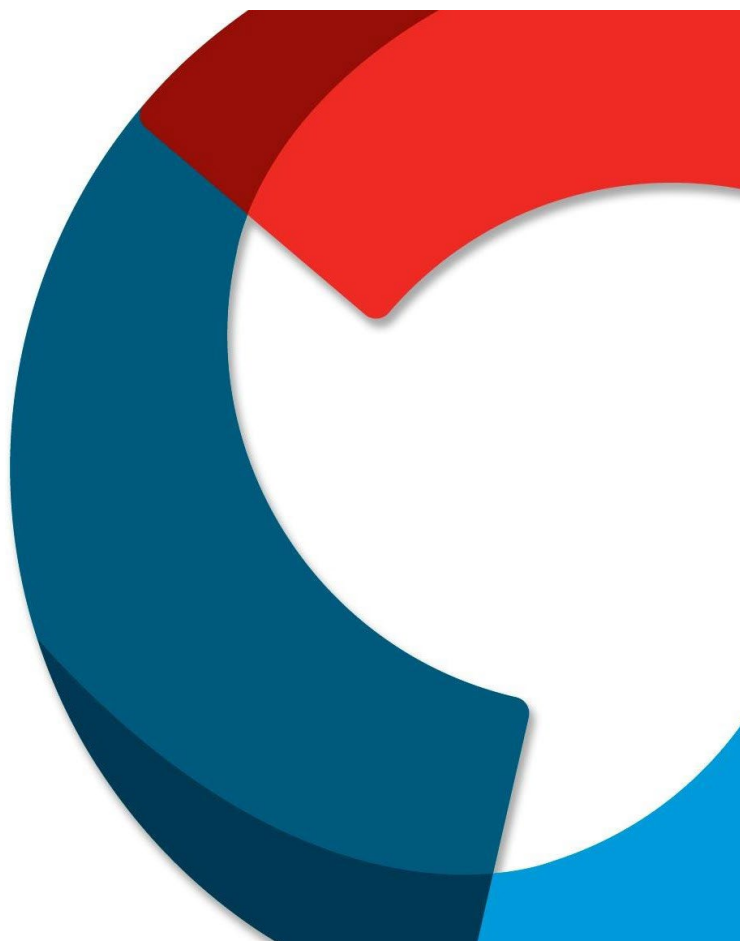


Safeguarding And Welfare Policy DISC



Document Control

Document Name		Safeguarding Policy (including Child Protection)	
Version	Date	Update by	Details
1.0	16.10.17	Sandy Connors	Annual Review. Changes made to reflect changes in personnel and operational practice.
2.0	16.10.18	Sandy Connors	Annual Review. Child Protection Policy absorbed.
3.0	31.11.19	Sandy Connors	Annual Review. Some legislative changes to reflect Irish requirements. Up-skirting included.
4.0	01.12.20	Sandy Connors	Annual Review against Covid 19 guidance. Online safety aligned to most recent guidance.
5.0	31.11.21	Sandy Connors	Annual Review by CR and CW, no changes in legislation. Sexual Harassment/misconduct added.
5.1	14.07.22	Chantal Ryan	Annual Review: updated to reflect current legislation
5.2	12.08.22	Sandy Connors	Annual Review: changes to governance
5.2	05.09.22	Document reviewers	Annual Review: minor changes to contact details and section on reasonable force.
5.3	01.09.22	Chantal Ryan	Annual Review: Minor changes of terminology in accordance with Irish usage
5.4	07.05.2025	Roslin Tracey	Annual Review and Update

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Associated Documents – need updating

Policy
Global Staff Code of Conduct Safer Recruitment Policy H&S Policy and associate Procedures Use of Technology Policy Whistleblowing Policy Attendance Policy External Speakers (including Freedom of Speech) Policy Student Disciplinary Policy

Legislation and Government guidance
Children First National Guidance for the Protection & Welfare of Children 2017 Child Care Act, 1991 Protection of Persons Reporting Abuse Act 1998 Children First Act 2015 Data Protection Fact sheet on mandatory reporting of female genital mutilation, 2016 Criminal Law (Sexual Offences) Act 2017 Equal Status Act 2000-2018 Addendum to Children First: National Guidance for the Protection and Welfare of Children 2019 Ireland's National Plan to Address Female Genital Mutilation The National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016

Approved

Proprietor	Signature and date
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1. Introduction

This policy and its associated procedures describe the safeguarding principles in place to support the welfare of learners attending the Dublin International Study Centre (DISC) in Ireland. This includes learners who are 17-years-old and as such this policy also includes the Child Protection requirements attached to this age group, as per the *Children First National Guidance for the Protection & Welfare of Children 2017*.

This policy applies to all permanent, contracted, agency and volunteer staff working at, or visiting DISC, including those who do not have cause to come into direct or regular contact with learners to carry out their daily duties.

2. Purpose and Aims

It is recognised that learners are a long way from home; experiencing a new culture; new environments and may bring with them specific needs. DISC aims to be a community where learners of all ages are protected from harm and have the right to access education in a safe and secure environment.

The safeguarding policy aims to ensure:

- All learners are safe;
- All staff and learners can recognise welfare issues and signs of abuse;
- All staff act in the best interests of the learners;
- All welfare and child protection concerns are escalated to an appropriate member of staff in a timely manner;
- Safeguarding is integrated into the leadership and management of the centre.

3. Safeguarding Principles

DISC recognises that any learner, regardless of age, could be potentially vulnerable and as such the following principles underpin all safeguarding practice:

- Safeguarding is everyone's responsibility;
- All staff understand that abuse in any form can happen within the ISC;
- There is a Designated Liaison Person (DLP) who has overall responsibility for safeguarding;
- The DLP acts on all safeguarding and child protection concerns in line with current legislation;
- All staff and learners are vigilant of possible safeguarding issues and risks of harm;
- All staff and learners have effective and various means to raise concerns;
- All learners know who to turn to for help, advice or support, can access services confidentially, quickly and easily, and have access to 24-hour support;
- All reasonable steps are taken to ensure the whereabouts of any learner who is 17 years old or is considered an adult at risk (students aged 18 or above who have needs for care and support, are experiencing, or are at risk of, abuse or neglect, and as a result of those needs, are unable to protect themselves against the abuse or neglect or the risk of it).
- All staff are aware of the importance of early help and how to access it;
- The centre is a safe place for learners to learn;
- All learners feel safe and secure, and protected from harm;
- Staff are aware of and actively use the Safeguarding Policy and adhere to local safeguarding procedures;
- The Centre Director has overall accountability for the safeguarding and welfare of learners within DISC;
- DISC staff are made aware of the additional requirements of vulnerable learners;
- There is regular monitoring and reporting of welfare and safeguarding issues so that trends are identified and acted upon.

- All staff members are required to read and understand *Chapters 1-3 of Children First National Guidance for the Protection & Welfare of Children*.

4. Safeguarding Roles & Responsibilities

All staff members including permanent, temporary, agency, contractors and volunteers are responsible for safeguarding.

4.1 Designated Liaison Person (DLP)

The DLP is trained in safeguarding in line with Tusla; National Child & Family Agency. In line with the *Children First National Guidance for the Protection & Welfare of Children 2017*, the role of DLP will always be a member of the senior management team within the Centre but not the Centre Director. The DLP is responsible for ensuring:

- All learners have sufficient and appropriate means to report concerns and incidents, and that all concerns are responded to;
- DISC staff are conversant with procedures outlined in this policy and those that directly support it;
- DISC staff complete appropriate safeguarding training;
- Advice and support are available to staff on issues relating to safeguarding;
- Literature and information from the provider and partner university agencies related to welfare and safeguarding services is readily available to learners;
- Individual welfare or safeguarding risk assessments are completed and followed;
- A complete and up-to-date record of all safeguarding related issues and activities is maintained and available to review on request;
- Learners receive appropriate individual support and advice, including for those learners with health conditions and/or care plans;
- Learners at risk are reported to Tusla or the HSE (whichever is most appropriate), the Gardaí and any other external agency;
- Safeguarding concerns relating to a member of staff are reported to Tusla or the HSE at the earliest opportunity.
- Working links with other agencies are established to provide welfare support and information to learners;
- The Centre Director and relevant Study Group personnel are kept informed of any appropriate information on any safeguarding or welfare issue (in line with current legislation);
- The Designated Liaison Person completes the Annual Safeguarding Review (ASR);
- Information is shared with parents, agents or sponsors as is deemed appropriate and in line with the *General Data Protection Regulations* (GDPR) on a case-by-case basis;
- Strong relationships with partner university agencies are maintained to provide welfare support and information to learners;
- Significant concerns are referred to the Central Student Wellbeing Team and/or Dean Education & Student Experience.

Please refer to *Appendix 1* for contact details for the DLP.

4.1. Deputy Designated Liaison Person (DDLDP)

The DDLDP is trained in safeguarding and undertakes the duties of the Designated Liaison Person in their absence.

4.2. Guardianship

All learners who are 17-years-old must have a guardian who is over 25 years old and lives close enough to attend emergencies at short notice. They must also be able to make decisions on behalf of the parents and live locally.

Where a 17-year-old learner does not have a family or guardian, then one must be appointed, either via the Godsil service or via another approved guardianship provider of the family's choice. The guardian will be responsible for:

- Being available 24 hours a day in case of emergency;
- Acting on behalf of the parent in the case of an emergency;
- Maintaining contact with the learner to ensure that they are safe and well.

In the interest of protecting 17-year-old learners, any 17-year-old learner without an approved guardian will be asked to defer their studies and return to their home countries unless this is rectified immediately by the family.

4.3. Centre Director

Overall accountability for the safeguarding and welfare of learners lies with the Centre Director. They are accountable for ensuring:

- A staff member is allocated to the DLP or DDLP roles;
- The DLP and the deputy can operate at all times within their statutory responsibilities as defined by the *Children First National Guidance for the Protection & Welfare of Children 2017* guidance;
- The DLP and deputy have current safeguarding training that is updated every 3 years as a minimum;
- The centre has a comprehensive safeguarding risk assessment in place that is reviewed annually;
- All staff are recruited safely in line with the *Safer Recruitment Policy*;
- All safer recruitment checks are recorded within a Single Central Record (SCR);
- The completion of the Annual Safeguarding Review;
- All staff receive safeguarding awareness within their initial induction period and every three years thereafter;
- A safeguarding training log is maintained and available to view on request;
- Systems are available to log welfare and safeguarding concerns and subsequent actions.

4.4. All staff

All staff must read and sign to say that they have understood the *Children First National Guidance for the Protection & Welfare of Children 2017 chapters 1-3*. All staff members are responsible for ensuring:

- They undertake safeguarding awareness training within their induction period and every 3 years thereafter;
- They read and understand the Safeguarding Policy and the associated policies and procedures within their Centres;
- In accordance with the *Children First Act 2015*, all mandated persons (including academic staff and welfare personnel) are legally required to report reasonable grounds for concern about child abuse or neglect to Tusla
- They are aware of whom to raise concerns to and by what means;
- They always act professionally and in line with the *Global Code of Conduct*.

5. Raising concerns

5.1. Enabling learners to raise concerns

All students must be made aware of the importance of raising concerns relating to themselves or others and not to act as a bystander. They must also be made aware of the means available to them to raise these concerns in an environment where they feel safe and supported without fear of judgment, while reducing anxiety and discomfort.

Information about the Centre's DLP, DDLPs and wellbeing team, and their contact details, must be displayed prominently in communal areas around Centres with a description of the roles. This information must also be prominently displayed on both the student and staff support sites on the Centre's virtual learning environment.

There must be multiple ways for students to report concerns. These include the following (please note this list is not exhaustive):

- The Centre's dedicated email address for student safeguarding and wellbeing concerns;
- The Centre's DLP is contactable during working hours;
- The Centre's wellbeing team is contactable during working hours;
- Our Student Assistance Programme is available for out-of-hours concerns;
- Students are aware how to contact external support such as the Police for urgent out-of-hours concerns.

5.2. Concerns about a learner (any)

All staff members are made aware of how to raise concerns about learners using a variety of means i.e. verbally, via email or via electronic tracking systems.

All concerns relating to safeguarding must be reported verbally in the first instance whilst those relating to welfare can be referred by email as well as verbally.

Unless there are extenuating circumstances, all concerns should be raised in a timely manner, and before the end of the same working day.

Please refer *Appendix 1* for contact details of the DLP in your area.

5.3. Child Protection concerns

A child is anyone under 18 years of age.

In the event a child protection concern is identified, this must be referred to the DLP/DDLP as soon as possible. The DLP/DDLP will undertake an investigation, and a joint report will be made to local social services and/or other external agencies as appropriate.

DLP and DDLP contact details are available in *Appendix 1*.

5.4. Allegations about a member of staff

If a concern is identified about the behaviour of a staff member which can or has put a learner at risk, this must be reported immediately to the Centre Director or, in their absence, the HR Advisory Service.

Any allegation relating to a staff member where a learner is under 18 will be referred to Tusla within 1 working day and before an investigation has been started. Any advice or guidance offered by Tusla must be acted upon by the DLP.

Allegations against any member of staff, whether employed or a former employee (including claims of historical abuse) will be managed in line with *Children First National Guidance for the Protection & Welfare of Children 2017*.

5.5. Allegations about the Centre Director (or a member of senior staff within Study Group)

In the event of a concern about the Centre Director, or any member of Study Group senior personnel is identified, this must be reported to **Simon Belfer** (Director Study Group Ireland), as soon as possible.

5.6. Reporting allegations outside of the Centre

Anyone (staff, parents, learners and members of the public) may share their concerns directly with external agencies such as social services or the Gardaí, if they have concerns that there is a risk of immediate harm, without needing parental consent.

For mandatory reporting relating to acts of Female Genital Mutilation (FGM) for teachers, please refer to *section 7.11*.

5.7. Whistleblowing

Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime.

Please refer to the *Study Group Global Whistleblowing Policy* for further details.

6. Investigations

It is understood that all allegations must be investigated in line with company policy; *Children First National Guidance for the Protection & Welfare of Children 2017* and in line with Tusla.

Advice and guidance relating to investigations can be sought from the Dean Education & Student Experience or the HR Advisory Service.

6.1. Supporting learners during investigations

Learners will be supported by the wellbeing team during all investigations. This includes those that reported the concern, those where concern was raised about them and those where the allegation may have been made against.

The decision to contact parents and/or agents will be made on a case-by-case basis, dependent on the disclosure, the safeguarding risk to the learner and the learner's wishes.

Please contact the Central Student Wellbeing Team for further guidance.

6.2. Supporting staff during investigations

Where an allegation has been made about a staff member the Centre's primary responsibility is to guard the safety of learners, however those staff involved will be supported, either as the person who raised a concern, as a witness or the person subject to the allegation.

Please contact the HR Advisory Service for further advice and guidance relating to supporting staff during investigations.

6.3. Malicious or unsubstantiated allegations

If an allegation made by a learner who is 17-years-old, is determined to be unsubstantiated or malicious, the DLP may refer the learner to *Tusla* to determine whether the learner concerned needs services or may have been abused by someone else.

Allegations deemed malicious may also be addressed via the *Disciplinary Policy and Procedure (UK & EU)*.

6.4. Referrals to the Garda Vetting Service and Teaching Council of Ireland.

A referral to the *Garda Vetting Service* will be made if a person in a regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. In the case of a member of teaching staff the matter may be referred to the *Teaching Council of Ireland* to consider prohibiting the individual from teaching. Please refer to the *Study Group Safer Recruitment Policy* for more information.

7. Welfare issues

All staff should be aware of the potential for welfare issues during safeguarding awareness training; however, they should also refer to <https://www.ispcc.ie/abuse/> for further information.

The definitions of abuse and an *Indicators of Abuse and Neglect* are available in *appendix 2*.

7.1. Bullying

DISC maintains a zero-tolerance policy on bullying, including online bullying, and as such staff and learners must be vigilant. Information about bullying is included within the safeguarding awareness training for staff and within the induction for learners.

Any concerns about bullying, including those that are based on prejudice and discrimination, must be raised as per *Section 5*.

The learner who is being bullied will be supported by the wellbeing team. As bullying behaviours are also indicative of abuse, the learner who is bullying will also be supported by the welfare team and/or another appropriate member of staff.

Any incident of bullying identified as a hate crime will be reported to the Gardaí.

7.2. Student whereabouts and attendance

Attendance is recorded for all learners. Please refer to the *Attendance Policy* for further information.

The whereabouts of all learners aged 17-years-old and adult learners considered to be vulnerable will be monitored and recorded. If a learner goes missing, then steps must be undertaken to find the learner in line with the centre's procedures. This may include contact with the guardian, parents or agents as appropriate.

In the event a learner is missing for 8 hours or earlier, if a safeguarding risk has been identified, then they must be reported to the Gardaí on 1890 442552 (missing persons).

Please refer to the *Whereabouts Procedures* and local monitoring procedures for further information.

7.3. Peer-on-Peer abuse

The Centre recognises that learners may sometimes harm or abuse their peers, which can raise safeguarding concerns. As such, DISC adopts a zero-tolerance approach to all forms of peer-on-peer abuse, including acts of violence, harassment, and incidents such as upskirting.

Staff members are advised about the types and indicators of peer-on-peer abuse within the safeguarding awareness training. Any concerns should be raised with the DLP immediately in line with *Section 5*.

If an incident is identified as peer-on-peer abuse, then a referral will be made to external agencies, including the Gardaí, Tusla or the HSE.

The perpetrators of peer-on-peer abuse will be subject to disciplinary action and/or reported to the Gardaí if it results in (or the threat of) sexual violence or harassment.

7.4. Substance misuse

This includes but is not limited to drugs (illegal and legal highs), alcohol, tobacco and vape devices.

UCD is a non-smoking campus and smoking or Vaping indoors is strictly prohibited at DISC.

The Centre operates a zero-tolerance policy on the use or misuse of illegal substances, the use of alcohol by learners aged 17-years-old and the use of tobacco and vaping products by learners aged 17-years-old.

Information is provided during the induction through the *Student Behaviour Charter*. This is supported by welfare advice and guidance both in the induction and throughout the year.

If a learner is found to have used or misused any illegal substance, this will result in disciplinary processes being initiated. It should also be understood that any learner over 18 assisting a younger learner to obtain alcohol, tobacco or vaping products will also result in disciplinary action. It may also result in the incident being reported to the Gardaí.

In the event a learner expresses a concern regarding drugs or alcohol, then advice is available via the wellbeing team.

7.5. Exploitation of Children

7.5.1. Sexual Exploitation

In the event when a learner is identified as possibly being a victim of child sexual exploitation, this should be referred to the DLP who will refer the learner to Tusla and a joint report would be submitted, as appropriate.

Please refer to *section 5* for information on how to raise concerns

7.5.2. Criminal Exploitation

It is understood that learners could be criminally exploited and that this may be missed because of the geography in which the criminal activity takes place. As such, all staff members must be vigilant to the potential for criminal exploitation on an international level.

If a learner is identified as being a potential victim of criminal exploitation, possibly as part of a drug network or as part of a gang, a concern should be raised with the DLP and a joint report submitted as appropriate.

7.6. Harassment and sexual misconduct

All learners should be protected from harassment and sexual misconduct from other learners, staff, and visitors, and as such, there is zero-tolerance of any form of harassment, inappropriate sexualised behaviour, or sexual misconduct. This includes those instances that are face-to-face or online.

Staff members should refer to the *Study Group Code of Conduct* for further information.

Learners should refer to the *Student Behaviour Charter*, *Student Safeguarding Policy* and the *Student Disciplinary Policy* for further information.

In the event an incident of harassment or sexual misconduct involves a learner who is under 18 years old, then Tulsa and the Gardaí will be notified.

In the event that a learner is over 18 years old, the decision to call the Gardaí will depend on the learner's wishes; the severity of the incident; and/or the risk to others.

7.7. Domestic abuse and/or violence

Study Group does not condone domestic abuse and/or violence in any form, and as such, information is included in training for staff and in the learner induction. Any concern relating to domestic abuse and/or violence should be raised with the DLP.

7.8. Homelessness

Due to the limited availability of private accommodation in Dublin, DISC has an agreement with the university to provide on-campus housing for 17-year-old learners.

If a learner chooses to live in private accommodation and then becomes homeless, the welfare team will make attempts to assist; however, it may not be possible to rehouse the learner. In these circumstances, the Centre Director may, in the learner's best interests and for ongoing safety, make the recommendation to send the learner home.

If a current learner becomes homeless, then support is available to them via the Centre's wellbeing staff.

7.9. Honour-based abuse and/or violence

If a learner under the age of 18 is identified as a possible victim of honour-based abuse and/or violence, this must be referred to the DLP, who will refer the learner to Tulsa, and a joint report will be submitted as appropriate.

7.10. Female Genital Mutilation (FGM)

Information for staff about FGM is included within the safeguarding awareness training.

The centre is committed to ensuring that female learners are safeguarded against FGM, so staff who suspect that FGM has been carried out, or could potentially be carried out, must report these concerns to the DLP (or their Deputy).

All other staff should report concerns relating to FGM as per *Section 5*.

7.11. Forced Marriage

The Centre understands that forced marriage is the result of violence, coercion and threats which can be physical, emotional or psychological. If a concern or suspicion is raised regarding the potential of the forced marriage of a 17-year-old learner, then the DLP, along with the welfare team, will work with local services to support the learner.

All other staff should report concerns relating to forced marriage as per *Section 5*.

7.12. Online safety

Use of the internet is a necessary tool for teaching and learning. Learners use the internet widely both inside and outside the learning environment, and as such, provisions are made within the supply of internet and the Virtual Learning Environment (VLE) to protect learner safety (such as internet filters), which is further reinforced through tutorial activities and the provision of internet safety-based information including the appropriate use of AI tools. Learner induction also includes the safe use of the internet, the appropriate use of social media and how to safely publish content online.

In line with the *Addendum to Children First: National Guidance for the Protection and Welfare of Children 2019*, all online activities are identified and mitigated against within the safeguarding risk assessment. Staff members should refer to the *Use of Technology Policy and the Study Group Staff Code of Conduct* for further information regarding the use of the internet whilst in an educational setting. However, it should be noted that the sharing of personal contact details in any form with learners could result in disciplinary action.

7.13. Images

Staff should not take photos of learners unless they are informed and there is active written consent or it is part of their job to do so. Likewise, any photos taken should not be used on social media unless there is written consent. The only exception to the written consent requirement is in group settings (2 or more people) where the student does not speak on camera and there are no identifying features. In this case, verbal consent is sufficient, and you can collect user generated content.

8. Learners with health conditions (physical, emotional or mental) or learning differences

DISC welcomes students with health conditions or learning differences and wants to facilitate their success. Learners are required to identify if they have any specific health conditions (physical, emotional or mental) and/or disability or learning difference prior to their application for study, and during their registration with the Centre. Learners who have specific health conditions or learning differences are made known to the DLP so that support can be provided.

It should be noted that information about a learner's health condition, learning difference and/or disability will only be shared on a need-to-know basis, or if the learner has given specific consent to do so.

The centre does not provide direct medical support, so learners with health conditions must be able to self-manage their conditions. All learners are encouraged to sign up with the local GP and/or university partner health services.

If any health condition (physical, emotional, or mental) results in poor attendance or a learner's reduced capacity to learn, then Study Group reserves the right to defer the learner's course as set out in the *Fitness to Study Policy*.

8.1. Mental health

The Centre plays an important role in supporting the mental health and wellbeing needs of all learners and understands that transition to a new country, to higher education and new ways of studying (including online learning) can present challenges. The Centre also understands that learners may arrive with pre-existing mental health conditions or present with new conditions as they progress with their study, and as such, there are many opportunities to disclose concerns both before arrival and at any time after. This enables DISC staff to make any accommodations required to enable the learner(s) to study effectively and maximise their learning experience.

Welfare support is available for learners with emerging mental health issues who can be signposted to university and local services. The centre also aims to support all learners with access to mental health support and to interventions that can improve academic achievement, social and emotional skills, reduce anxiety and stress and positively affect poor attendance.

Mental health is included within the safeguarding awareness training. There are also Mental Health First Aiders (MHFA) available if required. In addition, all staff members are made aware that:

- Mental health concerns could be an indicator of abuse (current and/or historic); neglect, or exploitation;
- They must not attempt to diagnose a potential mental health problem;
- As staff who regularly see learners, they are best placed to see changes in behaviour that could suggest a potential mental health problem;
- Abuse, neglect, and childhood trauma can negatively affect the learner's mental health, behaviour and education;
- Concerns about a learner's mental health must be raised with the wellbeing team.

If any health condition (physical, emotional, or mental) results in poor attendance or a reduced capacity to learn, then Study Group reserves the right to defer the learner's course as per the *Fitness to Study Policy*.

9. Fitness to Study

The Centre is committed to supporting learners with health conditions (physical, mental and emotional), learning differences or disabilities to achieve their best possible outcomes and, where appropriate, provide reasonable accommodations so that all learners can access their learning.

However, DISC also recognises that there will be instances where a learner's physical, mental or emotional health would give rise to concerns about the learner's fitness to study. In these cases, the decision to defer the learner's course will sit with the Centre Director with the assistance of wellbeing staff. Deferment will result in a learning returning home for care and support.

Please refer to the *Fitness to Study Policy* for additional information.

In addition, there are situations that may also impact on a learner's ability to continue with study, which in turn will prevent progression to the university, e.g. a committing a criminal offence would result in difficulties for those undertaking law courses. In these circumstances, the Centre Director will reserve the right to cancel a Learner's course.

Please refer to the *Criminal Conviction Policy* and the *Student Disciplinary Policy* for more information regarding criminal offences (alleged or proven).

10. Equality and Inclusion

10.1. The centre has a diverse community of learners (and staff) and expects all individuals to show respect and tolerance toward one another. DISC fully upholds the principles of the Equal Status Act 2000-2018 and all staff members are expected to be familiar with the Equality, Diversity, and Inclusion Policy, and to adhere to the values and guidelines it outlines.

10.2. Please refer to DISC's Equality and Diversity Policy for further details.

The centre embraces and celebrates all religions and denominations. Practical provision for learners to observe their religion can be made during their stay; however, this cannot compromise the centre's educational aims or a learner's ability to learn and develop.

Failure to respect learners, peers or centre staff will result in disciplinary action.

11. Additional

11.1. Searches and seizures

Any instance where it is suspected or reported that a learner is in possession of drugs (or other illegal substance), weapons or other items that could cause harm to themselves or others, this will be reported to the Gardaí who may choose to search the learner, their room or their belongings if consent is given or apply for a warrant to do so. If an electronic device which is Centre property has been used, or suspected of being used, to commit an offence, cause personal injury or damage to property, the Centre Director will authorise staff to examine any data or files held on the device. If a crime has been committed, the Gardaí will be notified.

On occasion, the college may contact the Gardaí, who could instigate a dog search of common areas for drugs and illegal substances.

11.2. The use of reasonable force

On occasion it may be necessary to apply the use of reasonable force or physical restraint to protect the safety of a learner or learners. Reasonable force is only to be undertaken as a last resort, in the reasonable professional judgement of the staff member involved. The use of force is only to be applied when, in the judgement of the staff member, to not do so would create a greater risk of harm.

All incidents involving learners who are 17-years-old will be reported to their parents or guardian.

If this is not possible then the site security or Gardaí must be contacted. The Centre Director must be informed immediately when reasonable force has been used.

11.3. Visitors

Visitors are welcomed in the Centre where it is appropriate and where it will not impact the safety and welfare of learners or staff. All visitors to the Centre should be recorded in a visitor book and must always be supervised by a member of staff. This applies regardless of whether the visit is arranged or unannounced.

If concerns are raised about a visitor, this should be reported to the Centre Director and the DLP immediately. On occasion it may be necessary to call the site security or the local Gardaí.

Please refer to DISC's *Health and Safety Policy* for further information.

11.4. Off-site trips and visits

Trips and visits may be organised by the centre, either as learner social events or as part of curriculum delivery. These will be arranged with the approval of the Centre Director and supported by appropriate staff. A risk assessment will also be in place to ensure that risks have been properly identified and mitigated against.

If the trip or visit includes a significant number of learners who are 17-years-old, then additional staff supervision will be appointed to ensure that safeguarding is maintained.

Please refer to DISC's *Risk Assessment Policy* for further information.

In the event that a learner who is under 18 goes missing during a trip or visit, then staff should manage this in line with *section 7.2*

11.5. Record Keeping

All concerns should be logged in CPOMS. It is important that notes only record the facts as presented by the student. Notes on the discussions, decisions made and the reasons for the decision should also be recorded in writing. This information should be kept confidential and stored securely in local welfare files.

It should contain:

- A clear, accurate and comprehensive summary of the concern;
- Details of how it was followed up and resolved;

- A note of the action taken, decisions reached and the outcome.

The DLP should ensure all personal information is processed fairly and lawfully and kept safe and secure. This does not prevent the sharing of information for the purposes of safeguarding children or an adult at risk when it is necessary, proportionate, and justified to do. See the *Information Sharing Principles*.

12. Appendix 1: DLP Contact details

The following are the DLP contact details for Dublin ISC

Centre	Name of DLP/DDLP	Telephone Number	Email
Dublin	DLP: Chantal Ryan	0861282122	CRyan@studygroup.com
Dublin	DDLDP: Elizabeth Begg		Elizabeth.begg@studygroup.com

Additional contact details

Name	Position	Telephone Number	Email
Ali Baines	Dean Education & Student Experience	+44 7467 940049	abaines@studygroup.com
	HR Advisory Service		maslam@studygroup.com
Cliona Wrynn	Centre Director	+353 1 487 0460	cwrynn@studygroup.com
Melinda Tan	Executive Dean	+44 7826 945809	melinda.tan@studygroup.com
Olly Walker	Deputy Director Student Wellbeing & Safeguarding (UK & EU)	01273 005102	owalker@studygroup.com

13. Appendix 2: Indicators of Abuse and Neglect

Taken from the ISPCC website

Neglect

Neglect occurs when an adult fails to take care of a child and this causes significant harm or stops a child developing properly. Neglect is something that happens over time and not just at one specific point. Neglect may include:

- Not keeping a child properly fed, kept warm, clean or clothed
- Not keeping a child safe
- Not giving attention and affection to a child
- Not bringing a child to school
- Not getting medical care for a child, if they need it

Emotional neglect may also lead to the child having attachment difficulties. The extent of the damage to the child's health, development or welfare is influenced by a range of factors.

Neglect is strongly linked to parental substance misuse, domestic violence, and parental mental illness and disability. A reasonable concern for the child's welfare would exist when neglect becomes a normal part of the relationship between the child and the parent or carer.

Emotional Abuse

Emotional abuse usually happens when an adult is not affectionate or supportive towards a child. This form of abuse is more about the kind of relationship a child has with an adult rather than incidents that take place. Emotional abuse can also occur when adults responsible for taking care of children are unaware of or unable to meet their children's emotional and developmental needs.

Emotional abuse is not easy to recognise because the effects are not easily seen.

Emotional abuse may include:

- Rejection
- Lack of comfort and love
- Lack of fun and play
- Lack of praise and encouragement
- Persistent criticism and sarcasm
- Blaming of the child and bullying
- Only providing care and affection to a child depending on their behaviour or actions
- Extreme overprotectiveness
- Inappropriate non-physical punishment (e.g. locking child in bedroom)
- Inappropriate expectations of a child relative to his/her age and stage of development

Emotional abuse is more likely to impact negatively on a child where it is persistent over time and where there is a lack of other protective factors. Signs of emotional abuse include a child feeling insecure, unhappy, having low self-esteem, underachieving in school or displaying risk-taking and aggressive behaviour. Once-off and occasional difficulties between a parent/carer and child are not considered emotional abuse.

Physical Abuse

Physical abuse is when someone deliberately hurts a child physically, puts them at risk of being physically hurt or, where possible, fails to take action to stop them from being physically hurt. It may occur as a single incident or as a pattern of incidents. This type of abuse includes severely physically punishing or deliberately hurting a child.

Physical abuse may include but is not limited to:

- Physical punishment
- Slapping, hitting or beating

- Pinching or biting
- Kicking or pushing
- Shaking
- Threatening
- Choking or suffocating
- Poisoning
- Hair-pulling
- Watching someone else hurt a child and not stopping them

A reasonable concern exists where the child's health and/ or development is, may be, or has been, damaged because of suspected physical abuse.

Sexual abuse

Sexual abuse occurs when a child is used by another person for his or her sexual pleasure or arousal, or for that of others. It includes the child being involved in sexual acts or exposing the child to sexual activity directly or through pornography. Child sexual abuse most commonly happens within the family and can be perpetrated by those in the immediate family, older siblings, extended family members or others. Cases of sexual abuse mainly come to light through disclosure by the child or his or her siblings/friends, from the suspicions of an adult, and/or by physical symptoms.

Sexual abuse may include:

- Any sexual act intentionally performed in the presence of a child
- An invitation to sexual touching or intentional touching of a child's body by a person or object for the purpose of sexual arousal or satisfaction
- Masturbation in the presence of a child or the involvement of a child in an act of masturbation
- Sexual intercourse with a child, whether oral, vaginal or anal
- Inviting or forcing a child to engage in prostitution, the production of child pornography or to participate in, or to observe, any sexual act
- Showing sexual material to children
- Exposing a child to inappropriate or abusive material through technology

Any sexual activity involving an adult and an underage person – consent cannot be given by an underage person, whether they may appear to express their agreement to participate in the activity or not.

Further information is available from: <https://www.ispcc.ie/abuse/>