

Safeguarding Policy for Children, Young People and Vulnerable Adults

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Signed: _____

Ciarán Lynch
Main DLP

Alan Brennan
Director

Date: 16/09/2025

16/09/2025

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Atlas Safeguarding Policy



1 Introduction

The Designated Safeguarding Person (DSP) for Atlas Language School is Ciarán Lynch, in our year-round centres. Ciarán can generally be found at Reception in Portobello House.

Main DS Leads: Ciarán Lynch
Email: ciaran@atlaslanguageschool.com
Phone: +353 87 991 5032

Portobello Centre Deputy DLP: Eve Reddin
Email: eve@atlaslanguageschool.com
Phone: +353 1 478 2845 / +353 86 107 0870

Rathmines Centre Deputy DLP: Ana Egitto
Email: ana.e@atlaslanguageschool.com
Phone: +353 1 478 2845 / +353 86 107 0870

Junior Programme (St. Louis High School in Rathmines) DLP: Gareth Hampton-Gray
Email: juniordublin@atlaslanguageschool.com
Phone: +353 89 430 5490

Atlas Language School is a language school for international students wishing to improve their English language skills. Our main school is located in Portobello House, Portobello, Dublin 2, Ireland. We also have schools in Rathmines (Dublin) and Ennis, County Clare (Ireland), Chichester and Liverpool (UK), and Malta. We take 16 and 17 year old students onto our year round adult courses and in addition we take closed groups (i.e. not mixed with other students) of young learners year round in our Portobello adult school. We run schools for young learners every summer in Rathmines and Chichester. Accommodation is for the most part in host families.

Who is covered by this policy?

ALL adults who have contact, in any form, with young people aged under-18 are covered by this policy. This is a Child Protection and Safeguarding Policy.

What is Safeguarding?

Safeguarding is the action taken to promote the welfare of children and protect them from harm. While protecting children from abuse is one part of safeguarding, children and young people also need safeguarding in order for them to grow, develop and achieve their full potential.

Child Protection – Protecting children from direct and/or harmful behaviour.

Young learners – Students under 18 (U18).

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Whilst the majority of this policy is applicable to all centres, the Safeguarding Officer or Academic Manager of each school is responsible for reviewing and updating the policy for their individual school in line with local conditions. This policy will be reviewed at least every two years and more frequently if needed in response to changes in legislation or national guidance.

Policy statement

Atlas Language School (hereafter referred to as Atlas) has a moral and legal obligation to ensure that, when given responsibility for young people, Atlas staff provide them with the highest possible standard of care. Atlas is committed to devising and implementing policies so that everyone accepts their responsibilities to safeguard and protect children from harm and abuse. This means following procedures to protect children and report any concerns about their welfare to appropriate staff and authorities. Atlas is committed to ensuring that:

- the welfare of the child is paramount.
- all children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have rights in general, and in particular the right to protection from all types of abuse. EVERY CHILD MATTERS.
- all suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately.
- **all staff (paid/unpaid) are covered by this policy and all staff have a responsibility to report concerns to the appropriate person**, normally the Designated Safeguarding Persons or Academic Manager.
- all staff receive appropriate training.
- this policy is disseminated to all staff, must be read by all staff and understood by all staff.

Atlas has a duty of care to safeguard all children from harm. All children have a right to protection, and the needs of disabled children and others who may be particularly vulnerable must be taken into account. Atlas will ensure the safety and protection of all children through adherence to the Child Protection guidelines adopted by Atlas.

Definition of child: A child is defined as a person under 18 (the Child Care Act 1991). The aim of this policy is to promote good practice, providing children and young people with appropriate safety and protection whilst in the care of Atlas and to allow staff to make informed and confident responses to child protection issues. This policy applies to real world and online environments.

Section 2

Safeguarding Children and Young People: Relevant Legislation

The UN Convention on the Rights of the Child (UNCRC) is an international treaty that recognises the human rights of children, defined as persons up to the age of 18 years. It pledges to protect and promote children's rights to survive and thrive, to learn and grow, to make their voices heard and to reach their full potential.

Of the 54 articles contained within the UNCRC, the most relevant statements to the current policy are detailed below:

Article 2: Children have the right to protection against discrimination.

Article 3: All adults should always do what is best for a child.

Article 12: Children have the right to an opinion and for it to be listened to and taken seriously.

Article 19: Children have the right to be protected from being hurt or badly treated.

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Republic of Ireland law, policy and guidance

Criminal Law (Sexual Offences) Act 2017

This Act addresses the sexual exploitation of children and targets those who engage in this criminal activity. It covers offences relating to the obtaining or providing of children for the purposes of sexual exploitation. It also covers offences of the types of activity which may occur during the early stages of the predatory process prior to the actual exploitation of a child, for example, using modern technology to prey on children and making arrangements to meet with a child where the intention is to sexually exploit the child. The Act also recognises the existence of underage, consensual peer relationships where any sexual activity falls within strictly defined age limits and the relationship is not intimidatory or exploitative.

Children First Act 2015

The Children First Act 2015 is an important addition to the child welfare and protection system as it will help to ensure that child protection concerns are brought to the attention of Tusla without delay. The Act provides for mandatory reporting of child welfare and protection concerns by key professionals; comprehensive risk assessment and planning for a strong organisational culture of safeguarding in all services provided to children; a provision for a register of non-compliance; and the statutory underpinning of the existing Children First Interdepartmental Implementation Group which promotes and oversees cross-sectoral implementation and compliance with Children First.

National Vetting Bureau (Children and Vulnerable Persons) Acts 2012–2016

Under these Acts, it is compulsory for employers to obtain vetting disclosures in relation to anyone who is carrying out relevant work with children or vulnerable adults. The Acts create offences and penalties for persons who fail to comply with their provisions. Statutory obligations on employers in relation to Garda vetting requirements for persons working with children and vulnerable adults are set out in the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012–2016.

Criminal Justice (withholding of information on offences against children and vulnerable persons) Act 2012

Under this Act, it is a criminal offence to withhold information about a serious offence, including a sexual offence, against a person under 18 or a vulnerable person. The offence arises where a person knows or believes that a specified offence has been committed against a child or vulnerable person and he or she has information which would help arrest, prosecute or convict another person for that offence, but fails without reasonable excuse to disclose that information, as soon as it is practicable to do so, to the Garda Síochána. The provisions of the Withholding legislation are in addition to any reporting requirements under the Children First Act 2015.

Criminal Justice Act 2006

Section 176 of this Act created an offence of reckless endangerment of children. This offence may be committed by a person who has authority or control over a child or abuser who intentionally or recklessly endangers a child by:

1. Causing or permitting the child to be placed or left in a situation that creates a substantial risk to the child of being a victim of serious harm or sexual abuse; or
2. Failing to take reasonable steps to protect a child from such a risk while knowing that the child is in such a situation.

Protections for Persons Reporting Child Abuse Act 1998

This Act protects those who make a report of suspected child abuse to designated officers of Tusla, the Health Service Executive (HSE) or to members of the Gardaí as long as the report is made in good faith and is not malicious. Designated officers also include persons authorised by the Chief Executive Officer of Tusla to receive and acknowledge reports of mandated concerns

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about a child from mandated persons under the Children First Act 2015. This legal protection means that even if someone reports a case of suspected child abuse and it proves unfounded, a plaintiff who took an action would have to prove that the individual who reported the matter had not acted reasonably and in good faith in making the report. If a report is made in good faith and in the child's best interests, an individual may also be protected under common law by the defence of qualified privilege.

Child Care Act 1991

This is the key piece of legislation which regulates child care policy in Ireland. Under this Act, Tusla has a statutory responsibility to promote the welfare of children who are not receiving adequate care and protection. Tusla has a duty to take appropriate action to promote the welfare of the child.

Policy aims

The aim of the Atlas Safeguarding Policy is to promote good practice by providing children and young people with appropriate safety and protection whilst in the care of Atlas Language School and to allow all staff to make informed and confident responses to specific child protection issues.

A child's rights

Anyone under the age of 18 is legally considered to be a child in Ireland

- All children have rights. No one can take away a child's right to be safe.
- All children have a voice.
- All children have the right to say 'no' if any person tries to do something to them which they feel is wrong.
- All children have the right to be supported against bullies.
- All children must feel they can tell an adult of any incident that frightens or confuses them, or makes them unhappy.
- All children must know that if they go to an adult for help, they will be listened to seriously and supported.
- All children have the right to be treated with respect and to be safeguarded from harm.

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2 The Atlas Language School Code of Conduct and promoting good practice

Child abuse, particularly sexual abuse, can provoke strong emotions in those dealing with such a situation. It is important that staff understand these feelings and do not allow them to interfere with their judgement about the appropriate action to be taken. Abuse can occur anywhere but especially in the home, school or in a sporting environment. Staff will have regular contact with young people and will play a central role in identifying cases where a student needs protection.

All suspicious cases of poor practice must be reported following the guidelines in this document.

The Atlas Code of Conduct

- All staff and responsible adults will promote an atmosphere of tolerance and respect and will actively challenge extremist views that threaten this atmosphere. Staff and responsible adults will promote core Irish values of democracy, the rule of law, individual liberty and tolerance of different beliefs and cultures.
- All staff and responsible adults need to set standards and to be excellent role models – be somebody children can trust, use appropriate language, be punctual, be fair and not have favourites, give clear instructions, know professional boundaries, be positive, react and respond appropriately to a variety of situations.
- All staff and responsible adults need to have an appropriate appearance for a work environment.
- All staff and responsible adults should refrain from smoking, drinking alcohol or consuming illegal drugs in the environs of students.
- All staff and responsible adults should not swear in front of young learners.
- All staff and responsible adults should be aware of Atlas guidelines on the use of social networks and misuse of IT.
- All staff and responsible adults in residential centres should be aware of appropriate forms of behaviour in accommodation, particularly around bedrooms and bathrooms and the right to privacy.
- All staff and responsible adults should be aware of the correct action to take with regard to arranging transportation for young learners.

This Code of Conduct is built upon in the following sections which give examples of good practice and poor practice.

Good practice

All staff should be encouraged to demonstrate exemplary behaviour in order to promote a child's welfare and reduce the likelihood of allegations being made. The following are common sense examples of how to create a positive culture and climate.

Following good practice can be as much for your benefit as for the student's.

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You SHOULD:

- work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- implement this policy at all times
- remember, other people may misinterpret your actions, no matter how well-intentioned
- challenge unacceptable attitudes of behaviour from other members of staff or students
- set an example you wish and expect others to follow
- treat all young people equally, avoiding favourites
- respect a young person's right to personal privacy
- make the experience of studying with Atlas fun and enjoyable: promote fairness, confront and deal with bullying
- treat all young people (including disabled young people) equally, with respect and dignity
- put the welfare of each young person first, before winning or achieving goals
- maintain a safe and appropriate distance from children and young people in your care (e.g. it is wholly inappropriate for staff to have an intimate relationship with a child or to share a room with them)
- avoid unnecessary physical contact with young people. Where any form of manual/physical support is required it should be provided openly and with the consent of the young person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the young person's consent has been given. Keep any physical contact with a child brief and don't touch a child anywhere that would normally be covered by a swimming costume
- use the procedure: demonstrate – ask permission if you have to touch a child – for example to demonstrate a sporting technique. However, it is always best to avoid touching at all and simply to demonstrate the technique
- try to ensure that other students and if possible other staff members or group leaders are present if physical contact is prolonged or sensitive – for example to comfort a crying child, if someone is injured or if you have to separate children who are fighting
- request written consent from the group leader if staff are required to transport young people in their cars. **You should NOT do this alone**
- ensure you work in pairs with the appropriate gender of staff doing the supervising if students have to be supervised in changing rooms
- be an excellent role model – this includes not smoking or drinking alcohol in the company of young people
- give enthusiastic and constructive feedback rather than negative criticism
- recognise the developmental needs and capacity of young people and disabled adults – avoiding excessive training or competition and not pushing them against their will
- keep a written record of any injury that occurs, along with the details of any treatment given. This should be recorded in Atlas incident reports
- ensure you know the location of medical consent forms for administering emergency first aid (provided you are qualified to do so) or other medical treatment if needed
- recognise if a student is developing a 'crush' on you. Do nothing that might be construed as encouraging this. Inform the Academic Manager. Never flirt with a student or make sexually suggestive or provocative comments, even in fun.

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Poor practice

It is not always easy to distinguish poor practice from abuse. It is therefore NOT the responsibility of employees to make judgments about whether or not abuse is taking place. It is, however, their responsibility to identify poor practice and possible abuse and to act if they have concerns about the welfare of the child.

You SHOULD NOT:

- spend time alone with young people away from others
- betray a situation of trust
- permit abusive peer activities (e.g initiation ceremonies)
- share changing rooms, washrooms, toilets or bedrooms with children. Always warn children before entering these places. Avoid being in these places with children unless absolutely necessary, and pay special attention to avoid being alone with a child. Always make sure you are there with another member of staff of the correct sex
- take young people alone in a car on journeys, however short
- engage in rough, physical or sexually provocative games or contact, including horseplay
- engage in inappropriate language with young people – writing, phoning, email or internet
- hit, throttle, push, kick or otherwise act aggressively either physically or verbally towards a child even in pretence
- share a room with a child
- enter children's rooms alone in a residence or invite children into their rooms
- take young people to your home where they will be alone with you
- allow or engage in any form of inappropriate touching
- allow children to use inappropriate language unchallenged
- make sexually suggestive comments or threats to a child, even in fun
- reduce a child to tears as a form of control
- fail to act upon and record any allegations made by a child
- do things of a personal nature for children or disabled adults they can do for themselves
- invite or allow children to spend time with you alone and unsupervised

N.B. It may sometimes be necessary for staff to do things of a personal nature for children, particularly if they are young or disabled. These tasks should only be carried out with the full understanding and consent of the child and group leader. Be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. **Do not take on responsibility for tasks for which you are not appropriately trained.**

All Atlas staff are made aware of the Atlas Code of Conduct on induction – a signed and dated copy is retained by Atlas and another given to individuals for personal reference.

IF IN DOUBT – REPORT IT!

3 Child protection, how to handle a disclosure, how to report suspicions of abuse and who to report it to

Atlas Language School, Dublin, has fully-trained, nominated **Designated Safeguarding Persons**. These officers are available at the contact details below. The main DLP who is a designated safeguarding person provides training to all members of staff and is supported in their role by other Deputy DLPs who are safeguarding officers.

DLP Safeguarding Officer Ciarán Lynch can be found at the Reception in Portobello House. Eve Reddin can also be found at the Reception in Portobello House. Ana Egitto can be found in our Rathmines Centre offices. Gareth Hampton-Gray can be found in the main office of the Junior Programme in Rathmines, St. Louis High School.

Email: ciaran@atlaslanguageschool.com / juniordublin@atlaslanguageschool.com

Phone: Ciarán – 087 991 5032 Gareth – 0894305490

Emergency number: An out-of-hours emergency contact number will be supplied to under-18 students studying in our adult centre.

If there is an issue outside school hours, arrangements will be made to have the child removed from a house immediately if the situation warrants it. The Academic Manager or one of the school's directors will be contacted immediately and they may go to the house concerned if necessary.

Defining Child Abuse

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. Remember **P.E.N.S.**

Physical Abuse: This is where someone physically hurts or injures a young person e.g. hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, and drowning. Giving young people alcohol or inappropriate drugs would also constitute child abuse.

Emotional Abuse: This is the persistent emotional ill treatment of a young person, likely to cause severe and lasting adverse effects on the child's emotional development. It may involve telling a young person they are useless, worthless, unloved, and inadequate or valued in terms of only meeting the needs of another person. Emotional abuse may occur when the young person is constantly criticised, given negative feedback, expected to perform at levels above their capability. Other forms of emotional abuse could take the form of name calling and bullying. Ill-treatment of children, whatever form it takes, will always feature a degree of emotional abuse.

Neglect: This occurs when an adult fails to meet the young person's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the child's health or development. For example, failing to provide adequate food, shelter and clothing, failing to protect from physical harm or danger, or failing to ensure access to appropriate medical care or treatment. Refusal to give love, affection and attention can also be a form of neglect. Neglect in sport could occur when a coach does not keep the young person safe, or exposing them to undue cold/heat or unnecessary risk of injury.

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Sexual Abuse: This occurs when adults use children to meet their own sexual needs, whatever form this may take. Showing young people pornography or talking to them in a sexually explicit manner are also forms of sexual abuse.

Possible Indicators of Abuse

Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that a child is being abused may include one or more of the following:

- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- an injury for which an explanation seems inconsistent
- the young person describes what appears to be an abusive act involving them
- another young person or adult expresses concern about the welfare of a young person
- unexplained changes in a young person's behaviour e.g. becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper
- inappropriate sexual awareness
- engaging in sexually explicit behaviour
- nightmares, sleep problems
- sudden or unexplained personality changes/mood swings; seems withdrawn, angry, clingy,
- shows significant changes in eating habits
- an older child behaving like a younger child, e.g. bedwetting or thumb-sucking
- develops fear of particular places or resists being alone with particular child or young person for unknown reasons
- shows resistance to routine bathing, toileting or removing clothes even in appropriate situations
- play, writing, drawings or dreams include sexual or frightening images
- refuses to talk about a secret he/she has with an adult or older child
- stomach aches or illness, often with no identifiable reason
- leaves clues that seem likely to provoke a discussion about sexual issues
- uses new or adult words for body parts; engages in adult-like sexual activities with toys, objects or other children
- develops special relationship with older friend that may include unexplained money, gifts or privileges
- intentionally harming himself or herself, i.e. drug/alcohol use, cutting, burning, running away
- sexual promiscuity
- develops physical symptoms, e.g. unexplained soreness, pain or bruises around genital or mouth
- sexually-transmitted disease
- pregnancy

This list is not exhaustive.

What to do if you suspect abuse – how to report

We may become aware of possible abuse in various ways. We may see it happening, we may suspect it is happening because of signs such as those listed above, it may be reported to us by someone else or directly by the young person affected. In the last of these cases, it is particularly important to respond appropriately.

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If you suspect an adult (or another student/child) is a threat to a child in some way, tell the Designated Safeguarding Person or Academic Manager IMMEDIATELY. If a student says or indicates that they are being abused, you should use the following guidelines without delay. You must act on allegations made. You MUST NEVER ignore an allegation or suspicion

Do:

- stay calm in the event of an allegation. Don't panic, don't over-react. It is unlikely that the student is in immediate danger.
- Listen, hear and believe. DO NOT INTERPRET OR TWIST THE WORDS OF SOMEONE MAKING AN ALLEGATION
- give time to the person to say what they want
- reassure & explain that they have done the right thing in telling. Explain that only those professionals who need to know will be informed
- **report the allegation or suspicion IMMEDIATELY to the Centre Manager or Designated Safeguarding Person.**

Don't:

- try to deal with it yourself
- gossip with colleagues about what has been said to you
- make a child repeat a story unnecessarily

What the Centre Manager or Designated Safeguarding Person will do

The Designated Safeguarding Person (DSP) is responsible for ensuring that reporting procedures are followed correctly and promptly, and they act as the liaison person with other agencies.

The person handling the disclosure will follow the principle of T.E.D. – Tell me, Explain to me, Describe to me.

- The Centre Manager or DSP will take a written statement from all parties involved.
- All contact between the child concerned and the alleged abuser should cease with **immediate** effect.
- The Centre Manager or DSP will speak to the person concerned to advise them of the allegations and advise them that no further contact is permitted.
- The Centre Manager or DSP will take appropriate action which may involve contacting external agencies, contacting agents / parents, suspending the member of staff concerned (or student) pending an investigation
- If the Centre Manager is the subject of the suspicion/allegation, the initial report must be made to the DSP, who will decide whether or not to refer the allegation to Social Services and inform other relevant parties.

It is not the responsibility of anyone working for Atlas, in a paid or unpaid capacity, to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns by reporting these to the Centre Manager or DSP. Atlas ensures all staff that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child.

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Handling a disclosure by a child

It is normal to feel overwhelmed and confused in this situation. Child abuse is a difficult subject that can be hard to accept and even harder to talk about. Children who are abused are often threatened by the perpetrators to keep the abuse a secret, so telling someone takes real courage.

Children have to grapple with a lot of issues, including the fear that no one will believe them. Care must be taken to remain calm and to show support throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure. Ideally, a child making a disclosure should be taken immediately to the Centre Manager or DSP. In the event that this is not immediately possible, these notes will help you in handling the disclosure.

Receive

Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down. Accept what is being said without judgement. Take it seriously.

Reassure

Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously. **Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.** Tell the child that you will need to tell some people, but only those whose job it is to protect children. Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React

Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions.

Do ask open questions like "Is there anything else that you want to tell me?" Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children whose first language is not English. Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and to whom you have to talk. Refer directly to the named DSP, or designated person in your organisation (as set out in this policy). **Do not discuss the case with anyone outside the Safeguarding team.**

Record

Make some brief notes at the time of the allegation and write them up in detail as soon as possible. *Do not destroy your original notes in case they are required by court.* **Record the date, time, place, words used by the child and how the child appeared to you – be specific.** Record the actual words used; including any swear words or slang. Record statements and observable things, not your interpretations or assumptions – keep it factual.

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What information should be recorded in the formal report?

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern – Tusla provide a [standard report form](#) which can be found in the Appendices; this will be available in the Safeguarding folder in the front office or in the academic office – which should include the following:

- The child's name, age and date of birth of the child.
- The child's home address and telephone number.
- Whether or not the person making the report is expressing their own concerns or those of someone else.
- The nature of the allegation. Include dates, times, any special factors and other relevant information.
- Make a clear distinction between what is fact, opinion or hearsay.
- A description of any visible bruising or other injuries. Also any indirect signs, such as behavioural changes.
- Details of witnesses to the incidents.
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
- Have the parents been contacted?
- If so, what has been said?
- Has anyone else been consulted? If so, record details.
- If the child was not the person who reported the incident, has the child been spoken to? If so, what was said?
- Has anyone been alleged to be the abuser? Record details.
- Where possible, referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact social services or Garda directly, or the ISPC Childline helpline on 1800 666 666 or text 50101.

Atlas Language School's closest TUSLA (social services office), in Lord Edward Street, Dublin 2, can be contacted on 01 6486 555.

vetting@garda.ie National Vetting Bureau/Garda Criminal Records Office

For vulnerable adults:

<http://safeguardingcommittee.ie/> National Safeguarding Committee
(Dublin South City 045-981810)

<http://www.internetsafety.ie/> Internet crimes

All reports will be reported to and recorded by one of the Designated Safeguarding Persons (DSP) and kept securely on the ATLAS internal computer network. Only the nominated Designated Safeguarding Persons (DSP), and Senior Management will have access to this folder, and outside agencies as appropriate.

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Confidentiality

Every effort should be made to ensure confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know basis only. This includes the following people:

- the director/s
- the parents of the person who is alleged to have been abused
- the person making the allegation
- Tusla (social services)/gardai
- the alleged abuser (and parents if the alleged abuser is a child).

What can adults do to prevent sexually harmful behaviour between children?

- Set and respect physical boundaries.
- Encourage children to also respect themselves and others.
- Demonstrate to children that it is all right to say “no” and that they need to accept “no” from others.
- Stay aware of how children are interacting with one another.
- Talk with children, and listen to what they have to say.
- Set clear guidelines.
- Regularly remind children of other trusted adults whom they can talk to.

4 Responsibilities and duty to report/handling a disclosure

Duty to report

ALL STAFF have a duty to report any allegation or suspicion of inappropriate contact with children to line/senior managers. Report any suspicions to the Safeguarding Officer or Centre Manager. All staff (paid or unpaid) have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff (paid or unpaid) to promote good practice by being excellent role models, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

Failure to comply

Non-compliance with the policy on contact with students under 18 will result in disciplinary procedures. (See disciplinary procedure in staff handbook)

Employers have a duty to, and will remove an individual from any activity where there is risk of harm to children. Employers have a ‘duty to refer’ the suspicion or allegation of an individual having inappropriate contact with young people to external authorities where there is risk of harm to children.

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External consequences of non-reporting

The Children First Act 2015 does not impose criminal sanctions on people who fail to make a report to Tusla. However, there are a number of administrative actions that Tusla could take if, after an investigation, it emerges that an individual did not make a report and a child was subsequently left at risk or harmed. Tusla may pass information about the failure to report to the National Vetting Bureau of An Garda Síochána. This information could then be disclosed to the individual's current or future employers when they are next vetted.

In general, many employers consider a failure to report a child protection concern to be a disciplinary matter. Employers are encouraged to include references to obligations in relation to mandated reporting in codes of conduct and contracts of employment for relevant persons. The Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012 requires that any person who has information about a serious offence against a child, which may result in charges or prosecution, must report this to An Garda Síochána. Failure to report under the Act is a criminal offence under that legislation. This obligation is in addition to any obligations under the Children First Act 2015.

Internal enquiries

The Directors will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further garda and social services inquiries. Irrespective of the findings of the social services or garda inquiries, Atlas will assess all individual cases to decide whether a member of staff can be reinstated and how this can be sensitively handled.

This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by garda. In such cases, Atlas will reach a decision based upon the available information which could suggest that on a balance of probability; it is more likely than not that the allegation is true. The welfare of the child should remain of paramount importance throughout.

Incidents that must be reported/recorded

If any of the following occur you should report this immediately to the Centre Manager and record the incident. You should also ensure the child's group leaders are informed:

- if you accidentally hurt someone
- if a student seems distressed in any manner
- if a child appears to be sexually aroused by your actions
- if a child misunderstands or misinterprets something you have done.

5 Specific areas of abuse

- Female genital mutilation (FGM)
- Child sexual exploitation

Female genital mutilation

FGM is a form of child abuse. FGM is illegal in Ireland yet is still practised in certain cultures and religions. In the event that you have suspicions that FGM has taken place please advise your line manager, the DSP or contact the ISPCC – they have a helpline dedicated to FGM that is anonymous and open 24/7, you can call them on: 1800 666 666.

Child sexual exploitation

Official definition of child sexual exploitation

Sexual exploitation of children and young people under-18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

The definition of child sexual exploitation is laid out in Ireland's Criminal Law (Sexual Offences) Act 2017.

Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may be groomed online. Some children and young people are trafficked into or within Ireland for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Child sexual abuse online

When sexual exploitation happens online, young people may be persuaded, or forced, to:

- send or post sexually explicit images of themselves
- take part in sexual activities via a webcam or smartphone
- have sexual conversations by text or online.

Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the sexual abuse has stopped.

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Child sexual exploitation in gangs

Sexual exploitation is used in gangs to:

- exert power and control over members
- initiate young people into the gang
- exchange sexual activity for status or protection
- entrap rival gang members by exploiting girls and young women
- inflict sexual assault as a weapon in conflict.

Girls and young women are frequently forced into sexual activity by gang members.

Who sexually exploits children and young people?

Identifying abusers is difficult because:

- data often is not recorded or is inconsistent or incomplete
- children and young people often only know their abuser by an alias, nickname or appearance
- victims may be passed between abusers and assaulted by multiple perpetrators
- children and young people are often moved from location to location and abused in each place
- young people may be given alcohol or drugs
- the number of known perpetrators is likely to be far higher than those reported.

People who sexually exploit children are often described as highly manipulative individuals. They exert power over young people through physical violence, emotional blackmail or financial pressure, for example holding them in debt. To maintain control or to distance children and young people from those who may be able to protect them, abusers create or exploit weaknesses such as: to maintain control or to distance children and young people from those who may be able to protect them, abusers create or exploit weaknesses such as:

- being isolated/distant from friends and family
- disengagement from services such as education or health
- challenging or criminal behaviour.

6 What to do if another child is accused of sexual abuse

What are the warning signs?

Behaviours that may indicate increased risk include:

- Regularly minimising, justifying, or denying the impact of inappropriate behaviours on others.
- Making others uncomfortable by consistently missing or ignoring social cues about others' personal or sexual limits and boundaries.
- Preferring to spend time with younger children rather than peers.
- Insisting on physical contact with a child even when that child resists.

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- Responding sexually to typical gestures of friendliness or affection.
- Reluctance to be alone with a particular child; becoming anxious when a particular child is nearby.
- Offering alcohol/drugs, sexual material or inappropriate “privileges” to younger children.

Stronger indicators of risk for abusive behaviour include:

- Linking sexuality and aggression in language or behaviour;
- Engaging in sexually harassing behaviour online or in person; and forcing any sexual interaction.
- Turning to younger or less powerful children rather than peers to explore natural sexual curiosity.
- The inability to control inappropriate sexual behaviours involving another child after being told to stop.
- Taking younger children to “secret” places or hideaways to play
- “Special” undressing or touching games.

The signs that a child is being sexually abused by another child would be the same as the signs discussed earlier in this document.

What can we do to help prevent sexually harmful behaviour between children?

Set and respect physical boundaries.

As adults we are responsible for modelling the boundaries we want children to honour. Even young children should be respected and their preferences accommodated when possible.

Encourage children to also respect themselves and others.

Teach children to value respectful interactions—including sexual interactions. Create environments where children will see that emotionally or sexually aggressive behaviours are not tolerated and that harmful behaviour will always be challenged.

Demonstrate to children that it is all right to say “no” and that they need to accept “no” from others.

Encourage them to always speak up if someone acts in a way that makes them uncomfortable, even if they were unable to object or to say “no” at the time. Teach children that they must listen to and accept others’ limits as well.

Stay aware of how children are interacting with one another.

Be alert to the warning signs that a child or young person may be acting in ways that make it difficult for other children to set a limit, or in ways that are sexually aggressive or abusive.

Talk with children, and listen to what they have to say.

Be someone that children can trust. Treat all children equally and do not have favourites.

Set clear guidelines and keep a careful eye on children’s internet and video game use

Explain to children the risks associated with using the internet, if possible restrict access to sites that are not age-appropriate, and ask them to tell you if they receive messages or emails containing suggestive or sexually explicit material.

What should you do if a child accuses another child?

Report to the Safeguarding Officer, or Centre Manager immediately. The Safeguarding Officer will ensure that both parties have separate support (i.e. accuser and accused) and will ensure that all accounts are fairly, comprehensively and accurately reported.

He or she will then contact the Tusla for further advice.

Section 3 Safeguarding Vulnerable Adults

There are no national guidelines in Ireland in relation to Vulnerable Adult abuse akin to those for the protection of children and young people (Children First). Nor is there a specific classification of crime in terms of age. Incidents of physical and sexual assault, fraud and financial exploitation are crimes and should be reported to Gardaí. In the case of Sexual Offences involving people with disabilities, there is specific provision in Section 5 of the Criminal Law (Sexual Offences) Act 1993. Ireland is a signatory to the UN Convention on the Rights of Persons with Disabilities.

However, the Adult Safeguarding Bill 2017 proposes legislation on protection from harm for vulnerable adults, primarily the elderly, but also those with mental health problems or learning disabilities. It also calls for the establishment of a National Adult Safeguarding Authority.

Nevertheless, there is no mention of protection for vulnerable adults, including asylum seekers or refugees, or for specific sexual orientation, those who are transgender for instance. The International Protection Bill 2015 does point to the need to safeguard asylum seekers and refugees, but the legislation is weak in this regard.

Definition of a vulnerable adult

A vulnerable adult is a person aged 18 years or over who may require assistance to care for themselves, or protect themselves from harm or from being exploited. This may be because they have a disability (either mental health, intellectual or physical), a sensory impairment, are old and frail, or have some other form of illness.

At Atlas, in an EFL context, we consider that a student with limited English may find themselves in a vulnerable situation and require assistance.

Definition of a vulnerable person for the purposes of Garda vetting

The Garda Vetting Bureau (children and vulnerable persons) Act 2012 defines a vulnerable person as a person, other than a child, who:

- (a) is suffering from a disorder of the mind, whether as a result of mental illness or dementia,
- (b) has an intellectual disability,
- (c) is suffering from a physical impairment, whether as a result of injury, illness or age, or
- (d) has a physical disability, which is of such a nature or degree – (i) as to restrict the capacity of the person to guard himself or herself against harm by another person, or (ii) that results in the person requiring assistance with the activities of daily living including dressing, eating, walking, washing and bathing.

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Vulnerable adult abuse is any mistreatment that violates a person's human and civil rights. The abuse can vary from treating someone with disrespect in a way which significantly affects the person's quality of life, to causing actual physical suffering. A vulnerable adult may be subjected to more than one form of abuse at any given time.

Physical abuse such as hitting, pushing, pinching, shaking, misusing medication, scalding, restraint, hair-pulling.

Sexual abuse such as rape, sexual assault, or sexual acts to which the vulnerable adult has not or could not have consented, or to which they were pressurized into consenting.

Psychological or emotional abuse such as threats of harm or abandonment, being deprived of social or any other form of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, being prevented from receiving services or support.

Financial or material abuse such as theft, fraud or exploitation, pressure in connection with wills, property, or inheritance, misuse of property, possessions or benefits.

Neglect such as ignoring medical or physical care needs and preventing access to health, social care or educational services or withholding the necessities of life such as food, drink and heating.

Discriminatory abuse such as that based on race or sexuality or a person's disability and other forms of harassment or slurs.

Domestic abuse refers to physical or emotional force or threat of physical force, including sexual violence in close adult relationships. It can also involve emotional abuse; the destruction of property; isolation from friends, family and other potential sources of support; threats to others including children; stalking; and control over access to money, personal items, food, transportation and their phone.

Elder Abuse is defined as "a single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust which causes harm or distress to an older person or violates their human and civil rights". After 65 years old is the point beyond which abuse may be considered to be elder abuse.

The abuse may be a single act or repeated over a period of time, it may take one form or a multiple of forms. The lack of appropriate action can also be a form of abuse.

Safeguarding best interest recognises the vulnerability of individuals where they are unable to make their own decisions and / or protect themselves, their assets or their bodily integrity and ensures appropriate and accountable protection for them.

Responding to and reporting vulnerable adult protection concerns

If you are concerned about the protection or welfare of a vulnerable adult, contact the DSP. It is recognised that adults have the right to self-determination and to make decisions, even if this means that they remain at risk. Where there are concerns regarding diminished capacity, consideration should be given to requesting a specialist assessment of the person's decision-making capacity in the context of the abuse allegations and the risk posed to the person.

When the DSP receives a report about suspected or actual abuse, they should consider the wishes of the vulnerable adult and if there are reasonable grounds for reporting to the Statutory Authorities. This will mean:

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- Clarifying or getting more information about the matter;
- Consulting with the vulnerable adult to hear his/her wishes etc;
- Where there is any doubt or uncertainty, consulting with the Statutory Authorities to obtain their advice on the situation;
- Where there are concerns about the diminished capacity of the vulnerable adult, considering assessment of decision making capacity in the context of the abuse allegations and the risk posed to the person;
- Making a formal referral to the Statutory Authorities.

A full written record of all decisions will be maintained by the DSP. Where a person is at immediate risk you should contact the Garda Síochána or Emergency Services on 999 or 112.

Confidentiality

All information concerned with the identification and reporting of vulnerable adult abuse is subject to best practice guidance on confidentiality. Where a vulnerable adult has capacity, their consent should be sought prior to disclosing information to another agency / Statutory Authorities.

Mandatory Reporting

It is a legal requirement throughout Ireland for any person who knows or believes that a serious offence has been committed including an offence relating to Rape, Sexual Assault and False Imprisonment to report such information to Gardai. It is an offence not to do so where that failure cannot be reasonably excused.

Consent

The consent of the vulnerable adult should be sought prior to reporting any matter to the civil authorities and onto family and care service providers. Sometimes adults do not want civil authorities to take action to investigate or protect them from harm. People have a right to make such choices about reporting; however if a criminal act is suspected, it must be reported. If upon receipt of the concern, where the vulnerable adult does not give consent to reporting, and it is not clear that a criminal act has taken place, and where the DSP believes others may also be at risk of harm, consultation should take place with the civil authorities as to the best course of action, in the absence of consent from the alleged victim.

In considering the capacity of the vulnerable adult to give consent, the following factors should be taken into account:

- The adult has the capacity to understand what is being asked of him/her
- Sufficient information is given, in a way that the person understands, to enable him/her to make an informed decision
- Consent is not received through any form of coercion.

If they are unable to give informed consent, discussions should take place with their carer, guardian or close family about reporting concerns/allegations and, where appropriate, discussions should take place with medical or social work personnel. There may need to be a determination as to who can give consent on behalf of the vulnerable adult; in some instances there may already be provision in place; consultation may be required with legal advisers and statutory personnel.

Please note the DSP should not make determinations around capacity to give consent, without consultation with appropriately trained and skilled personnel.

7 Radicalisation and Extremism

There is currently no government strategy in Ireland to stop people becoming involved in violent extremism or in supporting terrorism. However, Atlas staff must be vigilant and report anything worrying or out of the ordinary to the Academic Manager or DSP.

Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo-and/or and/or undermine contemporary ideas and expressions of freedom of choice.

Extremism (represented on both sides of the political spectrum) is an ideology, particularly in politics or religion, considered to be far outside the mainstream attitudes of a society or to violate common moral standards. Extremism can take many forms; political, religious and economic.

ELT organisations have been identified as areas where extremists may expound their views and try to involve others. In order to minimise the potential for our students being radicalised Atlas will;

- ensure that all views are respected, and challenge any which don't allow all students / staff to work easily together.
- identify a staff member with responsibility for developing and implementing policies to challenge extremism and radicalisation, who will develop and share links with other local organisations in a similar position.
- ensure there is a culture of understanding the terms 'radicalisation and extremism' and, if necessary, reassure staff and students that they will be supported if reporting any concerns (whistle-blowing) in this area.
- reinforce to students and staff the importance of mutual respect and tolerance in Irish culture.
- focus on online safety, ensuring appropriate filters are in place and that students understand what the organisation's online rules are.
- ensure the school environment is one where everyone feels safe and supported; not allow the display or promotion of inappropriate materials or organisations.

8 Safer recruitment

Atlas recognises that anyone may have the potential to abuse children in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children in Atlas. Pre-selection checks include the following:

Atlas follows a policy of safer recruitment which means:

- References for staff and host families will include a specific enquiry as to whether there is any impediment to the employee/family being employed in a situation where s/he will have responsibility for the care of or substantial access to children.
- A self-disclosure form about any criminal record and suitability to work with young people must be completed prior to employment.
- All references will be followed up.
- We will require completion of Garda Vetting before the induction day and normally prior to employment commencing for staff.
- No host family will be permitted to host under-18s unless Garda Vetting has been returned to the Accommodation Office.

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- In the event of delayed suitability checks, additional checks on suitability will be undertaken by way of obtaining extra references (over and above 2), both verbal and written. Applicants will commence work but will not be allowed to engage in any activity that involves interaction with children or young people. All such work will be risk assessed and there will be clear boundaries outlining the work that can and cannot be undertaken until checks have been received. Such risk assessments will ensure that the unchecked adult is not involved in regulated activity or in residential areas. Additionally, all staff will be expected to sign Atlas' Code of Conduct, which commits them to upholding the highest standards in the way they undertake their professional duties, and in their personal conduct.
- Staff must provide proof of identity and abode prior to taking up employment with Atlas.
- Any gaps in CVs must be explained satisfactorily.
- Applications for employment will normally only be accepted via the official Atlas Language School application form.
- Staff recruited from outside Ireland must also have police certificates from the last country they worked in.
- Staff who work abroad during the year and return in subsequent years (i.e summer work) must provide one reference from an employer in the intervening period (as long as a full check was done in the first year of employment in Ireland, and the records are still on file).
- Checks must be renewed every three years.

All advertisements for staff and host families will state 'Atlas Language School follows a policy of safer recruitment'. Furthermore, some of the questions asked in interviews will be specifically designed to explore the candidate's attitude towards working with young learners.

Evidence or disclosure of a criminal record will not necessarily result in a candidate not being appointed to a position. Naturally, the nature of the disclosure will be taken into account and if deemed irrelevant to dealing with young people, the candidate may well be successful if all other employment criteria are met. Such issues will be dealt with on a case-by-case basis.

Host families

- ❑ All the adults in a host family must have individual Garda Vetting Checks.
- ❑ Atlas employs a notification system which alerts us in advance to when an under-16 resident in a host family turns 16, at which point a Garda Vetting check is necessary.
- ❑ Checks will be renewed every three years.

Group leaders

Group leaders appointed by an agency must be checked by the agency in their own country, which must confirm that these checks have been carried out and that the person concerned has been cleared. In addition, group leaders coming with their own group (i.e. not sent by agency or by a school) must send in advance or bring with them evidence that they have been police checked and have been cleared.

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9 Garda Vetting Disclosure

It is Atlas' policy to vet all teaching, social and administrative staff prior to employment. In addition to this it is currently Atlas policy to check the main householder in every host family. Also every other adult member in a host family will complete the Atlas Child Declaration form. References will be followed up for host families and such references will specifically ask if the referee knows of any reason why a particular family is not suitable to host people under 18.

In the event of contra-indicators resulting from Garda Vetting that make an informed decision impossible, Atlas reserves the right to discontinue the relationship with the individual/s involved.

See the [Garda Vetting Policy for staff](#) and the [Garda Vetting Policy for Host Families](#) for further information.

10 Professional boundaries

The following are some examples of where professional boundaries may be exceeded.

- Personal relationships between a member of staff (paid or unpaid) and a student are discouraged. This includes through social networking sites such as Facebook.
- Use of abusive language is prohibited.
- Use of punishment or chastisement is prohibited.
- Passing on personal contact details to students is discouraged.
- Taking students to a member of staff's home is prohibited.
- Selling to or buying items from a student is prohibited.
- Accepting responsibility for any valuables on behalf of a student is prohibited.
- Accepting money as a gift or borrowing money from or lending money to a student is prohibited.

11 Training

The main DSPs have received formal training up to level 3. All current staff have received training from the Safeguarding Officer in the key issues of Child Protection. New staff receive the same training as part of the induction process. All staff sign a declaration that they have received and understood this training and comprehend the importance of the issues raised.

- Atlas undertakes to provide training sessions and to promote understanding and awareness of the Atlas Safeguarding Policy. This will happen
 - via the induction process (see below) with all new members of staff
 - via 'cascade training' provided by the Atlas DSPs through presentations/workshops
 - via making 'Safeguarding' a standing item on all meeting agendas, thereby raising awareness
- Atlas undertakes to review on an annual basis at a minimum the practice and implementation of its Safeguarding Policy and to provide any such further training as may be deemed necessary.
- Atlas will ask all staff (existing and new) to complete a short online course in the basic awareness of child protection issues ([Children First training](#))

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- Atlas will assist staff through training to;
 - analyse their own practice against established good practice, and to ensure their practice is not likely to result in allegations being made
 - recognise their responsibilities and demonstrate how to report any concerns about suspected poor practice or possible abuse
 - respond to concerns expressed by a child or young person
 - work safely and effectively with children
 - receive advisory information outlining good practice and informing staff about what to do if they have concerns about the behaviour of an adult towards a young person
 - gain First Aid training (where necessary).

Inductions

All employees will be required to undergo an interview. All employees receive an induction, during which:

- checks will be made that self-disclosure forms have been completed
- qualifications will be substantiated
- the job requirements and responsibilities will be clarified
- child protection procedures will be explained and training needs will be identified
- they will be asked to complete a short online course in Basic Awareness of Child Protection Issues
- staff will be asked to consent to the organisation's Code of Ethics, Conduct, and Child Protection policy by signing the Self Declaration form.

12 Electronic contact with students under the age of 18

Staff must exercise the same discretion and maintain the same professional distance in any electronic contact with children (anyone under 18) as they would in normal day-to-day life. Electronic contact includes phone communications (including texting) and online environments. Broadly speaking, never engage in any electronic communication with any students under the age of 18. In particular:

Good practice

- Never initiate electronic contact with a child unless for clear pedagogical purposes that have been sanctioned by the Academic Manager
- If a child contacts you electronically, keep your tone friendly, professional and neutral
- Avoid situations that involve the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings
- If a child seeks to develop an inappropriate personal relationship with you electronically, do nothing to encourage this; inform the Academic Manager and send a copy of any relevant communications. Do not engage in electronic communication with a student
- If a child confides sensitive information to you electronically, such as details of abuse, react as described in this policy under 'If a child discloses abuse'. Record the details and send a copy of all relevant communications to the Academic Manager

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- Do not initiate or accept 'friendship' requests from children however innocent these requests may seem, as this provides access to photos and other intimate details of each other's personal lives
- Do not establish or seek to establish social contact with U18s/students during or after the course
- Do not give personal email addresses or personal phone numbers to students under 18
- Do not communicate via email, text, phone or social networking sites, blogs, web pages or instant messaging services with U18s
- Do not post photos or videos of students under 18 on any social networking sites
- Do not distribute (by any means) images or information about students of any age
- Always avoid becoming personally involved in a student's personal affairs
- Always be aware that personal web profiles can be viewed by anyone and therefore you should be especially cautious about public web profiles and privacy settings
- Always seek advice from a line manager if an U18 seeks to establish social contact with you. **Normally, you should never do this**

Use of photographic/filming equipment

There is evidence that some people have used sporting events and summer camps as an opportunity to take inappropriate photographs or film footage of young and disabled people in vulnerable positions. All members of staff should be vigilant and any concerns should be reported to the Academic Manager and record the incident. There is no intention to prevent teachers/staff using video equipment or photography legitimately. However:

- parents, group leaders and students **must** give their written consent to any photography
- any photography/filming must take place in an open, public area and never in isolation
- the reasons why any photography/filming is taking place must be fully explained to those concerned
- the results of any photography/filming must be carefully stored, controlled and used only for the purpose for which they were intended.

13 Health and Safety

Part of providing a safe and secure environment for all of our students and staff means implementing robust Health and Safety policies, risk assessments and suitable levels of supervision. This Safeguarding Policy forms one of a suite of Atlas policies, including Health and Safety, and they should all be read and considered in their totality. In other words, the health and safety of a young person needs to be considered along with specific child protection issues when considering the whole area of Safeguarding. **All associated policies have been made available through line managers.**

Risk Assessments

Risk assessments are completed for every activity undertaken and are central to effective safeguarding of our students. The Groups and Social Programmes Manager ensures that the correct risk assessment is given to relevant staff leading an activity; that staff members read the risk assessment prior to departure or prior to starting the activity and sign a master sheet held by the Groups and Social Programmes Manager stating that they have read and understood the potential risks involved in the activity and what to do should anything happen. Post activity, the staff member then signs the risk assessment, with any updates deemed necessary, and returns

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the sheet to the Groups and Social Programmes Manager for filing. An EMERGENCY REACTION PLAN is given to every member of staff conducting an activity both on-site and off-site.

Incident reporting

Staff are reminded during inductions of the importance of recording incidents and the correct procedure for doing so.

Ratios

Staff/adult to student ratios will be age appropriate and activity appropriate but will never be fewer than 1:15 for students aged 12-17. Group leaders will never be made responsible for students who are not in their own group.

Road safety

All students, irrespective of age, are given appropriate training during inductions in the area of road safety, crossing roads safely, using pedestrian crossings and so on, as these may differ greatly from those in their own country.

Supervision levels

Students are given guidance in inductions and handbooks as to levels of supervision and curfew times, and what they may and may not do in their spare time. Supervision notes are sent to the student's parents so they are aware of what levels of supervision to expect for their child.

Missing students

Daily registers are kept for all lessons and activities. Classroom checks are done first thing in the morning to ensure all students are present. Missing students are reported to the Academic Manager who then follows this up with the group leader or with the Accommodation Office who will then contact the host family. An [Attendance and Punctuality Policy](#) is printed in the student handbook and expectations regarding attendance are covered in the student induction.

Fire safety

A full fire safety policy is in the policies folder but regular drills are held and fire marshals have been appointed – posters indicating who the fire marshals are can be found in the basement. All staff receive training in the use of firefighting equipment and fire risk assessments have been completed for the school buildings. Fire safety is covered in inductions for students and staff.

First Aid and medical

Medical consent forms are obtained for all students, as are personal details forms. Medical information is first relayed to the Admissions Team. They then input the information into the computer system in the student's record. In addition, they provide a report in writing to the relevant department head concerning any specific medical issues for students in their centre. There is a Health and Safety (HAS) code which appears under a student's name on the class register if appropriate. It is the teacher's responsibility to ask for further information on the relevant student.

Parents are advised on the medical consent forms that medicines should be left with host parents for safe supervision and administration. In the case of residential centres, medication is handed to the manager to be kept in a secure and cool location, to be administered at the appropriate time along with the group leader. A Register of Medicine Administration is kept. A minimum of 1 in 5 staff have received First Aid training from St John's Ambulance. Signs are prominently displayed identifying emergency service contact details and these are also written in all handbooks.

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Discipline and boundaries

Disciplinary procedures and possible consequences of poor behaviour are outlined in student and staff handbooks. Curfew times are set for U18s and communicated to host families and students via handbooks, supervision notes (examples to follow) and terms and conditions.

Airport transfers

All drivers used by taxi companies and coach companies have Garda Vetting clearance. If a student wants to travel independently from the airport to the host family, we still ask for arrival details so we can ensure the family is in when the student arrives. We also provide the student with information regarding the safest and best way to get to the school. For all students U18 travelling independently, we recommend either to the agent or to the parent that they have assisted check-in and travel as an unaccompanied minor. The taxi company we use provides this service if requested to do so.

14 Welfare

Named person

Ciarán Lynch is one of the Welfare Officers in Portobello House, alongside Eve Reddin and the rest of the FOH team. In the summer centres, the Centre Managers have this pastoral role and they are named on posters throughout the school. Of course, all staff have a responsibility to ensure a good level of welfare support for all students. In the adult school we have specific activities for U18s in addition to a weekly meeting where welfare issues may be discussed. This meeting is compulsory and registers are taken.

Activities

Activities are age appropriate. In sporting activities students of roughly similar ages will be put together.

Signs

Signs are prominently displayed in all centres showing who to see for welfare or safeguarding issues.

15 Transfers policy for individual students under 18

This policy is sent to parents of students under 18 who do not wish to use Atlas-arranged transportation on arrival or departure.

Atlas Language School has a strict policy regarding transfers for individual students under 18 from any port of entry in Ireland to the school and or host family. Normally we would expect any student under 18 to come to the school and/or host family via transportation booked and arranged by Atlas. Parents of students may decide to make their own arrangements but only if the following conditions are strictly followed. The parent must:

- provide Atlas with the name, address and phone number of the person meeting and delivering the student to the school and/or host family as soon as possible and preferably with the enrolment

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- ❑ provide Atlas with a signed letter or consent form agreeing to such a transfer and giving Atlas the details (flight number, arrival time etc)
- ❑ agree to Atlas contacting the person doing the transfer to verify the details of the transfer
- ❑ agree to pass Atlas emergency contact details to the student and the person collecting the student
- ❑ ensure that the student carries with him or her a letter from Atlas on Atlas Language School headed paper letter stating that this student is not being met by the school but by a family friend or relative and to give their phone number
- ❑ ensure that the student also carries a copy of the Atlas form 'Parental consent for a relative or family friend to provide a transfer for a student under 18 to the school or host family'
- ❑ return the completed consent form. By completing and signing the consent form the parent agrees to the above conditions.

16 Supervision of students under 18

The following tells you what we tell the parents of our students who are under the age of 18.

Supervision notes for parents of students aged 16 and 17 attending adult classes

In Ireland anyone under 18 is considered a child in the eyes of the law. As such, we have an extra care of duty towards this group of students to ensure that their welfare needs are properly met and that they have a safe and secure time with us here at Atlas. Atlas follows these additional procedures to enhance the safety and security of 16 and 17 year olds studying in adult classes:

1. We maintain a signing in/out sheet in reception. All 16 and 17 year old students must sign this sheet on entering and leaving the school premises. (See [Attendance and Punctuality Policy](#))
2. We hold specific inductions for 16-17 year olds. This induction covers all the same topics as the regular induction but more time is spent on
 - a. Laws relating to smoking/alcohol/drugs
 - b. What to do if they have a problem/who to call/how to call emergency services
 - c. What to do if they are arrested
 - d. Curfew times
 - e. How to deal with aggressive behaviour on the street
 - f. Importance of queuing/saying please/thank you/speaking quietly if in buses etc.
 - g. Importance of speaking to us if they have a problem
3. We offer a special meeting just for 16 and 17 year olds once a week with our social programme/admin staff. The purpose of this meeting is to have a chat, to check how they are finding things so far, and to ask if they need any help or advice. We advertise this meeting on the sign in/sign out register.
4. We make our external tour company aware of any under-18s going on excursions with them. We ensure our staff are aware of who the under-18s are on any activities we organise.

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5. We have a dedicated link on the Atlas website which covers how we care for this age group.
6. We will offer one free social activity every two weeks specifically for 16 and 17 year olds.
7. We have specific curfew times for students under 18 which are clearly written in handbooks each student receives. They are reproduced here.

If you are aged 15 to 17 you must obtain your host family's permission if you wish to stay out after 10pm and in any event you must be home by 10.30pm

If you are aged 12 to 14 you must not leave the area of your home in the evenings and you must be indoors by 9pm. Students taking part in an evening activity with their group leader must be home by 10pm at the latest. If you are 17 or younger, host families must know where you are at all times.

- 1) We take personal details from every student so that we have contact details for a responsible person back home whom we may contact in the event of an emergency.
- 2) All of our staff receive child protection training from our Designated Safeguarding Persons
- 3) Although we try to place your son or daughter within walking distance of the school, this is not always possible, especially during the summer months. The cost of travel cards is provided at induction
- 4) Students have access to an out-of-hours emergency phone number.

Please note, there will be frequent times when your son or daughter is not supervised by a member of Atlas staff. We cannot supervise every student 24 hours a day. That is why we require you to complete the consent letter contained in this package and to send it back to us. However, we hope that the measures we have put in place will mean that your son or daughter has a safe and problem free stay with us in Ireland.







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Supervision notes for parents of group students aged under 18 studying on out of summer group programmes (Stage Groups) and summer group programmes















In Ireland anyone under 18 is considered a child in the eyes of the law. As such, we have an extra care of duty towards this group of students to ensure that their welfare needs are properly met and that they have a safe and secure time with us here at Atlas.

- 1 We hold specific inductions for young learners. This induction covers
 - Laws relating to smoking/alcohol/drugs
 - What to do if they have a problem/who to call/how to call emergency services
 - What to do if they are arrested
 - Curfew times
 - How to deal with aggressive behaviour on the street
 - Importance of queuing /saying please / thanks you/ speaking quietly if in buses etc
 - Importance of speaking to us if they have a problem
- 2 We have appropriate numbers of staff trained in first aid
- 3 We have strict curfew times and rules for students under the age of 18. These curfew times are written in student handbooks and all of our host families are aware of these times. These curfew times are reproduced here. **It would help us greatly if you could go through these rules and expectations with your son or daughter before they come to Ireland**







ADVICE FOR HOST FAMILY ACCOMMODATION

| | |
|---|--|
|  | <u>GIVE YOUR MOBILE NUMBER TO YOUR HOST FAMILY</u> |
|  | Always keep your student card with you. |
|  | Ask your host family where/when you can wash your clothes. They may offer to wash them for you or show you how to use the washing machine. |
|  | In Ireland we flush toilet paper down the toilet and do not have separate bins. Sanitary towels or tampons should be wrapped in toilet paper and put in the bathroom bin. |
|  | If you are sick and cannot come to school, you must contact your group leader or ask your host to ring the school as soon as possible. It is important that someone knows where you are. |
|  | Always switch off lights and heaters when you leave a room. |

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| | |
|---|--|
|  | Showers should be 5-10 minutes. Host families may also ask that you shower at particular times, based on the hot water supply. |
|  | You should be home for all evening meals or let your host family know in advance if you will not be home for dinner. This means you must go home directly after your group activities. |
|  | You should not use the kitchen without permission, nor help yourself to food and drink unless your host family gives you permission to do so. |
|  | Keep your bedroom tidy. |
|  | No takeaway food in bedrooms or in your host's house without their permission. |
|  | Do not lose your key if you are given one – IF YOU DO, YOU WILL HAVE TO PAY FOR ANY COSTS |
|  | Keep valuable items locked in your suitcase – ATLAS WILL NOT ACCEPT RESPONSIBILITY FOR LOST OR STOLEN ITEMS |
|  | Do not make noise – especially after you go to bed or when you come in during the evening. |
|  | If you would like to invite your friends to your host family's house, please ask your host first if this is okay. |
|  | Never accept lifts from strangers or go anywhere with them. Go everywhere with a friend if you can. |
|  | Do not carry a lot of money or and do not show expensive items in public. Especially not in the city centre or in crowded places. |
|  | NO FIGHTING OR BULLYING ANYWHERE OR AT ANYTIME |
|  | No smoking is allowed anywhere or at any time for students under the age of 16. |
|  | No alcohol is allowed anywhere or at any time, nor is illegal drug use. |

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| | |
|---|---|
|  | <p>Do not steal or shoplift.</p> |
|  | <p>Do not play with fire alarms or fire extinguishers – IF YOU DO, YOU WILL HAVE TO PAY FOR ANY COSTS</p> |
|  | <p>Do not damage school or homestay property - IF YOU DO, YOU WILL HAVE TO PAY FOR ANY COSTS</p> |
|  | <p>Make sure you have the school number and your group leader's number. YOU MUST KEEP YOUR PHONE ON AND BE CONTACTABLE AT ALL TIMES WHEN YOU ARE NOT IN SCHOOL</p> |
|  | <p>Go to every class on time.</p> |
|  | <p>Make sure all rubbish is disposed of in the school bins provided.</p> |

17. Bullying and abusive behaviour

We want to have a happy school, and bullying will not be accepted in any form (religious, cultural, race, gender, sexual orientation). If you bully someone this is very serious and we may send you home. We welcome students from all backgrounds and will not allow discrimination by students or staff on the grounds of religion, gender, sexual orientation, or ethnicity. In addition, even greater sensitivity will be shown to students who are arriving in Ireland from countries currently in the midst of internal or international conflict.

If somebody is bullying you, tell your group leader, your teacher or the Centre Manager.

Remember, we are here to help and we want you to be happy with us. If something or someone is bothering you, **please tell us!**

Atlas Safeguarding Policy



What time do I have to be home?

| Age | Time |
|--------------------------|---|
| If you are aged 15 to 17 | You must obtain your host's or group leader's permission if you wish to stay out unsupervised and you must be home by 10pm |
| If you are aged 12 to 14 | You must obtain your host's or group leader's permission if you wish to stay out unsupervised, and you must be home by 9pm . |

Free time

- You may have free time in the evenings and on Sundays.
- You must follow the times when you have to be home in the evenings
- You may not leave the Dublin area (except with your group leader if you have one or with your host)
- You must go home for your evening meal immediately after school or activities have finished
- Your host must know where you are at all times
- You must be contactable at all times you are not in school (i.e. during your free time) **AND YOUR PHONE MUST BE KEPT ON**
- You are not allowed to go outside Dublin on your own at weekends or in the evening.
- You must never be out alone

Please note that the full Atlas Safeguarding Policy is available on our website

Student Code of Conduct

This is the Code of Conduct, which appears in junior student handbooks.

Everyone at Atlas is important. No-one is more or less important than other people. Students, staff, and host families should all feel comfortable, safe, important and respected. We need your help to make sure this happens – **and we expect your help.**

We ask you to agree to these things:

- **All students must accept and respect different beliefs and cultures.**
- Be honest, polite and respectful to other people (students, staff and hosts).
- We will never accept abusive or violent behaviour, including sexual, racial, or religious abuse. We will dismiss any student who does not follow this rule.
- Please look after school property (= our computers, tables, chairs, carpets, DVDs, etc.).
- Please look after your hosts' property.

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- Be safe. Take care of the safety of other people.
- Only use the school computers for your studies. Please do not try to use illegal websites.
- Switch off your mobile phone during lessons
- Follow school rules and Irish laws and customs.

18 Declaration of understanding

Please sign below to state that you have understood and will adhere to the guidelines set out in this policy to the best of your ability. This policy must be referred to regularly and will be updated when necessary.

“I acknowledge that I have read and understood the above policy and procedures in its entirety and agree to abide by them.”

Name (in bold): _____

Signature: _____

Date: _____

Atlas Safeguarding Policy



Appendix 1 – Useful forms

[Detailed report of student disclosure of abuse](#) (internal report form for completion by anyone taking a disclosure)

[Tulsa Child Protection and Welfare Report Form](#) (for completion by DSP)

Appendix 2 – Useful contacts

| Name | Number | Email/website |
|--|----------------------------------|--|
| Local social services/Tulsa office | Duty team contact 01 6486 555 | Area manager Des Delaney am.dscdw@tusra.ie |
| National Vetting Bureau/Garda Criminal Records Office | Locall 1890 488488 | vetting@garda.ie |
| ISPCC Childline helpline | 1800 666 666 or text 50101 | www.childline.ie |
| Samaritans | Freephone 116123 | www.samaritans.org |
| Internet crimes | Phone: (01) 602 8258 | Email: internetsafety@justice.ie or www.internetsafety.ie/ |
| National Safeguarding Committee (<i>for vulnerable adults</i>) | Dublin South City 045-981810 | http://safeguardingcommittee.ie/ |