

INTO 

LONDON

WORLD EDUCATION CENTRE

Recognised by more than 100 UK universities, our students have progressed to a wide range of universities including:



SAFEGUARDING & CHILD PROTECTION POLICY

November 2019

Safeguarding Policy

Introduction

INTO London recognises our responsibility to protect children and vulnerable adults in the course of their studies at the centre. This policy has been put together to ensure all staff and students, regardless of their age, race, gender, etc., are provided with a safe environment for their duties and studies. All adults working at the centre, including staff, volunteers, group leaders, accommodation staff, are required to abide by this policy.

This policy will be reviewed annually or more frequently if required, by the Designated Safeguarding Lead. INTO London Student Services Team is also the Welfare Team for the centre. The team is in charge of daily practical operations of safeguarding. The team normally reports to a Head of Student Services but is currently reporting to the Centre Director whilst the position is vacant. During this period, the Student Services Team Leader is the designated Welfare Officer for the Centre. The Centre Director is the Designated Safeguarding Lead. The Academic Director and Student Services Team Leader are Designated Safeguarding Persons, acting as Designated Safeguarding Lead in the absence of the Centre Director. If any safeguarding concerns or suspicious cases arise, they should be reported to Designated Safeguarding Lead.

Definitions

- A “child” is referred to a person under the age of 18.
- A “vulnerable adult”, broadly speaking, is someone aged 18 or over who, for any reason, may be unable to take care of themselves or protect themselves against significant harm or exploitation.
- “Safeguarding” is used as a generic term meaning “looking after” someone; “child protection” means to protect someone under the age of 18 from direct harmful behaviour.

Associated policies and documents

Other policies and documents, such as U18s policy, Child Protection Policy, Alcohol and Drugs Policy, Missing Student Policy, Staff Handbook(s), Local Operational Manual and Student Handbook, are referred to within this policy. They are available on INTO London Moodle or on request.

Code of Conduct

INTO London does not tolerate inappropriate behaviour from either staff or students and believe all should be treated with respect and should not be subject to any kind of abuse. The below lays out guidelines and areas that all adults working with children and vulnerable adults at the centre need to be aware of in order to create a safe school culture and environment. More details can also be found in the IUP and INTO London Local **Staff Handbooks** and **Student Handbooks**.

In all dealings with children and vulnerable adults, INTO London expect all staff, including group leaders, volunteers, homestay hosts, and students to:

- Respect people's right and their personal privacy;
- Use appropriate and respectful language;
- Be aware of and respect possible cultural differences;
- Challenge inappropriate or unacceptable behaviour and/or report to the designated senior member of staff;
- Report any allegation or suspected case to the Designated Safeguarding Lead;
- Maintain professionalism and keep clear boundaries;
- Be aware of company guidelines and policies set out for protecting both staff and students by reading staff and student handbooks, attending training and briefings as required and asking questions if they are unsure of anything

Please note that this list is not exhaustive and all staff and students should apply appropriate conduct at all times.

Personal interaction

- Physical contact should be avoided and is usually unacceptable
- If engaging in sporting activities, it should be in accordance with the national governing body (NGB) guidelines. More details can be found on <https://thecpsu.org.uk/help-advice/>.
- All staff should dress in accordance with the guidelines set out in the IUP Handbook.
- Any contacts on social networks or social media platforms should maintain professionalism and clear boundaries. Please also refer to **Social Media Policy** set out in the **IUP UK Employee Handbook**.
- Staff should never take photos of students on their personal phones
- Staff and students should not share accommodation or be involved in private social events.
- If alone with a child or vulnerable adult, doors should be kept open or the space is transparent, for example, with see-through glass windows or doors.
- In situations where a member of staff does not feel comfortable or shows concerns at meeting a child or vulnerable adult alone, the meeting should be conducted with a third party in presence, ideally, the DSL or one of the DSP's.
- Staff should not drive students in their own vehicles. In most cases, the Centre makes use of public transport for social events etc. but the Centre holds an account with a taxi service who use only DBS checked drivers if this is required. These can be booked via the Student Services Team or PA and Project Co-ordinator.
- If arranging taxis or coaches for children or vulnerable adults, certified companies and DBS checked drivers are used.
- All staff and students should be aware of the rules and regulations around alcohol, drugs and smoking either at the premises, accommodation or other public areas, especially when there are children in presence. Further details can be found in INTO London **Alcohol and Drugs Policy**.

Child Protection

INTO London has a separate **Child Protection Policy**, which details the following:

- INTO London's commitment to ensure the centre functions with a view to safeguarding and promoting the welfare of children receiving education at the centre;
- The Designated Safeguarding Lead with responsibility for child protection at the centre and their contact details;
- Details of Designated Safeguarding Persons and their contact details.
- Definitions of abuse and procedures for identifying and reporting cases or suspected cases;
- How to deal with a child telling a member of staff about possible abuse, including allegations against another member of staff;
- How records are kept and being in line with data protection, GDPR and confidentiality;
- Procedures and actions to take if a member of staff is accused.

Training

- INTO London will ensure all staff are required to complete training appropriate to their role in relation to safeguarding, child protection and *Prevent*.
 - All staff will have access to Level 1 Safeguarding and Prevent training as part of their induction process, via either online or face-to-face training and to *Prevent* training.
 - Designated member(s) of staff will be trained to Levels 2 or 3, which is conducted face-to-face.
 - Safeguarding training must be updated every 2 years as a minimum, *Prevent* every 3 years.
- All staff will receive a copy of this policy as well as of the **Child Protection Policy and be required to sign to say read and understood**.
- All staff will have information accessible to them regarding appropriate behaviour and conduct, which is also included in the **IUP UK Employee Handbook**.

Safer Recruitment

INTO London staff recruitment is the responsibility of relevant line management and is supported by centrally by HR. A more detailed description of the approach can be found in Centre's Recruitment Policy in the INTO London **Local Staff Handbook**. The process and materials used by HR and hiring managers aim to ensure all staff working in the centre will:

- Have appropriate and satisfactory* Enhanced DBS checks;
- Have been interviewed and their references checked as far as practically possible to a satisfactory level before start date;
- Have their identity checked before start date;
- Have shown original copies of their qualifications prior to start date.

- Have had gaps in their CV followed up satisfactorily at interview before any offer of employment is made.

All offers of employment are conditional upon meeting the above requirements.

**In cases where the member of staff's disclosure has a criminal record, the centre director and/or another designated senior member of staff will consult with HR to carry out a risk assessment and make final decision on whether the person is suitable for the post.*

In rare circumstances where a member of staff does not hold an appropriate DBS check, e.g. still awaiting the result, prior to their commencement to working with children/vulnerable adults, the below will be followed:

- Staff in question will have a List 99 check carried out to confirm their suitability to begin work.
- The DBS check will have been submitted, even if not yet returned.
- Have been interviewed and their references checked as far as practically possible to a satisfactory level before start date;
- A risk assessment will be carried out by the hiring manager to consider and assess the risks associated with them commencing employment. The risk assessment will be discussed with the Designated Safeguarding Lead and arrangements approved prior to the employee commencing work.
- No regulated activity will be conducted.

Welfare/Implementing Safeguarding

INTO London aims to ensure that appropriate and suitable arrangements are put in place for safeguarding children and vulnerable adults at the centre.

Risk assessments

INTO London ensures risk assessments for the below are carried out where appropriate and necessary and records are kept on file. Please also refer to INTO London **Local Operational Manual** for further guidance.

- INTO London centre and its building;
- INTO London contracted student accommodation;
- In-house social activities and events;
- Off-site social activities, events and excursions.

Supervision ratios

For any on- or off-site activities or events, risk assessments are carried out in advance and the number of students under the age of 18 or any vulnerable adults will be identified. Staff in charge will then make sure the staff and children/vulnerable adults ratio is kept at 1 : 10.

Missing students

INTO London has a **Missing Student Policy**, which details on how to identify and report it as a case of student missing, either in class, on-site, off-site on activities or during excursions, etc. It lays out the procedures and communication that follow. This also includes situations when students under the age of 18 not meeting their curfew hours, either at INTO London managed accommodation or homestay.

Welfare provision

All students are given opportunities at the time of applying for their course and again when they arrive in the Centre to register to disclose their age and/or any disability or medical condition that may deem them as either children or vulnerable adults. Students are further encouraged to do so during their induction and orientation programme and in the Student Handbook.

If students are identified as children at the point of entry onto their courses, INTO London **U18 Policy** will be applied and a copy provided to both the child and their parents/appointed guardian prior the student's arrival along with the course offer letter. Parents are required to sign consent form giving their permission for the student's study and living arrangements whilst in the UK.

Once the student arrives at the centre, a the Designated Safeguarding Lead will arrange to meet with all students under the age of 18 and explain what the centre has put in place for them and what is expected of them. Students sign the u18 policy after they've completed this session to confirm they've read and understood it.

INTO London also provides an airport transfer service, which is compulsory for all students under the age of 18, for their arrival pick-up and departure. If students wish to opt out the service, a written confirmation from their parent(s)/appointed guardian is required with details of the person meeting the student at the airport and their arrival date and time.

Students may disclose information that deem them as vulnerable adults either prior or after their arrival at the centre. Usually, it's advisable for them to disclose before they arrive if conditions are known, so that the centre can make suitable adjustment and arrangement in advance. The centre also understands in certain cultures or some circumstances, students may not realise their conditions, which will possibly be noticed by their teachers or other staff after they start their study programmes. A detailed referral procedure can be found in the INTO London **Local Operational Manual**. In both scenarios, INTO London will be able to utilise resources and advice from University of Gloucestershire as well as our contracted private consultant, The Thinking Space, to assess and support students.

U18 behaviour and Discipline

Please see **U18 Policy** and **Student Handbook** for details of their expected behaviour and procedures if any disciplinary action is taken against them.

Health and Safety

A detailed **Health and Safety Policy**, which includes fire safety and first aid provision, is included in the INTO London **Employee Safety Handbook** and **Addendum to INTO London H&S Handbook**.

Prevent

INTO London is committed to the safeguarding of its students from extremist materials and organisations and employs advanced web filtering. INTO London has a *Prevent* Policy, a *Prevent* Action Plan and an External Speaker Policy (combined as **Appendix 9**) and is committed to the 'Channel' process.

Appendix 6 – Child Protection Policy

General Policy Statement

INTO is committed to, and has a statutory and moral duty to ensure that each Centre functions with a view to safeguarding and promoting the welfare of children receiving education at each Centre. The definition of 'children' is those students under the age of 18. INTO recognises that some adults are also vulnerable to abuse. Accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. This policy underpins all our pastoral and academic responsibilities to our students and should be considered alongside other related policies and procedures in place for students and staff. Such policies can be found in the Student and Staff Handbooks. The Joint Venture Board / Management Committee will have ultimate responsibility and accountability for ensuring a safe learning and working environment for all our students and staff in each Centre. The policy applies to all staff, managers, volunteers and consultants working for INTO University Partnerships. The main elements and aims of the policy are as follows:

- To promote good practice and raise awareness of child protection issues amongst all INTO staff, managers, volunteers and consultants in order to provide a safe environment in which all children can learn and develop;
- To promote awareness of the designated senior members of staff with Child Protection responsibility within each Centre, and at Senior Executive/Director level across the Company;
- To provide INTO staff with relevant training in order to make informed and confident responses to specific child protection issues;
- To develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse;
- To ensure that INTO practices safe recruitment in checking the suitability of staff to work with children.

1. Promoting Good Practice – Guidelines

- 1.1. All employees are encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations.
- 1.2. All children regardless of age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse.
- 1.3. All employees should treat all students equally with respect and dignity.
- 1.4. It is important to understand that strong emotions can be aroused by certain child abuse situations, however it is vital that these feelings do not interfere with one's judgement about the appropriate action to take.
- 1.5. All employees should work to establish and maintain an environment where children feel secure, are encouraged to talk, and listened to.
- 1.6. All employees are required to make written records of concerns about children, even where there is no need to refer the matter immediately, and pass these to a designated person.
- 1.7. All employees have a crucial role to play in identifying welfare concerns and indicators of abuse and neglect at an early stage.
- 1.8. All visitors must be signed in and out of the Centre and must be escorted when on the premises.

- 1.9. All employees have a crucial role to play in helping identify welfare concerns, and indicators of possible abuse or neglect, at an early stage.
- 1.10. All staff should be aware of their duty to raise concerns about the actions or attitudes of their colleagues under the Whistleblowing policy (see IUP Staff Handbook). We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 1.11. The policy and practice of our Child Protection policy is made with reference to the Government Guidelines “Working Together to Safeguard Children” 2018. These guidelines will be adhered to as Best Practice in respect of procedures and responding to any issue. All designated staff will be required to be very familiar with the content of this document. **All staff** will be required to be familiar with the content of Part I, Keeping Children Safe in Education, 2019.

2. The Designated Staff with Responsibility for Child Protection

- 2.1. The designated senior member of staff with lead responsibility for Child Protection issues at each Centre is the Centre Director. The Centre Director / Deputies will receive appropriate training and support for this role, and all INTO staff will be made aware of this contact.
- 2.2. This person will take lead responsibility for raising awareness amongst employees within their Centre of issues relating to the welfare of children and young people, and the promotion of a safe environment within the Centre.
- 2.3. This person will also be responsible for ensuring the employees in their Centre know how to respond appropriately to situations/issues as they may arise in their Centre and will ensure that their employees are also working in a “safe environment”.
- 2.4. This person is responsible for:
 - 2.4.1. Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies (whether that be a Section 17 ‘child in need’ or a Section 47 ‘significant harm’ referral).
 - 2.4.2. Providing advice and support to other staff on issues relating to child protection.
 - 2.4.3. Maintaining secure storage of all referrals, complaints or concerns, separately from the student file.
 - 2.4.4. Ensuring that this policy is accessible to parents of children and/or young people on request.
 - 2.4.5. Liaising with appropriate agencies, including Children’s Services, local police, Designated Officer (previously Local Authority Designated Officer or LADO) and health professionals and, where necessary, attending Child Protection conferences.
 - 2.4.6. Ensuring that all staff are provided with appropriate training and are aware of the policy and procedures and conduct themselves appropriately including the Joint Venture Board / Management Committee.
 - 2.4.7. Ensuring that all suspicion and allegations of abuse are taken seriously and responded to swiftly and appropriately.
 - 2.4.8. Ensuring that appropriate child protection risk assessments are undertaken and any issues are addressed.
 - 2.4.9. Ensuring that each staff member has access to and understands the establishment’s Child Protection policy (especially new or part-time staff who may work with different educational establishments).

- 2.4.10 Ensuring that, when a child leaves the Centre, their Child Protection file is copied for any new establishment as soon as possible but is transferred separately from the main file.
 - 2.4.11 Ensuring that the Centre undertakes an annual review of all Child Protection issues which have arisen during the previous year (in September), prior to the annual updating of the Child Protection policy.
 - 2.4.12 Ensuring that the Centre's Child Protection policy is updated and reviewed annually (working with the Joint Venture Board / Management Committee regarding this task).
- 2.5. The Centre Director/Deputies is also responsible for appointing at least one other employee with responsibility for Child Protection issues within the Centre. These would normally be the Head of Student Services (or an appropriate equivalent) at each Centre. These designated staff members:
- 2.5.1. Report to the senior member of staff with lead responsibility.
 - 2.5.2. Will know how to make an appropriate referral.
 - 2.5.3. Will be available to provide advice and support to other staff on issues relating to child protection.
 - 2.5.4. Have particular responsibility to be available to listen to children and young people studying at the Centre.
 - 2.5.5. Will deal with individual cases, including attending case conferences and review meetings as appropriate.
 - 2.5.6. Will receive appropriate training and support for this role.
 - 2.5.7. Ensure appropriate risk assessments are undertaken and any issues are addressed.
- 2.6. INTO has also nominated the SVP UK Operations & Partnerships to take overall responsibility for promoting Child Protection and ensuring that the policy and processes are executed and reviewed appropriately.

3. Relevant Training for INTO Staff

- 3.1. INTO will ensure that all staff understand the responsibility placed on the company and individuals in relation to child protection and responsibilities and are provided with sufficient training and support in the area.
- 3.2. This training will help employees to analyse their own practice against established good practice, recognise their responsibilities and report any concerns about suspected poor practice or possible abuse, respond to concerns from a child, and to work safely with children.
- 3.3. All staff will have access to advice and guidance on safeguarding and on the boundaries of appropriate behaviour and conduct. These matters will form a significant part of staff induction.
- 3.4. Annual face-to-face safeguarding training will be arranged to supplement online training and to ensure that staff have an opportunity to refresh training every second year. *Prevent* training will also be provided annually, with the expectation that it be refreshed not less than every 3 years. Relevant staff will attend face-to-face Level 2 / 3 training provided by appropriate organisations, again to be refreshed, but every 2 years.

4. Defining Abuse and Procedures for Identifying and Reporting Cases or Suspected Cases.

- 4.1. **INTO recognises the following as definitions of abuse:** *(Please note that this list is not exhaustive and any suspected cases reported will, where necessary, only have information gathered by the designated senior member of staff prior to reporting to the relevant external agencies).*
- 4.1.1. **Physical Abuse** - Physical abuse causes harm to a child's person. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
 - 4.1.2. **Neglect** – Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may involve a failure to provide adequate food clothing or shelter, failing to protect a child from physical harm or danger, failing to ensure adequate supervision or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to, a child's basic emotional needs.
 - 4.1.3. **Sexual Abuse** – Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant. The acts may involve physical contact including penetrative or non penetrative acts. They may involve non-contact activities such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
 - 4.1.4. **Emotional Abuse** - Emotional abuse occurs where there is persistent emotional ill treatment or rejection such as to cause severe and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self worth. It may involve conveying to children that they are worthless or unloved, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all forms of abuse, though it may occur alone.
- 4.2. **If a child or young person tells a member of staff about possible abuse:**
- 4.2.1. Treat the matter seriously and keep an open mind.
 - 4.2.2. Listen carefully and stay calm.
 - 4.2.3. Do not interview the child, although it may be necessary to seek clarity using open questions. DO NOT put words into the child's mouth.
 - 4.2.4. Reassure the child that by telling you they have done the right thing.
 - 4.2.5. Inform the child you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
 - 4.2.6. Note the main points carefully and make detailed notes of the date, time, place, persons present, what the child said and did, what you asked etc. Ensure you sign and date this initial record.
 - 4.2.7. Immediately report to the designated person. DO NOT try to investigate concerns yourself and DO NOT tell others about the matter.
 - 4.2.8. Please note that if concerns are raised regarding a designated person, members of staff can make a direct referral to the Children's Services emergency duty team or local police

and/or inform the Designated Officer (formerly LADO). Please see guidance overleaf
(Reporting and dealing with allegations of abuse against members of staff).

4.3. Reporting and dealing with allegations of abuse against members of staff:

- 4.3.1. Once the designated person has received the accusation they must follow the following guidelines and as outlined in Working Together to Safeguard Children 2018.
 - 4.3.1.1. Assess whether the allegation is serious enough to refer on to local agency/social services.
 - 4.3.1.2. DO NOT investigate the matter with the member of staff, child concerned or potential witnesses.
 - 4.3.1.3. Obtain written details of the concern/allegation, signed and dated by the person who received the allegation (not the child/adult making the allegation).
 - 4.3.1.4. Countersign and date the written details.
 - 4.3.1.5. Record any information about times, dates and location of incident(s) and names of any potential witnesses.
 - 4.3.1.6. Record discussions about the child and/or member of staff, any decisions made, and the reasons for the decision.
 - 4.3.1.7. If an allegation requires immediate attention, but is received outside normal office hours, the designated senior manager should consult the Children's Services emergency duty team or local police and/or inform the Designated Officer (formerly LADO) as soon as possible.
 - 4.3.1.8. Refer the case to the Designated Officer (formerly LADO) within 1 working day. Referral should not be delayed in order to gather information and a failure to report an allegation or concern in accordance with procedures is a potential disciplinary matter.
 - 4.3.1.9. As soon as possible after an allegation is made or a concern of suitability is raised, the designated person should inform the parent(s) or carer(s) of the child/ren involved. The Designated Officer (formerly LADO) should be consulted first to ensure that this does not impede the disciplinary or investigative processes. In some circumstances, however, the parent(s)/carer(s) may need to be told straight away e.g. if a child is injured and requires medical treatment.
 - 4.3.1.10. The parent(s)/carer(s) and the child, if sufficiently mature, should be helped to understand the processes involved and kept informed about the progress of the case and of the outcome where there is no criminal prosecution. This will include the outcome of any disciplinary process, but not the deliberations of, or the information used in, a hearing.
 - 4.3.1.11. Advice should first be sought from the Designated Officer (formerly LADO), police and Children's Services who may want to impose restrictions on the information that can be provided. However, the principle is that INTO should, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body.
- 4.3.2. The accused member of staff should:
 - 4.3.2.1. Be treated fairly and honestly and helped to understand the concerns expressed and processes involved.
 - 4.3.2.2. Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process.
 - 4.3.2.3. If suspended, be kept up to date about events in the workplace.

In all cases the relevant regulatory bodies for the setting should be informed of the allegation and the outcome.

4.4. **Confidentiality**

- 4.4.1. Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents and accused person up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.
- 4.4.2. Paper records will be kept in the Head of Student Services' office (which is secured on a different lock from all other offices, with only the HoSS and Centre Director / Deputies having access). Electronic records to be stored in a secure Box folder, with only the Head of Student Services and Centre Director / Deputies to have access. Records will be maintained indefinitely (this period will be subject to review).

4.5. **Support**

- 4.5.1. INTO will work together with Children's Services and/or police, where they are involved, and consider the impact on the child concerned and provide support as appropriate. Liaison between the agencies should take place in order to ensure that the child's needs are addressed. INTO will also ensure that our students are not disadvantaged by language limitations and will ensure that an independent interpreter is available as appropriate.
- 4.5.2. As soon as possible after an allegation has been received, the accused member of staff should be advised. Human Resources should be consulted at the earliest opportunity in order that appropriate support can be provided for the employee via the organisation's occupational health or employee welfare arrangements.

4.6. **Suspension**

- 4.6.1. Suspension is a neutral act and it should not be automatic. It should be considered in any case where:
 - 4.6.1.1. There is cause to suspect a child is at risk of significant harm, or
 - 4.6.1.2. The allegation warrants investigation by the police, or
 - 4.6.1.3. The allegation is so serious that it might be grounds for dismissal
- 4.6.2. The possible risks to children should be evaluated and managed in respect of the child/ren involved and any other children in the accused member of staff's home, work or community life.
- 4.6.3. If a strategy discussion is to be held or if Children's Services and/or police are to make enquiries, the Designated Officer (formerly LADO) should canvass their views on suspension and inform INTO. Only INTO, however, has the power to suspend an accused employee and they cannot be required to do so by a local authority or police.
- 4.6.4. If a suspended person is to return to work, INTO should consider what help and support might be appropriate e.g. a phased return to work and/or provision of a mentor, and also how best to manage the member of staff's contact with the child concerned, if still in the workplace.

4.7. **Resignations and 'compromise agreements'**

- 4.7.1. If an employee tenders his or her resignation, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with these procedures. INTO will make every effort to reach a conclusion in all cases of allegations bearing on the safety or welfare of children even where the employee concerned refuses to co-operate with the process. Wherever possible, the person will be given a full opportunity to answer the allegation and make representations about it. Where an employee resigns it may be difficult to reach a conclusion and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete. However the Company will always endeavor to record and reach a conclusion wherever possible.
- 4.7.2. Compromise agreements – by which a person agrees to resign and the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference – will never be used in such cases.

The above circumstances will not prevent a thorough police investigation where appropriate, nor can it override our statutory duty to make a referral to Disclosure & Barring Services where circumstances require that.

5. Safe Recruitment of Staff

5.1. INTO will ensure that as part of its recruitment policy all staff working in the Centre:

- 5.1.1. Will have appropriate DBS checks PRIOR to the start date as far as is practically possible. If the result is not received before commencement of employment, the member of staff will need to have a Children's Barred List check carried out to confirm their suitability to begin work.
- 5.1.2. Will have been interviewed, and reference checked as far as practically possible to a satisfactory level PRIOR to start date.
- 5.1.3. Will have had their identity checked PRIOR to start date.
- 5.1.4. Will have seen documentary evidence of their qualifications PRIOR to start date.
- 5.1.5. All offers of employment are conditional upon meeting the above requirements.

6. Contact Details

6.1. INTO London World Education Centre

- 6.1.1. INTO London Designated Safeguarding Lead –
Kirsty McConaghy, kirsty.mcconaghy@intoglobal.com, 0203 6915600;
- 6.1.2. INTO London Designated Safeguarding Persons
Robin Peel robin.peel@intoglobal.com, 0203 6915603
Rouzana Rashid, Rouzana.rashid@intoglobal.com, 0203 6915600;
- 6.1.3. INTO University Partnerships – Sarah Williamson 01273 665209

6.2. Tower Hamlets Designated Officer (formerly LADO)

LSCB Manager – Monawara Bakht (monawara.bakht@towerhamlets.gov.uk)

6.3. Police

- 6.3.1. Police Child Abuse Investigation Team (CAIT) – 020 82176484
- 6.3.2. Multi-Agency Safeguarding Hub (MASH) – 020 7364 2972 /2904/5601/5606
- 6.3.3. Out of Office Hours (9.00am – 5.00pm) – 020 7364 4079
- 6.3.4. In an emergency could ring 999

6.4. Training

<http://www.childrenandfamiliestrust.co.uk/the-lscb/training/>
Central Services Training Administrator – 020 7364 1126.

6.5. **Child Protection Advice Line** – 020 7364 3444