

Target English International recognises the right of children and young people to protection from harm of any kind and is committed to promoting the welfare and safeguarding of children and young people.

# Target English International Safeguarding Policy and Procedures

Reviewed & updated March 2026 (M.Keddy & J.Hordon)



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 **BRITISH  
COUNCIL**  
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## 1. Safeguarding Policy Statement

### 1.1 Aims

TARGET ENGLISH INTERNATIONAL (hereafter referred to as TEI) and our staff have an overriding responsibility for the welfare and safeguarding of our clients (students/children). This means it is essential that safeguarding measures are embedded into our everyday practices which apply to all adults within the TEI community. The aim of this document is to inform and assist all TEI staff and associated adults with safeguarding and help them to understand what it means in practice while employing a child centred and co-ordinated approach.

This policy is reviewed regularly and updated annually with changes/additions to UK legislation and good practice. Student feedback is utilised and staff are invited to contribute to this development process by submitting in writing any proposals they might have in relation to safeguarding experiences or ideas for improvement.

This policy has been developed and is underpinned by the following documents, regulations, and organisations:

- Working Together to Safeguard Children
- Keeping Children safe in Education
- British Council – Guidance and Accreditation UK inspection criteria
- DFE Keeping children safe code of practice – OOSS (Out of School Settings)

Emphasis is placed on recognising potential or actual safeguarding issues and taking steps to minimise the effects on children and young people as well as TEI staff and other adults who form a wider part of the TEI community.

TEI acknowledges that we have a duty of care for each of our students and that safeguarding and welfare are the basic principles we keep in mind when designing our programmes, selecting our employees and choosing our operational centres.

This year (2026) our Summer School Centres will be operating in Edinburgh, Hull, Liverpool, Bath, Hatfield, Harrow, Colchester, Norwich and Dorset (Clayesmore School).

The TEI Designated Safeguarding Lead (DSL) will liaise with all relevant Local Safeguarding Children's Partnerships and with the local Prevent Teams in these areas prior to the TEI operational period. Website links to the area safeguarding and prevent organisations can be found in a table at the end of this document.

### 1.2 Principles

#### **We believe that:**

- All children have the right to be protected from abuse, exploitation and radicalisation
- Pro-active safeguarding and promoting the overall welfare of children is everyone's responsibility
- We have a statutory and moral duty to safeguard and promote the safety and welfare of children engaged in TEI activities
- That all children should experience a safe, secure and friendly environment

#### **We aim to:**

- Ensure that TEI as a company, all employees and associated adults (e.g. venue hosts & contractors) comply with legal, contractual and professional standards and responsibilities in their work with under 18s (this includes confidentiality and record keeping)
- Build and embed a culture of openness that recognises and accepts that abuse can happen in any organisation

### All children have the right:

- To be safe and happy
- To protect their own bodies
- To say no. It's alright to say no to someone when they feel something is wrong
- To get help against bullies e.g., tell children to enlist the help of friends, to say no without fighting and to tell an adult
- To be assured that no matter what happens staff will not be angry with them, and they should report any incident that frightens or confuses them or makes them unhappy
- To be believed - when children go to an adult for help, they need to know they will be believed and supported
- Not to keep secrets - we must teach children that some secrets should never be kept, even if they have promised not to tell

### TEI will safeguard under 18s by:

- Promoting and prioritising the safety and wellbeing of children
- Adhering to our policies and procedures - including codes of conduct
- Providing effective management for staff through supervision, support, and training (Basic, Advanced or Specialist depending on their role)
- Ensuring appropriate action is taken in the event of incidents/concerns of abuse and that support is provided to all parties
- Sharing relevant information about child protection and good practice with children, parents, staff, group leaders and any relevant third parties
- Sharing information about concerns with the agencies who need to know, involving parents and children as appropriate
- Ensuring that HR staff are trained in safer recruitment (refreshed at 2-year intervals)
- Following the procedures for safer recruitment and selection of staff
- Reviewing our policies and best practice at regular intervals

## 1.3 Responsibilities

The Director and all staff of TEI Summer Schools understand that safeguarding **is everyone's responsibility**.

TEI and its staff must be accountable for safeguarding by:

- Ensuring that TEI Summer Schools have appropriate structures, processes, and resources so that welfare and safeguarding is central to the operational practice
- Maintaining oversight of safeguarding issues through regular reporting while schools are operating
- Commissioning specific investigations (or escalations to local authorities if appropriate) into any issues raised
- Provide effective management for staff through supervision and training

Each individual adult in their role should:

- Work to raise awareness with students about safeguarding
- Ensure that systems and procedures are adhered to for the protection of students
- Always act in the best interests for the safety of the child

**The Centre Manager (CM)** has overall responsibility for the set up and running of the centre including implementing the company's policies and procedures. The CM also has overall responsibility for student welfare and ensuring that the companies welfare and safeguarding procedures are adhered to for the whole of the time that the centre is operating.

**The Director of Studies (DOS)** has responsibility for the delivery of the academic programme at the centre, in line with safeguarding and operating within all company policies.

**The Activity Manager (AM)** oversees the operation of the summer school activity programme and must operate appropriate safeguarding measures in line with company policies. This includes ensuring that every activity has a risk assessment in place.

## 2. Implementation of this Safeguarding Policy

### 2.1 Employees

To ensure effective implementation of the Safeguarding Policy, all employees undergo a TEI induction process, during which they confirm, in writing, that they have read and understood:

- **TEI Safeguarding Policy**
- **Employee Handbook** (including the staff code of conduct)
- **TEI Welfare Policy**
- **Their role-specific manual outlining key responsibilities for all staff**

Induction materials include manuals specific to the following roles:

- **Centre Manager**
- **Activity Manager**
- **Director of Studies**
- **Trinity Exam Coordinator (TEC)**
- **Teacher**
- **Activity Leader**

The Safeguarding Policy is introduced to all staff during induction, it is also available on the TEI website and provided in hard copy at each TEI centre.

#### **Accountability for Safeguarding:**

- **James Hordon**, TEI Managing Director, is the senior accountable person for safeguarding.
- **Maureen Keddy**, Designated Safeguarding Lead (DSL), is responsible for overseeing safeguarding and child protection throughout the organisation.

The DSL will ensure:

- A strong safeguarding culture across the organisation.
- Clear processes, resources, and training to protect children.
- Senior managers are held accountable for safeguarding and receive supervision and support throughout the operational period.

#### **Responsibilities of the DSL      Maureen Keddy**

- Disseminate the Safeguarding and Welfare Policies to all staff and relevant partners.
- Ensure all safeguarding training/information (including Prevent, FGM, and Online Safety) is up-to-date.
- Manage referrals, supporting staff to refer cases to external agencies when needed.
- Liaise with senior staff and external safeguarding agencies to address concerns.
- Ensure the policy is easily accessible to staff, parents, and partners.

## Employee Responsibilities:

- Prioritise the safety and well-being of children at all times.
- Adopt a child-centred approach, always considering the child's best interests.
- Be vigilant and act on any safeguarding concerns.
- Complete mandatory safeguarding training appropriate to their role (Basic, Advanced, or Specialist).
- Be aware of their duty of care and their legal responsibility when in a [position of trust](#)
- Understand their duty of care and legal responsibilities.
- Report concerns immediately to the DSL and make written records of incidents.
- Maintain confidentiality while ensuring the child's safety.

All senior operational staff (including Activity and Centre Managers) receive Advanced Safeguarding training before starting work.

## 2.2 Parental Consent

Before attending any TEI centre, parents must complete the online **Medical/Permissions Form** (usually via their agent). No child will be allowed to attend without this form. Completed forms are securely stored in compliance with GDPR and made available to relevant staff as needed.

## 3. Recruiting Staff – Safer Recruitment

TEI follows safer recruitment practices for all roles involving responsibility for, or substantial contact with, children under the age of 18.

All recruitment processes are conducted in line with current safer recruitment guidance. Staff involved in recruitment undertake **safer recruitment training at least every two years**.

All recruitment materials include the statement:

*“All staff appointments are subject to a satisfactory Enhanced DBS disclosure, satisfactory reference checks, and appropriate explanations of any gaps in employment history.”*

Appointments are conditional upon the completion of all safeguarding checks.

Further details regarding TEI's recruitment and safer recruitment procedures are available on request from the Recruitment Manager, Louise Brown at [l.brown@targetenglishinternational.com](mailto:l.brown@targetenglishinternational.com)

## 4. Staff Code of Conduct

The TEI Staff Code of Conduct exists to safeguard all students and to protect staff working with children. Expected standards of conduct are detailed within each role-specific staff manual.

For safeguarding purposes, all TEI students are considered children. These standards apply at all times during employment, including after courses have ended and students have left.

Under UK law, a child is defined as a person under the age of 18. TEI staff are considered to be in a **position of trust**, meaning they hold authority or responsibility over children. Breaches of this trust may constitute a criminal offence and may result in disciplinary and/or legal action. For information about this legislation please see: <https://www.legislation.gov.uk/ukpga/2003/42/section/16>

In Scotland the Protection of Vulnerable Groups (Scotland) Act (PVG) 2007 and further details can be found on the <https://www.mygov.scot/spent-and-unspent-convictions> website.

#### 4.1 Relationships with Students

Staff must maintain professional boundaries with students at all times.

- Any sexual activity with or directed towards a person under 18 by an adult in a position of trust is a criminal offence under the Sexual Offences Act 2003.
- Staff must not socialise with students outside working hours except during authorised activities or work-related duties.
- Staff must avoid situations that could place them or students at risk and must report any accidental or inappropriate contact immediately to their Centre Manager or the DSL.

#### 4.2 Smoking, Alcohol and Drugs

- Staff must not consume alcohol with students or purchase alcohol for them.
- Staff must never smoke or use e-cigarettes with students.
- Staff must never be under the influence of alcohol or drugs while on duty.
- Further guidance is contained within the Employee Handbook Alcohol, Drugs and Smoking Policy.

#### 4.3 Dress

Staff must dress appropriately for their role, ensuring clothing is not offensive, revealing or sexually suggestive. Activity Staff are issued with a uniform and must wear it during working hours.

#### 4.4 Communication with Students

All staff must comply with TEI Online Safety guidance:

- Personal contact details (including personal email addresses and phone numbers) must not be shared with students.
- Staff must not communicate with students via private messaging, email, phone, or social media.
- Friend or follow requests from students on social media platforms must be declined.
- Staff must not post or share images of students on social networking sites.

These rules continue to apply after the course has ended.

#### 4.5 Physical Contact with Students

Staff must avoid unnecessary physical contact with students.

In exceptional circumstances where a student is distressed or injured, staff should:

- Act professionally and use common sense
- Keep physical contact minimal and appropriate
- Ensure, wherever possible, that another member of staff is present

Whilst the Care Commission have advised that there is currently no legislation in place which forbids a member of staff from consoling a child (e.g. putting an arm around the shoulder of an upset child) or assisting a child who has hurt themselves (e.g. cut their knee), it is expected that the member of staff will act professionally in all circumstances.

#### 4.6 Transporting Students

- Staff must not transport students in their own vehicles.
- Students may only be accompanied using transport arranged or authorised by TEI.

- When accompanying a student in a taxi, staff should ensure another person is present where possible. The staff member should sit in the front seat and the student in the rear, with seatbelts worn at all times.

## 5. Student Supervision (Including Pastoral Care)

TEI maintains clear supervision and pastoral care procedures to ensure the safety and wellbeing of all students. These procedures are communicated to staff during induction and throughout employment.

For safeguarding purposes, **all TEI students attending junior centres are treated as juniors**, including students aged 16–17 (and 18 where applicable).

TEI retains **overall responsibility for student supervision at all times**, except where supervision has been formally transferred to an accompanying Group Leader under agreed arrangements.

- Students must not leave campus or enter out-of-bounds areas under any circumstances, even where parental permission has been provided.
- Attendance at all lessons and TEI-organised activities is compulsory. Registers are taken and all absences are followed up immediately.
- TEI staff carry out random checks of out-of-bounds areas throughout the day and evening.
- Any request by a Group Leader to sign students out of a scheduled activity must be approved by the Centre Manager or Activity Manager and supported by a written risk assessment.

### Supervision Ratios

TEI applies the following **minimum supervision ratios**, which may be increased following risk assessment:

- **Ages 8–10:** 1 adult per 10–15 students
- **Ages 11+:** 1 adult per 15–20 students

Group Leaders may be included in ratios only in relation to their own group and in a supporting role. TEI staff retain overall responsibility for supervision, organisation and leadership.

Ratios are increased where required due to the nature or location of the activity, student needs, or environmental factors such as weather.

### 5.1 Evening and Night-Time Supervision

In residential accommodation, minimum supervision ratios are:

- **Under 12s:** 1 adult per 15 students (applies to TEI 10yr olds.)
- **Ages 12–18:** 1 adult per 20 students

The Centre Manager (Welfare Officer) and Activity Manager (Fire Officer) are resident on site, supported by other TEI staff. All Activity Staff undertake pastoral duties as part of their role.

A clearly defined pastoral rota is in place for evenings and post-curfew (11:00pm), identifying staff responsibility at all times. Students are escorted back to residences after evening activities, followed by staff patrols to ensure students remain in residence.

Between **11:00pm and 8:00am**, students travelling with a Group Leader remain under the Group Leader's primary supervision; however, a senior member of TEI centre management is always on call and available in case of emergency.

## 5.2 Supervision on Excursions

Students are supervised by an adequate number of TEI staff throughout all excursions. Staff must not leave their group at any point unless pre-agreed free time has been authorised. Failure to supervise students appropriately is treated as gross misconduct.

Where scheduled free time is permitted:

- It must be included in the itinerary and risk assessed
- Students must remain in groups of at least three
- Students under 14 must remain with an adult at all times
- At least one TEI staff member will remain at a designated meeting point

Students must wear TEI ID lanyards and carry emergency contact details at all times. Staff ensure students understand meeting points and return times.

## 5.3 Other Supervision considerations

Appropriate supervision is provided during mealtimes, class breaks and in academic areas. A pastoral rota clearly identifies staff responsibility during these periods.

## 5.4 Missing Students

A missing student is treated as a **safeguarding incident** and acted upon immediately.

### If a student is missing on site:

- Friends and the Group Leader are asked for information
- Attempts are made to contact the student
- All centre staff are informed and a thorough search is conducted
- Head Office and campus security are notified if the student is not located promptly

### If a student is missing on an excursion:

- Senior centre staff, Head Office and the Group Leader are informed immediately
- A search is conducted at the last known location
- A staff member remains at the designated meeting point
- Local hospitals and police stations are contacted if necessary
- Police are notified without delay if the student cannot be located and their whereabouts remain unknown

## 5.5 Risk Assessments

Risk assessments are completed, reviewed and updated for all on-site and off-site activities and are monitored by Head Office. They take account of the activity, location, student needs and any additional risks.

Senior Staff receive training on risk assessment during induction and all staff must:

- Follow agreed control measures
- Provide students with clear safety instructions
- Complete or review risk assessments for activities

## 5.6 Key Centre Contacts

Each Centre Manager ensures that an up-to-date list of emergency and safeguarding contacts is available to all staff, including:

- Local NHS walk-in centre
- Nearest hospital
- Local pharmacy
- Local Safeguarding Children Partnership
- Emergency services (999)

## 5.7 First Aid

A sufficient number of TEI staff are trained in Emergency First Aid. First aid kits are accessible on site and portable kits are taken on all excursions.

Centre Managers, Activity Managers and Activity Leaders receive Emergency First Aid at Work training. Host venues also provide qualified first aid support.

A list of trained first aiders is displayed in each centre office. First aid kits are checked weekly and must never contain medication.

## 5.8 Student Induction

Students receive an onsite induction on arrival at their Centre, introducing key staff, their roles and responsibilities and are issued with:

- A TEI student ID card
- Emergency contact details
- A student manual covering rules, personal safety, UK law, health, first aid, fire safety and procedures if separated from groups.

Agents receive a detailed pre-departure guide to pass on to students.

## 5.9 Online Safety

Staff and students must comply with TEI Online Safety guidance and the Staff Code of Conduct. Staff must not communicate with students via personal online platforms or share student images online. You will find the TEI online safety policy here: [TEI Online E-Safety Policy](#)

## 5.10 Accommodation

All students reside in approved host accommodation. TEI works closely with host venue management and carries out regular checks to ensure safeguarding standards are maintained.

Accommodation arrangements ensure:

- Appropriate separation in rooms/classes by age and gender
- Separate facilities for staff and students

All accommodation documentation is reviewed regularly in line with the TEI Welfare Policy.

## 6. Safeguarding and Child Protection

TEI is committed to safeguarding and promoting the welfare of all children in its care and expects all staff and partners to share this responsibility.

## 6.1 Terminology

### Child

For the purposes of this policy, a child is defined as any person up to the age of 18 (there may be a small number of 18 year olds attending the course, they are to be considered Juniors for the duration of their stay in terms of school rules etc.) TEI recognises that children travelling from overseas may be unfamiliar with UK customs, language and systems, and may therefore be more vulnerable to harm. TEI is committed to meeting, and where possible exceeding, its duty of care towards all children.

### Safeguarding and promoting the welfare of children

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment, including abuse and neglect
- Preventing impairment of children's physical or mental health or development
- Ensuring children grow up in safe and effective care environments
- Taking action to enable all children to achieve the best possible outcomes

### Child protection

Child protection is part of safeguarding and refers specifically to actions taken to protect individual children who are suffering, or are likely to suffer, significant harm.

### Abuse

Abuse is a form of maltreatment of a child and may involve acts of commission (inflicting harm) or omission (failing to act to prevent harm). Abuse can occur in a family, institutional or community setting, including online, and may be perpetrated by adults or other children.  
(Working Together to Safeguard Children, 2018)

### Local Safeguarding Children Partnerships (LSCPs)

Local Safeguarding Children Partnerships replace former Local Safeguarding Children Boards. LSCPs bring together the local authority, health services and police to coordinate safeguarding arrangements and responses.

The **Designated Safeguarding Lead (DSL)** fulfils the role previously undertaken by the Local Authority Designated Officer (LADO). Details of relevant LSCPs are included at the end of this policy.

## 6.2 Types of Abuse

There are four main categories of abuse:

- Physical abuse
- Neglect
- Sexual abuse
- Emotional abuse

The definitions below are taken from *Working Together to Safeguard Children (2018)*.

### 6.2.1 Physical Abuse

Physical abuse involves deliberately causing physical harm to a child, including hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. It may also occur when a caregiver fabricates or induces illness in a child.

## 6.2.2 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. This may include failure to provide adequate food, shelter, clothing, medical care, protection from harm, or emotional support. Neglect may also occur during pregnancy as a result of maternal substance misuse.

## 6.2.3 Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This includes physical contact (such as penetration or non-penetrative acts) and non-contact activities, including exposure to sexual images, online exploitation, grooming or encouraging sexually inappropriate behaviour. Sexual abuse may be perpetrated by adults or other children.

## 6.2.4 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child that causes severe and long-lasting adverse effects on emotional development. This may include humiliation, intimidation, isolation, silencing a child, imposing inappropriate expectations, exposure to domestic abuse, serious bullying (including cyberbullying), or exploitation. Emotional abuse may occur alone or alongside other forms of abuse.

[What to do if You're Are Worried a Child is Being Abused – Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect.

## 6.2.5 Bullying

Bullying is the repeated abuse or mistreatment of a child by an individual or group and may involve elements of physical, emotional or sexual abuse, or neglect.

Bullying is not tolerated at TEI. Centres actively promote positive behaviour, address concerns promptly, and reinforce expectations through staff supervision, student guidance and visible anti-bullying messaging.

Cyber bullying

## 7. TEI Safeguarding Procedures

All TEI staff have a responsibility to act immediately on any safeguarding concern. The welfare of the child is always the paramount consideration.

### Responding to a Disclosure

If a child discloses abuse or neglect, the member of staff must:

- Listen carefully and remain calm; do not interrupt or investigate
- Keep the focus on the child and use age-appropriate language
- Reassure the child they have done the right thing
- Not promise confidentiality; explain information may need to be shared to keep them safe
- Contact the Designated Safeguarding Lead (DSL) immediately. If the DSL is unavailable, contact the TEI Director without delay
- Make a written record as soon as possible, using the child's own words where possible

Initial notes may be made immediately, but staff must complete the TEI Safeguarding/Child Protection Recording and Reporting Form (Appendix A) and forward it to the DSL as soon as possible. All hard-copy records are stored securely with restricted access.

The DSL will determine and take appropriate action, including referrals to Children's Social Care or the Police where required. The TEI Director must be informed of all safeguarding and child protection reports.

Parental consent is not required where harm is suspected. Parents or carers must not be informed unless advised to do so by statutory agencies.

### **Reporting a Safeguarding Concern**

Staff must:

- Record concerns promptly and accurately
- Maintain confidentiality and share information only with those who need to know
- Inform the DSL immediately

The DSL will:

- Decide whether a referral to Children's Social Care or the Police is required
- Inform the TEI Director
- Follow statutory guidance on referrals
- Record decisions, actions taken, dates and times, including reasons where referrals are made without parental consent

### **Concerns or Allegations About Adults**

This applies to all adults on site, including staff, Group Leaders, visitors, contractors and agency staff.

#### **7.1 Low-Level Concerns**

Any concern, however minor, about an adult's behaviour, attitude or breach of policy must be reported immediately and verbally to the DSL. These are referred to as low-level concerns.

Anyone reporting concerns in good faith will be supported. If the concern relates to the DSL, it must be reported directly to the TEI Director.

#### **7.2 Visitors**

All visitors must sign in and out, wear a visitor lanyard and be escorted. Unauthorised or unannounced individuals will be asked to leave immediately. Police will be contacted if an individual refuses to leave.

Staff and Group Leaders are expected to challenge unknown individuals and direct them to reception or centre management.

#### **7.3 Allegations**

An allegation is any concern that an adult has:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against a child
- Behaved in a way that indicates they may pose a risk of harm
- Behaved in a way that indicates they may not be suitable to work with children

## 7.4 Formal Procedure

All allegations must be reported immediately to the DSL, TEI Director and/or HR Manager.

They will:

- Take immediate action to protect children
- Decide whether the concern meets the threshold for referral to the LSCP Designated Officer
- Determine whether suspension or alternative arrangements are required

The adult concerned must not be informed until initial safeguarding decisions have been made.

If the allegation concerns the TEI Director, it must be referred to the DSL, Head of HR and LSCP Designated Officer without informing the Director.

This procedure applies regardless of when or where the alleged abuse occurred. Historic allegations must be referred to the Police.

Support must be provided immediately to the child and appropriate support arrangements put in place for the staff member involved.

### 7.4.1 Initial Discussion

The Case Manager (DSL or Director, depending on the allegation) will consult with the LSCP Designated Officer to assess the nature and seriousness of the allegation, agree immediate actions and decide whether further investigation is required.

Outcomes may include no further action, internal investigation or referral to statutory agencies. All decisions must be recorded.

### 7.4.2 Internal Investigation

Where required:

- The LSCP Designated Officer will advise on the process and investigator
- Interviews will be conducted in a neutral setting with a note-taker present
- Parents' consent is required before interviewing a child
- Staff may be accompanied by a representative

Safeguarding investigations take precedence over disciplinary procedures.

### 7.4.3 Suspension

Suspension will only be used where necessary to protect children. Alternatives such as redeployment or supervised duties will be considered first.

If suspension is required:

- Written confirmation will be issued within one working day
- A named HR contact will be provided
- Ongoing support will be offered

The Case Manager will decide, in consultation with the LSCP Designated Officer, what information may be shared with parents or carers.

#### 7.4.4 Recording

All safeguarding concerns and allegations must be recorded using the TEI Safeguarding Recording and Reporting Form and returned to the DSL. Records must detail the concern or allegation, actions taken, decisions reached and outcomes.

#### 7.4.5 Confidentiality and Information Sharing

Staff must not promise confidentiality where safeguarding is concerned.

TEI ensures that:

- Information is shared only to protect the child
- Only relevant information is shared on a need-to-know basis
- Records clearly distinguish between fact and opinion
- Safeguarding records are stored securely and centrally by the DSL

#### 7.4.6 Retention of Safeguarding Records

Safeguarding records are retained until the child reaches 25 years of age, in line with IRMS guidance. Where records are kept longer, the reason is clearly documented.

### 8. Bullying and Abusive Behaviour

TEI is committed to providing a safe, inclusive and supportive environment. Bullying, abuse and aggressive behaviour of any kind are not tolerated. This section should be read alongside TEI behaviour and discipline policies and Codes of Conduct.

#### 8.1 Definition of Bullying

Bullying is repeated behaviour intended to hurt, intimidate or isolate another person. It may be:

- **Physical:** hitting, kicking, pushing, taking belongings
- **Verbal:** name-calling, insults, racist, sexist or discriminatory remarks, including online
- **Social / Emotional:** exclusion, spreading rumours, intimidation or humiliation

This list is not exhaustive. All students have the right to feel safe, respected and protected regardless of gender, race, nationality, disability, religion, sexual orientation or background.

Where bullying (including online bullying) or abusive behaviour is suspected, a prompt and fair investigation will take place. Both the victim and the alleged perpetrator will be supported throughout. TEI adopts a child-centred approach, recognising that harmful behaviour may indicate unmet needs, while making it clear that bullying will not be tolerated and may result in serious consequences.

#### Preventative Measures

Staff are expected to:

- Promote respectful behaviour and positive relationships
- Ensure classes and activities are free from ridicule, harassment and isolation
- Model appropriate behaviour at all times

- Enforce agreed standards of conduct consistently
- Display anti-bullying information prominently

## Responsibilities

All students and staff must behave in line with TEI Codes of Conduct.

Staff are trained to:

- Recognise bullying and abusive behaviour
- Report concerns promptly
- Support victims
- Follow TEI safeguarding and behaviour procedures

The DSL is responsible for:

- Recording bullying incidents
- Overseeing responses and outcomes
- Ensuring procedures are followed

## 8.2 Bullying Procedure

All bullying concerns must be reported immediately to the Centre Manager, Welfare Officer or DSL. Staff must not attempt to resolve matters independently.

Immediate actions may include:

- Securing the safety of those involved
- Listening objectively to all parties in a safe setting
- Take a 'no-blame' approach ensuring that all information is collated
- Separating students where necessary
- Inform the perpetrator/s of potential consequences of their behaviour (they may be sent home/miss an outing etc.)
- Recording the incident using the TEI Safeguarding Recording and Reporting Form
- Informing Group Leaders and senior staff (and parents if appropriate).

Persistent bullying or serious incidents, including physical assault, must be referred to the DSL immediately and may involve police or external agencies. Serious cases may result in repatriation at the student's expense.

TEI will:

Deal with instances quickly, fairly and in as positive a manner as possible for both students and staff.

- Investigate promptly and fairly
- Keep accurate records
- Apply proportionate sanctions
- Support all parties involved
- Maintain confidentiality where appropriate
- Monitoring the problem until it is resolved to everyone's satisfaction

Sanctions may include warnings, withdrawal from activities, parental involvement, repatriation or police referral.

Allegations involving staff are managed under TEI safeguarding and allegations procedures and may involve statutory agencies.

## 9. Equality and Diversity

TEI is committed to equality of opportunity and to providing a safe environment free from discrimination and harassment. All students and staff are entitled to respect and dignity.

TEI promotes equality regardless of gender, age, disability, race, nationality, religion, marital status or sexual orientation.

We aim to achieve this by:

- Modelling respectful behaviour
- Challenging discrimination and prejudice
- Taking action where discriminatory behaviour occurs
- Encouraging education and awareness

## 10. Prevent – Extremism and Radicalisation

TEI recognises its duty under the Counter-Terrorism and Security Act 2015 to prevent people from being drawn into terrorism.

**Radicalisation** is the process by which individuals adopt extreme views.

**Extremism** is opposition to democratic values, the rule of law, mutual respect and tolerance.

All children are potentially vulnerable to extremist influence.

Indicators of radicalisation or extremism:

- Behaviour becoming more centred on extreme ideologies
- Loss of interest in friends and activities not associated with the extreme ideology, group or cause
- Changing their personal appearance to align with the extreme ideology, group or cause
- Possession of materials or symbols associated with the extreme ideology, group or cause
- Attempts to recruit others to the extreme ideology, group or cause
- Communication with others that suggest an affiliation with an extreme ideology, group or cause
- Using insulting or derogatory language about another extreme ideology, group or cause

An increase in prejudice-related incidents committed by the individual for example:

- Physical or verbal assault
- Provocative behaviour
- Damage to someone's property
- Derogatory name calling
- Possession of prejudice-related material
- Refusal to co-operate
- Supporting violence towards others

### Staff Responsibilities

All staff must:

- Promote British values

- Remain vigilant to warning signs
- Respond promptly to concerns
- Report concerns to the DSL
- Adopt a professionally inquisitive approach

### 10.1 Prevent Procedure (radicalisation concerns).

Concerns must be discussed with the DSL, who will determine appropriate action, including potential referral to the local Prevent team. Staff may escalate concerns via whistleblowing if necessary.

Further information can be found at: <https://www.gov.uk/government/publications/prevent-duty-guidance>

## 11. Contextual Safeguarding

TEI recognises that harm may occur outside the family, including online, in peer groups or community settings. Concerns relating to contextual safeguarding must be reported to the DSL immediately and recorded.

### 11.1 Peer-on-Peer Abuse

Peer-on-peer abuse includes physical, sexual, emotional, financial abuse, coercive control, bullying, exploitation and harmful sexual behaviour, both online and offline.

Both victim and alleged perpetrator are treated as potentially vulnerable. Safeguarding responses focus on protection, support and risk management.

### 11.2 Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment between children are not tolerated. All concerns must be reported to the DSL immediately. The DSL, with the Director, will assess risk, ensure immediate safety and decide whether referrals are required.

### 11.3 Child Criminal Exploitation (CCE)

CCE may include county lines, forced criminal activity or exploitation. While unlikely in short-term provision, staff must report any concerns immediately.

### 11.4 Emotional Wellbeing and Mental Health

Staff should be alert to changes in behaviour that may indicate emotional distress. Concerns must be shared with the DSL and Group Leader.

Gov.UK has produced a range of resources to support staff to promote positive health, wellbeing and resilience among young people including its guidance "[Promoting Children and Young People's Emotional Health and Wellbeing](#)".

### 11.5 Self-Harm

Any suspected or disclosed self-harm must be treated seriously. Immediate safety is paramount. If a child has self-harmed whilst attending a TEI activity a first aider should be called immediately. The incident should then be reported to the DSL will decide next steps, including medical or external support.

### 11.6 Up-skirting

Up-skirting is a criminal offence under the Voyeurism Act 2019. Any concerns must be reported immediately to the DSL.

### 11.7 Sexting

It is illegal to create, possess or share sexual images of anyone under 18. Staff must not view or share images and must report concerns to the DSL immediately.

Adults sharing an indecent image of a child to report the incident is also illegal, never request any images are forwarded directly to you or if one has been sent to you, report it and do not forward to anyone else until advice from Police has been sought.

### 11.8 Female Genital Mutilation (FGM)

FGM is illegal in the UK. Any disclosure or concern must be reported immediately to the DSL, who will inform the police and social care.

### 11.9 Private Fostering

TEI students reside on residential campuses and do not stay in private fostering or Homestay arrangements. However, any concerns regarding a child's care arrangements must be reported to the DSL.

## 12. Removal from Course

In cases of serious misconduct, TEI may require a student or staff member to leave the course. Actions may include formal warnings, parental contact, sanctions or repatriation. Repatriation is a last resort and decisions are made on a case-by-case basis with safeguarding as the priority.

## 13. Whistleblowing

TEI encourages staff to raise concerns about safeguarding or poor practice. If concerns are not addressed appropriately, staff should follow the Whistleblowing Policy as outlined in the Staff Handbook.

## 14. Contacts

Title	Name	Phone	email
TEI Designated Safeguarding Lead (DSL)	Maureen Keddy	07950 109430	<a href="mailto:m.keddy@targetenglishinternational.com">m.keddy@targetenglishinternational.com</a>
TEI Managing Director	James Hordon	07825334663	<a href="mailto:jameshordon@targetenglishinternational.com">jameshordon@targetenglishinternational.com</a>
Emergency 24/7 Number		07950 109855	

## 15. Guidance documents

<p><b>Working together to safeguard children</b></p>	<p><a href="https://www.gov.uk/government/publications/working-together-to-safeguard-children--2">https://www.gov.uk/government/publications/working-together-to-safeguard-children--2</a></p> <p><a href="#">Working together to safeguard children 2023</a></p>
<p><b>Keeping children safe in education 2023 (KCSIE)</b></p>	<p><a href="#">Keeping children safe in education 2023</a></p>
<p><b>NSPCC – Safeguarding for Out Of School activities</b></p>	<p><a href="https://learning.nspcc.org.uk/research-resources/2020/a-summary-of-after-school-clubs-community-activities-and-tuition-safeguarding-guidance-for-providers">https://learning.nspcc.org.uk/research-resources/2020/a-summary-of-after-school-clubs-community-activities-and-tuition-safeguarding-guidance-for-providers</a></p>
<p><b>Gov.UK Overview of Sexting Guidance</b></p>	<p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Overview_of_Sexting_Guidance.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647389/Overview_of_Sexting_Guidance.pdf</a></p>
<p><b>Gov.UK Position of Trust</b></p>	<p><a href="#">Sexual Offences Act 2003 (legislation.gov.uk)</a></p>
<p><b>Promoting children and young people’s mental health and wellbeing</b></p>	<p><a href="#">Promoting children and young people’s mental health and wellbeing (publishing.service.gov.uk)</a></p>
<p><b>CEOP thinkuknow online safety guidance</b></p>	<p><a href="#">Thinkuknow: professionals</a></p>

**Appendix A**



**Target English International Child Protection Recording and Reporting Form**

**(for all staff use)**

TEI Centre	Yor Name and job role	Todays date

**Child's Details**

Name of child		
Age of child		Are you reporting your concerns?
Nationality		YES / NO
Language		Responding to concerns raised by someone else?
Child's date of birth		YES / NO Delete as appropriate

If you are responding to concerns raised by someone else please give their name and position within the centre / organisation:

Please provide details of the incident or concerns, include dates, times, describe any injuries and whether this is a first-hand account or the account of others. Include any other relevant details:

The child's account / perspective (as they have told you):

Please provide details of anyone alleged to have caused the incident or to be the source of any concerns:

Please provide details of anyone who witnessed the incident or who shares the concerns:

\_\_\_\_\_

Have you passed this concern on to your Manager?      **Yes**    **No**      delete as appropriate

If yes, please give a summary of the discussion and any relevant dates and times:

\_\_\_\_\_

If no, provide an explanation of why not:

\_\_\_\_\_

Have you passed this concern on to the Lead Safeguarding Officer?    **Yes**    **No**    delete as appropriate

If yes, please give a summary of the discussion and any relevant dates and times:

\_\_\_\_\_

If no, provide an explanation of why not:

\_\_\_\_\_

Add any other relevant info: *(e.g. this was a serious incident and I / my manager have informed the police) including names dates times etc.*

\_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

**Email this form marked strictly private and confidential to: [m.keddy@targetenglishinternational.com](mailto:m.keddy@targetenglishinternational.com)**