



SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

A. Policy Statement

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 Dublin (ECD) 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.

A1 Terminology

Safeguarding: *caring for children appropriately and protecting them from that which is not in their best interest.*

Child Protection: *protecting children from abuse.*

Abuse: *all forms of physical and/or emotional ill treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.*

All Adults: *refers to all adults who are working with the children (including group leaders, homestay hosts and transport providers).*

Designated Liaison Person: *On site member of staff responsible for day to day child welfare concerns.*

Minor: *Person under 18 years old.*

A2 Statement of Commitment:

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



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We recognise that the welfare of the Minor is paramount and we will endeavour to safeguard Minors, in compliance with the *Children First Act (2015)*, by:

- Valuing them, listening to and respecting them;
- Adopting child protection guidelines through procedures and a code of conduct for all adults;
- Appointing both a Designated Liaison Person for dealing with child protection concerns and a Deputy;
- Recruiting staff and homestay providers safely, ensuring all necessary checks are made;
- Providing effective staff management, through recruitment policies, supervision, support, training and Garda Vetting;
- Sharing information about child protection and good practice with all.
- Sharing information about concerns with relevant agencies and involving parents and Minors appropriately.
- Requiring the parents of all Minors attending our regular courses to complete a student agreement & consent form before arrival.
- Informing group leaders of our policies, rules & regulations and requiring them to act in loco parentis.

A3 Policy Review

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

This policy will be reviewed each time an incident is reported or every 2 years if that is sooner, by the DLP and the management team.

The key relevant points of the policy are explained to all young learners upon arrival and there are posters in each centre that reiterates this information. Details of the DLP, management team and key staff members are provided to each student upon arrival.

A4. Adults' Responsibilities:

This Policy applies to all Alpha College members of staff including directly employed staff, homestay hosts, accommodation and transport providers, and anyone working on behalf of Alpha College of English. All adults are expected to read and abide by the policy and procedures set out in this document.

B. Code of Conduct

B1. Overview:

The purpose of the policy is to provide protection for Minors, and to provide staff with guidance on procedures they should adopt if they suspect a Minor may be experiencing, or be at risk of harm.

We expect all adults working on behalf of Twin English Centre Dublin to act as excellent role models for all students in their care and to cultivate a respectful, safe and secure environment for staff and students.

B2: Safe Environment:

- All Twin English Centre Dublin personnel hired to work directly with Minors are Garda Vetted prior to commencing employment; hold a Child Protection certificate and have received training as part of their induction.
- All Twin English Centre Dublin Young Learners personnel wear a Twin English Centre Dublin badge including their name and title as long as they are on campus.
- Twin English Centre Dublin Young Learners personnel are aware of the Visitor's Policy and ensure the Visitors Sign-in Sheet is kept up-to-date. Any visitor to the Twin English Centre Dublin Young Learners sites is encouraged and required to sign in at the Twin English Centre Dublin office.

B3: Interaction:

- Maintain professional physical and relationship boundaries, and act in a way appropriate to your Duty of Care;
- Do not make suggestive or inappropriate remarks to or about any adult or Minor. Inappropriate remarks include innuendo, swearing and discussing their or your own intimate relationships.
- Other than in exceptional circumstances do not communicate directly with Minors via email or text messages and only then with prior consent from the child's parent or guardian.
- Do not engage in behaviour that may be construed as "grooming" a Minor for example giving money, presents or favours or talking or behaving in an inappropriate manner.
- Avoid putting yourself in a situation where you are on your own with a Minor as far as possible.
- Conduct all interactions in a calm manner, and avoid shouting at Minors wherever this is possible unless there is a Health & Safety risk.
- Ensure physical contact within clear boundaries to avoid any allegations of inappropriate touching.
- If you are required to be in a one-to-one setting with a Minor, consider how this can be managed effectively,
 - o i.e. considering if the one-to-one setting is really necessary, leaving a door open, using a room that has a window in the door and positioning yourself within sight of the door.



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- Do not socialise with Minors outside of school organised events.

B4: Appropriate Appearance:

Adults should present an appearance which:

- Promotes a positive and professional image;
- Is appropriate to their role;
- Is not likely to be viewed as offensive, revealing or sexually provocative;
- Does not distract, cause embarrassment or give rise to misunderstanding;
- Is absent of any political or otherwise contentious slogans;
- Is not considered to be discriminatory.

B5: Alcohol, Drugs and Smoking:

- Do not consume, or allow a Minor to consume any alcohol, drugs, cigarettes or intoxicating substances on school premises.
- Do not provide alcohol, drugs, cigarettes or intoxicating substances to Minors.
- Do not work or be present on school premises while under the influence of any intoxicants or drugs.

B6: IT and Social Networks:

- Do not share your personal social media details with any Minor.
- Do not take any images or videos of Minors on your personal recording equipment.

B7: Accommodation:

- Abide by the accommodation rules and guidelines in your local centre. For details please refer to your staffhandbook and your induction.
- Do not enter private areas without first gaining the student's permission, or in the case of needing to search property, without informing them first and doing so in their presence.

B8: Transport:

- All transport providers, whether staff or contractors, to have appropriate suitability checks



C. Child Protection Procedures

C1: Responding Procedures:

In the event of any concerns reported to any member of staff of Alpha College, the adult should:

- Follow the guidelines outlined in C1.1 (below);
- Report immediately to the Line Manager or DLP;
- Explain concerns and the reasons behind them;
- The DLP will advise the adult on the next step.

Under no circumstances should a Minor be left in a situation that exposes him or her to harm or risk pending Child & Family Agency intervention. In the event of an emergency and the unavailability of a Duty Social Worker, the DLP will contact An Garda Síochána.

C1.1. How to respond to a child or young person telling you about abuse

When someone talks to you about alleged abuse, remember you are **not** investigating the situation, just listening. If a Minor discloses abuse, remember this may be the beginning of a legal process, as well as a process of recovery for the Minor. Legal action against a perpetrator can be seriously damaged by any suggestion that the Minor's words have been influenced in any way by the person they told.

The following guidance should be followed as far as possible:

- Rather than directly questioning the Minor, just listen and be supportive.
- Never stop a Minor who is freely recalling significant events, but don't push them to tell you more than they wish.
- Do not promise to keep the information a secret. Rather you must inform the Minor that you will have to share this with the person responsible for their safety and with your DLP.
- You may wish to ask a senior member of staff to join you to provide additional support, backup & verification of the conversation.
- Write an account of the conversation immediately afterwards, as close to verbatim as possible. Make a note of what the Minor actually said, using his/her own words and phrases.
- Describe the circumstance in which the disclosure came about.
- Where physical harm is being reported use a body map to indicate the location of cuts, bruises and abrasions, noting the colour of any bruising.
- Hand your record to your Line Manager, or DLP who will contact the local children's social care office where appropriate.



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C2. Contact Details:

The DLPs for Twin English Centre Dublin are:

Marianne Curci, Young Learners Manager: +353 851360053. Deputy DLP:

For Alpha College: Dublin North (Inner City)	
Duty Social Work Department: 492 North Circular Rd, Parkview, Dublin 1. Tel.: 01 8566856 Office Hours: 9am - 5pm	An Garda Síochána: Mountjoy Garda Station, 399, North Circular Road, Dublin 7 Tel: + 353 1 666 8682

For Twin English Centre Dublin Residential Centre: Dublin West	
Duty Social Work Department: Bridge House, Cherry Orchard Hospital, Ballyfermot, Dublin 10. Tel.: 076 6955587 Office Hours: 9am - 5pm	An Garda Síochána: Lucan Garda Station, Main street, Lucan, Co. Dublin Tel.: +353 1 666 7300

For Twin English Centre Dublin Homestay Centre: Dublin South	
Duty Social Work Department, Our Lady's Clinic, Patrick Street, Dun Laoghaire, Co. Dublin. Tel.: 01 6637300 Office Hours: 9am - 5pm	An Garda Síochána: Dundrum Garda Station, Kilmacud Road Upper, Dundrum, Dublin 14 Tel.: +353 1 666 5600

Not all concerns will meet the reasonable grounds for concern. In this case, the concern and any informal consultation will be documented and kept confidentially and securely.

The DLP will inform the member of staff, volunteer or student who raised the concern that it is not being referred in writing, indicating the reasons. The DLP will advise the individual that they may make a report themselves or contact the Duty Social Work Team.



C3. Recording Procedures

- All serious concerns communicated to the DLP will be responded to on the same day whenever possible, or the following day at the latest.
- All information regarding allegations of abuse or safeguarding concerns is recorded in writing and securely filed by the DLP.
- Access to the safeguarding file is only available to the DLPs and Directors of the school, and any official outside agency as appropriate.
- A summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be noted on the person's confidential personnel file. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It may also be considered if future allegations are made.
- Details of allegations that are found to be malicious should be removed from personnel records.

C4. Confidentiality Statement

- All information regarding a concern or assessment of child abuse or neglect should be shared on 'a need to know' basis in the interests of the Minor with the relevant statutory authorities.
- No undertakings regarding secrecy can be given. This is made clear to all adults working with Alpha College, although they can be assured that all information will be handled taking full account of legal requirements.
- The provision of information to the statutory agencies for the protection of a Minor is not a breach of confidentiality or data protection.
- Information gathered for one purpose must not be used for another without consulting the person who provided that information.

C5. Procedures for Dealing with Allegations of Abuse against a member of staff

The DLP will work with the Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the Minor.

C6. Procedures for Dealing with Allegations of Abuse against a student

The DLP will work with the Appropriate Social Work Department for advice on appropriate actions to take to ensure the safety of the Minor.



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C7. Procedures for shared facilities between adults and minors

In the instance when we have minors sharing facilities with adults:

- The DOS will try to ensure that minors and adults classes are held in different buildings.
- Where the above is not possible, minors' and adults' breaks will not take place at the same time.
- Minors will be supervised in shared facilities at all times, either by their English Language Teacher, their group leader or a member of Alpha College staff.
- All Alpha members of staff are aware that minors should be left unsupervised while on the premises.

Any unsupervised minors should be taken immediately to the main office or DLP.

Reference: Tusla.ie

Last Updated: 02/05/2019. MC & ML.