

# Kaplan International Dublin Child Safeguarding Statement

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## **A. POLICY STATEMENT**

Kaplan International Languages is an English Language School with 11 schools across the UK and Ireland in the following locations; Bath, Bournemouth, Cambridge, Dublin, Edinburgh, Liverpool, London Covent Garden and a 30+ School, Manchester, Oxford and Torquay. All schools (except London 30+) accept students from the age of 16 years old. The Bath and Torquay schools also offer courses for Young Learners, aged 12 and over, both as individuals (summertime) or as closed groups (year-round). All schools also have accreditation to take closed groups of students aged under 16 years old, this is rare and requires specific ad-hoc risk assessment.

Kaplan International Languages offers homestay and residential accommodation. Residential accommodation is available to all students over the age of 18 with the exception of Bournemouth which is also available to students aged 16 or 17. Homestay is available to everyone but under 18s must stay either in homestay or, provided they have their parents' consent, private accommodation.

This policy applies to all students of Kaplan International Languages who are under the age of 18 years.

Kaplan International Languages recognises its responsibility to safeguard and promote the welfare of children. The safeguarding legislation is set out in the Children First Act 2015.

There is also very useful guidance given by the following which have informed the contents of this policy: *Children First: National Guidance for the Protection and Welfare of Children (2017)*, and *Tusla's Child Safeguarding: A Guide for Policy, Procedure and Practice*.

In accordance with the requirements of the Children First Act 2015 and Children First: National Guidance for the Protection and Welfare of Children 2017, Kaplan International Languages has agreed the Child Safeguarding Statement set out in this document.

Sarah/Siohban please check we are quoting the correct legislation we say National Guidance 2011 latest is 2017

Kaplan International Languages recognise our responsibility to safeguard and promote the welfare of Under 18s, within the Irish legal framework and criteria of our educational oversight and accrediting bodies. We endeavour to ensure that we provide a safe, positive and pleasant study and home environment for all our students. In ensuring this, it is essential that parents and students provide us with details of any known medical conditions they may have. All Kaplan International Languages teams work hard to give all our students the most positive study experience they can have, but we show an additional duty of care towards our students who are legally minors. Whilst we cannot, and do not, aim to take the place of these students' parents, we monitor them more closely than other students and require all parents of Under 18s to sign a Consent Form. Parents need to be aware that students studying at Kaplan International Languages will be in an adult environment and enrolled in an adult context.

**Kaplan International Languages understands that the safety of Under 18 students is paramount to Kaplan International Languages and we have put in place specific measures to ensure that students are in a safe environment.**

This policy applies to **all** students under 18 years regardless as to their race, gender, religion, nationality, ethnicity etc.

This guidance is for the use of **all** staff, contractors, volunteers and visitors who come into contact with under 18s all of whom have a responsibility to safeguard them.

Under 18s also have a responsibility to look after each other and raise concerns with adults if necessary.

The school has a responsibility to ensure that:

- Students are listened to, valued and respected;
- Staff are aware of the need to be alert to the signs of abuse and know what to do with their concerns;
- All paid and unpaid staff are subject to rigorous recruitment procedures;
- All paid and unpaid staff are given appropriate support and training.

It is the responsibility of **all Adults** to tell the Kaplan International **Designated Liaison Officer** and the **Mandated Person** at the School if there is a concern that a student might be at risk or is actually suffering abuse.

The Kaplan International Languages Designated **Designated Liaison Officer** is Sue Edwards and she can be contacted via email [sue.edwards@kaplan.com](mailto:sue.edwards@kaplan.com)

The name of the **Mandated Person** can be found on posters throughout the Schools and within the induction materials. They are also contained within the school specific Appendix to this Policy.

All Mandated Persons must undergo specific safeguarding training and be aware of all statutory guidance including that mentioned above entitled Children First: National Guidance for the Protection and Welfare of Children 2011 It is the responsibility of the Mandated Person to make themselves available for consultation by staff, volunteers, visitors and students.

***It is the responsibility of all Adults to act immediately upon all child protection concerns relating to students.***

This policy should be read alongside the following policies and guidance which are relevant to Kaplan International Languages's responsibility to safeguard and promote the welfare of students under the age of 18:-

- Kaplan International Languages Dublin Safeguarding Policy – Covid 19 appendix
- Crisis Support Policy
- Terror Attack Guidance
- Supervision Policy
- Social Media Policy

- Kaplan International Languages CCTV Policy
- U18s Living in Private Accommodation
- Staff Handbook
- Teacher Handbook
- Policy for Employees without current Garda vetting
- Recruitment Process
- Reference Check Procedures
- Accommodation Manager Standards
- Homestay Recruitment Guide
- Homestay Handbook
- U18 Rules and Conditions for Hosts
- U18 Contract
- U16 and U18 Consent Form
- Tour Leader Rules and Responsibilities
- Excursion Guidelines
- Anti-Bullying Policy for Students
- Complaints Procedure
- E-Safety Policy
- Health and Safety Policy
- Red Alert Policy
- Yellow Alert Policy

### Terminology

This policy refers to the following roles which are detailed below –

**Director of Studies** – Responsible for the academic side of a student’s course including allocating teachers and students to classes, testing students, hiring and training teachers and advising students.

**Student Services Manager** – Responsible for the administrative side of a student’s stay including checking visas and passports, collecting emergency contact details and taking payments. Also provides advice on the student’s life in their new country including opening a bank account and buying mobile phone credit. Typically responsible for collecting student feedback at the start and end of their course.

**Accommodation (& Welfare) Manager** – Responsible for the provision of Kaplan accommodation in homestay or residence as well as organising airport transfers for before and after the student’s course. Is also typically the Local Designated Liaison Officer (see below) and point of contact for all welfare issues (please see Appendix for more information).

**Social Programme Manager** – Responsible for the student’s leisure programme during their time with Kaplan. Organises trips and activities inside and outside of the school. Also sells tickets for local sporting or cultural events. Creates risk assessments for all trips provided by the school.

**Academic Support Manager** – Permanent teaching staff who also assume responsibility for various out of classroom roles including social programme.

**Principal** – Responsible for the overall management of the school, health and safety and compliance. Line manager of the above 5 roles.

**Director of Operations** - Person responsible for strategic direction of the UK and Ireland region and for the running of all Kaplan International Languages schools in the UK and Ireland.

**Mandated Person**- The person responsible for safeguarding students aged under 18 years old throughout the School and report externally if required to Tusla.

**Local Designated Liaison Person** – This person will be the resource for any staff who has any child protection concerns and ensure that internal reporting procedures have been followed.

**Designated Liaison Officer**- The person responsible for ensuring that reporting procedures within the organisation are followed and child welfare and protection concerns are referred promptly to Tusla.

The following terms are also frequently used –

**Child protection** - Protecting those under 18 from direct harmful behaviour.

**Garda Vetting**– An Ireland criminal record check done against the National Vetting Bureau. All checks done by Kaplan International Languages includes any information held by the Garda considered relevant to working with under 18s as well as the standard criminal record check.

**Duty of care** - An obligation to ensure the safety and wellbeing of others.

**Level 1 safeguarding training** - A foundation certificate in safeguarding children.

**Tusla**- The statutory bodies with primary responsibility for child welfare and protection.

**Minor** - A person under the age of 18.

**Safeguarding** - Umbrella term meaning 'look after'.

**U18** - A person under the age of 18.

More information can be found on the separate **Safeguarding Policy Glossary** if required.

This policy will be reviewed every 12 months and will be signed off by the Director of Operations and Senior Director of Compliance and Accreditation

This policy will be made available to the parents and hosts of the students to whom we offer a service. The full version is available publicly on Kaplan International Languages website:-

<https://www.kaplaninternational.com/faq-categories/under-18s> alongside a shorter statement on Under 18s under the FAQ's section of the website. A hard copy of the policy is also available at each school.

## **CODE OF CONDUCT**

All staff, contract workers and volunteers are responsible for students while on the school premises. Outside of the school premises they are also responsible if they have been designated to supervise an

organised school activity or if the Under 18 is travelling to and from the centre on a Kaplan International Languages organised transfer service.

This Code of Conduct is to enable trust to be built between Under 18s and adults and to assist in the creation of a safe school culture where both adults and Under 18s are protected from any behaviour or actions that could be misconstrued.

Adults are expected to act as excellent role models to our students in all aspects of their working duties, for example by being dressed appropriately when on school premises or carrying out school duties, by using appropriate language and challenging any inappropriate language used by a young person, student or adult working with young people, and by respecting a young person's right to privacy.

The following constitutes Kaplan International Languages **Code of Conduct for Safeguarding**:-

i. General

- No member of staff should be left alone with an U18/young person where they cannot be observed by others;
- Physical contact between adults and under 18's is usually not acceptable except in extenuating circumstances;
- It is an offence under the Sexual Offences Act 2003 for any person in a Position of Trust to engage in sexual activity of any sort with students under the age of 18 even though the legal age of consent is 16;
- Under no circumstances should visitors be allowed access to the premises unaccompanied when students who are under 18 are present;
- Where possible there should always be at least two adult members of staff present with a group of students under the ages of 16 (see **Kaplan International Languages Supervision Policy**);
- Staff should be alert to strangers frequently waiting outside school premises with no apparent purpose;
- Students receive an U18 contract at induction and have regular U18 meetings;
- There should be regular welfare slots at team meetings for updates;
- No member of staff should make contact with a student under the age of 18 on social media either before, after or during the student's course of study (please see the **Social Media Policy** for further details);
- Socialising with students outside of school at activities or events which are not arranged by Kaplan is permitted provided all of the students in the group are over 18. For groups containing students under the age of 18, authorisation must be sought in advance from the principal. Socialising with individuals under the age of 18 is not permitted without prior authorisation.

ii. Attendance Monitoring & Reporting

- U18s are identifiable on registers and a list of U18 students is sent to all school departments each week.
- Online Registers are completed ten minutes into each class.
- An Attendance Monitor checks registers and will locate any missing U18 students.
- Agents and parents are informed if an U18 student's attendance drops below 85% or causes concern.

iii. Outings Trips & Transfers

- All vehicles hired for outings must be insured, roadworthy and fitted with seatbelts.
- All drivers should travel with at least one escort. Drivers and escorts should have up to date DBS

checks and should have been subject to appropriate recruitment procedures. All drivers and escorts should agree to abide by these guidelines.

- Roll call will be taken at the start of a journey and again before commencing the return journey; if traveling in more than one vehicle, students will be encouraged to travel in the same vehicle there and back.
- Staff accompanying trips will carry the contact numbers for the school (including the emergency phone) and emergency services in the event of an alert being necessary.
- If a student under the age of 18 goes missing while on a trip, staff should instigate an immediate search. If the student cannot be found supervising staff should consider notifying the appropriate security staff and/or the Garda.
- If, having notified security staff and the Garda, the student cannot be found, the parents/carers of the student will be notified immediately.
- The care of the remaining students is paramount. It is imperative that they return to the school as quickly as possible, while a senior staff member remains at the visit site to co-ordinate contact between security staff and the student's parents/carers.

#### iv. Alcohol and drugs

Kaplan International Languages is committed to ensuring that the use of alcohol and drugs does not have an adverse effect on the working and social conditions of students, staff and visitors. Kaplan International Languages recognises that alcohol and drugs may play a part in the lives of some people and this section is designed to inform students and staff of Kaplan's policy in relation to these issues.

Drugs and alcohol are not permitted on school premises under any circumstances (other than alcohol bought by staff or the school and stored or consumed in the school during staff social events outside of school opening hours). Staff or students found carrying either, drugs or alcohol whilst at school will be subject to disciplinary action.

The following are not permitted and could lead to expulsion and/or the involvement of the Garda –

- Possessing illegal drugs
- Selling or supplying illegal drugs
- Drinking alcohol if under the age of 18
- Supplying an under 18 with alcohol

If a student under the age of 18 is found to be involved with any of the above the parents of the student should be informed and a warning or expulsion letter issued.

Support is available to anyone requiring advice on or suffering from any of the issues mentioned above from a Mandated Person or school Principal.

**Much of the more specific aspects of the Code of Conduct are contained in the guidance and policies listed above including the Staff, Teacher and Homestay Handbooks.**

#### v. Whistleblowing

Whistleblowing is an important aspect of a safeguarded institution whereby staff and volunteers are encouraged to share concerns about a colleague's behaviour in confidence, with the School or Safeguarding Officer, line manager or senior manager or Head Office HR as appropriate.

Working with vulnerable groups including minors and young people places staff and volunteers



in positions of power. In order to retain the trust of vulnerable people, it is essential that all reasonable steps are taken to ensure this power is exercised responsibly.

There may be situations whereby staff or volunteers have concerns about the conduct of a colleague towards a participant. All members of Kaplan International Languages have the right and the responsibility to raise concerns, without prejudice to their own position, about the behaviour of staff, managers, volunteers, students or others, which may be harmful to those in their care and will receive appropriate support when doing so.

Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers. Refer to Kaplan’s **Whistleblowing Policy** for further details.

Checklist for Whistleblowing: -

What to do if you wish to raise a concern:

PLEASE DO:	PLEASE DO NOT
Raise the matter as soon as possible if you feel your concerns are warranted	Do nothing. The School would prefer you to raise your concerns so that we can carry out a full and fair investigation
Report your concerns or suspicions to whoever has the appropriate authority to deal with them	Be afraid of raising your concerns. The School has safeguards in place to protect staff that raise a concern
Be assured that the School will take seriously concerns raised based on honest and reasonable suspicions	Try to investigate the matter yourself. This may complicate any later enquiries, particularly if a criminal investigation becomes necessary
Familiarise yourself with the whistle blowing procedure	Approach or accuse any individuals directly
Consider writing down the key points and details as to why you are concerned	Tell your suspicions or concerns to anyone other than those with the proper authority

What to do if receive a concern:

PLEASE DO:	PLEASE DO NOT
Be fully responsive to staff concerns and seek appropriate guidance	Ignore the concerns raised
Respect principles of confidentiality when dealing with staff	Approach or accuse any individuals directly
Take detailed notes of the information; including all details in relation to the matter of concern	Tell your suspicions or concerns to anyone other than those with the proper authority

Evaluate the allegation objectively	Try and investigate the matter yourself
Report this to Director of Operations who will in turn inform the Head Office SMT, HR and legal team	Do nothing- staff should feel able to communicate their concerns freely and in confidence
Deal with the matter promptly and as a matter of priority	Delay the speed of response

#### vi. Low Level Concerns

A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a “nagging doubt” – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct.

The term ‘low level’ does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm.

Any low level concerns should be:

- Raised with the line manager/Mandated Person/Local Designated Liaison Person (as appropriate)
- Addressed as soon as possible in order to support individuals to correct inappropriate behaviour at an early stage
- Dealt with sensitively and proportionately
- Used to update and improve the safeguarding policy

Examples of low level concerns include:

- Being over friendly with children
- Having favourites
- Taking photos of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

### C. CHILD PROTECTION

#### i. Recognising signs of abuse

It can often be difficult to recognise signs of the abuse which young people and students under 18 years may experience in their lives. Our duty of care at Kaplan International Languages includes looking out for and flagging any possible signs or indicators of abuse. The signs listed in this policy are only indicators and it should be borne in mind that they can have reasonable explanations. Students may behave strangely or seem unhappy for many reasons, as they move through the stages of their lives or their families experience changes. As well as exhibiting signs, students under the age of 18 and young people may tell you of

abuse that is happening or has happened in their lives. Always listen to the young person and follow the guidelines and procedures below, and those set out in the safeguarding training you have received.

If you are worried about a student, it is important that you speak to your Mandated Person or Principal and keep a written record together of any behavioural signs or physical symptoms you have noticed.

#### Signs of Physical Abuse

- Bruising (including finger mark bruising);
- Bites, burn and scald marks; small round burns that could be caused by a cigarette;
- Fractures;
- Large numbers of scars of different sizes or ages;

#### Signs of Emotional Abuse

- Excessively clingy or attention-seeking behaviour;
- Very low self-esteem or excessive self-criticism;
- Excessively withdrawn behaviour or fearfulness;
- Aggression or other challenging behaviour manifestations;
- Despondency;
- Lack of appropriate boundaries with strangers; too eager to please;
- Eating disorders and other disorders such as OCD or excessive anxiety;

#### Neglect

- Inadequate supervision, being left alone for long periods of time;
- Lack of stimulation, social contact or education;
- Inadequate nutrition, leading to ill-health;
- Constant hunger; stealing or gorging food;
- Failure to seek or to follow medical advice such that a student's life or development is endangered;
- Inappropriate clothing for the conditions;
- Misuse of alcohol or drugs;

#### Signs of Sexual Abuse

- A student under the age of 18 who is inappropriately sexually provocative or seductive with adults or other students or displays inappropriate sexualised behaviour more generally;
- Repeated sleep disturbances through nightmares and/or bed wetting;
- Allegations or disclosure;
- Genital soreness, injuries or discomfort;
- Sexually transmitted diseases;
- Urinary infections;

*Young people may additionally exhibit:*

- Depression;

- Drug and/or alcohol abuse;
- Eating disorders; obsessive behaviours;
- Self- mutilation; suicide attempts;
- School/peer/relationship problems;

Note that challenging behaviours in classes, on social activities, on school premises and or noted by homestay providers should be seen as possible symptoms of a wider issue for a student under the age of 18 years and every effort should be made to support the minor as a disciplinary approach may not be appropriate in all instances for challenging or disruptive behaviour. Kaplan International Languages Team members should do their utmost to provide a holistic approach when responding to challenging behaviours. At Kaplan International Languages we aim to support our teams working with young people in providing a young person or child-centred approach.

Some members of our communities hold beliefs that may be common within particular cultures but which are against the law in Ireland. Kaplan International Languages does not condone practices that are illegal or harmful to students under the age of 18 years. Examples of particular practices are:

- Forced Marriages - No faith supports the idea of forcing someone to marry without their consent. This should not be confused with arranged marriages between consenting adults.
- Under-age Marriages - In England, a young person cannot legally marry or have a sexual relationship until they are 16 years old or more
- Female Circumcision - This is also known as FGM or Female Genital Mutilation. This is against the law yet we know that for some in our communities it is considered a religious act and a cultural requirement. It is also illegal for someone to arrange for a student under the age of 18 years to go abroad with the intention of having her circumcised or subjected to FGM.
- Ritualistic Abuse - Some faiths believe that spirits and demons can possess people (including those under the age of 18 years). What should never be condoned is the use of any physical violence to get rid of the possessing spirit. This is physical and emotional abuse and people can be prosecuted even if it was their intention to help the young person.

### **Radicalisation**

Radicalisation is a process where a person, often from a vulnerable background begins to adopt extreme political, religious, or social views and through these engage in extremist activity. Their views will often be formed through misguidance, misunderstanding, jealousy, anger, a 'sense of injustice', resentment or fear.

The following are some signs that could mean somebody could be at risk of radicalisation or is going through a radicalisation process:

#### **Physical changes:**

- Sudden or gradual change in physical appearance
- Suddenly or unexpectedly wearing religious attire
- Getting tattoos displaying various messages

- Unexpectedly shaving their head (skinhead)
- Possessing unexplained gifts and clothing (groomers will sometimes use gifts such as mobile phones and clothing to bribe a young person)

**Social changes:**

- Cuts ties with their friends, family or community
- Starts to become socially withdrawn
- Becoming dependent on social media and the internet
- Begins to associate with others who hold radical views
- Bullies or demonises other people freely
- Begins to attend rallies and demonstrations for extremist causes
- Associates with known radicals
- Visits extremist websites, networks and blogs

**Emotional Changes**

- Begins to complain, often with anger, about governmental policies, especially foreign policy
- Advocates violence or criminal behaviour
- Begins to believe in conspiracies
- Exhibits erratic behaviour such as paranoia and delusion
- Speaks about seeking revenge
- Starts to exhibit extreme religious intolerance
- Demonstrates sympathy to radical groups
- Displays hatred or intolerance of other people or communities because they are different

If staff do become aware of, or see signs of conflict, aggressive or extreme behaviour or opinions held by a student or group of students then the member of staff should inform the School Principal.

Kaplan International Languages takes safeguarding very seriously, therefore we have put the following measures in place;

- Provide appropriate training for staff as soon as possible. Part of this training will enable staff to identify students under the age of 18 who may be at risk of radicalisation
- We will build student's resilience to radicalisation by promoting fundamental British values and assist their personal, social and emotional development and understanding of the world
- We will ensure that our staff understand the risks so that they can respond in an appropriate and proportionate way
- We will be aware of the online risk of radicalisation through the use of social media and the internet
- As with managing other safeguarding risks, our staff will be alert to changes in student's behaviour which could indicate that they may be in need of help or protection
- We will not carry out unnecessary intrusion into a student's life but we will take action when we observe behaviour of concern

**Peer on peer abuse**

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but is not limited to, bullying (including cyberbullying), sexual violence and sexual harassment; physical abuse such as hitting, shaking, biting, hair pulling, or otherwise

causing physical harm; sexting and initiating/hazing type of violence and rituals. Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, students with SEND and LGBTQ+ students are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act. Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline.

Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexualised remarks about a person's clothes or appearance, using sexualised names etc.
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing, displaying pictures, drawings or photos of a sexual nature; and
- Online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages.

Kaplan International Languages has an important role in developing students' understanding of what constitutes peer-on-peer abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "just having a laugh" or "boys being boys"
- Robustly challenging behaviours, such as grabbing bottoms, breasts, genitalia, flicking bras, lifting up skirts and up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause humiliation or distress. Up skirting is now a criminal offence.

Other strategies in place to prevent the occurrence of peer-on-peer abuse include:

- Providing developmentally appropriate lessons which develop students' understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any students to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable

Allegations against students of peer-on-peer abuse will be reported in accordance with the procedures set out in this policy if the relevant threshold criteria have been met (i.e. where there is reasonable cause to suspect a student is suffering or is likely to suffer significant harm).

A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the school's policies on behaviour and discipline will apply. The school will seek the advice of Tusla on the investigation of any allegation and will take all appropriate action on the safety and welfare of all students concerned including that of the student accused of abuse.

If it proves necessary that any students need to be interviewed by the Garda with regard to allegations of abuse, the school will ensure that, depending on the advice of Tusla, the

parents/guardians are informed as soon as possible and that an appropriate adult supports the student during the interview. In the case of students whose parents are abroad, the student's education guardian will be asked to support the student and to accommodate him or her if it is necessary to suspend him or her during the investigation.

Where peer-on-peer abuse occurs both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The Local Designated Liaison Person as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the school) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to:

- the wishes of the victim
- the nature of the alleged incident
- the ages of those involved
- whether the incident was an isolated one or part of a pattern any power imbalance between the victim and perpetrator
- any ongoing risks to the victim and other students
- any relevant contextual factors

Tusla will independently risk assess the situation and any report produced by them will be used to inform and update the school's own risk assessment which, in any event, will be reviewed on a regular basis.

ii. How to handle a disclosure by a student under the age of 18

In the event that a student makes an allegation or disclosure of abuse against an adult or another student or young person, it is important that you:

- Listen to them;
- Let them know that you take what they are saying seriously;
- Do not attempt to question or interview them yourself;
- Let them know that you will need to tell someone else in order to help them.
- Do not promise to keep what they tell you secret but stress anyone you inform will not tell others unless absolutely necessary and the aim will be to support and help the young person
- Inform your Local Designated Liaison Person and Designated Liaison Officer as soon as possible;
- Make a written record of the incident or events.

Sometimes you may just feel concerned about a student but do not know whether to share your concerns or not. In this situation you should always raise your concerns with your Mandated Person who will help you to decide what to do.

The school Principal, Director of Operations and the Legal team would keep records of any allegations made and investigations undertaken. These records would be kept centrally on KI Connect accessible only by the Director of Operations, Director of Compliance and Legal Team. The school principal and Local Designated Liaison Person would also keep records accessible only to themselves. If files need to be transferred they should only be sent via a secure email attachment and between the above teams. Further to the above the Welfare, Prevent, Accident and Complaints log are all held at school level in secure files accessible only by the department managers. There is a Red and Yellow Alert Policy in place which can be found on KI Connect.

iii. Allegations made against staff, volunteers or another student

Organisations that work or come into contact with students and young people need to be aware of the possibility that allegations of abuse will be made against members of their staff or another student. Allegations will usually be that some kind of abuse has taken place. They can be made by students and they can be made by other concerned adults.

Allegations can be made for a variety of reasons. Some of the most common are:

- Abuse has actually taken place;
- Something happens to a student that reminds them of an event that happened in the past and the student is unable to recognize that the situation and the people are different;
- Students can misinterpret your language or your actions because they are reminded of something else;
- Some students know how powerful an allegation can be. If they are angry with you about something they can make an allegation as a way of hitting out;
- An allegation can be a way of seeking attention.

All allegations should be brought to the notice of the Local Designated Liaison Person immediately.

In cases where the allegation is made against this person, the complainant should approach either the school principal or Designated Liaison Officer. They will then inform the Director of Compliance and the Legal Team and ensure that the following steps are followed:

1. Make sure that the student in question is safe and away from the alleged abuser;
2. Contact the principal or Designated Liaison Officer for Kaplan International Languages;
3. Irrespective of any investigation by the Garda, follow the appropriate disciplinary procedure. Common practice is for the alleged abuser to be suspended from work until the outcome of any investigation is clear;
4. Consider whether the person has access to students anywhere else and whether those organisations or groups need to be informed;
5. Act upon the decisions made in any strategy meeting;
6. Investigate all incidents internally after any external investigation has finished, reviewing organisational practice and putting in place any additional measures to prevent a similar thing happening again;
7. Seek advice, if appropriate, from outside agencies such as Tusla (Contact details can be found in the School specific Appendix to this policy).

In cases where the allegation is made against another student, the above steps should still be followed. Point 3 would be approached on a case by case basis, for example, the accused student may be allowed to stay in school but be removed from their class if they are in the same class as the student making the allegation. A decision needs to be made with regards to accommodation, if the accused is over 18 we would consider asking the student to leave Kaplan accommodation. If the accused is under 18 we would allow them to stay but may need to move them to ensure they are separated from the student making the allegation. In cases where the accused is under 18, the parents should also be informed as soon as possible.

#### **Making referrals**



Responsibility for referral decisions rests with Local Designated Liaison Person and Designated Liaison Officer. The referral procedures to be followed are determined by the nature of the disclosure being made.

The key determinant as to which procedure is to be followed is whether the child is:

- in need
- at risk of suffering harm.

In circumstances where a student has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the Local Designated Liaison Person and/or Designated Liaison Officer will, when the concern is identified, immediately liaise with Tusla.

As soon as sufficient concern exists that a student may be at risk of harm or in immediate danger, a referral to Tusla and/or Garda will be made immediately by the Local Designated Liaison Person and/or Designated Liaison Officer. The school is not required to obtain parental consent prior to a referral being made to statutory agencies. If the initial referral is made by telephone, the Designated Liaison Officer should confirm the referral in writing within 24 hours. If no response has been received within three working days, the Designated Liaison Officer must contact Tusla again.

#### **External agencies**

When the school decides to refer a particular complaint of abuse to Tusla or Garda, the parents and student will be informed in writing of their right to make their own complaint or referral to Tusla or Garda where appropriate, and will be provided with contact names, addresses and telephone numbers.

#### **D. TRAINING**

It is the responsibility of the **Principal** together with the **DoS** in each school to ensure that all staff have the appropriate level of safeguarding training.

As part of their induction all staff are provided with a copy of this **Safeguarding Policy** and sign a declaration to say that they have read and have access to it. The induction checklist includes an introduction to the Local Designated Liaison Person and information on where they can be found, how they can be contacted and who deputises for them. All staff are responsible for the safeguarding of under 18s and the requirement to remain vigilant and report concerns to the Local Designated Liaison Person is covered at induction and reinforced regularly through team meetings.

Further to the above, role specific training will be provided to department managers on specific requirements as follows: -

- **Director of Studies/Academic Team** – U18 absence reporting procedure. Garda vetting requirements for teachers teaching U18's. Safer recruitment procedures. Common Scenarios training.
- **Student Services Manager/Accommodation & Welfare Manager** – U18 absence reporting procedure. Garda vetting for host families. U18 absence reporting procedure. U18s in Private Accommodation. Common Scenarios training.
- **Social Programme Manager/Academic Support Manager/Staff conducting Social Programme Trips or activities** – Supervision policy. Risk assessment creation. Excursion Guidelines. Terror attack guidance. Tour leader rules and responsibilities. First aid training. Social media policy.

Any changes to policy are communicated to all staff via the Local Designated Liaison Person and the most up to date versions of all policies are kept on KI Sharepoint. Specific information on the people responsible for safeguarding as well as their contact details is provided on the school specific Appendix to this policy together with information on the school's curfew times, first aiders, and fire wardens. This Appendix is updated and re-circulated to all relevant parties as and when changes occur.

All staff undergo an on-line Level 1 Safeguarding training aimed at people working in the language industry (available through their K+ Online accounts). New staff complete this training as part of their induction before starting work.

We encourage further relevant training wherever relevant and available. The Mandated Person and Local Designated Liaison Person are trained to specialist level. All the other members of the school management team and all members of the accommodation and welfare team should be trained to specialist level either via a face-to-face, the appropriate course at their LSCB (formerly levels 2 or 3) or an online course.

Records, monitoring and an audit of what safeguarding training has been undertaken by which members of staff is held on the Single Central Register which is maintained and reported on by the Compliance Team. All certificates for training completed are held by the relevant school within the employee files.

It is aimed that all staff will have a refresher safeguarding training every 2 years either at, or above, their current level. Reminders for completion of safeguarding training are sent by the Compliance

Team.

#### **E. SAFER RECRUITMENT**

The application of rigorous procedures for the recruitment of any staff who come into contact with students under the age of 18, both directly and indirectly, can reduce the likelihood of allegations of abuse being made that are founded.

The below should be read together with the following Kaplan International Languages documents and Policies: -

- Recruitment Process
- Reference Check Procedures
- Accommodation Manager Standards
- Homestay Recruitment Guide

As an absolute minimum, the following standards should be followed:

- All prospective workers (paid and unpaid) have an enhanced Garda Vetting check before they start employment. Anyone who refuses to do so should not be employed; (N.B All Group Leaders must sign a declaration prior to arrival in Ireland that they have had equivalent police checks in their own country);
- All prospective workers (paid and unpaid) should be interviewed to establish previous experience of working in an environment where there is contact with students and perceptions of acceptable behaviour;
- All prospective workers (paid and unpaid) should be able to explain any gaps in CVs;
- All prospective workers (paid and unpaid) should be asked for details of their previous employment and for the names of two referees;
- Nobody should start work before these two references have been received. These references should be on the standard Kaplan International Languages. Reference template which asks specifically about the candidate's suitability to work with under 18s. Referees should be reminded that references should not misrepresent the candidate or omit to say things that might be relevant to their employment;
- All job adverts should include the fact that all staff are responsible for safeguarding and all of the above points should be communicated to applicants before an interview is arranged.
- All appointments to work with students under the age of 18 should be subject to an agreed probationary period;
- New members of staff should be clear about their responsibilities and wherever possible work to an agreed job description;

These guidelines should be available to everyone and fully discussed as part of an induction process;

A single record of all checks made during recruitment needs to be kept in one place; usually this is one spreadsheet. It should record that the following have been done or are N/A:

- Identity – name, address, DoB, evidence of check made and date
- Start date
- Role in organisation
- Qualifications – required, evidence of check made and date
- Garda Vetting – evidence of check and date
- Overseas Police check – check required (Y/N), evidence of check and date
- Right to work Ireland – evidence of check and date

## **F. HOSTS**

“Host” means the main person (or persons) responsible for providing care and catered accommodation to students in a domestic residence. Kaplan selects and assesses the suitability of all hosts themselves in accordance with the criteria set out by ACELS. Kaplan makes clear its expectations from hosts in the Hosting Agreement, which is signed prior to any hosting arrangement commencing.

Hosts play a critical role in the safeguarding of students during their time at Kaplan. Students spend the majority of their time in their accommodation during their stay and Hosts are the eyes and ears of Kaplan during time spent away from school. It is therefore imperative that Hosts are familiar with the Safeguarding Policy and work closely with Kaplan to ensure students are appropriately safeguarded during their time with us.

Specific guidance regarding Hosts is contained in the following policies and guidance:-

- Homestay Recruitment Guide
- Homestay Handbook
- U18 Rules and Conditions for Hosts

All main carers who apply to be Hosts undergo a Garda Vetting check.

Hosts are required to read the full version of this **Safeguarding Policy** and are encouraged to undertake level 1 safeguarding training (via a link on K+ Online).

All Host homes are visited and Hosts are interviewed to assess their suitability and in order to inform them of their safeguarding responsibilities. Hosts require two references on the Kaplan International Languages pro forma reference form, which includes questions about their suitability to work with minors. They are re-visited every two years if they remain Hosts for a lengthy period of time, or sooner if negative feedback is received.

i. Transfer to and from homestay Hosts for the duration of students’ stay.

It is our aim to ensure younger students (especially U16s) are placed in homestays or residences that are as close to school as possible. Students under 18 years are expected to travel to school unaccompanied, however Hosts are instructed to show students how to get to and from the school - some may provide maps, others may make the trip with the students themselves. Homestay Hosts are also instructed to exchange mobile numbers with students so that they can keep in touch regarding late dinners, activity arrangements and any problems etc. Group Leaders or Activity Leaders accompany all under-16s to the appropriate bus stop or see the students into mini buses/taxis when evening activities have finished, with students required to return to their accommodation with any student(s) with whom they are sharing accommodation. Students under the age of 18 are bound by curfews when staying in homestays (see attached School specific Appendix for applicable curfew times).

ii. Missing students procedure for Hosts

If your student has not returned home after an hour beyond an agreed curfew time (please refer to the school specific Appendix), and you are worried about their safety, please follow the procedure below:

1. Try to contact the student directly to find out where they are. If they are too far away to walk or if they do not know the way home it is best to make them wait where they are and pick them up if you can, or send a taxi for them. Make sure the taxi driver knows their name and ask the student to only accept a taxi driver who knows their name. The student will have to pay for this taxi. If the student does not have cash the school will pay and ask the student to reimburse them.
2. If you do not have the student's number or cannot get in touch with them, contact the Accommodation and Welfare Manager as they may have their details, or any friends' details in the records. We may also have been contacted by the student on the emergency phone.
3. If this is unsuccessful hosts should call the School Emergency phone (see school specific Appendix for this number).

iii. Under-18s and Homestay Hosts

Homestay Hosts report to the **Accommodation & Welfare Manager/Student Services Manager** concerns with their students, from health issues to attendance. Information is then passed on to the relevant member of staff to be dealt with (i.e. attendance issues are to be dealt with by the **Director of Studies**, welfare issues are to be dealt by the Mandated Person).

If Hosts are ever concerned about a student in any way, they should contact the Mandated Person who will be able to assist.

Students may feel more comfortable in approaching their teachers should they have any concerns about their homestay. Teachers are to use their own discretion and then liaise with other senior members of the staff (the Director of Studies, Accommodation and Welfare Manager, Student Services Manager or Principal), depending on the severity of the concern. Translators may need to be used in those cases when a student's level of English is too low. These may be group leaders, or a member of staff with relevant language skills (Head office can facilitate with finding someone to translate if required). It will be made clear that discretion is required with regard to anything confidential. Notes are to be kept on the student's record. (see CLASS > Course Booking > Notes).

## **G. IMPLEMENTING SAFEGUARDING**

### **i. Pre-arrival**

Prior to arrival our customer service and sales teams ensure we receive completed minor documents for all under-18 students

### **ii Group transfers**

A coach will be booked for the entire group, when requested, with a Meet & Greet service to welcome students at the airport terminal and to accompany the group to the coach bay, ready for boarding. A member of staff will meet the group at the school or drop-off point on arrival. Here a small briefing will take place and welcome packs will be distributed unless otherwise arranged. The school emergency number is given to Group Leaders together with a comprehensive list of all students' accommodation details. Where possible, Group Leaders' mobile numbers will be taken. Taxis will be booked to take students to each homestay host if necessary - Group Leaders will leave last.

### **iii. Individual transfers**

Most individuals will arrive on their own. The vast majority of them will have booked a transfer through us, as they are travelling on their own. Those who have booked a transfer with us will be collected by a taxi driver at the airport or given alternative instructions, our transfer company will check on flight delays and liaise with the member of staff in charge of the emergency phone. On the return transfer the student will be collected and returned to the airport.

If the student is not booking a transfer with Kaplan then they complete:

- Transfer Waiver – Parent / Guardian Authorisation

All students under the age of 18 years old who book accommodation with Kaplan are placed in homestay accommodation. If the student does not book accommodation with Kaplan then their parents complete:

- The Kaplan International Languages U18s Living in Private Accommodation Form

All U18 students must have parental consent if they choose to live in private accommodation. The accommodation and adult supervision must be suitable to ensure there is satisfactory duty of care that meet safeguarding requirements the adults must be:

- Known to the parents/student
- Appointed by the students' parents
- A mature and positive role model
- Ideally able to communicate in English
- Willing and able to communicate with the school and take care of the student if necessary
- Contactable by Kaplan International Languages in case of an emergency
- Contactable by Kaplan International Languages if there are any serious concerns about the

student's welfare or health, attendance or punctuality, progress or motivation, or any proposed change to their study plans

- Able to provide assistance to the student if they are ill and need looking after on a daily basis.

New students arrive at the school each Monday. Prior to their arrival the school will ensure they have details of all new students who are under 18. On their first day, as part of induction, the Mandated Person will introduce themselves to the students and ensure they understand that they are the main point of contact for any welfare issues for students under the age of 18.

All students take part in the School induction on their first day. On induction day students are given a tour of the school to show them the facilities and a presentation where the role of each key member of staff is explained (so that students will learn that if they have issues with their accommodation they should discuss this with the Accommodation Manager, if they have issues with their class/level they should discuss this with the Director of Studies, etc.). In addition to this information at induction, a clear photo board with staff names and job titles is displayed in reception and posters explaining who can help with each issue are displayed in every classroom. The procedure for evacuating the building in the event of an emergency is also explained as is the procedure for seeking medical advice or attention in Ireland. A tour of the city is also given to show students the city's main attractions and to help them familiarise themselves with the transport system, main bus stops, etc. During registration all students are required to provide the following information; valid address in their country, valid phone number in their country, email address, mobile phone number, address in Ireland and next of kin contact details in case of emergency.

Based on information gleaned during students' placement test interview, the Director of Studies will liaise with the Student Services Manager with regards to any student under the age of 18 who is not comfortable in their accommodation and will seek to take immediate action.

The Student Services Manager will ensure the student is confident in travelling to and from the School and that they are taking the most appropriate route. Should any teacher or any other member of staff believe a student requires additional support and could be classed as a vulnerable adult they will notify the Local Designated Liaison Person who will arrange to see the student.

#### **iv Attendance Policy**

All students are told at induction that they are expected to attend 100% of their classes. They are advised that by attending all of their lessons they will get maximum benefit from their time at the school and gain optimum improvement in their English Language skills. If for any reason a student misses a class we ask them to inform us by phone, email or letter. School contact details are given to the student on day one.

Should a student under the age of 18 be absent from school the student's teacher will inform the Director of Studies. The Director of Studies will flag this up with Student Services and the student will be contacted directly to find out why the student has not attended school and ascertain whether they require any assistance. If contact cannot be made with the student the Student Services will inform Head Office, who will contact the agent to contact the parents, if the student has not maintained contact with the parents the Garda would be contacted and the parents of the student would be kept updated.

**v. Student Missing from Education**

All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any student missing from School. The procedure includes the requirement to record any incident, the action taken, and the reasons given by the student for being missing.

All staff should be aware that children going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The School has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the local authority students who are missing from school for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken, and the reasons given by the student for being missing.

**vi E-Safety**

The widespread use of digital communications technologies, presents young people with a lot of opportunities for learning, participation, creativity and self-expression. At the same time, it poses a range of safeguarding concerns, which can be grouped as follows:

- **Content-** Student exposure to illegal, inappropriate or harmful online content including spam, pornography, substance abuse, violence, cyber-bullying, extremism and hate sites, and lifestyle sites that promote eating disorders, self-harm or suicide;
- **Contact-** Students participate in Exploitative digital communication including viruses and malware, personal data or identity theft, cyber-stalking, online grooming, anonymous online chat sites and cyber-bullying;
- **Conduct-** Concerns for students health and well-being, such as gaming, gambling or social network addiction; online disclosure of personal information and ignorance of privacy settings; online reputation and 'sexting' (sending and receiving personally intimate digital images); and illegal conduct, including hacking, plagiarism, and copyright infringement of digital media, such as music and film.

E-safety is a shared responsibility; all staff, students, residence staff and host families are encouraged to work together to develop strategies to promote a safe environment. As with all other risks, it is impossible to eliminate those risks completely. It is therefore essential, through good educational provision to build students' understanding of the risks that they may encounter, so that they have the confidence and skills to face and deal with these risks.

All students are required to sign the IT rules on their first day as part of their registration. Staff are required to sign the **IT Acceptable Use Policy** prior to starting work (Further details can be found in the **E-Safety Policy**).

**vii Risk Assessments**

All schools are required to have risk assessments for fire and health and safety which help ensure that school premises are safe for all students including those under the age of 18. Any trip or activity which is to take place outside of school premises either led by the social programme manager, activity leader or teacher must have a specific risk assessment for that trip or activity which follows the Kaplan International Languages risk assessment pro forma. These are held by the School Principal and include potential hazards, details of who may be harmed, a risk rating and a revision date for the assessment. A risk assessment should be signed by the person leading the activity and then stored in the school.



Before taking students to a place which hasn't been visited before a new risk assessment must be created either by, or with the assistance of, the Social Programme Manager. All new Social Programme Managers are given training on risk assessment creation as part of their induction and are encouraged to collate external risk assessments from premises which are visited regularly.

**H. Confidentiality and information sharing**

The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will cooperate with the Garda and Tusla to ensure that all relevant information is shared for the purposes of child protection. Where allegations have been made against staff, the school and Local Designated Liaison Person will consult with the Tusla and, where appropriate, with the Garda to agree the information that should be disclosed and to whom.

Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the college and a report to the SMT and KI Languages SMT. The Local Designated Liaison Person will monitor the operation of this policy and the School's internal safeguarding procedures and present an annual report to the SMT and KI Pathways SLT. Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

**I CHECKLIST OF FREQUENTLY OCCURRING WELFARE ISSUES**

<b>Signs to look out for</b>	<b>Possible issue</b>	<b>Teachers input</b>	<b>Action to be taken</b>
<b>Student making negative remarks about their homestay</b>	Student feeling unhappy in homestay due to loneliness, homesickness or inappropriate matching of homestay provider	Teacher to refer student to relevant managers	Student Services Manager to <u>spea</u> <u>k to the student concerned</u> assess severity of the case, offer assistance in communication with homestay host and/or find alternative homestay host for student. NB where an under 18 year old expresses discomfort in a homestay provider and wishes to move the student should be moved asap
<b>Students looking depressed and not participating in class</b>	Student feeling a little lonely and homesick or a possible indicator of a wider problem	Teacher to speak to student and refer to relevant managers	SSM/DoS to speak to the student and may suggest excursions, in-school activities or/and introduce student to other fellow students of same age and nationality. SSM to check on homestay provider. Continued monitoring put in place
<b>Student attendance suddenly drops</b>	Student may be depressed, very homesick, or staying out late too often and possibly engaging in inappropriate activities for their age group	Teacher to pass on concerns to their own manager	Mandated Person to <u>spea</u> <u>k to the student</u> to check on their general welfare and try and engage with the student to ascertain what the issues are. They should follow up and investigate via homestay host and student for homesickness and depression (see above examples). In addition the attendance officer or teacher should explain clearly to student that poor attendance has severe consequences That they could be outside the terms of their visa and could ultimately be sent home.
<b>Student attendance suddenly drops or student is consistently late</b>	Student may be depressed, not engaging with the teacher, lesson content or classmates /feeling excluded from class groupings	Teacher to pass on concerns to DoS	DoS to investigate if the make up of the class age and gender is suitable for the student and assess whether content is age appropriate and engaging for the age group. Teacher support such as observations can be given or classes may need to be timetabled differently.
<b>Student presenting challenging behaviours in class, social activities or homestay (e.g. confrontational, sexually explicit, argumentative or attention seeking)</b>	It is possible the student may have experienced a type of abuse in their lives in their home country or be experiencing an issue here at the Ireland . They may also have background worries not related to abuse such as a family divorce or breakdown.	Teacher to refer to DoS	Student to be carefully monitored both off and on school premises including their accommodation provider. The person with the best relationship with the student (usually their teacher or the Mandated Person) to <u>spea</u> <u>k to the student</u> to check on general well -being and possible reasons for the behaviour. Follow up and monitor