To create the world's most accessible and innovative language school that changes lives through education.

English Path Dublin
Safeguarding Policy

Version History

Version	Author	Reviewed by	Pages	Approved by	Date published
3	Sian Matos	Dominika Comas		Sian Matos (Director of Global Operations)	05.10.2026
2	Sian Matos	-	39	Sian Matos (Regional Manager)	18.03.2025
1	Sian Matos	Sian Matos	33	Sian Matos (Regional Manager)	11.10.2024

Introduction

English Path is committed to safeguarding and promoting the welfare of young people and vulnerable adults. We expect all staff and volunteers to share this commitment. We are fully committed to ensuring that consistent effective safeguarding procedures are in place to support everyone at the school.

Translations available. Please ask Student Services.

©2026 English Path

Contents

Context 5
Declaration 6
Scope 6
English Path Safeguarding Team: 6
Terminology 7
Commitments 9
Best practice 10
Preventing Radicalisation 10
Safer recruitment 11
Group Leaders 11
Staff Induction 11
Students' Induction 12
External Suppliers and Contractors 12
Global/National Health Emergencies 12
Accommodation 12
Residential Accommodation 13
Arrival/Departure Transfers 13
Overnight Travelling 14
Curfews 14
Attendance 14
16 & 17 students on an adult course: 14
Students on a Young Learner programme: 15
Supervision 15
Risk Assessments 16
Welfare of students online 16
Social Programme 16
16 & 17 year old students on an adult course: 17
Data Protection 17
Student protection – information for staff 18

Types of child abuse and neglect, information for staff 18
Possible signs of abuse 19
Mental Health 19
Child Criminal Exploitation (CCE) 20
Consensual and non-consensual sharing of nudes and semi-nude images 21
Serious violence 21
Peer on peer/child on child abuse 21
Domestic abuse 22
Violence Against Women and Girls (VAWG) 22
So-called 'honour-based' abuse 23
Female Genital Mutilation (FGM) 23
Forced marriage 23
Procedures at EP Dublin 23
Responsibilities of all EP Dublin Staff 24
How to recognise possible signs of abuse 24
Handling disclosures from Children: 25
Keeping track of records 26
Reporting of Concerns and Role of the HSE 26
Action to be taken by School personnel 26
Action to be taken by the Designated Liaison Person 27
Allegations. 28
Allegations or suspicions of child abuse by EP employees or by a member of a hosting family 28
Procedures to be followed 28
Reporting Procedure: 29
Action to be taken by the Centre Manager 29
Further follow up required 30
Feedback from the HSE 31
Peer abuse 31
Reporting and recording 32
Confidentiality and information sharing: 32
Legal framework 33
Appendix 1 - Example Role Description: Designated Liaison Person 34

Appendix 2 - Contacts/useful links 35
Appendix 3 - Allegation/Concern Report Sample Form 36
Appendix 4 - Contractor & Supplier Safeguarding's Statement 38
Appendix 5 - English Path Staff Safeguarding 39

Context

English Path's head office is located at 891 Greenford Road, Greenford, London, UB6 0HE. We offer a range of language programmes in our UK schools located in London, Birmingham and Leeds. English Path also has schools in Berlin, Brisbane, Dubai, Dublin, Malta, Paris, Riyadh and Toronto. Each location has its own Safeguarding Policy in line with the requirements of each country.

This is the Safeguarding Policy for our school in Dublin, Ireland.

In Dublin, we are located at 1 Clarinda Park North, Dun Laoghaire, Co. Dublin, Ireland. We offer students aged 16 and 17 courses on adult programmes at English Path, Dublin as well as closed mini stay programmes. Other Young Learner courses are offered at our seasonal camp.

English Path is committed to providing a safe and secure environment for students, staff and visitors and promoting a climate where children and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others. We aim to safeguard and promote the welfare of students by protecting them from maltreatment; preventing impairment of students' mental and physical health or development; ensuring they grow in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

English Path recognises that there is a legal framework within which we need to work to safeguard students who have care and support needs and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant legalities. We are committed to safeguarding students in line with Irish legislation and relevant national and local guidelines.

At English Path we are committed to creating a culture of zero-tolerance of harm to students which includes: the recognition of students who may be at risk and the circumstances which may increase risk; knowing how abuse, exploitation or neglect manifests itself; and being willing to report safeguarding concerns.

This extends to recognising and reporting harm experienced anywhere, including on our activities programme, within other organised or voluntary activities, in the community, in the person's own home and in any other setting.

English Path is committed to best safeguarding practice and to uphold the rights of all students to live a life free from harm from abuse, exploitation and neglect.

Declaration

English Path believes everyone has the right to live free from abuse or neglect regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status. Our purpose is to care for our students, this is one of our core values, and our commitment is to provide and promote the welfare of all students (young learners and adults) regardless of age, gender, ethnicity, beliefs, nationality, or ability. Staff, suppliers and volunteers are expected to agree to and share this commitment.

English Path acknowledges that safeguarding is everybody's responsibility and is committed to preventing abuse and neglect through safeguarding the welfare of all students who study with us.

Actions taken by English Path will be consistent with safeguarding principles ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the student concerned.

Scope

English Path is devoted and committed to providing a safe environment and to care for the welfare of all its students (children and young adults included), regardless of age, gender, ethnicity, believes, nationality or ability. English Path expects all its staff, students, suppliers, and volunteers to adhere to and share this commitment. We understand that the students' needs are paramount, and we believe that every student has the right to feel safe. Therefore, we are committed to providing a safe environment, as far as is reasonably practicable, to protect them from physical or psychological harm.

EP Dublin Safeguarding Team:

Who to contact:

Designated Liaison Person - Dominika Comas and Deputy Designated Liaison person Kristina Bizjak and Noel Guckian Newell - +353 83 335 2042.

The EP Dublin Safeguarding team are located at: 1 Clarinda Park North Dún Laoghaire Co. Dublin Ireland

Terminology

Child / Young Learners

A person/people under the age of 18.

Concern

When someone is worried or concerned that a child is at risk of harm or not being looked after in the appropriate manner.

Designated Liaison Person

The Designated Liaison Person is the person appointed to take lead responsibility for students' protection issues in school. The person fulfilling this role must be a senior member of the school's leadership team or have experience in this role within another organisation.

Designated Safeguarding Officer

Safeguarding officer is the designated person within the school with primary responsibility for managing and reporting concerns about children and for putting into place procedures to safeguard children in the school.

Disclosures / allegations

When there is information which shows that an adult may have behaved in a way that is harmful towards a child.

Safeguarding

Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adult at risk and children, from that harm; and to respond appropriately when harm does occur. Safeguarding applies consistently and without exception across our programmes, partners, students, volunteers and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Adult at Risk of harm

Adult at risk of harm – Any student or visitor to the school whose personal circumstances may make them more vulnerable than many other adults. This term replaces 'vulnerable adult' which was used in previous versions of this policy. It is also frequently shortened to 'adult at risk'. Factors that may deem someone to be an adult at risk may include a physical disability (e.g. sight/hearing impairment, mobility impairment), special needs (e.g. learning difficulties, dyslexia), level of English (students with a low level of English may not fully understand instructions or be able to effectively express a concern), lack of local knowledge (unfamiliar with the local vicinity or customs). Each student's level of vulnerability may depend on the context and it cannot be assumed that someone who is not regarded as an adult at risk within the school premises doesn't become vulnerable off-site.

Welfare

Protecting and having systems in place to protect students from maltreatment and harm, ensuring they study with the provision of safe and care.

Commitments

- To foster a safe environment and to ensure we safeguard any child, young learner, or vulnerable adult (for the purpose of this policy referred to as students) while studying with English Path at any of our campuses.
- To identify the names of responsible persons in the school and explain the purpose of their role.

- To involve students in decision-making which affects them (taking the age and developmental stage of children into account.)
- To encourage positive and safe behaviour among students.
- To protect students from abuse or neglect and to reduce the risks of abuse or neglect.
- To prevent harm to students' health.
- To provide clear guidance to all teaching and non-teaching staff within the campus and the wider organisation on how to keep students safe and what to do in case of harm. To provide training sessions to staff members and to raise awareness of their responsibilities in identifying and reporting possible causes of abuse/harm/risk.
- To ensure that those responsible for recruitment are aware of how to apply safeguarding principles when employing staff.
- To implement and maintain good communication among the English Path community, as well as developing good and effective working relationship with other agencies where required (child protection/safeguarding partners).
- To create a good monitoring system of students thought to be at risk of harm and to ensure we provide support to those in need.
- To create a structured system that all staff have access to and can follow in case of harm/abuse.
- To ensure that all staff members working at each campus who have contact with students have been checked as to their suitability, including verification of their identity, qualifications, and an Enhanced GARDA VETTING check, and to ensure that this information is stored securely and kept up to date.
- To ensure staff members are positive role models to both students and other staff members and to never engage in rough, physical, or sexually provocative games.
- To ensure that if any deficiency or weakness is identified, it is addressed promptly.
- To ensure confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored in line with our Data Protection Policy.
- To commit to an annual Safeguarding review and report.

Best practice

Best practice refers to the actions of staff whilst working with or near to students. It also refers to the way staff communicate with students and the information that they share with them. In English Path's definition of 'best practice', we refer to staff having a warm professional relationship with students which allows students to feel welcome and supported during their time at school but maintains rigid professional boundaries.

The professional boundaries described include but are not limited to: staff not accepting friend or follower requests on social media from students; not spending time with students outside of school

and school-arranged activities; not giving out personal phone numbers and other contact information to students; and not forming relationships with students which go beyond the scope of respectful professional relationships between employees and customers.

Staff must behave in a way that upholds English Path's values of caring for each other, cherishing diversity and operating ethically and professionally. They should behave in a way that does not cause deliberate offence to other staff members, students, partners and service providers. Staff should protect themselves against liability or allegations which could cause conflict between them, the student and the parent(s)/guardian(s) by being mindful of their posture, language and tone. Staff are also expected to avoid using their position to gain access to information for their own advantage and/or a students' detriment, including the power to intimidate, threaten, coerce, or undermine students, or to form or promote relationships with students which are of a sexual nature, or which might become so.

When there is no guidance or staff are worried on how to proceed, they are advised to discuss the circumstances with the Designated Safeguarding Staff on campus, or Group Safeguarding Leads.

Staff are expected to; understand the responsibilities which are part of their employment role and be aware that appropriate sanctions will be applied where these are breached, always act and be seen to act in the students' best interest, take responsibility for their own actions and behaviour, be open to advice and feedback from colleagues and pass on any concerns regarding the conduct of colleagues where necessary.

Preventing Radicalisation

At EP Dublin, all staff and students are expected to have an acceptance and tolerance of a range of views and beliefs. This is clearly stated within our pre-course information. EP Dublin staff will receive training where they are made aware of what could potentially be viewed as an extremist or radicalized view and the process of referral if encountered.

Safer Recruitment

English Path Dublin is committed to ensuring that all staff working with children and young people are appropriately recruited and vetted.

Garda vetting will be carried out for staff undertaking relevant work or activities with children, in accordance with the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012–2016, as amended.

This includes staff whose roles involve:

- Responsibility for the care or supervision of children.
- Regular contact with students under the age of 18.
- Teaching, supervising or supporting children as part of English Path's educational and Young Learner programmes.

English Path will assess each role to determine the appropriate safeguarding and vetting requirements. Relevant staff must complete the required vetting process before commencing duties involving children.

Safer recruitment procedures also include appropriate identity checks, employment references, verification of qualifications where relevant, and safeguarding induction and training.

Records of recruitment and vetting checks will be maintained securely in accordance with applicable data protection requirements.

Group Leaders

All closed groups of students under the age of 18 must be accompanied by at least one Group Leader, with a maximum of 20 students per Group Leader, subject to the requirements of the programme and relevant risk assessments.

Before arrival, Group Leaders receive pre-arrival information and safeguarding guidelines through our partner agency. They are required to provide an appropriate criminal record or police clearance certificate from their country of residence. The Dublin Designated Liaison Person (DLP), oversees the verification and recording of these checks, including any additional Garda vetting requirements applicable in Ireland.

On arrival, the Programme Coordinator, or another designated member of the Young Learners team, meets with the Group Leaders to review safeguarding responsibilities, supervision arrangements, emergency procedures and programme guidelines. Group Leaders are required to confirm that they have read and understood these guidelines.

Planned excursions and activities are also discussed, and Group Leaders are provided with the relevant risk assessments, which they must review and acknowledge before participating.

Group Leaders' contact details, including a telephone number on which they can be reached while in Ireland, are collected before arrival and shared with the relevant English Path teams. This ensures that Group Leaders can be contacted promptly in the event of an emergency or incident involving a student in their group.

Staff Induction
All new members of staff receive an induction at the commencement of employment. Induction includes an overview of their role in the organisation together with identifying and reporting abuse, and confidentiality issues.

All staff receive training on Safeguarding Awareness to help them fulfil their responsibilities in respect of child protection.

All staff members take the Basic Awareness training and are also expected to join our regular in house CPD Safeguarding sessions. These trainings are organised by the Designated Liaison Person and will be renewed annually.

Students' Induction
As part of orientation process students receive an induction, this induction has a welfare section where they receive important details regarding their own security; school rules, who to speak to in case they need support with classes, health care, who's responsible for safeguarding at the school, laws of the country in which they are studying (alcohol/drugs) and a school/city tour. This is delivered by Safeguarding Officers.

As part of the induction and safeguarding procedures, students aged 16 & 17 years old will be giving a different coloured lanyard (green). Students enrolled in Young Learner programmes (green).

At school or on activities students will be reminded that they must always wear their lanyard.

External Suppliers and Contractors
All our external suppliers will sign a form confirming they are aware of the need to safeguard young and vulnerable adults within our school and community and will share this commitment. With this form they confirm all their employees have been advised, informed and vetted to work with children. Appendix 4 – sample form.

Global/National Health Emergencies

In the event of a global or national health emergency, such as the COVID-19 pandemic, English Path is committed to ensuring the safety and well-being of all students and staff. We will implement and regularly update our safeguarding policy to address emerging health risks, provide clear communication channels, and ensure access to mental health support. This includes adhering to government guidelines, facilitating remote learning when necessary, and fostering a supportive environment that prioritises the physical and emotional health of our community. Collaboration with local health authorities will be essential in maintaining a safe educational setting during such crises.

Accommodation

Students aged 17 or younger are not permitted to book a course without accommodation or to stay in their own accommodation, unless they are staying with their parents or legal guardian, and this has been arranged in advance with the appropriate documents signed. We reserve the right to inspect any accommodation which is not provided by English Path to ensure it's suitable for young students or vulnerable adults. Students aged 16 & 17 on an adult course must book half board homestay accommodation, and students on Young Learner Programme have mandatory full board accommodation options.

Students aged 8 to 12 will not share rooms with students aged 13 to 17, and they will be booked just as part of a group (not individually). The accommodation team will always try to allocate students aged 16 & 17 together, separated from younger students. 16- & 17-year-old students on adult courses will not be allocated with 16- & 17-year-olds on Young Learner programmes.

At English Path Dublin, homestay accommodation is arranged either directly through English Path or through our accommodation partners, Famworld and Hosts International.

All host families accommodating students under the age of 18 are subject to appropriate safeguarding checks. These include Garda vetting, where applicable, for relevant adults residing in the household, in accordance with Irish legislation and safeguarding requirements. English Path and its accommodation partners are responsible for ensuring that appropriate checks have been completed before placing students with host families.

Host families are encouraged to complete Tusla's *Children First* online safeguarding training and are provided with guidance on their safeguarding responsibilities, including how to recognise and report concerns.

English Path and its accommodation partners ensure that host families are visited and assessed before students are placed with them. This includes an accommodation inspection, a risk assessment and confirmation that the accommodation meets English Path's requirements and applicable TrustEd Ireland standards.

Host families are required to acknowledge their safeguarding responsibilities and comply with the relevant child protection procedures. Two independent references are obtained for new host families.

English Path and its accommodation partners maintain appropriate records of host assessments, safeguarding checks and inspections. Host families receive safeguarding information and guidance, with refresher training provided as appropriate to support the continued safety and welfare of students.

Residential Accommodation

Where residential accommodation is used by both under 18s and over 18s, the accommodation is split according to age. Under 18s are then split by male/female with separate bathroom facilities.

Arrival/Departure Transfers

All students arriving in Ireland are given our school emergency telephone number.

We request that those aged 16- and 17-years old book an arrival taxi to take them to their accommodation. The taxi drivers are Garda Vetting checked. Parents are informed of the risks if not booking a taxi transfer service in the parental consent form. If the student is being met by a friend or family member at the airport, or not booking an EP transfer we require their full contact details and travel information in advance of arrival.

Students enrolled on Young Learner programmes must book a transfer unless parents/guardian have made arrangements to drop their child off at school or EP provided accommodation, and parental consent has been signed in advance.

Overnight Travelling

Wherever possible, students should stay in their English Path provided accommodation. If students under the age of 18 wish to spend a night outside their accommodation in a different location, a parental consent form must be signed for each occasion providing details of where student is staying, with whom and return times. Students must be supervised by an authorised adult, ideally this person

should be known by the parents. These trips are not authorised during weekdays unless for exceptional reasons.

Curfews

Students aged 8 to 12 will not have unsupervised free time and their activities must have finished by 21.00 when they must be back in their provided accommodation.

Students aged 13 to 17 enrolled on a Young Learner Programme are allowed to have unsupervised free time while on the offered leisure programme, they must return to the provided accommodation by 22.00.

Students aged 16 and 17 on an adult course are allowed to have unsupervised free time, they must return to the provided accommodation by 22.00 Monday to Sunday. Sunday to Thursday and 23.00 Friday and Saturday.

Attendance

16 & 17 students on an adult course:

All students aged 16 or 17 on an adult course must sign in at the front desk on a daily basis before class.

All students aged 16 or 17 are highlighted on our registers to make the teacher aware of their age.

They, or their host family on their behalf, must call in or email before 08.45 if they are not coming to school that day.

If we have not heard from them and they are not in class, the teacher will tell the Academic Management team by 9:30am and we will call the student immediately. If the student doesn't answer and the host family are unavailable (or guardian if private accommodation) we will call their agent (if applicable) and keep trying. We will also try to contact the student through other media, including e-mail, WhatsApp and Facebook. If we are unsuccessful at contacting the student, agent, host family or guardian and still have no news from them by 5pm, their parents will be contacted.

Students on a Young Learner programme:

Students on a young learner course are required to attend 100% of their lessons and activities on a daily basis. Attendance is checked for every lesson or block of activities within the first 15 minutes of the class/activity starting.

They, or their host family on their behalf, must call or email in before 08.45 if they are not coming to school that day. If a student on a Young Learner programme is taken ill and their host is not home, the student must come to school where they will be supervised, accompanied to a doctor if necessary and they will be allowed to rest in the medical room until their host returns home.

If we have not heard from them and they are not in class, the teacher will tell the Academic Management Team by 9:15 am and we will call the student/host family immediately. If the student doesn't answer and the host family are unavailable (or guardian if private accommodation) a member staff will visit the student's accommodation and another member of staff will continue to try to make, contact.

Absence of any minor or vulnerable adult will be immediately followed up with notification to the police if necessary. In this case, the parent and/or agent will be contacted immediately to notify them.

For more details about how EP manages attendance and safeguards the wider school community please refer to our attendance policy.

Supervision

Extracurricular activities for under 18s are supervised with one adult for every 20 students. For students aged 8 to 12 is ratio is one adult for every 15 students.

Risk Assessments

All our activities are risk assessed and include particular consideration for under 18s and vulnerable students. Additional risk assessments are in place for unsupervised free time, which includes travelling from school/accommodation.

Welfare of students online

In case of the need to transfer our teaching online, as with face-to-face teaching, safeguarding and child protection is vital when teaching remotely. We have the following important processes in place to help us safeguard our students online.

- Students are strongly encouraged to keep their cameras on throughout the lessons.
- We have a set of helpful classroom rules for our classes which the teacher reminds the students of at the start of each lesson
- All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Using strong password protection, with passwords that are at least 8 characters, with a combination of upper- and lower-case letters, numbers and special characters
- Ensuring the hard drive is encrypted, so that if the device is lost or stolen the files on the hard drive cannot be accessed by attaching it to a new device
- Making sure the device locks automatically if left inactive for a short period of time
- Not allowing family or friends to use the device
- Storing the device securely to avoid theft
- Ensuring that anti-virus and anti-spyware software is up to date
- Installing updates to ensure that the operating system remains up to date
- Staff should ensure that all safeguarding concerns are reported immediately to the DLP.

Staff must ensure all communication with parents and students is conducted through the school following normal guidance and ensure this remains professional.

Social Programme

Students on a Young Learner Programme (13 to 17 as individuals < 12 if groups): The activity programme is an integral and compulsory part of the Young Learner Programmes offered by English Path. All activities are risk assessed.

16 & 17 year old students on an adult course:

Our weekly Social Programme is offered to ALL students on adult courses. Some activities are not suitable for this age group, and they will be informed about this during their induction. These activities are not compulsory and those aged Under 18 can choose to attend or not attend. Sign-up sheets are

located at the Student Services desk. Students Under 18 will be listed on the Sign-up sheet so staff can be sure they do not sign up for events not suitable for their age group. All Social Activities have a risk assessment completed to ensure the whole group attending are safeguarded during the excursion. These are reviewed by the teacher/activity leader prior to the excursion and the students informed of the risks and provisions put in place (see Excursion Policy).

Data Protection

English Path and its staff will ensure that all data about students is handled in accordance with the requirements of the law, and any national and local guidance. We ensure the Data Protection Act 2018 (DPA) and IRELAND General Data Protection Regulation (IRELAND GDPR) are followed in our procedures. DPA and IRELAND GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff will speak to the Designated Liaison Person or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of students. A record is kept where concerns/disclosures are recorded and stored securely by the Designated Safeguarding Person

Student protection – information for staff

Types of child abuse and neglect, information for staff

The welfare and well-being of our students is incredibly important. Any concerns regarding the safety or welfare of a student must be brought to the attention of the Safeguarding Officer.

Recognising abuse;

Abuse: a form of maltreatment of a person. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Students may be abused by an adult or adults or a child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent

or carer failing to: provide adequate food, clothing and shelter including exclusion from home or abandonment; protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DLP and DDLPs will be considering whether children are at risk of abuse or exploitation in situations outside their families.

Possible signs of abuse

All the staff needs to be alert to signs and symptoms that may indicate that a young person has suffered or is suffering abuse. Many of the signs and symptoms may have an alternative explanation but all are a concern, particularly if several of these occur are persistent (unexplained bruises or injuries; particularly if these seem to be inconsistent with the explanation, untreated injuries, reluctance to go home, fear of parents being contacted, , eating disorders, poor personal hygiene, withdrawal from physical contact, asking to move class, attention seeking or over compliance, attempted suicide/self-harm, violent outbursts / aggression to others, poor peer relationship, drugs or alcohol abuse, inappropriate sexual remarks, pregnancy)

Definitions, signs and symptoms of child abuse and neglect can be found in *Children First: National Guidance for the Protection and Welfare of Children (2017)*, published by the Government of Ireland.

https://www.gov.ie/en/department-of-children-disability-and-equality/publications/children-first-national-guidance-for-the-protection-and-welfare-of-children-2017/

In addition to the types of abuse and neglect outlined in this guidance, all members of staff must remain alert to the following specific safeguarding issues:

Mental Health

We are aware that mental health problems can, in some cases, be an indicator that a child/student has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members,

however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a student that is also a safeguarding concern, this will be shared with the DLP with a view to referring to appropriate agencies following the referral procedures.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education. Any possible CCE case will be shared with the DLP with a view to referring to appropriate agencies following the referral procedures.

Child Sexual Exploitation (CSE)

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 also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16- or 17-year-old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the

victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. Sharing nudes and semi-nudes covers the incidents where:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the Designated Liaison Person with a view to referring to appropriate agencies following the referral procedures.

Serious violence

All staff will be made aware of indicators, which may signal that students are at risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We are aware that there is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DLP.

Peer on peer/child on child abuse

We recognise that peer on peer abuse can have a devastating effect on children and vulnerable adults, including becoming a barrier to their learning and can have serious consequences for their mental health. Effectively preventing and tackling abuse can help to create a safe, disciplined environment where students are able to learn and fulfil their potential. If the evidence suggests that there was an intention to cause harm to the victim, an incident should be regarded as abusive whether or not severe harm was actually caused.

This is behaviour by an individual or group of individuals which can be a one-off incident or repeated over time, intentionally intended to hurt another individual or group either physically or emotionally.

Types of peer-on-peer abuse;

Bullying, cyberbullying, physical, sexual violence & harassment between children, initiation/hazing, teenage relationship abuse, sexting (when someone sends or receives a sexually explicit text, image or video – this includes sending 'nude pictures' or 'rude pictures' or 'nude selfies', having or distributing indecent images of an under 18 person is a criminal offence, under Sexual Offences Act 2003, many people are not aware of that. If an incident involving sexting occurs in our schools we will follow the guidance as set our in the IRELANDCCIS (IRELAND Council for Child Internet Safety)

Domestic abuse

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DLP with a view to referring to appropriate agencies.

Violence Against Women and Girls (VAWG)

VAWG is defined as any act of gender–based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of

"honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DLP with a view to referring to appropriate agencies.

So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage)

HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a student that might be at risk of HBA or who has suffered from HBA, they will share it immediately with the DLP with a view to referring to appropriate agencies.

Female Genital Mutilation (FGM)

FGM is a procedure where a part of the external female genitalia is removed and there is no medical reason for this. Whilst religious, social or cultural reasons are sometimes given for FGM, in IRELAND it is considered to be a way of controlling female sexuality which can cause severe and long-lasting damage to physical and emotional health, it is frequently a very traumatic and violent act for the victim and can cause harm in many ways. It is a criminal offence in IRELAND and mandatory for school staff to report any concerns about it.

Forced marriage

Forcing a person into a marriage is a crime in Ireland. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent. Any possible forced marriage case will be shared with the DLP with a view to referring to appropriate agencies following the referral procedures.

Procedures at EP Dublin

All staff at EP Dublin will follow the recommendations for reporting concerns or disclosures as outlined in the **2015 Children First Act** and the Department of Education and Science document, **Children First National Guidance 2017.**

The staff and the management of this school have agreed that:

– All concerns/disclosures involving child protection welfare issues will be reported in the first instance to the DLP (Deputy DLP where appropriate)

– Each report to the DLP will be dated and signed by the person making that report using the Standard Report Form (SRF). See Appendix 2

– A strict adherence to maintaining confidentiality- information regarding concerns or disclosures of abuse should be given on a 'need to know' basis.

Responsibilities of all EP Dublin Staff

English Path Dublin has nominated Dominika Comas as its primary Designated Liaison Person (DLP). This person is the Designated Liaison Person for the school in all dealings with the HSE, An Garda Siochana and other parties in connection with allegations of abuse. Those other parties should be advised that they should conduct all matters pertaining to the processing or investigation of alleged child abuse through the Designated Liaison Person. Where the Designated Liaison Person is unavailable for whatever reason, the **Deputy Designated Liaison Person (DDLP) Kristina Bizjak and/or Noel Guckian Newell,** will act and follow procedure. The Designated Liaison Person should immediately inform the Centre Manager that a report involving a student in the school has been submitted to the relevant HSE office.

How to recognise possible signs of abuse

Indicators of possible abuse are outlined in Chapter two and Appendix One of the Children First guidelines 2011. All staff should familiarize themselves with the contents of those sections. No one indicator should be seen as conclusive in itself and may indicate conditions other than child abuse. It is important that school personnel consult the relevant sections of Children First where they have concerns regarding possible abuse.

- Hard copies of Children First and this policy document are available in the main office
- In addition, a copy of the 2017 Children First: National Guidance for the Protection and Welfare of children can also be found in the main office.

The Children First guidelines state that a HSE should always be notified where a person has a reasonable suspicion or reasonable grounds for concern that a child may have been or is being abused or at risk of abuse. The following examples are quoted as constituting reasonable grounds for concern:

- Specific information from the child that he/she was abused.
- An account be a person who saw the child being abused
- Evidence, such as injury or behaviour, which is consistent with abuse and unlikely to be caused another way
- An injury or behaviour which is consistent both with abuse and with an innocent explanation but where there are corroborative indicators supporting the concern that it is a case of abuse – e.g. a pattern of injuries, an implausible explanation, other indications of abuse, dysfunctional behaviour, and
- Consistent evidence, over a period of time that a child is suffering from emotional or physical neglect.

A suspicion, which is not supported by any objective indication of abuse or neglect, would not constitute a reasonable suspicion or reasonable grounds for concern.

Handling disclosures from Children:

- An abused child is likely to be under severe emotional stress and a staff member may be the only adult whom the child is prepared to trust. Great care should be taken not to damage that trust.
- When information is offered in confidence, the member if staff will need tact and sensitivity in responding to the disclosure. The member of staff will need to reassure the child, and retain his or her trust, while explaining the need for action and the possible consequences, which will necessarily involve other adults being informed. It is important to tell the child that everything possible will be done to protect and support him/her, but not to make promises that cannot be kept e.g. promising not to tell anyone else.
- While the basis for concern must be established as comprehensively as possible the following advice is offered to school personnel to whom the child makes a disclosure of abuse:

- Listen to the child
- Do not ask leading questions nor make suggestions to the child
- Offer reassurance but do not make promises
- Do not stop a child recalling significant events
- Do not overreact
- Explain that further help may have to be sought
- Record the discussion accurately and retain the record on the SRF. See Appendix 2

This information should then be reported to the Designated Liaison Person. The record of the discussion should be given and retained by the Designated Liaison Person.

Keeping track of records

When child abuse is suspected, it is essential to have a record of all the information available. Staff should note carefully what they have observed and when they observed it. Signs of physical injury should be described in detail and, if appropriate, sketched. Any comment by the child concerned, or by any other person, about how an injury occurred should be recorded, preferably quoting words actually used, as soon as possible after the comment has been made. All records so created should be regarded as highly confidential and retained in a secure location by the Designated Liaison person.

In addition, each centre will record any incident in our Incident Reporting Book. The date and initials of the member of staff must be entered to confirm the reporting procedure.

Reporting of Concerns and Role of Tulsa

Action to be taken by School personnel

- If a school employee receives an allegation or has a suspicion that a pupil is being abused the school employee should, in the first instance, report the matter to the Designated Liaison

Person in EP Dublin. The need for confidentiality at all times, as previously mentioned, should be borne in mind.

Action to be taken by the Designated Liaison Person

- Where there are reasonable grounds for concern that a child has been abused or is at risk of abuse, the Designated Liaison Person (DLP) must ensure that the concern is reported promptly to Tusla, the Child and Family Agency, in accordance with *Children First: National Guidance for the Protection and Welfare of Children*.
- Reports should be submitted to Tusla using the Child Protection and Welfare Report Form, available through Tusla's reporting procedures. The DLP may also contact the relevant Tusla Duty Social Work Team by telephone for advice or to discuss an urgent concern.
- When making a report, the DLP should provide as much relevant information as possible about the child, the nature of the concern and any actions already taken. A lack of complete information must not delay a necessary report.
- Where a child is in immediate danger, An Garda Síochána must be contacted immediately by calling 999 or 112. Where an urgent child protection concern arises outside Tusla's operating hours and cannot wait, An Garda Síochána should be contacted.
- The DLP must inform the Centre Manager when a child protection report is made, unless the concern involves the Centre Manager, in which case the matter must be escalated to senior management. All information must be treated confidentially and shared only with those who need to know.
- Parents or guardians should normally be informed that a child protection concern is being reported, unless doing so could place the child at further risk, compromise an assessment or investigation, or otherwise be inappropriate. Where there is uncertainty, the DLP should seek advice from Tusla. Any decision not to inform parents or guardians must be recorded, together with the reasons.
- All concerns, reports, advice received and actions taken must be documented accurately and stored securely in accordance with English Path's safeguarding and data protection procedures.
- Staff who are mandated persons under the Children First Act 2015 retain their individual statutory reporting responsibilities.

- Where English Path staff have concerns about a child but are unsure whether the matter should be reported to Tusla, they should seek advice from the Designated Liaison Person (DLP). The DLP may consult the relevant Tusla Duty Social Work Team for advice on whether a formal report is required. Where appropriate, this consultation may take place without initially

disclosing identifying details. If Tusla advises that a report should be made, the DLP should act on that advice and follow the appropriate reporting procedures.

- If, following consultation, the DLP decides that the concern does not meet the threshold for reporting to Tusla, the reasons for this decision must be recorded in writing and communicated to the staff member who raised the concern. The staff member should be advised that they may contact or report the concern directly to Tusla if they remain concerned. Any report should be made using Tusla's Child Protection and Welfare Report Form (see Appendix 2). Persons reporting child protection concerns in good faith may be protected under the Protections for Persons Reporting Child Abuse Act 1998.
- Where a staff member is a mandated person under the Children First Act 2015, their individual statutory reporting obligations remain in place, regardless of the DLP's decision.

Allegations.

Allegations or suspicions of child abuse by EP employees or by a member of a hosting family

- This is intended to provide guidance to EP Management in situations where an allegation of abuse is made against a member of staff. The most important consideration to be taken into account by EP Management is the protection of the children. Their safety and well-being must be a priority. However, because of the involvement of EP employees or host family members; EP Management has duties in respect of them as well. The guidelines are offered to assist EP Management in having due regard to the rights and interests of the children under their care and those of the employee or host family member against whom an allegation is made.
- As employers, EP Management should note that legal advice should always be sought in these cases, as circumstances can vary from one case to another, and it is not possible in this procedure to address every case.

Procedures to be followed

- The reporting procedure in respect of the allegation,
- The procedure for dealing with the employee

In general, the same person should not have responsibility for dealing with the reporting issue and the employment issue. For English Path Dublin, the Designated Liaison Person is responsible for reporting the matter to the appropriate Tulsa office, while the Centre Manager, acting in consultation with the line manager of the employee, is responsible for addressing the employment issue. However, where the allegation of abuse is against the Designated Liaison Person, the Centre Manager will assume the responsibility for reporting the matter to Tulsa.

The primary aim of English Path is to protect the children within the school to whom they have a duty of care. However, school employees may be subject to erroneous or malicious allegations. Therefore, any allegation of abuse should be dealt with sensitively and the employee fairly treated. This includes the right not to be judged in advance of a full and fair enquiry.

Reporting Procedure:

- Where an allegation of abuse is made against an English Path employee, the Designated Liaison Person (DLP) must act promptly in accordance with the school's safeguarding procedures.
- The DLP should ensure that the allegation is recorded accurately, including the details provided by the person raising the concern. Where appropriate, a written statement may be obtained from the person making the allegation, including a parent or guardian acting on behalf of a child. However, obtaining a written statement must not delay any necessary safeguarding action or referral to Tusla.
- The DLP must inform the Centre Manager of the allegation without delay, unless the allegation concerns the Centre Manager, in which case it must be escalated to senior management. Information must be shared confidentially and only with those who need to know.
- **Reporting allegations:** Any English Path employee who receives an allegation of abuse against another employee must report it immediately to the DLP. The DLP will assess the concern in accordance with *Children First: National Guidance for the Protection and Welfare of Children* and consult or report to Tusla as appropriate.
- **Concerns or suspicions:** Employees who have concerns about the conduct of another employee must report these to the DLP without delay. Where there is uncertainty about whether a concern meets the reporting threshold, the DLP may seek advice from the relevant Tusla Duty Social Work Team.
- **Referral and follow-up:** Where reasonable grounds for concern exist, the DLP must ensure that the matter is reported promptly to Tusla. The Centre Manager, in consultation with senior

management and HR, will consider any necessary internal safeguarding and employment measures, ensuring that the safety and welfare of the child remain the priority.

- **Police involvement:** Where a child is in immediate danger, An Garda Síochána must be contacted without delay.
- All allegations, decisions, referrals and actions taken must be documented and stored securely. English Path will cooperate with Tusla and An Garda Síochána, where appropriate, while ensuring that any internal employment procedures are managed fairly and separately from external child protection assessments.
- Any statutory reporting obligations of mandated persons under the Children First Act 2015 remain in place.

Action to be taken by the Centre Manager

When the Centre Manager becomes aware of an allegation of abuse against a school employee, the Centre Manager should privately inform the employee of the following:

- The fact that the allegation has been made against him/her
- The nature of the allegation
- Whether or not the matter has been reported to the appropriate Tulsa office by the Designated Liaison Person.
- The employee should be given a copy of the written allegation, and any other relevant documentation. The employee should be requested to respond to the allegation in writing to the Centre Manager within a specified period of time. The employee should be told that his/her explanation to the Centre Manager would also have to be passed on to Tulsa.
- At this stage, it should be remembered that the first priority should be to ensure that no child is exposed to unnecessary risk. The Centre Manager should as a matter of urgency take any necessary protective measures. These measures should be proportionate to the level of risk and should not unreasonably penalize the employee, financially or otherwise, unless to protect children.
- If, in the Centre Manager's opinion, the nature of the allegation warrants immediate action, the Centre Manager should direct that the employee absent him/herself form the school with immediate effect. Where the Centre Manager is unsure as to whether the nature of the allegations warrants the absence of the employee from the school while the matter is being investigated, he/she should consult with the Child Care Manager of the local Tulsa office and/or An Garda Siochana for advice as to the action that those authorities would consider necessary. Following those consultations, the Centre Manager should have due regard for the advice offered.

- Any absence by a school employee would be regarded as administrative leave of absence with pay and not a suspension. Such leave of absence would not imply any degree of guilt on the part of the school employee.

Further follow up required

- Whether or not the employee is absent from the school on administrative leave, it is necessary for the Centre Manager to inform the relevant Line Manager immediately of the matter. The Centre Manager should convene an immediate management meeting for this purpose and inform EP management members of the nature of the allegations, the action taken in respect of same and the outcome of any consultations with Tulsa/or a Garda Siochana. Members of EP Management should be reminded of their serious responsibilities to maintain strict confidentiality about all matters relating to the issue. The principles of due process and natural justice should be adhered to by all members of EP management.
- It should be noted that, in certain situations, it might not be possible for EP Management to reach any definite conclusions as to whether the alleged abuse actually occurred. Such a situation could occur where the allegations of abuse relate to the past employment of the school employee and where these allegations are being investigated by either the HSE or a Garda Siochana. In such situations it may not prove possible for EP Management to conduct any proper enquiry into the allegations. In these cases the Centre Manager should maintain regular and close liaison with those authorities and a decision on the position of the EP employee should be taken having due regard to the advice given to the EP Management by those authorities.
- However, where the alleged abuse has taken place within the school, or relates to the abuse of pupils of the school by EP employees outside of school time, EP Management should convene a further meeting. At this meeting, management should consider in detail the allegations which have been made against the school employee and the source of those allegations, the advice of Tulsa and/or An Garda Siochana in relation to the allegation and the written response of the employee to the allegations.
- At this meeting the person/agency who is alleging abuse by the school employee should be offered an opportunity to present his/her case to EP management and may be accompanied by another person in doing so. Parents/guardians may act on behalf of a child. Likewise, the employees should be afforded an opportunity to make a presentation of his/her case to EP Management and may also be accompanied by another person.
- Having followed the procedures outlined above, and having satisfied itself that is has sufficient information to hand for it on make a determination in relation to the allegation, the Centre Manager should then make a decision on the action, if any, it considers necessary to take in respect of the employee.

Feedback from Tusla

- Under *Children First: National Guidance for the Protection and Welfare of Children*, Tusla is responsible for assessing child protection and welfare concerns referred to it, including allegations involving employees.
- Where an allegation concerns an English Path employee, the Designated Liaison Person (DLP), in conjunction with the Centre Manager, will liaise with Tusla as appropriate and seek relevant updates on the progress and outcome of the assessment, subject to confidentiality and data protection requirements.
- English Path recognises the importance of addressing allegations promptly and fairly, while prioritising the safety and welfare of children and respecting the rights of employees.
- Any information shared by Tusla will be considered alongside English Path's own internal procedures when determining whether further action is required. English Path will cooperate fully with Tusla and An Garda Síochána, where appropriate, and maintain confidential records of all relevant communications and decisions.

Peer abuse

- In a situation where child abuse is alleged to have been carried out by another child, the reporting procedures outlined above should be followed.
- Sexualised behaviour between children is inappropriate and must be taken seriously. Schools should arrange separate meetings with the parents of all the children involved in such behaviour with a view to resolving the situation.
- Sexualised behaviour may also be indicative of a situation that requires assessment by Tulsa

Reporting and recording

At English Path, we are committed to ensure that professional behaviour applies to relationships among students and staff, there are clear and professional boundaries, and everyone is aware of what

is an appropriate behaviour. Staff are required to work in a professional manner, and everyone should avoid conduct which can lead to questions about motivation and/or intent.

Personnel is required to report to the DLP or Safeguarding Officer any concerns or allegations about behaviour of colleagues that could put students at any risk. There are no retributions or disciplinary action taken against a member of staff who makes such report if it is done in good faith. It is an offence to not disclose information relating to possible child abuse.

Only the DLPs have access to the relevant forms. All information is recorded, and all records are signed and dated. They are kept confidentially and chronologically.

Records show:

- what the concerns were
- whether any follow-up action was taken
- how and why decisions were made

All incidents, disclosures or signs of abuse are fully recorded with dates, times, locations, and actions taken.

Confidentiality and Information Sharing

The Designated Liaison Person (DLP) will ensure that safeguarding information is treated confidentially and shared only with relevant professionals or agencies where necessary to protect the safety and welfare of a student.

Consent will be sought where appropriate. However, information may be shared without consent where there is a child protection concern or a legal obligation to report. Only relevant information will be disclosed to those who need to know, in accordance with applicable data protection requirements.

If the staff member reporting the concern or the DLP requires advice regarding confidentiality or information sharing, they may seek guidance from Tusla.

Staff must record all concerns or allegations accurately using the appropriate safeguarding reporting form (see Appendix 3). Records must be stored securely and shared only with authorised individuals.

Monitoring and Review process

Our policies and procedures are regularly reviewed and updated as required, at least on an annual basis. EP will review this policy when appropriate, i.e., a change to the legislation, a change of personnel or as a result of a safeguarding incident occurring.

English Path is committed to working in partnership with national and local agencies to practice at the highest possible level. As well as consulting our students and staff when appropriate.

English Path works with the local Council through their Local Authority Designated Officer to ensure that we take appropriate action. We act on their guidance and appreciate their support.

Yearly Report: At the end of each year the DLP(s) will create an annual report on the concerns and allegations. This is a record of the year and reviews the actions taken and enables us to make any necessary changes to our policies and procedures, and to review and update our training programmes.

Legal framework

English Path Dublin works in accordance with the Children First Act 2015 and Children First: National Guidance for the Protection and Welfare of Children. Where child protection or welfare concerns arise, English Path will liaise with Tusla, the Child and Family Agency, and An Garda Síochána where appropriate, following the relevant reporting procedures.

This policy is consistent with all other policies adopted by English Path and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children.

- Anti-Harassment and Anti-bullying
- Attendance Policy
- Equality and Diversity
- Health and Safety
- Mental Health and Wellbeing
- Modern Slavery
- Student Code of Conduct

Appendix 1 - Example Role Description: Designated Liaison Person

The designated person within the organisation has primary responsibility for putting into place procedures to safeguard students at risk, where relevant and for managing concerns about students at risk.

Duties and responsibilities include:

- Working with others within the organisation to create a positive inclusive environment at the campus.
- Play a lead role in developing and establishing the organisation's approach to safeguarding students and in maintaining and reviewing the organisation's implementation plan for safeguarding students in line with current legislation and best practice.
- Coordinate the distribution of the safeguarding student policy, procedures, and resources throughout the organisation.
- Contribute to ensuring other policies and procedures are consistent with the organisation's commitment to safeguarding students.
- Advise on the organisation's training needs and the development of its training strategy.
- Receive reports of and manage cases of poor practice and abuse reported to the organisation – including an appropriate recording system.
- Manage liaison with, and referrals to, external agencies for example social-care services and the police.
- Create a central point of contact for internal and external individuals and agencies concerned about the safety of students within the organisation.
- Provide advice and support to regional safeguarding/welfare officers and play a lead role in their recruitment, selection and training.
- Represent the organisation at external meetings related to safeguarding.

To create the world's most accessible and innovative language school that changes lives through education.

Appendix 2 – Contacts and Useful Links

Child Protection Information and Guidance

- **Tusla – Child and Family Agency**
  Child protection and welfare concerns, reporting guidance and contact details.
  https://www.tusla.ie/
- **Children First: National Guidance for the Protection and Welfare of Children (2017)**
  https://www.gov.ie/en/department-of-children-disability-and-equality/publications/children-first-national-guidance-for-the-protection-and-welfare-of-children-2017/
- **Children First Act 2015**
  https://www.irishstatutebook.ie/eli/2015/act/36/enacted/en/html
- **Tusla – Reporting Child Protection and Welfare Concerns**
  Information on reporting concerns, contacting the relevant Duty Social Work Team and submitting a Child Protection and Welfare Report.
  https://www.tusla.ie/children-first/
- **Department of Education – Child Protection**
  https://www.gov.ie/en/department-of-education/
- **An Garda Síochána**
  For emergencies or concerns involving immediate danger, contact 999 or 112.
  https://www.garda.ie/

Relevant Legislation

- Child Care Act 1991, as amended
- Children First Act 2015
- Protections for Persons Reporting Child Abuse Act 1998
- National Vetting Bureau (Children and Vulnerable Persons) Acts 2012–2016, as amended
- Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012
- Criminal Law (Sexual Offences) Act 2017
- General Data Protection Regulation (EU) 2016/679
- Data Protection Act 2018

All safeguarding concerns must be reported in accordance with English Path Dublin's safeguarding procedures. The Designated Liaison Person (DLP) is responsible for coordinating referrals to Tusla, where appropriate. Staff who are mandated persons under the Children First Act 2015 retain their individual statutory reporting responsibilities.

Useful Contacts:

English Path Dublin: Dublin South Social Work Department – 01 6637300

YL Centre Dublin South: Dublin South Social Work Department – 01 663 7300

Appendix 3 - Allegation/Concern Report Sample Form

Please complete if you have any (safeguarding/prevent) concerns about a student or staff member. You must complete the boxes in bold. Other information can be filled in by the DLP later if you don't know.

Date	
Student first name	
Student family name	
Gender	
Date of Birth	
Nationality	
Group/Individual booking	
Student booking number	
Name of person noting concern	
Role/connection with school	
Date and time concern noted	
Location	
Concern (please provide as much detail as possible) **NB: If reporting a disclosure/allegation made by a student, please use this space to describe accurately (or a close as you can remember) the conversation. (You can add extra paper if you need to give more details)**	
Signed	

Response to concern. This section to be completed by the DLP.

Do parents, group leader, agent, homestay, other need to be informed? YES/NO

Does this need to be elevated to Senior Manager? YES/NO If yes please complete below:

Reported to: _____

Date : _____

Response & follow up	**By whom** (full name)	**When** (date and time)

Appendix 4 - Contractor & Supplier Safeguarding's Statement

English Path is committed to provide a safe environment to its students and protect them from maltreatment and harm.

Contractors and suppliers visiting school are made aware of this commitment.

- Contractors and suppliers are made aware that at EP London students under the age of 18 are present and that they should behave appropriately.
- Every visitor must sign in at the reception and wear a visitor badge.
- Contractors will only work in the required area and will not enter other areas of the Campus.
- Any contractor/s whose work may require to them being unaccompanied or unsupervised with under 18 years old will be subject to appropriate background checks including enhanced GARDA VETTING, character references from previous employers. This includes taxi drivers, coach drivers, cleaning staff, canteen staff, security staff or activity providers.
- The contractor/supplier will undertake responsibility for making these checks.
- Any concerns about inappropriate contact or conduct with English Path students will be followed up in collaboration with the school.
- If the contractor brings any subcontractor to school, contractor is responsible to make sure the subcontractor follows the same procedures.

I confirm, I have read and, I agree to the above statement. I agree to ensure all employees of my organisation are aware of your Safeguarding procedures. I confirm all employees who will provide service to English Path will have enhanced GARDA VETTING or will not work with Under 18s.

Name_____ Signed _____

Company_____ Service Provider _____

Date _____

Appendix 5 - English Path Staff Safeguarding

I confirm, I have read and understand English Path's Safeguarding policies and procedures and my responsibilities within this framework.

Name_____ Signed _____

Date _____