

<b>Title:</b>	<b>Safeguarding Policy</b>
<b>Responsible:</b>	<b>Daniela Petralia/Natasha Malik</b>
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### **Kaplan International English Safeguarding Policy**

Kaplan International English recognises its responsibility to safeguard and promote the welfare of children within the legal framework of the Children Acts 1989 and 2004 staff are also made aware of:

‘Care of under 18s: Guidance for ELT providers’ updated, December 2014. Available here:  
<http://www.britishcouncil.org/education/accreditation/information-centres/care-children>

<https://www.gov.uk/government/publications/keeping-children-safe-in-education>

We are aware that many children and young people are the victims of different kinds of abuse and that they can be subjected to social factors that have an adverse impact upon their lives – including domestic violence, substance misuse, bullying, child prostitution and ritualistic abuse. We aim to create a safe environment within which children and young people can thrive and adults can work with the security of clear guidance.

Under the terms of the Children Act 2004 anyone under the age of 18 is considered to be a child/young person.

These guidelines are for the use of all paid staff, contractors, volunteers and visitors. We will make them available to the parents and hosts of the students to whom we offer a service. Through them, we will endeavour 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

All child protection concerns should be acted upon immediately. The Kaplan International English designated child protection officer is Daniela Petralia and she can be contacted via email [Daniela.Petralia@kaplan.com](mailto:Daniela.Petralia@kaplan.com). If you are concerned that a student might be at risk or is actually suffering abuse, you should tell the Kaplan International English designated child protection officer and the local designated child protection officer at your School.

If the designated officer is not available, speak to the Principal of the school.

These guidelines are divided into the following sections:

1. Recognising signs of abuse
2. What to do with your concerns
3. Allegations made against staff or another student
4. Safe recruitment
5. Preventing radicalisation and extremism
6. Good practice
7. Safeguarding students in Kaplan International English
8. Checklist of welfare issues
9. 9 General points affecting safeguarding of under-18s

## **1. RECOGNISING SIGNS OF ABUSE**

It can often be difficult to recognize abuse. The signs listed in these guidelines are only indicators and many can have reasonable explanations. Students may behave strangely or seem unhappy for many reasons, as they move through the stages of lives or their families experience changes. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further.

Someone can abuse a student by actively inflicting harm or by failing to act to prevent harm. Abuse can take place within a family, in an institutional or community setting, by telephone or on the Internet. Abuse can be carried out by someone known to a student or by a complete stranger.

If you are worried about a student it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

### **Physical Abuse**

Physical abuse can involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, and suffocating. It can also result when a parent or carer deliberately causes the ill health of a student in order to seek attention; this is called fabricated illness. Symptoms that indicate physical abuse include:

- Bruising in or around the mouth, on the back, buttocks or rectal area
- Finger mark bruising or grasp marks on the limbs or chest of a small child

- Bites
- Burn and scald marks; small round burns that could be caused by a cigarette
- Fractures to arms, legs or ribs in a small child
- Large numbers of scars of different sizes or ages

### **Emotional Abuse**

Emotional abuse happens when a student's need for love, security, praise and recognition is not met. It usually co-exists with other forms of abuse. Emotionally abusive behaviour occurs if a parent, carer or authority figure is consistently hostile, rejecting, threatening or undermining. It can also result when the student is prevented from social contact with others, or if developmentally inappropriate expectations are imposed upon them. It may involve seeing or hearing the ill-treatment of someone else. Symptoms that indicate emotional abuse include:

- Excessively clingy or attention-seeking behaviour
- Very low self-esteem or excessive self-criticism
- Excessively withdrawn behaviour or fearfulness; a 'frozen watchfulness'
- Despondency
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders

### **Neglect**

Neglect is the persistent failure to meet a child/person's basic physical and/or psychological needs, causing damage to their health and development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect a child/person from harm or danger, or failing to access appropriate medical care and treatment when necessary. It can exist in isolation or in combination with other forms of abuse. Symptoms of physical and emotional neglect can include:

- 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 child's life or development is endangered
- Inappropriate clothing for conditions

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child/person is aware of what is happening. This may include physical contact, both penetrative and non-penetrative, or involve no contact, such as watching sexual activities or looking at pornographic material. Encouraging children/young people to act in sexually inappropriate ways is also abusive. Under the Sexual Offences Act 2003, any sexual activity – contact or non-contact – with a child under the age of 13, is a crime. Symptoms of sexual abuse include:

- Allegations or disclosure
- Genital soreness, injuries or discomfort
- Sexually transmitted diseases; urinary infections
- Excessive preoccupation with sexual matters; inappropriately sexualized play, words or drawing
- A child/young person who is sexually provocative or seductive with adults
- Repeated sleep disturbances through nightmares and/or wetting

Older children and young people may additionally exhibit:

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

Some members of our communities hold beliefs that may be common within particular cultures but which are against the law in England. Kaplan International English does not condone practices that are illegal or harmful to children/young people. 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 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 child to go abroad with the intention of having her circumcised.

- Ritualistic Abuse

Some faiths believe that spirits and demons can possess people (including children). 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 child.

## **2. WHAT TO DO WITH YOUR CONCERNS?**

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

- Listen to them and/or closely observe their presentation and behaviour;
- 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;
- Inform your designated child protection 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 designated child protection officer, who will help you to decide what to do.

## **3. 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 – 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 designated child protection officer immediately. In cases where the allegation is made against this person, the complainant should approach a more senior official or take the following action him or herself:

- Make sure that the student in question is safe and away from the alleged abuser;
- Contact an alternative CPO;
- Irrespective of any investigation by social workers or the police, you should 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;
- Consider whether the person has access to students anywhere else and whether those organisations or groups need to be informed;
- Act upon the decisions made in any strategy meeting.

All incidents should be investigated internally after any external investigation has finished, reviewing organisational practice and putting in place any additional measures to prevent a similar thing happening again.

Well-functioning organisations encourage an environment where people feel safe to express their concerns about the practice of others. The term 'whistleblowing' is often used pejoratively; if a staff member, volunteer or visitor has concerns, they should not be victimized in any way for expressing them.

## **5. SAFE RECRUITMENT**

The application of rigorous procedures for the recruitment of any staff who come into contact with students, both directly and indirectly, can reduce the likelihood of allegations of abuse being made that are founded. As an absolute minimum, the following standards should be followed:

- All prospective workers (paid and unpaid) should complete an application form which asks for details of their previous employment and for the names of two referees;
- All prospective workers (paid and unpaid) should be checked against the Barring list and have an enhanced Disclosure and Barring Service (DBS) disclosure before they start employment with you anyone who refuses to do so should not be employed

(N.B All Group Leaders must sign a declaration prior to arrival in the UK 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
- Nobody should start work before references have been received. Referees should be reminded that references should not misrepresent the candidate or omit to say things that might be relevant to their employment;
- All appointments to work with students 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 need 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
- DBS certificate – Disclosure number, evidence of check and date
- Barred list check
- Enhanced DBS – evidence of check and date
- Overseas Police check – check required (Y/N), evidence of check and date
- Right to work in UK – evidence of check and date
- Prohibited list check - evidence of check and date
- Disqualification by association – evidence of check

All new staff should undergo on-line Level 1 Safeguarding training

## **5. PREVENTING RADICALISATION AND EXTREMISM**

Kaplan International English are subject to a duty under Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. Whilst this is a standalone policy, it is integral to our Prevent policy and should be applied as an extension to the School’s current and established policies and procedures that cover this area.

One of the key purposes for an international student who attends an international school in an Anglophone country is to experience a diverse multi-national environment. Students in an ELT school are often well-travelled, tolerant and extremely eager to make new friends from different countries and cultures.

However, 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 consult with the School Prevent lead, Principal and this is immediately referred to Kaplan International English prevent lead and Senior Management team to decide a course of action. Aim to talk to the student (s) about acceptance and tolerance of a range of views, that people think differently and believe different things - all of which is OK as long as it is reasonable and belief doesn't extend to hurting/denigrating those with different beliefs.

Kaplan International English takes safeguarding very seriously, therefore to ensure that we adhere to and achieve the Prevent duty we will;

- Provide appropriate training for staff as soon as possible. Part of this training will enable staff to identify children 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.
- We will work in partnership with our designated prevent coordinators for guidance and support

## **6. GOOD PRACTICE**

Every organisation working with students should have a designated U18 protection officer who must undergo safeguarding training and be aware of all statutory guidance including:

'Care of Under 18s: Guidance for ELT providers' updated, December 2014. Available here:  
<http://www.britishcouncil.org/education/accreditation/information-centres/care-children>

<https://www.gov.uk/government/publications/keeping-children-safe-in-education>

It is the responsibility of this person to make themselves available for consultation by staff, volunteers, visitors and students;

All staff, contract workers and volunteers are responsible for students while on the school premises and if delegated to supervise an organised school activity outside school. Anybody who has contact with international students under 18 should be given information at induction, and ongoing training and updates (including the above) when required, on their responsibilities, institutional policies, procedures and expectations of professional conduct and ethical behaviour relating to under 18s. This information should be updated and communicated as and when policies change. Staff involved in caring for international under 18s should also be aware of what information is sent to parents and children

- No member of staff should be left alone with a child/young person where they cannot be observed by others;

- Under no circumstances should visitors be allowed to wander around the premises unaccompanied when children and young people are present;
- Where possible there should always be at least two adults present with a group of students under the ages of 16 – it is vital that the ratio of adult to child is adequate to ensure safety.
- Staff should be alert to strangers frequently waiting outside a venue with no apparent purpose.

### **Outings & Trips**

- 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 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 home organisation 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 within half an hour, the appropriate security staff and the police should be notified;
- If, having notified security staff and the police, 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 home site 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.

### **7. STAFF, VOLUNTEER AND CONTRACT STAFF MUST BE AWARE OF PROCEDURES FOR SAFEGUARDING UNDER-18s**

Kaplan International English is committed to safeguarding the welfare of young people under 18 and vulnerable adults who book a programme with our schools.

The school ensures that reasonable steps to promote and safeguard the welfare of young people and vulnerable adults are taken. In conjunction with the Principal, the Accommodation & Welfare Manager is appointed the lead member of staff in relation to safeguarding issues and as the Under 18's point of contact.

The school completes DBS checks of all staff who come into contact with students. As they are in a position of trust they have been made aware that they have a duty of care for all students.

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

- ✓ Programme Participation Waiver for under 18's
- ✓ Medical and Authorisation for Emergency Medical Treatment Form for under 18's

We also request students travelling on their own complete:

- ✓ Under 18 Letter of Consent to Travel

### **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 group to coach bay, ready for boarding. A member of staff will meet the group at the college or drop-off point on arrival. Here a small briefing will take place and welcome packs will be distributed unless otherwise arranged. The college 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.

### **Individual transfers**

Most individuals will arrive on their own. The vast majority of them will have booked a transfer through us, and 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, 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 they complete:

- ✓ Under-18's Private Accommodation Information Request Form.

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

All students take part to the college induction on their first day. On induction day students are given a tour of the college 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 the UK. Copies of passports are taken and a college ID card with photos issued. A tour of the city is also given to show students the city's main attractions and to help them familiarize themselves with the transport system, main bus stops, etc. During induction all students are required to provide the following information; valid address in their country, valid phone number in their country, email address, UK mobile phone number, UK address 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 Accommodation & Welfare 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 Accommodation & Welfare Manager will aim to meet student under 18 in their first week of study at the college to ensure they are satisfied with their classes, accommodation, life in [INSERT NAME OF CITY] and if there are any underlying issues they have and are not comfortable in speaking to their host family about.

The Accommodation & Welfare Manager will ensure the student is confident in travelling to and from the college 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 Accommodation & Welfare Manager who will arrange to see the student.

#### **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 home-stays or residences as close to school as possible. Homestay 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. Homestay hosts are also instructed to exchange mobile numbers with students so that they can keep in touch re late dinners, 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 the following curfews when staying in homestays:

13 & under	21.30 [but under the supervision of a GL or staff member at all times]
14 - 15	22.30 [but under the supervision of a GL or staff member at all times]
16 -17	23.00

#### **Missing students procedure for hosts**

If your student has not returned home after an hour beyond an agreed curfew time, 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.
- 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, notify the Centre Manager/Student Services Manager. They may be able to contact one of their friend's hosts if they are likely to be together.
- 4) If the Student Services Manager and the Accommodation Manager are both unavailable, call the school emergency phone for further advice.
- 5) If all else fails and you have no idea where they are you will have to notify the police. You will need a full description of the student, the area they may be in, any contact details you may have, friends or relatives in the area, health or medical conditions etc. Remember if you think the student may be in danger, or that a crime may be in progress, call 999.

#### **Under-18s and Homestay Hosts**

Homestay hosts report to the Accommodation & Welfare Manager and /or School Administrator any 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 Accommodation & Welfare Manager).

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, 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 elementary. These may be group leaders, fellow students or member of staff with relevant language skills. It will be made clear that discretion is required with regard to anything confidential. Notes are to be kept on students' record. (see CLASS > Course Booking > College Notes)

#### **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 aged 18 be absent from school the students' teacher will inform the Director of Studies. The Director of Studies will flag this up with the School Administrator, who will contact the student 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 School Administrator will inform Head Office, who will contact the agent to contact the parents, if the student had not maintained contact with the parents the police would be contacted and the parents of the student would be kept updated.

## 7 CHECKLIST OF WELFARE ISSUES

<b>Signs to look out for</b>	<b>Possible issue</b>	<b>Teachers input</b>	<b>Action to be taken</b>
Student making negative remarks about their homestay	Student feeling unhappy in homestay	Teacher to refer student to Accommodation and Welfare Manager	Accommodation and Welfare Manager to assess severity of the case, offer assistance in communication with homestay host and/or find alternative homestay host for student
Students looking depressed and not participating in class	Student feeling a little lonely and homesick	Teacher to speak to student and refer to Social Activities Organizer	Social Programme Organizer may suggest excursions, in-college activities or/and introduce student to other fellow students of same nationality
Student attendance suddenly drops	Student may be depressed, very homesick, or staying out late too often	Student to pass on concerns to Accommodation and Welfare Manager.	Accommodation and Welfare Manager to investigate via homestay host and student. For homesickness and depression see above examples. Otherwise explain clearly to student that poor attendance has severe consequences on final results and will bring down their overall marks.

## Special Needs Students

We ask students/agents to fill in a questionnaire in order to assess our ability to accept such students and in order to be able to make any plans or adjustments as needed to accommodate the student at college, in the host family, and in all areas of college life. (Please see Kaplan International English Disability Policy and Disability Questionnaire for further details)

## 8 GENERAL POINTS AFFECTING SAFEGUARDING OF UNDER-18s

FIRST AID

Regular checks are carried out to ensure that the students and staff are not interfering with any fire-fighting equipment (e.g. propping doors open with fire extinguishers) or with fire exits.

The Maintenance Manager is in charge of the first aid kits and is to ensure that these are adequate in number and that all staff knows where they may be found (included in staff induction). Unless in use, all kits are to stay in their designated position so as to be always accessible. The Maintenance Manager has also completed the First Aid course together with the Student Services Co-ordinator and Social Programme Organiser. In case of an incident, the incident report form is completed.

#### EMERGENCY PHONE

Key members of staff (namely Accommodation & Welfare Manager, Principal and Director of Studies) share the emergency phone on a rota basis. The handover for the emergency phone is on Fridays and the Student Services Co-ordinator is to provide the following documents:

- List of all individual arrivals for the weekend (this contains student who have booked transfers from the airport, students who will make their own way and students who have booked own accommodation)
- List of group arrivals with accommodation and transfer details
- List of entire homestay host database with indication of emergency families available for the weekend

On the following Monday the person on duty is to inform the Accommodation & Welfare Manager of what has happened during the week end in terms of emergencies.

#### **9 Whistleblowing**

Whistleblowing is an important aspect of a safeguarded institution whereby staff, student mentors and volunteers are encouraged to share genuine 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 genuine concerns about the conduct of a colleague towards a participant. All members of KIE 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.

In accordance with the Public Interest Disclosure Act 1988 KIE will support and protect those staff and students who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions.

Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers.

### **Principles**

- KIE makes clear that no staff member will be subject to victimisation or other detriment by reporting concerns which they believe to be true.
- Any issue reported will be taken seriously and investigated. This may involve interviews or an investigation to establish the facts.
- KIE prefers matters to be raised where suspicion first arises rather than waiting for or searching for proof.
- Concerns raised will be treated in a confidential manner and feedback will be given on any action taken.
- Employees should put their names to any allegation wherever possible.
- A complainant will need to demonstrate that there are reasonable grounds for the concern, and will be expected to co-operate with any investigation that takes place. If any meeting or interview is arranged, there is a right to be accompanied by workplace colleague.
- This procedure will be supported by management culture.

### **What does the Policy cover?**

This policy covers whistleblowing relating to alleged:

- Miscarriages of justice in the conduct of statutory or other processes
- Failure to comply with a statutory or legal obligation
- Potential maladministration, misconduct or malpractice
- Health and safety issues including risks to the public as well as risks to students and members of staff
- Abuse of authority
- Unauthorised use of public or other funds
- Fraud or corruption
- Breaches of financial regulations or policies
- Mistreatment of any person
- Action that has caused or is likely to cause physical danger to and person or risk serious damage to school property
- Sexual, physical or emotional abuse of members of staff or students
- Unfair discrimination or favouritism
- Racist incidents or acts, or racial harassment

### **Confidentiality**

KIE will try and protect the identity of employees who raise a serious concern and do not want their identity to be disclosed. However, it should be recognised that in some instances, it may not be able to resolve the concern without revealing identity (for instance because a statement from an

employee may be required as supporting evidence). In these circumstances the employee will be advised on how the investigation will proceed.

#### **Procedure for reporting a Concern**

- All matters should be kept in strict confidence and therefore concerns should be raised with a line manager or Principal. This is subject to the seriousness and sensitivity of the issues involved and who is thought to be involved in the alleged wrongdoing or malpractice.
- If the staff member believes that manager or Principal is involved they should raise their concerns with the Head of HR for Kaplan International.
- Staff members should set out the background of the concern, giving names, times and places where possible, and the reason why they are particularly concerned about the situation and this can be done via email, in person or in writing.
- Staff members are not expected to provide proof of an allegation but will need to demonstrate when providing information that there are sufficient grounds for the concerns.
- KIE will treat all anonymous allegations seriously but a concern expressed anonymously is much less powerful and can prove difficult to investigate where all the facts are not known or further information is required and the person cannot be contacted to provide further details.

#### **Response to the Concern**

- The action taken by the School will depend on the nature of the concern raised. The matters raised will normally be investigated internally by the School with consultation from the Senior Management team and Following consultation with the Senior Management and legal team if the report requires this, concerns may be referred to a regulatory body or the Police in criminal matters.
- In order to protect the employee, the School and KIE also those accused of possible wrongdoing or malpractice, initial enquiries will be made to the decide whether an investigation is appropriate and, if so, what form the investigation should take.
- Some concerns may be resolved by immediate agreed action without the need for a full investigation. If urgent action is required, this will be taken before any investigation is conducted.
- Within 10 working days of a concern being received, where the identity of the employee is known the School will write to the staff member:
  - Acknowledge that the concern is being raised
  - Indicating how it proposes to deal with the matter
  - Giving an estimate of how long it will take to provide a final response
  - Telling the staff member whether any initial enquiries have been made, and
  - Telling the employee whether further investigations will take place, and if not, why not.
- The School will provide the necessary advice about the procedure and give practical support that is possible.

- Subject to legal constraints, staff members will normally receive feedback about the outcome of any investigation.

### False Allegations

If an employee makes an allegation in good faith that cannot be confirmed by an investigation, no action will be taken against the employee. If, however, an employee makes an allegation for an ulterior motive, e.g. for a malicious reason, disciplinary action will be taken against that employee which could result in dismissal.

### Checklist

#### 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 who 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 the KIE 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