systems of our organisation in a way that contributes to the welfare of our key stakeholders, and respects the rights of all individuals affected by our operations.

To be successful, we must strive to develop and expand both as a company and individuals. Our core values of **professionalism**, **teamwork** and **respect** help us to achieve this growth.

We have written a **code of conduct** as guidelines for all Twin staff to follow. This code is based on our values. While the code provides a broad range of guidance about the standards of integrity and business conduct, no code can address every situation that individuals are likely to encounter. As a result, this code is not a substitute for our responsibility and accountability to exercise good judgment on proper conduct.

Behaving professionally

We deliver services in accordance with Twin policies and professional standards.
We offer only those services we can deliver and strive to deliver no less than our commitments.
We compete vigorously, engaging only in practices that are legal and ethical.
We respect the confidentiality and privacy of our agents, students, our staff and others with whom we do business. Unless authorised, we do not use confidential information for personal use, Twin's benefit or to benefit a third party.
It is unacceptable for us to receive or pay bribes.

Respecting others and the environment

We treat our colleagues, customers and others with whom we do business with respect, fairness and courtesy.
We take pride in the diversity of our workforce and view it as a competitive advantage to be nurtured and expanded.
We are committed to maintaining a work environment that is free from discrimination or harassment.
We try to balance work and private life and help others to do the same.
We invest in the ongoing enhancement of our skills and abilities.
We provide a safe working environment for our staff.
We aspire to act in a manner that minimises the detrimental environmental impact of our business operations.

Upholding the Twin name

Our clients and colleagues trust Twin based on our professional competence and integrity - qualities that underpin our reputation. We uphold that reputation.
We respect our competitors, embrace competition and do not condone verbal or written abuse against others.
We seek to serve only those clients whom we are competent to serve, who value our service and who meet appropriate standards of legitimacy and integrity.

When speaking in a forum in which audiences would reasonably expect that we are speaking as a representative of Twin, we generally state only Twin's view and not our own.

APPENDIX 4

Student code of conduct

In Your Lessons

- Attend all lessons on time
- Come prepared and properly dressed for class
- Do your homework on time
- Speak only English in class
- Only use your mobile for study
- No food or drink (except water) in class
- Help to keep the classroom tidy

Behaviour

- Do not be rude, aggressive or violent
- Do not try to buy alcohol or cigarettes if you are under 18
- No chewing gum in the school
- Only smoke in the smoking areas
- Keep your personal items (wallets; phones) with you at all times

Consideration

- Treat other students, Twin staff and homestay hosts with consideration. Respect the different cultures, races, religions and genders at Twin.
- Bullying (hurting someone either physically or emotionally) is not ok. Tell the school if you, or someone you know, is being bullied
- Look after the facilities in the school and your homestay

Communication

- Tell the school if you are sick and cannot come to class
- Tell the school if you change your address, email address, or telephone number
- If you are going to travel or spend the night somewhere else, tell the school and your homestay host

Online safety

- Keep user names and passwords private
- Do not use another person's user name or password
- Do not enter, create, share or keep any illegal or unsuitable material
- Be polite when you communicate with others online
- Tell the school if any material or messages make you feel worried or unhappy
- Do not take, send or share pictures of anyone without their permission

All Twin staff are available to help you if you have any questions or problems. You may also ask to speak to the Head of Student Services in private and confidentially.

Please note that if you break the code of conduct or the law, we may decide to remove you from the school and your accommodation immediately and without returning any money.

APPENDIX 5

Types of abuse

This policy recognises the following definitions in regard to the types of abuse:

(i) **Physical Abuse** – May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

Children who are physically abused may have:
bruises
burns or scalds
bite marks
fractures or broken bones
other injuries and health problems

(ii) **Emotional Abuse** – Emotional abuse is the persistent emotional ill treatment of a person such as to cause severe and persistent adverse effects on emotional development. It may involve conveying to the person that they are worthless, inadequate, or valued only insofar as they meet the needs of another. Developmentally inappropriate expectations being imposed causing the person frequently to feel frightened, or the exploitation or corruption of the person will also constitute emotional abuse.

Children who are emotionally abused may:
be overly-affectionate towards strangers or people they haven't known for very long
lack confidence or become wary or anxious
not appear to have a close relationship with their parent
be aggressive or nasty towards other children and animals
use language or act in a way or know about things that you wouldn't expect them to
struggle to control strong emotions or have extreme outbursts
lack social skills or have few, if any, friends

(iii) **Sexual Abuse** – Involving forcing or enticing a child, young person or vulnerable adult to take part in sexual activities whether or not they are aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts. For example it may also include involving the child or vulnerable adult looking at, or being involved in the production of, pornographic material or watching sexual activities, or encouraging the child, young person or vulnerable adult to behave in sexually inappropriate ways.

Children who are sexually abused may:
Stay away from certain people
Show sexual behaviour that's inappropriate for their age
Have physical symptoms

(iv) **Neglect** – Neglect is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development, or unresponsiveness to their basic emotional needs.

Children who are neglected may have:
Poor appearance and hygiene
Health and development problems

Housing and family issues

Other types of abuse include:

Psychological – repeatedly being made to feel unhappy, humiliated, and afraid or devalued by others

Financial or material – stealing or denying access to money or possessions

Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender sexual orientation, disability or cultural background

Child sexual exploitation - children are sexually exploited for money, power or status. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. It does not always involve physical contact and can happen online.

So-called 'honour-based' violence (HBV) - encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Radicalisation - the process by which a person comes to support terrorism and forms of extremism.

Other signs of abuse include:

Being withdrawn
Suddenly behaving differently
Anxiety
Being clingy
Depression
Aggression
Problems sleeping
Eating disorders
Taking risks
Missing school
Obsessive behaviour
Use of drugs
Use of alcohol
Self-harm

APPENDIX 6

Prevent Policy

Under the Counter Terrorism & Security Act 2015, you have a legal duty to prevent people of all ages being radicalised or drawn into terrorism.

Understanding the risk of extremism
Staff, students & other adults (group leaders, homestays etc.) may arrive at school already holding extremist views, or, whilst part of the school, they may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials via hardcopy or online, inspirational speakers, friends or relatives being harmed, social networks.
People who are vulnerable are more likely to be influenced.
Their vulnerability could stem from a range of causes: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, becoming a victim of hate crime or discrimination, bereavement.

Ways to counteract risks
Promote a safe and supportive international environment via clear expectations of accepted behaviours and those that will not be tolerated, including radicalisation and extremism.
Promote the core British values of (i) democracy, (ii) the rule of law, (iii) individual liberty
(iv) respectful tolerance of different faiths or beliefs.
Where possible, develop critical awareness and thought to counter accepting extremism without question, especially of online material.
Challenge radical or extremist views in any context, and then report concerns.
Be observant and vigilant in noticing any signs of radical or extremist behaviour.

Signs that may cause concern
Students talking about exposure to extremist materials or views outside school
Changes in behaviour, e.g. becoming isolated
Fall in standard of work, poor attendance, disengagement
Changes in attitude, e.g. intolerant of differences / having a closed mind
Asking questions about certain topics (e.g. connected to extremism)
Offering opinions that appear to have come from extremist ideologies
Attempting to impose own views/beliefs on others
Use of extremist vocabulary to exclude others or incite violence
Accessing extremist material online or via social network sites
Overt new religious practices
Drawings or posters (e.g. in accommodation) showing extremist ideology/views/ symbols
Students voicing concerns about anyone

How and when to react to concerns
All concerns, however small, should be reported in confidence to the

Your concern will be dealt with sensitively and carefully.

APPENDIX 7

Emergency Response Policy

Context of school and type of off-site visits that happen
Twin English Centre London (ECL) runs English language programmes for both adults and juniors throughout the year. Under 16s normally come as part of a group or with a responsible adult. 16/17 year olds may also come as individuals and join an adult programme.

Groups may have a social programme provided by Twin, which may or may not include a Twin Activity Leader. If they do not book a Twin social programme, this is organised independently by the Group Leaders.

Individuals may choose to take part in the Twin adult social programme. Some events on this programme are accompanied by a Twin Activity Leader, while others are not.

In July and August, a separate social programme is run for students on the Parent and Junior programme. All junior events are accompanied by a Twin Activity Leader.

Any student may be taken on a class outing by their teacher as part of their tuition programme.

This policy applies to all of the off-site visits except for those on the adult social programme that are not accompanied by a Twin Activity Leader. It also covers the response in the case that a major incident happens in London where there is the possibility that Twin students are involved, although not taking part in an organised visit.

Definition of an emergency
i) An incident where a student/ staff member/ anyone connected to the school has:
a) suffered a life-threatening injury or fatality
b) is at serious risk of the above
c) has gone missing for 30 minutes (juniors)
ii) An incident that is beyond the normal coping mechanisms of the team leading an off-site visit.
iii) A major incident (e.g. a terrorist attack, natural disaster, or riot) taking place at a location where Twin students may be present, although not on an organised visit (see section 6)

Pre-planning
i) All risk assessments must cover dealing with emergencies
ii) Alternative visit plans must be available
iii) A visit information pack is to be prepared for each visit, including:
names/ phone numbers for everyone
medical information for those with conditions or taking medication
nearest A&E hospital name, address and phone number
safe refuge locations
emergency response page
iv) Visits planned to minimise time at major transport hubs
v) Check students have any required medication before departure

Response at control centre
i) Immediate action
Board room at main school becomes the control centre
Principal assumes leadership role, or if absent, Head of Student Services, supported by Head of Operations
Clear control space and alert other members of the emergency response support team
Assess situation based on information given by visit leader

Check all members of group are accounted for/ safe/ adequately supervised (for children)

Immediately start log of events using prepared form

ii) Following action

Consider whether more staff are required at emergency site to accompany casualties to hospital/ replace injured staff

Go online to find and continually monitor information and help available in area of emergency

Ensure everyone (at emergency site and control centre) has sustenance to keep going

Keep communication lines open following guidance in section 7

All incoming calls about the emergency to be logged and responses recorded

If any students are unaccounted for, contact their Group Leaders/ agent/ parents/ homestay host to see if they have had any contact

Reroute any ongoing visits as appropriate

iii) Preparing for return of students

Ensure they will have food/ drink/ quick access to medication

Consider emotional needs of everyone involved and arrange for counselling if appropriate

Organise transport to accommodation

Inform all need to know contacts about the emergency and action taken, including homestay hosts so they can assist their students upon their return home.

iv) Post emergency

Rearrange any upcoming visits as appropriate

Ensure ongoing emotional support is available

Collect all records and compile in coherent way

Issue positive and reassuring bulletin to all stakeholders (day following emergency)

Do RIDDOR need to be informed? www.hse.gov.uk/riddor/reportable-incidents.htm

Review emergency procedure

Response at emergency site

i) Immediate action

Teacher/ Activity Leader/ assumes control, or if not present/ possible the Group Leader

The exact response will depend on the situation, for example:

during a terrorist attack staff and students should all 'Run, Hide, Tell' - get away from danger, try to find safe place, call emergency services

Leader should make sure all members of group are accounted for, safe and adequately supervised (if children)

If any students are unaccounted for, inform the emergency services at the scene if possible

Check the visit information pack for

names/ phone numbers for everyone

medical information for those with conditions or taking medication

nearest A&E hospital name, address and phone number

safe refuge locations

emergency response page

If anyone is injured, establish extent of injuries and give first aid if appropriate

Contact relevant emergency services.

If it is necessary for a student to go to hospital, ensure an adult accompanies them, taking full medical information and any medication. Inform control centre when this happens.

Do not contact parents/ agents/ any outside agencies; this should be done by control centre

Do not speak to media; refer them to the control centre

Do not allow photos

Control communication by everyone in group as far as possible: a call or text saying 'I'm ok' could be the best thing to do

ii) Subsequent action

Remain calm, measured and reassuring

Move group away from scene of emergency to safe refuge location

Keep records using the emergency log form
Maintain contact with control centre with frequent updates
Return the group to base as soon as is practical

Response to an emergency when it is not known whether Twin students are involved
Response will depend on gravity of incident and will be to the discretion of the Principal and/ or Head of Operations
If deemed necessary, the Principal, or, if not available, Head of Operations, sends a message to all students asking them to confirm that they are safe
After one hour, the Principal, Executive Head, Head of Operations, and other members of the emergency response support team are given lists of students who have not responded to try calling them. Group Leaders can be contacted directly to account for everyone in their groups.
If any students do not respond, try calling their homestay host
If after two hours any students are still not contactable, call the agent/ parents to see if they have had any contact
Continue to try to contact the student until successful.

Communication
i) Internal
Inform the Managing Directors
Send a quick email to all staff giving need-to-know information:
emergency procedures are in operation due to XXX incident
that they may be called on to cover
not to talk to anyone outside organisation, especially not media
that they will be updated as more news becomes available
ii) External
Prepare factual, honest and reassuring (if possible) statements to be communicated to next of kin/ agents preferably by phone
Depending on nature of emergency, other agents/ next of kin may need to be told that their students/ relatives are not involved in the emergency
iii) Students
Depending on nature of emergency, contact students as quickly as possible and find out if they are safe
As soon as it is practical and safe, make sure every student under 18 calls their parents and talks for a few minutes
iv) Others
Inform homestays, travel operators, legal support, etc. as appropriate
Only one person to deal with any media enquiries, using a prepared statement.

Training
i) Students
Simplified 'Emergency Procedures' in pre-arrival information, student handbook, and induction
ii) Group Leaders
'Emergency Procedures' in pre-arrival information, Group Leader handbook, and induction.
ii) Staff
'Emergency Procedures' in staff handbook and induction
All staff read this policy during onboarding
Refresher as part of annual safeguarding training

APPENDIX 8

Emergency procedure during excursions and group visits

Immediate response
Stay calm!
Get away from danger
Try to find safe place (safe refuge locations in visit information pack)
Call emergency services (999)

Take register
Make sure all members of group are present
If anyone missing:
Try to make contact (phone number in visit information pack)
Inform emergency services/ HQ
Check medical information and inform emergency services of any conditions

Injured students
Give first aid if appropriate
Ensure they are accompanied to nearest A&E (details in visit information pack)

Communication
Maintain contact with control centre with frequent updates
Control communication by everyone in group as far as possible

Other
Keep records using the emergency log form
Return the group to base as soon as is practical

Do not
Contact parents/ agents/ any outside agencies
Speak to media
Allow photos

APPENDIX 9

Schools E-safety Policy

1. Introduction
2. Scope of Policy
3. Policies and Practices
   3.1   Use of internet facilities, mobile and digital technologies
   3.2   Reporting abuse
4. Inspection and Standards
   4.1   Monitoring
   4.2   Sanctions
5. Appendices

Appendix 1: Twin Schools Social Media Policy

1.   Introduction
1.1   Twin Group recognises the internet and other digital technologies provide a vast opportunity for children and young people to learn. Unlike any other mode of technology, the internet and digital technologies allow all those involved in the education of children and young people to promote creativity, stimulate awareness and enhance learning.

1.2   As part of our commitment to learning and achievement we at Twin Group want to ensure that the internet and other digital technologies are used to:
- Raise educational standards and promote student achievement.
- Enable students to gain access to a wide span of knowledge in a way that ensures their safety and security.

1.3   Twin Group as part of this policy, holds steadfastly to the ethos that there should be an equitable learning experience for all students using ICT technology. We recognise that ICT can often allow SENDs students increased access to the curriculum and other aspects related to learning.

1.4   Twin Group is committed to ensuring that **all** its students will be able to use existing, as well as up and coming, technologies safely. We are also committed to ensuring that all those who work with children and young people, are educated as to the dangers that exist so that they can take an active part in safeguarding them.

The nominated person for the implementation of this policy is Sarah Morse (Executive Head).

2.   Scope of Policy
2.1   The policy applies to:
- all students;
- all group leaders
- all Twin staff

2.2   Twin Group will ensure that the following elements are in place as part of its safeguarding responsibilities to students:

- a list of authorised persons who have various responsibilities for E-safety;
- Safeguarding and Child Protection policy which includes relevant IT & Social Media section that is regularly reviewed and updated;
- adequate training for staff;
- adequate supervision of students when using the internet and digital technologies;
- education that is aimed at ensuring safe use of internet and digital technologies;
- a reporting procedure for abuse and misuse.

3.   Policies and Procedures

3.1   Use of internet facilities, mobile and digital technologies

3.1.1.   Twin Group will seek to ensure that internet, mobile and digital technologies are used effectively for their intended educational purpose, without infringing legal requirements or creating unnecessary risk.

3.1.2   Twin Group expects all staff, students and group leaders to use the internet, mobile and digital technologies responsibly and strictly according to the conditions below:[1]
Users shall not:

- Visit internet sites, make, post, download, upload or pass on, material, remarks, proposals or comments that contain or relate to:
  - o   Indecent images of children
  - o   Promoting discrimination of any kind
  - o   Promoting racial or religious hatred
  - o   Promoting illegal acts
  - o   Any other information which may be offensive to peers or colleagues.

3.1.3   Incidents which appear to involve deliberate access to websites, newsgroups and online groups that contain the following material will be reported to the Police:
- Images of child abuse (images of children whether they are digital or cartoons, apparently under 16 years old, involved in sexual activity or posed to be sexually provocative)
- Adult material that potentially breaches the Obscene Publications Act 1959 in the UK
- Criminally racist or anti-religious material
- Violence and bomb making
- Illegal taking or promotion of drugs
- Software piracy
- Other criminal activity

3.1.4   In addition, users may not:
- Use host institution/ host institution's facilities for running a private business;
- Visit sites that might be defamatory or incur liability on the part Twin Group or adversely impact on the image of Twin Group;
- Upload, download, or otherwise transmit (make, produce or distribute) commercial software or any copyrighted materials belonging to third parties outside of Twin Group, or to Twin Group itself;

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[1] For the purposes of this document, internet usage means any connection to the internet via web browsing, external email, news groups or messaging services, mobile technologies e.g. mobile phone, including Bluetooth applications, PDA's etc.

- Reveal or publicise confidential or proprietary information, which includes but is not limited to:
- financial information, personal information, databases and the information contained therein, computer/network access codes, and business relationships;
- Intentionally interfere with the normal operation of the Internet connection, including the propagation of computer viruses and sustained high volume network traffic (sending or receiving of large files or sending and receiving of large numbers of small files or any activity that causes network congestion) that substantially hinders others in their use of the Internet;
- Use the Internet for soliciting, representing personal opinions or revealing confidential information or in any other way that could reasonably be considered inappropriate.
- Transmit unsolicited commercial or advertising material either to other user organisations, or to organisations connected to other networks, save where the material is embedded within, or is otherwise part of, a service to which the member of the user organisation has chosen to subscribe.
- Assist with unauthorised access to facilities or services accessible via the institution/ host institution's network.
- Undertake activities with any of the following characteristics:
  - wasting staff effort or networked resources, including time on end systems accessible via the Twin Group network and the effort of staff involved in support of those systems;
  - corrupting or destroying other users' data;
  - violating the privacy of other users;
  - disrupting the work of other users;
  - using the institution/ host institution's network in a way that denies service to other users (for example, deliberate or reckless overloading of access links or of switching equipment);
  - continuing to use an item of networking software or hardware after Twin Group has requested that use cease because it is causing disruption to the correct functioning of Twin Group;
  - other misuse of the institution/ host institution's network, such as introduction of viruses.
- Use mobile technologies or mobile internet services in any way to intimidate, threaten or cause harm to others. Moreover, mobile technologies should not be used to access inappropriate materials or encourage activities that are dangerous or illegal.

3.2   Reporting Abuse

The following outlines what to do if a child or adult receives an abusive email or accidentally accesses a website that contains abusive material:

Any incidents must be reported to the Principal immediately. The Safeguarding Policy must be activated to ensure safeguarding of the child/vulnerable adult and the appropriate authorities must be informed. The disciplinary process will be activated as appropriate.

4.   Inspection and Standards

Twin Group recognises the need to have regular inspections of policies and procedures in order to ensure that its practices are effective and that the risks to students are minimised.

4.1   Monitoring

Twin will employ a range of monitoring strategies and systems to ensure compliance with this policy and intervene when issues arise:

4.1.1   Ensure there are web filtering systems in place to filter and block inappropriate websites.

4.1.2   Where possible, staff directly supervise children whilst using technology.

4.1.3   Staff investigate and intervene promptly in case of any incident or breach alert of the filtering system.

Twin recognizes the inevitable use of the internet and social media by students and the challenges of monitoring it. In addition to the above, staff are therefore trained to identify signs of cyberbullying and/or any online abuse.

4.2   Sanctions

4.2.1   Twin Group has been careful to develop in conjunction with its partners, policies and procedures to support the innocent in the event of a policy breach and enable the Group to manage such situations in, and with, confidence.

4.2.2   Where there is inappropriate or illegal use of the internet and digital technologies, the following sanctions will be applied:

- Students
    - o   Students will be disciplined according to the Student code of conduct. Serious breaches may lead to the incident being reported to the Police or other regulatory bodies, for instance, illegal Internet use or child protection concerns.
- Adult (Staff, Volunteers and Group Leaders)
    - o   The adult may be subject to the disciplinary process, if it is deemed he/she has breached the policy
    - o   Serious breaches may lead to the incident being reported to the Police or other regulatory bodies, for instance, illegal Internet use or child protection concerns.

4.2.3   If inappropriate material is accessed, users are required to immediately report this to the Principal, so this can be taken into account for monitoring purposes.

Appendix 1

SOCIAL MEDIA POLICY

Rationale

The widespread availability and use of social media applications bring opportunities to understand, engage, and communicate in new and exciting ways. It is important that we are able to use these technologies and services effectively and flexibly. However, it is also important to ensure that we balance this with our duties to Twin students, the community, our legal responsibilities and our reputation.

For example, our use of social networking applications has implications for our duty to safeguard our international students - children, young people and adults.

The policy requirements in this document aim to provide this balance to support innovation whilst providing a framework of good practice. They apply to all members of staff.

The purpose of the policy is to:

- Protect Twin from legal risks
- Ensure that the reputation of Twin and its staff is protected
- Safeguard all our students [children, young persons and adults]
- Ensure that any users are able clearly to distinguish where information provided via social media is legitimately representative of Twin

Definitions and Scope

Social networking applications include, but are not limited to: Blogs, Online discussion forums, Collaborative spaces, Media sharing services, 'Microblogging' applications, and online gaming environments. Examples include Twitter, Facebook, Windows Live Messenger, YouTube, Flickr, Xbox Live, Blogger, Tumblr, Last.fm, and comment streams on public websites such as newspaper sites.

Many of the principles of this policy also apply to other types of online presence such as virtual worlds.

All members of staff should bear in mind that information they share through social networking applications, even if they are on private spaces, are still subject to copyright, data protection and Freedom of Information legislation, the Safeguarding Vulnerable Groups Act 2006 and other legislation. They must also operate in line with Twin Safeguarding Policy.

Twin staff must not invite, accept or engage in communications with students in any personal social media whilst in employment at Twin. The following guidelines should be adhered to:

- Staff should not use personal email accounts or mobile phones to make contact with any current student of any age or any ex–student under the age of 18 nor should any such contact be accepted. Staff are advised not to use personal email accounts or mobile phones to make contact with other staff, or any members of Twin's community, for work-related purposes.
- Staff should not accept any current student of any age or any ex–student under the age of 18 as a friend, follower, subscriber or similar on any personal social media account

- Any communication received from students on any personal social media sites must be reported to a DSS
- If any member of staff is aware of any inappropriate communications involving any students in any social media, these must be reported immediately
- If any member of staff is aware of anyone accessing extremist/ terrorist websites or using social networks to exchange extremist/terrorist views, this must be reported immediately
- Staff are strongly advised to set all privacy settings to the highest possible levels on all personal social media accounts
- Staff are advised to avoid posts or comments that refer to specific, individual matters related to Twin and members of its community on any social media accounts
- Staff should not post photographs or videos of students on any social media accounts

There are many legitimate uses of social media for marketing purposes and to support student learning. For example, Twin has an official Twitter account. When using social media for marketing or educational purposes, the following practices must be observed:

- Staff should set up a distinct and dedicated social media site or account for educational purposes. This should be entirely separate from any personal social media accounts, and ideally should be linked to an official school email account.
- The URL and identity of the site should be notified to the Principal before access is permitted for students
- The content of any Twin sanctioned social media site should be solely professional and should reflect well on the company
- Staff must not publish photographs or videos of students without the consent of parents/carers (given in the parental consent form), identify by name any student featured in photographs, or allow personally identifying information to be published on school social media accounts
- Care must be taken that any links to external sites from the account are appropriate and safe
- Any inappropriate comments on or abuse of Twin sanctioned social media should immediately be removed and reported to the Principal
- Staff should not engage with any direct messaging of students through social media where the message is not public
- All social media accounts created for educational purposes should include a link to the school website. This will indicate that the account is officially sanctioned by Twin.

APPENDIX 10

Under 18 Procedures

All of the duties below are the responsibility of the Head of Student Services
These procedures are in place throughout the year for juniors in groups, but become even more important in July and August when we accept individual juniors.

Procedures for under 16s

1) Lanyards
 Students wear different coloured lanyards depending on their age as follows:
            10 – 13 red lanyards
            14 – 15 purple lanyards
            16+ white lanyards
This enables staff to quickly identify students requiring a higher level of supervision.

2) Parental consent forms
The Admissions team check all parental consent forms are saved on Class <u>and the section "For students under the age of 16" has been completed.</u> If forms are found to be missing, this is followed up with the agent/parent immediately.
Our policy is to only accept individual juniors under 14 if a responsible adult accompanies them to and from school. If a junior arrives at the school without this section of the form completed, inform the Principal immediately.

2) Induction
Individual U16s should join a junior group induction if happening on the same day. If not, a separate induction should be conducted (the student must not just join the adult induction). <u>In any case, the student must have a full junior induction.</u> U16s in groups will have their induction in their first class straight after the test.

3) Weekly welfare tutorials
Individual U16s have a welfare tutorial every week. A record is kept in <u>\\twinschool\files\Departmental Folders\English Centres\ECL\School Admin\Welfare\Under 18s\Welfare Tutorials</u>. Any problems must be addressed immediately.

4) Attendance monitoring
All individual U16s must sign in every morning. The sign-in sheet is generated every Friday and kept on the notice board next to the Head of Student Services' desk.
Teachers should report all absences after 15 minutes. As a belt and braces approach, the Head of Student Services checks all junior classes after half an hour. The Head of Student Services will try to contact any missing students, the group leader, the homestay host, the agent, and/ or the parent/ guardian to ascertain the reason for absence. If they cannot be accounted for, the police are contacted immediately.
If a teacher is found not to have reported a junior student absent, disciplinary action is taken.

5) Break supervision
Parents/ carers are informed through the parental consent form that they must not leave under 14s at the school before 8.45. After signing in, all U14s must sit in front of the student services area (in sight of the office) until the lesson begins. U14s must not leave the school during the break. Students aged 14/15 may go to the ground floor of the building or the courtyard, but should not leave the premises.
An intern or other staff member supervises all junior breaks. As a belt and braces approach, the receptionist must be made aware and asked to stop any U14s from leaving unaccompanied either during the breaks or after the lessons. To facilitate this, students aged 10-13, 14-15, and 16+ will all have different coloured lanyards.
A classroom is made available for all junior students for lunch.

6) Class outings
Teachers must not take U16s out of the building unless prior permission is obtained from the Principal.
In the case that a class outing is approved, a minimum of 2 adults must be present for U14s in case of emergency, and the supervision ratio of 1:15 must be respected. The adults supervising the activity must conduct a risk assessment. Students under 14 should not be given any free time during the outing, and must be accompanied to and from school.

Procedures for 16/17 year olds

1) Parental consent forms
The Admissions team check all parental consent forms are saved on Class. If forms are found to be missing, this is followed up with the agent/parent immediately.

2) Induction
Individual 16/17s must attend the full induction and then return for their own induction at 12.30. They must complete and sign a checklist, which is then saved at \\twinschool\files\Departmental Folders\English Centres\ECL\School Admin\Welfare\Under 18s\Inductions. Students that arrive late must still be given both inductions.
16/17s in groups will have their induction in their first class straight after the test.

3) Weekly welfare tutorials
Individual 16/17s have a welfare tutorial every Thursday. A record is kept in \\twinschool\files\Departmental Folders\English Centres\ECL\School Admin\Welfare\Under 18s\Welfare Tutorials. Any problems must be addressed immediately.

4) Attendance monitoring
All individual 16/17s are highlighted on the registers and teachers should report all absences after 15 minutes. The Head of Student Services will try to contact any missing students, the group leader, the homestay host, the agent, and/ or the parent/ guardian to ascertain the reason for absence. If they cannot be accounted for by the end of the school day, the police are contacted.
If a teacher is found not to have reported a junior student absent, disciplinary action is taken.

5) Class outings
16/17s are allowed to attend class outings but must be accompanied to and from the school by their teacher. The adults supervising the activity must conduct a risk assessment that includes specific risks for U18s.

6) Holidays
In order to spend the night somewhere else, 16/17s need permission from the school and a letter from a parent. If necessary a risk assessment will be completed.

APPENDIX 11

Whistleblowing Policy to Safeguard and Promote the Welfare of Children

<u>Policy Statement</u>

All staff and employees including temporary staff, volunteers, students, contractors or external partner agencies have a duty to express any concerns that they may have with regards to the conduct of any individual(s). The term 'staff' will hereafter include all of the wider workforce, as stated above.

Twin Group is committed to the highest standards of openness, integrity and accountability. All persons working for, or with this organisation, must feel safe and supported in order to express their concerns.

This policy document is intended to encourage and enable our staff to raise their concerns and to do so without fear of victimisation or discrimination. It does not replace the Complaints Procedure or the Safeguarding Policy or the organisation's standard procedures for reporting allegations or concerns about staff or volunteers.

The Public Interest Disclosure Act (PIDA) protects the public interest by providing a remedy for individuals who suffer workplace reprisal for raising a genuine concern, whether it is a concern about child safeguarding and welfare systems, financial malpractice, danger, illegality, or other wrongdoing. The concern may relate to something that is happening or has happened in the past. The PIDA covers all workers, including temporary agency staff. It does not cover the self-employed or volunteers. The Act also provides protection should individuals have difficulty gaining a reference from an employer because they have raised a concern. It makes it clear that any clause in a contract that purports to gag an individual from raising a concern that would be protected under the Act is void.

<u>Aims</u>

This policy aims to:

- Encourage adults working for or within the organisation to feel confident in raising concerns;
- Provide a process by which concerns can be raised and dealt with;
- Receive feedback on the process (where appropriate); and
- Provide a means by which staff can receive support where concerns have been raised.

<u>What does the safeguarding whistle blowing policy cover?</u>

This policy is designed to cover concerns that staff have about the conduct of individuals in a position of trust within the organisation which could be detrimental to the safety or wellbeing of young people and where staff, for whatever reason, *feel unable* to raise them under the organisation's standard child protection procedures around dealing with such allegations. It would include issues about:

- Unprofessional behaviour
- Bullying by staff
- Any form of abuse (physical, sexual, emotional or neglect)
- Name calling
- Personal contact with children and young people which is contrary to the organisations policies and codes of conduct
- Any form of racial abuse

- Inappropriate sexualised behaviour
- Knowledge about an individual's personal circumstances which may indicate they could be a risk to children or unsuitable to work with children

Please be mindful that these are examples of concerns, and are not exhaustive.

Safeguarding against harassment or victimisation

Twin is committed to professional standards and to supporting staff. It is recognised that the decision to report a concern is a difficult one to make. Harassment or victimisation will not be tolerated and Twin will take appropriate action in order to protect the person raising the concern when they are acting in good faith.

Confidentiality

All concerns will be treated in confidence, however, there may be a need for the whistle blower to give evidence e.g. if they have witnessed a crime or in regard to disciplinary procedures if this is the outcome.

Anonymous allegations

This policy encourages staff to raise concerns to be identified in doing so as part of their professional role/responsibility. However, anonymous allegations will be investigated as thoroughly as possible.

False allegations

If staff raise a concern in good faith which is not confirmed by an investigation, no action will be taken. However, if a concern is raised maliciously, disciplinary action may be taken.

How to raise a concern

Staff should normally raise their concerns with the Designated Safeguarding Lead (DSL) or another member of Designated Safeguarding Staff (DSS). In certain circumstances, staff may feel they are unable to follow the organisation's standard procedures e.g. because they feel their position in the organisation would be in jeopardy, they would be subject to intimidation, or that the person of concern is the designated manager to whom they should report such matters and there is no one senior to refer to. They should then contact a more senior member of management or, if this is not possible, the Local Safeguarding Children Board directly:

Greenwich Safeguarding Children Board,
First Floor,
The Woolwich Centre,
35 Wellington Street,
London SE18 6HQ
tel: 0208 921 4477
email: safeguardingboard@greenwich.gov.uk or safeguardingtraining@greenwich.gov.uk
web: http://www.greenwichsafeguardingchildren.org.uk/site/index.php

LSCB Independent Chair: Nicky Pace, nickyjpace@gmail.com

Acting LSCB Manager: Dan Timariu, dan.timariu@royalgreenwich.gov.uk

LSCB Administrator: lorraine.harry, lorraine.harry@royalgreenwich.gov.uk

The Local Safeguarding Children Board should also be contacted in circumstances when the matter has been raised under appropriate organisation procedures for referring child protection concerns, but the referrer considers that the manager has not taken the concerns seriously or acted appropriately with relation to them.

When following the Whistleblowing Policy, concerns may be shared verbally, but should also be recorded in writing by completing an incident report form.

Staff may wish to invite their trade union representative to be present during any subsequent interviews.

<u>How Twin will respond:</u>

Twin will respond to any allegations following this procedure:
- Where appropriate, see the student is offered support
- Decide what action to take based on the allegation
- If necessary, contact the Local Safeguarding Children Board, and follow the advice and suggested actions they provide
- Whilst a complaint is being investigated, the member of staff will be suspended, and if the complaint is upheld, they will be dismissed and any relevant authorities informed immediately

Within 10 working days of a concern being raised the referrer will receive a written response from the responsible person which will:
- Acknowledge that the concern has been received;
- Supply information on relevant support mechanisms
- Advise whether further investigations will take place; or
- Advise that no further action has taken place and why.

<u>Who to contact</u>

Designated Safeguarding Lead
Sarah Morse (Executive Head)
smorse@twinuk.com
020 8269 5669

If it is felt that it would be unsafe for any reason to share concerns with the named person from your organisation the following are appropriate contacts with whom to discuss your concerns:

Daniela Hierzer (Summer Centres Senior Activity and Welfare Manager)
dhierzer@twinuk.com
020 8269 5666

Pamela Nwogbe (Head of Student Services)
pnwogbe@twinuk.com
020 8269 5667

Joanne Sayer (Operations and HR Director)
jsayer@twinuk.com
020 8269 5680

Mariola Rzeszowska (Head of Seasonal Schools)

mrzeszowska@twinuk.com
020 8269 5675

Other support

NSPCC Whistleblowing Helpline 0800 028 0285

APPENDIX 12

SEND Policy

Twin ECL operates a Special Educational Needs & Disabilities (SEND) policy. Students and/or their parents are strongly urged to declare any specific learning requirements, special needs, or physical disabilities at the application stage, and again on the booking form. In cases where the student is accepted, the teacher(s) will be informed and steps will be taken to help the student. These may include:

- modifying classroom materials (within reasonable expectation)
- provision of classroom materials in large print
- use of a computer
- allocation of extra time and rest breaks during tests
- individualised homework

If a special need or disability is not disclosed pre-arrival, but one is identified after arrival at Twin, then the teacher should discuss their concerns with the SEND coordinator who will decide what action needs taking.

For all SEND students, a risk assessment is carried out, and all staff involved informed, both verbally and in written instructions, of any necessary action need or precautions arising. In all cases, support given mirrors as closely as possible the support given in the student's home country.

Twin recognises the fact that SEND students may be more vulnerable to the risk of abuse, and teachers and safeguarding officers are extra vigilant for signs of such.

Language Difficulties

Twin recognises that most students will have language difficulties as international students are, by definition, non-native speakers.

Learning Difficulties

Severe learning difficulties

Twin does not cater for international students with severe learning difficulties. We have neither the resources nor the expertise to provide adequate provision in such cases.

Twin asks prospective students about SENDs on the booking form. If a prospective student has severe learning difficulties then Twin advises them that we cannot cater for their needs and will suggest an alternative provider if appropriate.

Moderate learning difficulties

Twin will have a consultation process with any prospective student who indicates moderate learning difficulties on the pre-booking questionnaire. A decision will then be made as to whether to accept the student based on each individual case. If we feel that we are not able to accept the student, we will suggest an alternative provider if appropriate.

Mild learning difficulties

Twin accepts students with mild learning difficulties and indicates these on ILP documents to enable teachers to be aware of them, and to consider them both in terms of learning goals and classroom management. Teachers are given any extra support or resources necessary to help the student make the most of their time at Twin.

Students with literacy problems

If a student has a severe imbalance between their communicative skills of speaking and listening, and their reading and writing, then extra tuition may be provided at a cost to be discussed with the Principal on a case by case basis.

Students with behavioural problems

Our policy reflects the fact that the vast majority of students behave impeccably. Our aim is to focus on what students do well, and thus minimising attention given to 'inappropriate' behaviour.

For 'inappropriate' behaviour there is a clear procedure. This starts with the classroom teacher first addressing the issue, and then referring the student to the Assistant Head of School if the problems continue. If this fails to solve the problem, the Head of School will intervene. As a last resort, the school has the right, at the discretion of the directors, to cancel a student's course without any refund.

Juniors

If there is a problem with a junior student/s in a closed group, the above procedure is applied. However, the group leader is expected to be fully involved in the process at all stages. Should the case be deemed serious enough, parents/guardians will be informed at all stages through emails and phone calls.

Help and support

Teachers and students can find additional support and discuss their concerns with the SEND co-ordinator:

Sarah Morse (Executive Head)
smorse@twinuk.com
020 8269 5669

If the SEND co-ordinator is unable to advise, help will be sought from an organisation specific to the SEND (National Dyslexia Association, Royal National Institute of Blind People, British Deaf Association etc.).

APPENDIX 13

TET Student Safeguarding Procedures

Twin English Centre London (ECL) shares its premises with Twin Employment and Training (TET). TET uses the facilities to provide training and services for jobseekers and young people aged 16+. These procedures are in place to ensure that under 18s on ECL programmes (referred to here as ECL juniors) are safeguarded from any potential risks posed by TET students.

1) Timetables and break times
TET timetables are shared with the ECL team and the registers are available at reception. TET programmes start half an hour later than ECL programmes and finish one hour earlier, to avoid the two student groups entering and leaving the premises at the same time. TET break times are held at separate times to ECL juniors. A classroom is made available to junior groups for lunch, and junior individuals must leave at 12.30.

2) Classrooms
TET are assigned six classrooms which are towards the end of the corridor. ECL juniors are normally taught in the classrooms located closest to the student services office and furthest away from the TET classrooms. TET students are not allowed to enter ECL classrooms and vice versa, even if they are empty.

3) Identification of students
All ECL students wear lanyards, with under 16s having different colours to 18+. All TET students wear visitor badges and sign in at reception. All students have an ID copy on file.

4) TET tutors
All TET tutors are DBS checked. All undergo safeguarding training which specifically refers to all measures outlined above and appropriate adult/ junior interaction.

5) TET student induction
The TET student induction includes specific guidance regarding interaction with U18s.

APPENDIX 14

Staff Code of Conduct for online delivery

In the event of delivering sessions via virtual means, staff and volunteers must:

- Wear suitable clothing.
- Use computers in appropriate areas and against a neutral background (e.g. avoid using a computer in the bedroom).
- Use language that is appropriate, respectful, and inclusive at all times.
- Don't smoke or vape during online sessions.
- Don't drink alcohol before or during online sessions.
- Switch off mobile phone.
- Keep hands in view on table.
- Stick to the session's content and don't share personal information.
- Ensure you are the first and last person to enter and leave the virtual room (students shouldn't be able to be in virtual room without a teacher present).
- Don't allow students to share their screens and disable private chat function.
- Before students enter the waiting room they must have their real first name displayed.
- Use a Twin account to set up the online session. All scheduling needs to be done by Twin HQ staff and not individual teachers.
- Expect HQ staff members to drop into sessions unannounced for safeguarding purposes.
- Take register and report missing U18s.
- Should the student begin to display inappropriate behaviour, end session quickly and inform line-manager what has happened and why.

APPENDIX 15

Student Code of Conduct for online lessons

When attending sessions online, students must:

- Wear suitable clothing.
- Use computers in appropriate areas and against a neutral background (e.g. avoid using a computer in the bedroom).
- Don't smoke or vape during online sessions.
- Don't drink alcohol before or during online sessions.
- Switch off mobile phone.
- Keep hands in view on table.
- Display your real first name before entering the waiting room.
- Use language that is appropriate, respectful, and inclusive at all times.
- Do not send offensive, violent, sexual or any other form of inappropriate material. If this occurs, you will be removed from the session and your parents will be contacted. If the material is of a violent or sexual nature the police may need to be contacted.
- Do not, under any circumstances, record or screen shot online sessions. Doing this is a serious breach of the Data Protection Act 2018 and will lead to parents/carers being notified.