



Group Safeguarding Policy

Including:
Safer Recruitment Policy
Whistleblowing Policy
2019

Date of Review: July 2019

Date of Next Review: February 2020

Signed: Nigel Miller – Managing Director
Active Learning Group

CHILD AND YOUNG PERSON SAFEGUARDING PROTECTION POLICY

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Related Documents:	Health and Safety Policy Recruitment & Selection Policy Student Supervision Policy Staff Induction Policy Student Attendance Policy Social Media and Electronic Communication Policy Procedure for Accompanying Students to Hospital Tackling Extremism and Radicalisation - Prevent Missing Person Procedure
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Publication:	At least one copy will be available at each centre for reference. This policy is also available on our website and staff portal.

Introduction

Ardmore Language Schools provide residential and/or home stay language and activity courses for groups of students or individuals aged 9-17.

The following policy outlines Ardmore Language Schools' welfare procedures and approach to student safeguarding. It relates to all students in our care regardless of age, gender, ethnicity, nationality, disability or religion and is relevant to all adults working with or alongside Ardmore Language Schools. All Ardmore members of staff are required to read and implement our Safeguarding Policy without exception.

1. Application of Policy

The policy applies to all permanent, seasonal, contracted, agency or internship staff employed by Ardmore Language Schools. It is equally applicable to those providing homestay accommodation for our students, visitors, contractors and group leaders.

2. Statutory Guidance

Ardmore Language Schools acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring practice reflects statutory responsibilities, government guidance and complies with best practice and British Council requirements. The policy gives due regard to statutory guidance and complies with the following legislation:

- **Section 17 & 47 Children Act 1989** (please see <http://www.legislation.gov.uk/ukpga/1989/41/contents>)
- **Working Together to Safeguard Children (2018)** (please see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)
- **Keeping Children Safe in Education (2018)** (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741314/Keeping_Children_Safe_in_Education_3_September_2018_14.09.18.pdf)
- **Duties of Social Care, Police and NSPCC**
- **UN Convention on the Rights of the Child 1989** (please see http://www.unicef.org.uk/Documents/Publication-pdfs/UNCRC_PRESS200910web.pdf)
- **Childcare Act 2006**
- **Children and Social Worker Act 2017**
- **Counter Terrorism and Security Act 2015**
- **Section 11 Children Act 2004** (please see <http://www.legislation.gov.uk/ukpga/2004/31/contents>)

3. Policy Statement

All children have the right to protection from any kind of abuse and to experience a safe and friendly environment whilst in our care; this is of paramount importance to us. Ardmore is committed to providing, as far as reasonably practicable, a safe and secure environment for all of our visiting students.

3.1 All children have the right...

- To be safe; no one should take this right away from them.
- To protect their own bodies; their body belongs to them.
- To say no; it is alright to say no to someone if that person tries to do something to them that they feel is wrong.
- To get help against bullies; tell children to enlist the help of friends, to say no without fighting and to tell an adult.

- To tell; you must assure children that no matter what happens you will not be angry with them and that you want them to tell you of any incident that frightens or confuses them or makes them unhappy.
 - To be believed; when children are told to go to an adult for help, they need to know they will be believed and supported. This is especially true in cases of sexual abuse; which children rarely lie about.
 - Not to keep secrets; teach children that some secrets should never be kept, even if they promised not to tell.
- a. Ardmore endeavour to safeguard both our students and staff by:**
- Promoting and prioritising the safety and wellbeing of children.
 - Adopting child protection guidelines through effective procedures and a staff code of conduct.
 - Ensuring appropriate action is taken in the event of incidents/concerns of abuse and that support is provided to all parties.
 - Following carefully the procedures for safer recruitment and selection of staff.
 - Providing effective management for the staff through supervision, support and training.
 - Sharing information about child protection and good practice with children, parents and carers, staff and any relevant third parties.
 - Sharing information about concerns with the agencies who need to know and involving parents and children appropriately.
 - Reviewing our policy and best practice at regular intervals.

4. Relevant Terminology:

Child – The legal definition of a child in the UK is a person under the age of 18. As an organisation we understand that under 18s from overseas may not have the same knowledge of life and local customs as students from the UK, hence more vulnerable to harm. We are committed to meeting and exceeding our duty of care where possible towards all students and safeguarding them from harm. (Working Together to Safeguard Children, 2018)

Child Protection – Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. (Working Together to Safeguard Children, 2018)

Safeguarding – is not the same as child protection, although they are highly intertwined. Safeguarding is the process of protecting children from abuse and neglect, preventing impairment of their health and development and ensuring that they are growing up in circumstances consistent with the provision of safe and effective care. (Working Together to Safeguard Children, 2018)

Abuse - A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm (omission). Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. (Working Together to Safeguard Children, 2018)

Local Safeguarding Partners – The LSPs are made up of the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. (Keeping Children Safe in Education, 2018)

Type of Abuse	Possible Indicators
Neglect	
<p>The persistent failure to meet a child’s basic physical and psychological needs which is likely to result in serious impairments to their health and development. This may involve a parent or carer failing to provide food, shelter, clothing or a failure to protect from physical harm or danger or allow access to medical treatment. (Keeping Children Safe in Education, 2018)</p>	<p>Obvious signs of lack of care including:</p> <ul style="list-style-type: none"> • Problems with personal hygiene • Constant hunger • Inadequate clothing • Poor relationship with peers • Emaciation • Untreated medical problems • Repetitive discipline issues, lateness, compulsive stealing
Physical Abuse	
<p>Actual or likely physical injury or failure to prevent physical injury or suffering to a child including hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. (Keeping Children Safe in Education, 2018)</p>	<ul style="list-style-type: none"> • Physical signs do not tally with the given account of the occurrence • Conflicting /unrealistic explanations of the cause • Repeated injuries • Bruising in unusual places • Symmetry in injuries • Delay in reporting or seeking medical advice. • Unexpected covering up (e.g. long sleeves when previously short –sleeves were worn) • Reluctance to take part in activities requiring exposing body, e.g. swimming or some sports
Sexual Abuse	
<p>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 or non-penetrative acts. 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. (Keeping Children Safe in Education, 2018)</p>	<ul style="list-style-type: none"> • Sudden changes in behaviour • Displays of affection which are sexual and age inappropriate • Tendency to cling or need constant reassurance • Tendency to cry easily • Regression to younger behaviour (thumb sucking, acting like a baby etc) • Unexplained gifts or money • Wetting/soiling day or night
Emotional Abuse	
<p>The persistent emotional maltreatment of a child such as to cause severe and persistent 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 cyber bullying), 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, though it may occur alone. (Keeping Children Safe in Education, 2018)</p>	<ul style="list-style-type: none"> • Rejection • Low self-esteem • Being withdrawn/ isolation • Rocking, hair twisting, thumb sucking • Child being blamed for actions of adults • Child being used as a carer for younger siblings • Affection and basic emotional care giving/warmth persistently absent or withheld • Being angry and aggressive • Swinging between withdrawn and angry/aggressive in short space of time • Self-harm (in extreme cases)

Additional specific areas relating to child and young person abuse

Tackling extremism and radicalisation policy

The Ardmore Group is fully committed to safeguarding and promoting the welfare of all children young person's attending an Ardmore Group Site. Every member of staff recognises that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability in today's society. The tackling extremism and radicalisation policy sets out The Ardmore Group beliefs, strategies and procedures to protect vulnerable individuals from being radicalised or exposed to extremist views.

The following national guidelines should also be read when working with this policy:

1. Prevent Duty (DfE)
2. Keeping Children Safe in Education (DfE)
3. Working Together to Safeguard Children (HM Government)

Aims

The Ardmore Group tackling extremism and radicalisation policy is intended to provide a framework for dealing with issues relating to vulnerability, radicalisation and exposure to extreme views. The objectives are that:

1. All staff will have an understanding of what radicalisation and extremism are and why there is a need to be vigilant during camp time.
2. All staff will understand the policy for tackling extremism and radicalisation and will follow the policy guidance swiftly when issues arise.
3. All children will understand the dangers of radicalisation and exposure to extremist views: building resilience against these and knowing what to do if they experience them.
4. All group leader(s)/agent(s) will know that the policies are in place to keep children safe from harm and that The Ardmore Group regularly reviews its systems to ensure they are appropriate and effective.

Definitions and indicators

Radicalisation is defined as the act or process of making a person more radical or favouring extreme or fundamental changes in political, economic or social conditions, or institutions or habits of the mind.

Extremism is defined as the holding of extreme political or religious views.

There are a number of behaviours which may indicate a child is at risk of being radicalised or exposed to extreme views. These include:

- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause.
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Changing their style of dress or personal appearance to accord with a particular extremist ideology, group or cause.
- Possession of materials or symbols associated with an extremist ideology, group or cause.
- Attempts to recruit others to the extremist ideology, group or cause.
- Communications with others that suggests identification with an extremist ideology, group or cause.
- Using insulting or derogatory names for another ideology, group or cause group.
- An increase in prejudice-related incidents committed by that person – these may include:
 - Physical or verbal assault.
 - Provocative behaviour.
 - Damage to property.
 - Derogatory name calling.
 - Possession of prejudice-related materials.
 - Refusal to co-operate.
 - Condoning or supporting violence towards others.

Procedures for referrals

It is important to be constantly vigilant and remain fully informed about the issues which affect the local areas, cities and society in which The Ardmore Group works. Staff are reminded to suspend any 'professional disbelief' that instances of radicalisation 'could not happen here' and to be 'professionally inquisitive' where concerns arise, referring any concerns to the **Designated Safeguarding Lead (DSL) or to The Local Prevent Referral Team.**

The Ardmore Group believe that it is possible to intervene to protect people who are vulnerable. Early intervention is vital and staff must be aware of the established processes for front line professionals to refer concerns about an individual(s) and/or an extremist ideology(s), group(s) or cause(s). The Ardmore Group staff must have the confidence to challenge, and to intervene, and ensure that strong safeguarding practices are based on the most up-to-date guidance and best practice.

All of The Ardmore Group's staff undertake Channel General Awareness training created by the College of Policing. The Ardmore Group's DSL will discuss the most appropriate course of action on a case-by-case basis and will decide when a referral to external agencies is needed.

As with any child protection referral, staff must be made aware that if they do not agree with a decision not to refer, they can make the referral themselves and will be given the contact details to external Local Safeguarding Partners. The Ardmore Group staff have the option to follow The Ardmore Group **whistleblowing policy** if they are not comfortable discussing the concern with their line Manager.

Peer on Peer Abuse

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations.

Peer-on-peer abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence. Online peer-on-peer abuse is any form of peer-on-peer abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, peer-on-peer grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

The Ardmore Group are committed to the prevention, early identification, and appropriate management of peer-on-peer abuse (as defined as above) both within and beyond the activity setting. In particular, we:

- In order to protect children, The Ardmore Group have taken a whole-company Contextual Safeguarding approach to preventing and responding to peer-on-peer abuse
- The Ardmore Group do not feel it is acceptable merely to take a reactive approach to peer-on-peer abuse in response to alleged incidents of it; and believe that to tackle peer on-peer abuse proactively, it is necessary to focus on all four of the following areas:
 - Systems and structures
 - Prevention
 - Identification
 - Response/intervention
- The Ardmore Group recognises the national and increasing concern about this issue and wish to implement this policy in order to mitigate harmful attitudes and peer-on-peer abuse in their activity settings.

How The Ardmore Group uses Contextual Safeguarding to Peer on Peer Abuse

The Ardmore Group is adopting a whole-company Contextual Safeguarding approach, which means:

- Being aware of and seeking to understand the impact that these wider social contexts may be having on the children in our care

- Creating a safe culture in the activity settings by, for example, implementing policies and procedures that address peer-on-peer abuse and harmful attitudes
- Promoting healthy relationships and attitudes to gender/ sexuality.
- Hotspot mapping to identify risky areas geography to look for trends or abusive natures.
- Training on potential bias and stereotyped assumptions.
- Being alert to and monitoring changes in students' behaviour and/or attendance.

When does behaviour become problematic or abusive?

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

The Ardmore Group follow the continuum model (below) to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a student's sexual behaviour and deciding how to respond to it.

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally Expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviour	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable Consensual, mutual, Reciprocal	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour
Shared decision Making	Context for behaviour may be inappropriate	No overt elements of Victimisation	Coercion and force to ensure compliance Intrusive	
	Generally consensual and reciprocal	Consent issues may be unclear May lack reciprocity or equal power	Informed consent lacking or not able to be freely given	Sadism
		May include levels of compulsivity	May include elements of expressive violence	

Other behaviour

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, The Ardmore Group staff can draw on aspects of the continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond.

This could include, for example, whether it:

- Is socially acceptable
- Involves a single incident or has occurred over a period of time.
- Is socially acceptable within the peer group
- Is problematic and concerning
- Involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability.
- Involves an element of coercion or pre-planning,
- Involves a power imbalance between the child/ children allegedly responsible for the behaviour and the child/children allegedly the subject of that power.

How can a child who is being abused by their peers be identified.

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of

the fact that the way(s) in which children will disclose or present with behaviour(s) because of their experiences will differ.

Record

All concerns should be accurately recorded using the online safeguarding reporting system (CPOMS).

Referrals

The Designated Safeguarding Lead needs to seek advice about making referrals to Social Care and follow the Local Safeguarding Partners Guidelines on Protection referrals.

Child sexual exploitation policy

This policy has been developed in response to growing concerns about the scale of sexual exploitation and the recognition that any child might be targeted for grooming and exploitation. This policy should be followed by all Head Office staff, site staff and volunteers.

Definitions

The Government has released an updated definition of child sexual exploitation, following a consultation completed in 2017.

The new, clearer definition will help practitioners across all services understand and be able to recognise when children are in danger of child sexual exploitation. It will also help agencies record, analyse and disrupt incidences.

“Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.”

The revised definition is included in the Working Together to Safeguard Children Statutory Guidance.

- Children may be exploited by an individual, several individuals working as an organised group, or by a gang.
- Grooming is the process of ‘preparing’ a boy or girl for a sexual purpose. Grooming is often slow and subtle, continuing for several weeks or months and lulling the child into a false sense of security. It always involves manipulation and deceit.
- Two types of grooming are recognised: street grooming which occurs in the community, and online grooming using technology including the internet and mobile phones.

The complexity and challenge of sexual exploitation and grooming

It can be difficult to identify children and young people who are at risk of sexual exploitation. The grooming process draws children in to what they initially perceive as a new and caring relationship with an exciting older boyfriend or girlfriend. Attempts to explain the risks to the child may be met with derision and hostility. By the time the child realises the reality of the ‘relationship’ they may have been seriously sexually, physically and psychologically abused, threatened with the distribution of indecent photographs or videos of their abuse and warned that they will put themselves or their family in danger if they speak out. Unsurprisingly, the child will be unwilling to disclose their abuse, particularly to people in positions of authority such as teachers, social workers or police officers.

The child may find it impossible, for a number of reasons, to speak to their parent(s)/guardian(s) and their abusers will have sought to isolate them from their family and friends. Some children may have developed drug or alcohol addictions and rely on their abusers for supply.

Procedure

Site staff are in daily contact with the children during their stay at The Ardmore Group and play an important role in keeping children safe and supporting them when things go wrong. To help keep children safe from sexual exploitation and grooming, The Ardmore Group will:

- Raise staff awareness of sexual exploitation and grooming.

- Help Group Leader(s)/agent(s) to understand the issue if a concern is raised.
- Contribute to multi-agency safeguarding and child protection arrangements.
- Promote healthy and safe relationships.

Sexually active young people

In law, a child is a person under the age of 18 in the UK. Not all sexual activity involving a child is criminal, nor is it always abusive. The law is very clear on certain aspects of sexual activity, but care providers and other agencies are expected to use professional judgement to determine whether a concern about sexual activity involving a child over the age of 13 is exploitative or abusive and should be referred to children's social care or the Police. Sexual activity involving a child under 13 is always a criminal offence and The Ardmore Group will always refer such concerns to children's social care.

Procedure for reporting

Camp staff should report any concern about under-age sexual activity to the **Designated Safeguarding Lead** who will decide on the most appropriate course of action.

Camp staff that are approached by a child wishing to discuss sexual matters must make it clear to the children that they cannot guarantee confidentiality but will act in the child's best interests.

Female Genital Mutilation

The Ardmore Group has robust and rigorous safeguarding procedures and takes its responsibilities of child protection seriously. Female Genital Mutilation is a form of child abuse and as such is dealt with under this policy. The Ardmore Group uses the World Health Organisation definition as written below.

"Female Genital Mutilation (FGM) comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons."

The UK Government has written advice and guidance on FGM that states:

"FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practised on a child it is a violation of the child's right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child."

"Girls are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM."

UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women."

Procedures

The Ardmore Group take proactive action to protect and prevent girls being forced to undertake FGM BY

- Having a robust attendance policy that does identify any unexplained absences from lessons and/or sessions.
- Giving FGM training for the **Designated Safeguarding Lead and team** with disseminated training for all staff on camp.

Indications that FGM has taken place

- Prolonged absence from camp with noticeable behaviour change.
- Spend long periods of time away from the sessions during the day. e.g. extended toilet breaks.
- A child who has undergone FGM should be seen as a child protection issue.

Indications that a child is at risk of FGM

- The group comes from a community that is known to practice FGM - especially if there are elderly women present.
- In conversation a child may talk about FGM.
- A child may express anxiety about a special ceremony.

- The child may talk or have anxieties about forthcoming holidays to their country of origin.
- If a woman has already undergone FGM – and it comes to the attention of any professional, consideration needs to be given to any Child Protection implications e.g. for younger siblings, extended family members and a referral made to the **Designated Safeguarding Lead** who will decide on the most appropriate course of action.

If a member of staff suspect that a child is a victim of FGM it is their responsibility to raise the concern with The Ardmore Group Designated Safeguarding Team who will provide advice.

Record

All interventions should be accurately recorded using the **Safeguarding Concern Referral Book and logged on the online safeguarding report system (CPOMS).**

Referrals

The Designated Safeguarding Lead needs to seek advice about making referrals to Social Care and follow the Local Authority Safeguarding Boards Procedure Guidelines on FGM and Child Protection referrals.

Self-Harm Policy

Recent research indicates that up to one in ten young people in the UK and worldwide engage in self-harming behaviours, and that this figure is higher amongst specific populations, including young people with special educational needs. The Ardmore Group's staff can play an important role in recognising self-harm and contribute to its prevention, and also support children that may be currently engaging in self-harm and their parents.

Definition of Self-Harm

Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- Cutting, scratching, scraping or picking skin
- Swallowing inedible objects
- Taking an overdose of prescription or non-prescription drugs
- Swallowing hazardous materials or substances
- Burning or scalding
- Hair-pulling
- Banging or hitting the head or other parts of the body

Risk Factors

Several factors can contribute to making a child vulnerable to self-harm: individual factors such as:

- Depression / anxiety
- Poor communication skills
- Low self-esteem
- Poor problem-solving skills
- Hopelessness
- Impulsiveness
- Drug or alcohol abuse

Family factor:

- Unreasonable expectations
- Neglect or physical, sexual or emotional abuse
- Poor parental relationships and arguments
- Depression, self-harm or suicide in the family

And social factors, such as:

- Difficulty in making relationships / loneliness
- Being bullied or rejected by peers

The Ardmore Group's staff may become aware of warning signs which indicate a child is experiencing difficulties that may lead to thoughts of self-harm or suicide. These warning signs should **always** be taken seriously and staff observing any of these warning signs should seek further advice from one of the designated safeguarding team.

Possible warning signs include:

- Changes in eating / sleeping habits (e.g. children may appear overly tired if not sleeping well)
- Increased isolation from friends or family, becoming socially withdrawn
- Changes in activity and mood e.g. more aggressive or introverted than usual
- Lowering of academic achievement
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing e.g. becoming a goth

Staff Roles in working with children who self-harm

Children may choose to confide in a member of The Ardmore Group's staff if they are concerned about their own welfare, or that of a peer. The Ardmore Group's staff may experience a range of feelings in response to self-harm in a child such as anger, sadness, shock, disbelief, guilt, helplessness, disgust and rejection. However, in order to offer the best possible help to children it is important to try and maintain a supportive and open attitude – a child who has chosen to discuss their concerns with a member of The Ardmore Group's staff is showing a considerable amount of courage and trust.

Children need to be made aware that it may not be possible for staff to offer complete confidentiality. **If you consider a child is at serious risk of harming themselves then confidentiality cannot be kept.** It is important not to make promises of confidentiality that cannot be kept even if a child puts pressure on you to do so.

Any member of staff who is aware of a child engaging in, or suspected to be at risk of engaging in, self-harm should consult one of the designated safeguarding team.

Following the report, the designated safeguarding team member will decide on the appropriate course of action. This may include:

- Contacting the Group Leader and/or the agent.
- Arranging professional assistance e.g. doctor, nurse, social services
- Arranging an appointment with a counsellor
- Immediately removing the children from activities if their remaining on site is likely to cause further distress to themselves or their peers
- In the case of an acutely distressed child, the immediate safety of the child is paramount and an adult should remain with the child at all times.
- If a child has self-harmed whilst attending The Ardmore Group, a first aider should be called for immediate help.
- Head Office must always be notified immediately if there is suspicion or evidence of self-harming – this will be done via contacting the DSL team.

Further Considerations

Any meetings with a child, their group leader or their peers regarding self-harm should be recorded in writing including:

- Dates and times
- Concerns raised
- Details of anyone else who has been informed

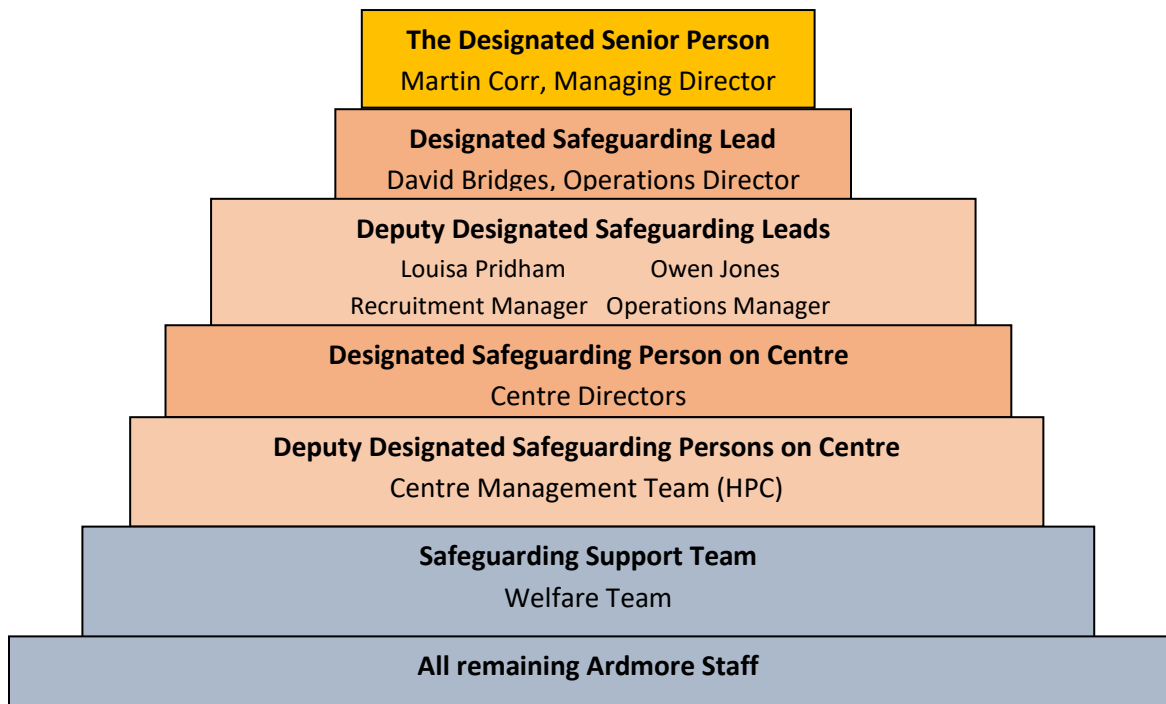
This information should be stored in line with The Ardmore Group’s Policy on retaining confidential documents.

If staff are aware of a child self-harming or a child on camp has spoken about self-harming, even if it is regarding a sibling, friend or parent, It is important to encourage the child to talk. They must be reassured that they are not in trouble; friends can worry about betraying confidences, so they need to know that self-harm can be very dangerous and that by seeking help and advice for a friend they are taking responsible action and being a good friend. They should also be aware that their friend will be treated in a caring and supportive manner.

The peer group of a young person who self-harms may value the opportunity to talk to a member of staff either individually or in a small group. Any member of staff wishing for further advice on this should consult one of The Ardmore Group designated safeguarding team members.

When a young person is self-harming it is important to be vigilant in case close contacts of the individual are also self-harming.

6. Staff Roles and Responsibilities



6.1 The Designated Senior Person (DSP) (Martin Corr, Managing Director)

- The DSP is supported by the Active Learning Group Safeguarding Senior Person: Wesley Westaway (Head of Training and Safeguarding – Active Learning Group). The DSP has the overall view of the procedures and deputes the daily safeguarding responsibilities to the Designated Safeguarding Lead who is supported by a team of Deputy Safeguarding Designated Persons.
- Trained to Safeguarding Level 3 – DSL

6.2 Designated Safeguarding Lead (David Bridges, Operations Director)

- The DSP is supported by the Active Learning Group Safeguarding Senior Person: Wesley Westaway (Head of Training and Safeguarding – Active Learning Group)
- Trained to Safeguarding Level 3 – DSL
- The Designated Safeguarding Lead has responsibility for the safeguarding and welfare of students, supported by all members of summer school staff.
- Providing advice and support to all staff on issues relating to child protection.
- Reporting any concerns about Adults that pose a risk to children to the Local Authority Designated Officer (LADO).
- Concerns raised by children or staff on behalf of children to the Local Safeguarding Partners (LSP) and the police.
- Maintaining a complete and up-to-date record of all child protection-related concerns, issues, incidents, reports, referrals and complaints.
- Ensure safeguarding standards are communicated to all staff and training is sufficient and appropriate.

6.3 Deputy Designated Safeguarding Leads (Martin Corr, Owen Jones, Louisa Pridham)

- Trained to Safeguarding Level 3 – DSL
- Responsible for supporting the Designated Safeguarding Lead in their daily duties and overall responsibilities.
- Ensuring that all staff training required and completed in relation to child protection is recorded and audited regularly to identify training needs and any recording gaps.
- Ensuring that all students have sufficient and appropriate means to report concerns, issues and incidents.
- Assume DSL duties and responsibilities in their absence or handle any complaints or allegations against the nominated lead if appropriate.

6.4 Designated Safeguarding Person on Centre (Centre Director)

- Trained to Safeguarding Level 2.
- Overall accountability for the safeguarding and welfare of students lies with the Centre Director for each centre.
- Point of contact for all centre staff for welfare or safeguarding concern.
- Ensuring that all students receive a full induction and timely updates on matters relating to safeguarding and welfare.
- As line managers to individual centres, the DSP on Centre is accountable for ensuring Centre Managers, Welfare Officers and all members of staff implement the Safeguarding Policy.
- Responsible for the day to day functioning of the team.

6.5 Deputy Safeguarding Persons on Centre (Head of Pastoral Care & Centre Management Team)

- Trained to Safeguarding Level 2.
- To assist the Designated Safeguarding Person on Centre with any safeguarding issue and support them in the training and implementation of the safeguarding policy amongst all staff, students, group leaders and visitors.
- The HPC will act as the first DSP on Centre in their absence, or if the concerns/accusations are against the DSP.

6.6 Safeguarding Support Team (Welfare Team)

- Basic Safeguarding training
- Our Welfare Leaders are go-to people for students with everyday queries, needs or concerns relating to their welfare and are identifiable in white uniform.

- Welfare Leaders closely monitor and document student welfare and maintain accurate records of the issues of day to day issues and outcomes, reporting any issues to management that they feel are more serious.

6.7 All Staff Members

- Basic Safeguarding training
- All staff share a responsibility to protect students from harm, which includes being vigilant in identifying signs and symptoms of physical and psychological abuse and neglect and reporting any concerns in accordance with our policy.

7 Staff Training

All new and returning Ardmore Staff undergo training to ensure they are sufficiently prepared for their role and responsibilities, amongst which Safeguarding plays a key element.

7.1 Handbooks

All employees will be required to read Ardmore's Safeguarding Policy as part of their induction process. The importance of safeguarding children is also included in each role specific handbook.

7.2 Online Training

All employees will receive our in-house, Online Training prior to their arrival. Online Training includes a comprehensive description of our policies, procedures, practices and provisions in relation to the safeguarding of our students. Staff must bring their Certificate of Successful Completion with them on their arrival at the centre, prior to commencing their duties.

7.3 Centre Arrival

The centre arrival induction is designed to reinforce the points above (and other training elements explicit in the online training, policies and handbooks) and provide centre specific information. All staff are required to sign their induction form to record that they have received and understood the training and documentation, which includes Safeguarding.

7.4 Continuous Development

If any areas are identified as lacking, staff will receive the necessary training. Head Office will also conduct Centre Checks whereby staff will be randomly selected and tested on their safeguarding knowledge.

8 Safer Recruitment and Employment Policy

The Ardmore Group' reputation for high quality childcare depends on the professionalism and hard work of all staff. The Ardmore Group place the safeguarding and safety of all children and young people as their number one priority, and therefore follow this strict safer recruitment policy, to protect both the children and young people and the staff working within the individual centre settings, and wider offices.

Our recruitment process aims to ensure that all reasonable steps are taken to ensure that unsuitable people are prevented from working with children through Ardmore. We, therefore, follow a strict policy of safer recruitment that includes the following:

Advertising

At The Ardmore Group, we believe in providing an environment which recognises and values people's differences/individuality, and benefits from the unique strengths that these differences bring to our organisation. This commitment promotes respect and equal treatment for all persons regardless of age, disability, gender, ethnicity, marital or civil partnership, nationality, race, religion or belief, sex, or sexual orientation. We insist that this respect is applied in every aspect of our business and in how we conduct ourselves, under the Equality Act 2010. We advertise our vacancies through a variety of channels, from specialist job boards, to local schools, to our own website. We believe this approach allows us to reach a wide range of applicants, to ensure The Ardmore Group attracts the best talent.

Recruitment

The Ardmore Group use a variety of recruitment channels to appoint staff members with relevant experience in childcare. Recruitment decisions are made following an extensive application, interview, training and vetting process.

In making the decision, the following factors are taken into account:

- Relevant qualifications or applicants studying towards a relevant qualification.
- Experience working with children and young people in similar environments.
- Additional skills such as first aid or lifeguarding.
- Personality and enthusiasm.

For Seasonal Workers and Fixed Term Contract Work They Must Have The Following:

- **Application Form:**

All Seasonal staff are required to complete an application form for the role for which they are initially applying. This includes all Personal Details (e.g. Current and previous name(s)), full Educational History including dates and institutions, and five years of Employment History at the time of application. Any gaps in the Application Form must be clarified and updated with the Recruitment Co-Ordinator responsible for the centre prior to the commencement of employment.

- **Interview:** Interviews will explore the applicant's ability to meet the job description and suitability for the role. It will also enable the recruiter to explore any gaps in the applicant's work history to satisfy themselves the applicant meets standards and Safeguarding criteria. Questions asked in interview will be specifically designed to explore the candidate's attitude towards working with young learners. Previous disciplinary action/disclosures will also be addressed and considered at this stage to establish full circumstances of the individual case.

The Ardmore Group use interview templates that are specific to the role for which a candidate has applied. They help to assess a candidate's suitability for the role by investigating their experiences, motivation for working with The Ardmore Group, any gaps in employment, ability to adapt to on-centre scenarios, personality and safeguarding experience amongst other factors.

- **References:**

The Ardmore Group require one professional or academic reference covering the past 3 years for every seasonal candidate as sufficient evidence to establish a candidate's employment and /or educational history.

Volunteer or Personal (e.g. Baby sitting) referees cannot be used.

- **Health Declaration:**

All seasonal staff are required to complete an annual self-assessed Health Declaration for The Ardmore Group to ensure they are fit for work, and to declare any medical issues that may impact their ability to complete their job role on centre. Where any concerns are raised, further discussion will take place with the Recruitment Team.

- **Certificates and Qualifications:**

Seasonal staff appointed in specialist roles (e.g. Centre Directors, Director of Studies, Head of Pastoral Care and Lifeguards) are required to provide evidence of their qualification to The Ardmore Group. These records are kept on file centrally at Head Office and the staff member is required to have the originals on centre for inspection, if required.

- **UK Right to Work and Identification (ID) Checks:**

All staff members are required to provide original evidence that they are eligible to work in the UK, by providing at least one document from the list provided by the Home Office.

Separate to the UK Right To Work Check,

- one proof of name - ID 1 (e.g. Full Driving Licence with current name) and
- one proof of address – ID 2 (e.g. bank statement with current address dated in the past 3 months) document is required for identification purposes.

This can be done either in person or via the Post Office Document Certification Service, it is to be kept on file centrally at Head Office. Staff members are required to show photo ID when they arrive at any training day and on their first day on centre to the Centre Director.

- **DBS Staff Checks:**

A prerequisite to be able to work with children in The Ardmore Group' care is to hold and provide evidence of a valid Enhanced Disclosure & Barring Service (DBS) Certificate where the outcome of the check is deemed satisfactory. The DBS certificate may be registered on the DBS Update Service, with DBS certificates obtained and issued via The Ardmore Group valid for three years. Non The Ardmore Group DBS certificates will be accepted if they are either on the Update Service, or were obtained within the last year with a current employer or University and fall within one of the categories below.

The Ardmore Group may make checks regarding this period of time, including checks against the children's barring list. Should the staff member not hold a DBS certificate that falls under one of the categories below, then The Ardmore Group will ask the staff to obtain a The Ardmore Group DBS.

- a. **The Ardmore Group DBS:** Accepted if issued in the last 12 months but a new DBS for each summer season is preferred and should be issued three months prior to employment commencing. If the employee has been working for Ardmore continuously without a three-month gap, then their previous season's DBS will be accepted. A DBS is Only required for candidates who have lived and worked in the UK for more than 6 months (Overseas Police Check will still apply), if the 6 month time frame is during their employment with Ardmore, then a DBS will be processed at that time.

- b. **Non The Ardmore Group DBS; under 1 year:** if the check is LESS THAN a year old by the time the staff member works. The Ardmore Group will ask for a copy of the certificate but will process a new DBS for the new season.
- c. **DBS Update Service:** Ardmore must see an original copy of the certificate and request the candidates permission to carry out the check.

Confirmation of student or work history can be in the form of:

School, College or University

- Current ID card, or
- a 'Letter of Study Verification' from the Student Admissions department only (need to be currently studying)

This is valid for two seasons at a time, excluding Summer which will require a separate check.

From Current or Pervious employer

- Current ID Card,
- a 'Letter Of Employment Verification',
- reference from a senior manager, or
- a Payslip issued in the past month (this must include name and address, and employer details (e.g. logo) on it

- **Overseas Police Checks**

Before inviting them to interview, candidates must have the right to work in the UK. The Ardmore Group cannot consider candidates who do not possess the required visa status and/or work permit for the UK due to the temporary nature of our summer positions. If a candidate possesses the appropriate documentation and if successful, they will be required to provide evidence of their right to work in the UK in support of their application.

Overseas Police Checks' or a 'Certificate of Good Conduct' will be required from the applicant's country of residence where the applicant has lived outside the UK. This may be in addition to the UK Enhanced DBS if circumstances apply.

- a. **Overseas Police Check:** Accepted if issued in the last 12 months but a new Overseas Police Check for each summer season is preferred and should be issued three months prior to employment commencing. Only required for candidates who have lived and worked in a country for more than 6 months.
- b. **Overseas Police Check AND DBS:** In some cases, both a DBS and Overseas Police Check will be required, as above.

- **Contract Paperwork:**

All Staff will be sent a contract of employment, which they are asked to read, understand and sign with wet ink (physically sign). Contracts should be returned to the Recruitment Co-Ordinator within 7 days of issue, along with the:

- Employee declaration,
- financial details (including bank details), and
- new starter checklist (including employee statement and student loan questions for taxation purposes).
- Next Of Kin details (for emergency purposes),
- Overseas Criminal Record checks (if applicable), and

- other relevant information should be provided.
- **Returning Members Of Staff:**

Returning members of staff are asked to re-apply, and re-interview (if applicable) each season to inform The Ardmore Group of any change in circumstances. This ensures The Ardmore Group records are kept up to date and employment gaps are monitored. The Ardmore Group will not re-employ anyone that has previously been dismissed from the Company.
- **Performance Management & Appraisals:**

All seasonal staff members will be subject to ongoing performance management to help identify strengths and weaknesses. Seasonal appraisals will also be held, and information passed on to the Recruitment Team. Any performance or conduct issues will be addressed by the Centre Director, Operations and or Recruitment Team, and may affect future employment with The Ardmore Group.
- **Risk Assessments:**

In the event that some Personal Details and or documents have not been provided prior to the commencement of employment, a Seasonal staff member may be allowed to work subject to a strict and full Risk Assessment against background checks such as; A Full five year work History and a Clear Barred List Check. The Ardmore Group reserves the right not to employ a staff member if key background and or document checks (e.g. UK Right To Work) have not been deemed satisfactory.
- **Agency Staff**

The Agency will be required to submit a copy of their vetting form to confirm the individual meets the requirements for employment in the UK in regulated activity. On their first day, the agency staff must provide proof of identification for verification by the Centre Director, and complete the onsite induction check.
- **Group Leaders**

The provision of applicable Overseas Police Checks also applies to Group Leaders/adults accompanying our students. Whilst Ardmore does not require to see the original Overseas Police Checks of Group Leaders or accompanying adults who are entrusted by the organisation, we do require signed, written assurance (Group Leader Declaration) from an authorised person in the agency, prior to the arrival of the group leaders or accompanying adults. This confirms that a police check has been carried out and that the documents have been seen by the authorised signatory, and that the signatory confirms the suitability of the Group Leaders and accompanying adults in question to accompany and work in close proximity to children. This may be received either as a letter or electronically as a PDF. Failure to provide such assurances will mean that group leaders and accompanying adults will not be allowed unsupervised contact with children.
- **Local Organisers and Homestay Hosts**

The primary caregiver of each host family is subject to an Enhanced DBS check amongst other household requirements to safeguard our students. The DBS application must include a selection that the position involves 'working with children or adults at the applicant's home address' for the police to provide information on all adults residing at that address. Ardmore Language Schools works in agreement with all our Local Organisers to ensure they themselves have a valid DBS disclosure and that they are responsible for maintaining records and suitable checks on their homestay hosts which are available for inspection by the company.

Full Time Members of Staff Including Head Office Staff Must Follow:

- **References:**
Staff members require two professional and / or academic references covering the past 3 years. Volunteer or Personal (e.g. Baby sitting) referees cannot be used.
- **Curriculum Vitae (CV)**
Staff are required to provide a CV to The Ardmore Group. The Ardmore Group will keep a copy of the staff members CV on file at Head Office. A CV should not and will not be used instead of a fully completed role specific application form.
- **Health Declaration:**
Staff are required to complete an annual self-assessed Health Declaration for The Ardmore Group to ensure they are fit for work, and to declare any medical issues that may impact their ability to complete their job role. Where any concerns are raised, further discussion will take place with their Line Manager and HR representative.
- **Certificates and Qualifications:**
Staff appointed in or asked to complete specialist roles (e.g. First Aider or Lifeguard) are required to provide evidence of their qualification to The Ardmore Group. These records are kept on file centrally at Head Office and the staff member is required to have the originals when working in a location other than Head Office for inspection, if required.
- **UK Right to Work and Identification (ID) Checks:**
All staff members are required to provide original evidence that they are eligible to work in the UK, by providing at least one document from the list provided by the Home Office.

Separate to the UK Right To Work Check,

- one proof of name - ID 1 (e.g. Full Driving Licence with current name) and
- one proof of address – ID 2 (e.g. bank statement with current address dated in the past 3 months) document is required for identification purposes.

This can only be done in person at Head Office or with a Safer Recruitment trained member of staff if offsite.

- **DBS Staff Check:**
Staff must hold either a valid The Ardmore Group DBS certificate or third party DBS which is live on the Update Service at all times. The Ardmore Group DBS certificates will be obtained and issued via Head Office and are valid for three years. Staff can then, if they wish to, register on the DBS Update Service at their own expense. Staff with a third party DBS must provide the original DBS certificate as part of this validation. If the subscription to the Update Service lapses at any time, then the staff member will be issued with a The Ardmore Group DBS. The cost of the Update Service subscription is at the sole expense of the staff member.
- **Overseas Police Checks**

Overseas Police Checks' or a 'Certificate of Good Conduct' will be required from the applicant's country of residence where the applicant has lived outside the UK. This may be in addition to the UK Enhanced DBS if circumstances apply.

- **Contract Paperwork:**

All Staff will be sent a contract of employment, which they are asked to read, understand and sign with wet ink (physically sign). Contracts should be returned to the Recruitment Co-Ordinator within 7 days of issue, along with the:

- Employee declaration,
- financial details (including bank details), and
- new starter checklist (including employee statement and student loan questions for taxation purposes).
- Next Of Kin details (for emergency purposes),
- Overseas Criminal Record checks (if applicable),
- Signed job role, and
- other relevant information should be provided.

- **Performance Management & Appraisals:**

Staff members will be subject to ongoing performance management to help identify strengths and weaknesses. Annual appraisals will also be held, and any performance or conduct issues dealt with at the time they occur. Depending upon the outcome of these, this may affect future employment with The Ardmore Group.

- **Application Form:**

Staff are required to complete an application form for the role for which they are initially applying. This includes all Personal Details (e.g. Current and previous name(s)), full Educational History including dates and institutions, and full Employment History from the moment of leaving full-time Education. Any gaps in the Application Form must be clarified and updated with the Safer Recruiter at interview prior to the commencement of employment.

In the event that some Personal Details and or documents have not been provided prior to the commencement of employment, a full-time member of staff member may be allowed to work subject to a strict and full Risk Assessment against background checks such as; A Full work History and a Clear Barred List Check. The Ardmore Group reserves the right not to employ a staff member if key background and or document checks (e.g. UK Right To Work) have not been deemed satisfactory.

For all Staff members.

The Ardmore Group will record the information provided from any DBS Check but will only keep a copy of the disclosure for a maximum of 6 months if there is a disclosure note.

- In exceptional circumstances a staff member who does not hold a current DBS may work on centre, supervised by a fully DBS checked member of staff. This will be subject to a risk assessment, authorised by the company director and placed on Centre.
- As the information contained in a DBS Check is only correct at its date of issue, all staff members are asked to sign a DBS Declaration as part of their Application Form and contract of employment. Before they begin work the staff member needs to state that no criminal offences have been

committed since the disclosure was issued, which would be every 3 months. Any false information or deliberate omission may result in dismissal or disciplinary action.

- The Ardmore Group volunteers are subject to the same pre-employment checks as paid staff members. This includes satisfactory DBS status and references.
- The Ardmore Group takes its responsibility to safeguard children seriously and acts on 'Keeping children safe in education' guidance referring to 'Disqualification by Association'. The Ardmore Group asks their staff to provide relevant information about themselves or a person who lives or works in the same household as them, in order to determine whether or not the disqualification by association requirement applies.

A **Single Central Register** containing the vetting requirements of all staff working at Head Office and on centre is maintained in accordance with current guidelines to ensure the safeguarding of all children in The Ardmore Group care.

9 Staff Safeguarding Code of Conduct

Our organisation is committed to creating a safe environment in which young people can feel comfortable and secure whilst engaged in any of Ardmore's programmes. Staff should ensure that their conduct does not pose any risk to the safeguarding or welfare of students and should set them a good example. The onus is on the member of staff – not the students – to distance themselves from any potentially inappropriate situation. As well as to our students, we also have a duty to protect staff from false allegations or career-damaging mistakes. Staff must use common sense and professional judgment to avoid circumstances which could be perceived to be of an inappropriate nature but, in addition, we also impose the following strict guidelines:

9.1 Attitude

Staff should be committed to:

- Treating children and young people with respect and dignity.
- Always listening to what a child has to say.
- Valuing each child or young person.
- Recognising the unique contribution each individual can make, irrespective of ethnicity, attainment, age, disability, gender or background.
- Being aware that someone might misinterpret their actions no matter how well intentioned.
- Never drawing any conclusions about others without checking the facts.
- Never exaggerating or trivialising child abuse issues or making suggestive remarks or gestures about, or to a child or young person, even in fun.
- Respecting a young person's right to privacy.

9.2 By Example:

Ardmore representatives should endeavour to provide an example, which we would wish others to follow:

- Use appropriate language with children and young people and challenge any inappropriate language used by a young person, child or an adult working with young people.
- Staff must not smoke or consume alcohol in front of or in the company of students or their group leaders or allow any effects of these practices to affect them in any way.
- Wear clothing that is appropriate to their role and is not likely to be viewed as offensive, revealing or sexually provocative. This clothing should not distract, cause embarrassment or give rise to misunderstanding. Clothing should be absent of any political or otherwise contentious slogans.
- Staff who are involved in relationships with other members of staff should ensure that their personal relationships do not affect their role within Ardmore.

- Staff are expected to promote and praise positive behaviour in students, encourage them to follow rules, follow disciplinary procedures in cases of misconduct, set an appropriate example to students and help and encourage them to stay safe.

9.3 Communication and Interaction with Students

All Ardmore representatives must recognise and understand that they are in a position of trust. The legal responsibilities of people working with children extend past the end of any contract they have with Ardmore Language Schools. Please be aware of the potential dangers of personal contact (i.e. contact beyond what is reasonably expected in performing your duties) with students.

- Take care to avoid becoming personally involved in a student's personal affairs.
- Do not attempt to instigate any private contact with students of any age during or after the course.
- UK law prohibits any sexual, intimate, dating or other romantic relationship (even if consensual) between any Ardmore Representative (all of whom are in a position of trust) and any current or former student under the age of 18 in breach of the Sexual Offences Act 2003.

9.3.1 Social Media/ Electronic Communication

- Staff are expected to strictly follow our *Social Media Policy & Electronic Communication Policy*. This policy applies to the relationship between students and staff before, during or after a course.
- Staff must not distribute (by any means) images or information about students of any age. This includes use of the student images or details on blogs, social networking sites or message systems.
- Remember that your personal profiles can be viewed by anyone, and people working with children should be especially careful about their personal web presence.
- Where necessary, any electronic contact will preferably be with the Group Leader. Urgent contact with students must be through company provided centre mobiles. Staff must pay particular attention to use neutral, unemotive language that will not be misconstrued. Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.

9.4 One to One contact

- Staff should not spend excessive amounts of time alone with children, away from others.
- In the event of having to meet with an individual child or young person, make every effort to keep this meeting as open as possible.
- If privacy is needed, ensure that other staff are informed of the meeting and its whereabouts. For these meetings there should be two members of staff present. Staff should never find themselves alone in a closed space with a child, especially of the opposite sex.
- Staff should never enter a student's bedroom alone without another member of staff present; if it absolutely necessary to do so, for example if the student is sick, you should call their GL to go in with you.
- Always be publicly open when working with children; avoid one to one situations where others don't see you.

9.5 Cultural Sensitivity

We encourage all of our staff and students to embrace the multinational nature of our community at Ardmore. All members of the summer school community are expected to take an active role in promoting equality and embracing diversity. Staff must take great care to respect cultural, political and religious sensitivities of our learners. Racial bias or stereotyping will not be tolerated.

9.6 Physical Contact

It is generally advised that Ardmore representatives refrain from any physical contact with students. Whilst there are exceptions to this, it is crucial that staff only do so in necessary and appropriate circumstances to their role. You

must always remain conscious of the physical context of your actions and remember that even innocent actions can be misconstrued.

Staff should never:

- Physically chastise a child.
- Engage in sexually provocative or rough physical games, including horseplay.
- Do things of a personal nature for a child or a young person that they can do for themselves.
- Allow, or engage in, inappropriate touching of any kind.
- Avoid all contact with intimate parts of their body.
- Initiate any sort of physical contact. If a student does, e.g. a hug, allow it if in a public place and withdraw when possible.

9.6.1 First Aid

Staff should never feel constrained from acting immediately to prevent harm even when it involves body contact. Actions must have a first aid purpose and should not involve more contact than is necessary. Ensure there is open access to the environment and bear in mind the student's requirement for privacy and dignity.

9.6.2 Positive Touch

Physical acts of communication to indicate approval, reassurance or sympathy should be avoided wherever possible. If a child is hurt or distressed, the Ardmore representatives will do his/her best to comfort or reassure the child without compromising his/her dignity or doing anything to discredit his or her behaviour.

9.7 Over Familiarity/ Favouritism

- Staff should not show favouritism to any individual or group. Overfamiliarity with a particular student or group can be misconstrued.
- Even if close in age to you, a student is still a student. Staff should never allow themselves to be drawn into inappropriate attention-seeking situations such as tantrums or crushes.
- *Staff should be friendly with students but always remember that students are not their friends.*

10 Implementing Safeguarding/ Welfare Procedures

10.1 General Welfare Provisions

10.1.1 First Aid: At least two First Aiders will be at each centre, identifiable by a green lanyard. Centre Fact Sheets also provide details of local healthcare and emergency services for each centre.

10.1.2 Identification: Students are issued with an ID card and wristband detailing both the 24-hour emergency number and the centre emergency number upon arrival. Both must be worn at all times and actively monitored by all staff.

10.1.3 Fire Safety: Regular fire alarm checks and drills take place within our centres. As part of the student induction process, children are shown where the fire exits are located and where to meet if the fire alarm is activated. See also our *Health and Safety Policy*.

10.1.4 Welfare Team: Ardmore have a welfare specific staff team who undertake welfare specific duties such as break, meal and night time supervision and are specifically identified via induction, posters and in writing as key people to approach regarding welfare needs.

10.2 Student Induction

All students receive an induction upon arrival at an Ardmore Centre to include:

- A presentation highlighting the rules, regulations, safety and communication systems on centre.
- Ardmore Language Schools' expectations of student behaviour.
- An explanation of who's who on centre and who they can contact for help or advice.
- A site orientation of where everything is; crucial meeting/fire points, out of bounds areas and important facilities.
- An outline of their programme.
- Any emergency procedure whilst on or off site.

10.3 Risk Assessments

Risk assessments will be carried out by management for all on-site and off-site activities fortnightly, or as appropriate, to remove and eliminate risk where possible. It is the responsibility of all staff to read and implement these Risk Assessments as well as to be vigilant in assessing the risks of their own work and activities.

10.4 Supervision

The Centre Director is responsible for the safeguarding and welfare of students whilst they are in residential boarding accommodation. The Centre Director is responsible for the safeguarding and welfare of students on and off site. Staff and homestay providers should know the whereabouts of all students during the summer school day and during the hours of curfew.

Full details of supervision and monitoring can be found in our *Student Supervision Policy*.

10.4.1 Missing Person Procedures

If staff or homestay providers cannot account for the whereabouts of a student, our *Missing Persons Procedures* are immediately invoked. Early stages include attempting to contact the student and any known friends or local guardians, and searching summer school premises, including the student's bedroom, and surrounding areas, if applicable. If a student cannot be found, the situation is escalated to the Centre Director, their deputy or by contacting the person holding the emergency phone if neither are immediately contactable in person. The Centre Director will make the decision as to when the Police 101 should be telephoned, and an official Missing Person Report made depending on his assessment of the situation.

10.5 Site Security

10.5.1 Signage: Students must know how to find help in case they have a problem: this should be the supervising member of staff or GL in their building. Ardmore effectively signposts all of their centres to identify boundaries, facilities and highlight key people and policies.

10.5.2 Unidentified People on Campus:

All persons associated with Ardmore are identifiable by their uniform and an Ardmore Lanyard. Ardmore operates a policy of challenging any person on site who is not known or identifiable to staff - providing the staff member feels comfortable to do so and that there is more than one staff member present. Where there is concern, or if the unidentified person approaches any of the accommodation blocks, call the police and explain that you have young children on site. Fill out an incident report.

10.6 Accommodation

10.6.1 Residential: All of our host centres are requested to supply evidence of risk assessments, gas safety certificates, floor plans and safeguarding policies. In the absence of this evidence, confirmation that this is available at the centre upon inspection is required.

Allocations: Genders must be separated in accommodation. Students in Homestay Hosts will always be separated by gender.

In residence, priority will be given in the following order where the accommodation permits:

- By accommodation block

- By accommodation flat
- By corridors, where males are accommodated on the lower floors.

Where the above is not possible the students should be separated as far as possible with adults stationed in between rooms.

Facilities: Bathrooms must be separated by gender and be signposted for the use of either Staff or Students. If necessary, staff should be given set times to use facilities.

10.6.2 Homestay Hosts: Ardmore work in agreement with Local Organisers who are informed and trained by Ardmore in relation to the safeguarding and welfare of our students. They are responsible for ensuring Homestay Hosts comply fully with our standards. Full details can be found in our Local Organiser's Handbook.

Private Fostering Students under the age of 16 residing with a host that is not his/her own immediate family for more than 27 nights must be reported to the local authority, usually social care, at least six weeks before the arrangement starts.

10.7 Transport/ Service Providers

Before Ardmore engages any companies to provide services for our students, such as coach or car operators, they will be required to complete an agreement confirming that minimum requirements are met. This includes confirmation that all employees with unsupervised access to students have a full criminal records clearance details as well as evidence of adequate insurance cover.

10.7.1 Unaccompanied Minors

Students travelling alone will be supervised starting at their point of arrival. At the port of arrival airline staff will pass the child to an Ardmore Representative who will accompany the child to their destination and, similarly upon their return, to check in and security.

10.8 E-Safety

Ardmore Language Schools recognises that e-safety is an area of growing concern. Our students increasingly use mobile phones on a daily basis and these functions are very susceptible to misuse. Whilst the summer school cannot exert full control over how students choose to conduct themselves online or how to use electronic devices, maximum effort is made to educate students about online safety. In addition, certain measures are put in place to prevent the use of electronic devices and the internet for specific potentially harmful purposes. Cyberbullying will not be tolerated and will be managed through our anti-bullying and disciplinary procedures.

10.9 Student Provisions

Some students may be more vulnerable to harm than others, for example students with special educational needs, disabilities or chronic medical conditions or dietary requirements. All students and agents are requested to provide pre-arrival health information. Specific measures are also put in place for individuals who may need further support and guidance in the absence of a Group Leader.

10.9.1 Where a student is 18 or over

In the unlikely event that a student is 18 or over the following steps shall be taken:

- Students instructed to follow the same course rules as all other students, (e.g. no allowance made for them being old enough to buy alcohol or cigarettes).
- All staff are alerted to the fact that an 18-year-old student is on the course, how to identify him/her and to be vigilant about the student's behaviour and interaction with younger students.
- The person will be allocated accommodation next to a GL or staff member
- They will be given an allocated time to use facilities, separate to that of other students.
- They will only participate in activities with their own group.

10.9.2 Individuals

In the absence of a Group Leader, Ardmore recognise our individuals may be more vulnerable and in need of further support.

- All individual visiting students are identified to all members of staff.
- Individuals are met upon arrival by an Ardmore Representative and according to our Unaccompanied Minors Procedures.
- Individuals are inducted specifically by a member of the Welfare Team (HPC where possible) and receive a tailor-made Welcome Letter.
- A member of the Welfare Team assigned to them who will check in with them daily and report to the HPC.
- Staff receive specific training, on site and in handbooks, relating to individuals.

10.10 Policy on Taking Photographs of Children

The taking of pictures of children and teenagers is restricted for legal reasons. There are two reasons for our policy as outlined below, firstly, the protection of children in our care, and secondly, data protection regulations.

Students are also instructed in their handbook about the policies surrounding taking photos/videos of other students. Students must not take any photos/videos of other students/GLs or members of staff without first asking permission. Any photos/videos taken with permission may not be uploaded onto any social networking site.

This policy refers to the use of film and digital cameras, including mobile phones:

- Only staff authorised by the Centre Director or Head Office are allowed to take pictures of students and must be employees of Ardmore Language Schools Ltd
- Students must never be photographed alone, but always in pairs or groups
- No clues as to the identity of the student must be visible in the image
- Members of staff and/ or Group Leaders of both genders must be present
- Students are to be asked their permission before taking the picture
- Only pictures of students in appropriate dress are acceptable, for example, taking pictures of students at poolside is not allowed
- Any person taking photographs must be in Ardmore Uniform and should let the person being photographed know whether or not the image will be retained for further use
- Images must be securely stored and only used by those authorised to do so
- Images must not be transmitted electronically, or printed copies distributed, unless authorised by Head Office
- Anyone suspected of capturing unauthorised or inappropriate images should be reported to the CD or immediately to Head Office
- Photos taken must not be stored on personal devices.
- Staff must not – by any means or in any circumstances – make, view or access illegal or inappropriate images of children.

10.11 Anti-Bullying Policy

Every student should feel safe to learn and socialise. Every student should be safe from victimisation and discrimination at an Ardmore Centre. Their journeys to and from an Ardmore Centre should be free from fears and intimidation. No-one should suffer the pain and indignity that bullying can cause.

Ardmore views bullying as a serious matter and one that could warrant severe disciplinary action, possibly legal action. However, the intention is to create an environment where bullying is unlikely and where, if it does occur, the person being bullied will feel able to seek help and allow action to be taken early. Students are told about bullying

in their centre induction and told to report it to the Welfare team or any other member of staff if it is happening to them or one of their friends.

10.11.1 What is Bullying?

It is behaviour, usually repeated over time that intentionally hurts another individual or group, physically or emotionally, by an individual or a group. There is a deliberate intention to hurt or humiliate with a situation imbalance that makes it hard for the victim to defend themselves.

Bullying can include: name calling; taunting; mocking; making offensive comments; physical violence; taking belongings; inappropriate touching; offensive graffiti; spreading hurtful rumours and untruths; leaving an individual out of groups.

Cyber bullying can include the above via: Instant messaging (IM) and chat rooms, e-mail, social networking sites such as Facebook, online gaming, mobile phones.

(Please see <http://www.childline.org.uk/Explore/Bullying/Pages/CyberBullying.aspx>)

Bullying can break the law, examples of types of behaviour which are illegal are:

- Violence or assault
 - Theft
 - Harassment and intimidation over a period of time including calling someone names or threatening them, making abusive phone calls, and sending abusive emails or text messages (one incident is not normally enough to get a conviction)
 - Anything involving hate crimes*, which is any incident that is perceived by the victim or any other person to be:
 - o Racist
 - o Homophobic
 - o Transphobic (discrimination against transsexual or transgender people)
 - o Due to a person's religion
 - o Due to a person's beliefs
 - o Due to a person's gender identity
 - o Due to a person's disability
- Please see https://safe.met.police.uk/hate_crimes/get_the_facts.html

10.11.2 Why is it Important to Respond to Bullying?

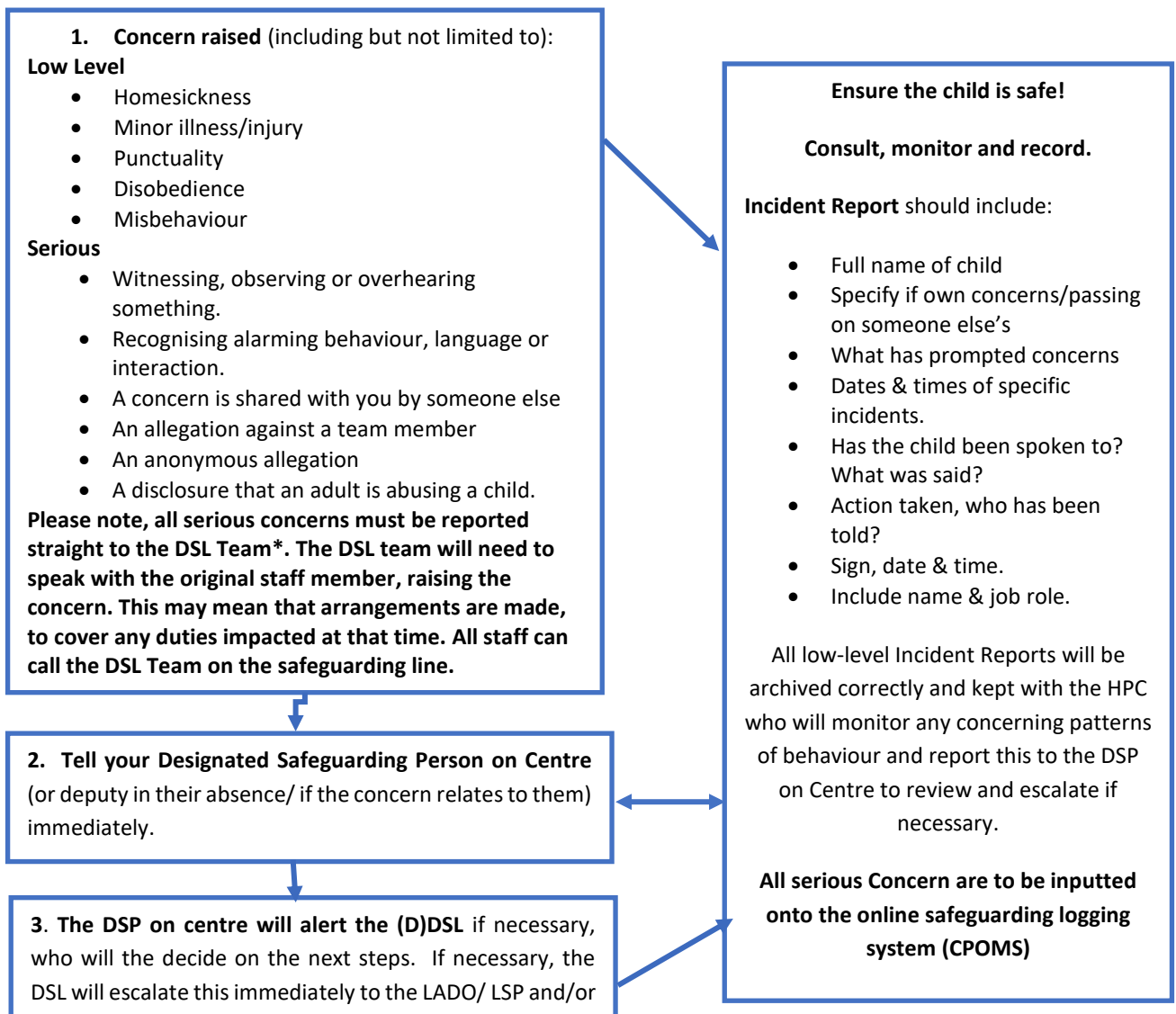
Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Students who are bullying need to learn different ways of behaving.

10.11.3 Responding to a Child Making an Allegation of Bullying

Anyone who hears an allegation or notices bullying behaviour against another child, must report the matter immediately to the Centre Director. This should be addressed according to the severity of the case and in line with our Student Disciplinary Procedure. If the Centre Director is unavailable, or involved in an allegation, the matter must be referred immediately to the (Deputy) DSL at Head Office.

11. Raising and Reporting Concerns

All staff should be vigilant to potential risks to the welfare of students and report any concerns or incidents to an appropriate member of staff as soon as possible via the following steps:



*All staff have the right to refer any concern straight to the LADO/ LSP and/or local police as appropriate, or if they feel the DSL Team hasn't fulfil their concern. Information will be made available in a central location on site.

- At no point should an attempt be made to investigate the situation. This will be undertaken by Social Services and/or the Police as necessary. Ardmore Language Schools is an agent of referral and not of investigation

Remember: In every case, the child's wellbeing is our utmost priority. In an emergency, do not delay, dial 999.

12. Responding to a Child Making an Allegation of Abuse

Action must be taken if anyone has 'behaved towards a child or children in a way that *indicates* that he or she may pose a risk of harm to children" (Keeping Children Safe in Education, 2018). If a child discloses any information to an Ardmore Representative suggesting that they have been abused in any way, the process outlined below should be followed. If this information is reported by a child to their homestay host, the homestay host should inform Ardmore as soon as possible using the emergency contact number.

12.1 Receive

- Listen to what is being said without displaying or expressing your reaction.
- Take what the child says seriously and allow for any difficulties with language.

12.2 Reassure

- Reassure the child that they are doing the right thing and listen carefully.
- You must not promise confidentiality; you have a duty to pass on information.
- Acknowledge how difficult it must have been to talk about it, reassure them.

12.3 React

- React calmly and listen carefully and patiently.
- Make sure that the child is safe and away from any immediate harm.
- Do not assume or make any speculations.
- Do not probe; keep questions to the minimum required to ensure a clear and accurate understanding, open questions are most suitable.
- Remember that an allegation of child abuse may lead to a criminal investigation, so **do not attempt to personally investigate any allegations** of abuse.
- Ensure the way you communicate is appropriate to the student's age and understanding. **Do not** ask the child to make a written statement.
- Explain what you have to do next and who you have to talk to.

12.4 Record

- Record in writing on CPOMS everything that was said as soon as possible, using the child's own words.

- Note date, time, and names of persons to whom the information was given. Ensure that the record is signed and dated by these persons.

12.5 Report *(refer to the flowchart in section 11)*

- It is the duty of Ardmore staff to report disclosures or allegations of abuse.
- Report immediately to the DSL team or to the LADO/ LSP and/or local police as appropriate.
- **Do not** confront any person against whom an allegation has been made.

12.6 Remember

- Support the child, listen, reassure and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
- Seek support for yourself if needed.
-

12.7 Review (led by DSL)

- Has the action taken provided a good outcome for the child?
- Did the procedure work?
- Were there any deficiencies in the procedure, have these been remedied?
- Is further training required?

13. Supporting Staff and Students Involved in Cases or Allegations

The Ardmore Group takes its duty of care to all those who are involved in safeguarding issues seriously. If a staff member is the subject of an allegation, the company's primary duty of care must be to protect all students. It may therefore be considered necessary to inform the Local Authority Designated Officer (LADO) with the allegation they can advise on if a staff member should be put on alternative duties, or to suspend an individual, in the short-term, whilst a thorough investigation is undertaken. Where accused of inappropriate behaviour, staff will always be given the opportunity to explain the situation and their actions and will be in contact with a member of the DSL Team who will provide them with confidential support and progress updates, where appropriate. If staff are subject to malicious allegations, then they can be assured that this will be dealt with under the disciplinary procedure.

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

(Keeping Children Safe in Education, 2018)

In the case of a child being the subject of an allegation, a designated member of the welfare team will be appointed to support the student who has been accused of inappropriate behaviour.

We recognise that our students are more likely to need additional support due to the fact that the vast majority are a long way from home and experiencing a new culture and environment. Every effort will be made to ensure that the child's safety and wellbeing is paramount and to promote a community feeling for students. Provisions are put in place to accommodate individual needs and we ensure that opportunities to forge friendships with other students are plentiful and accessible. Staff should monitor for potential issues and report any concerns they have. Staff and students can be assured that decisions will never be taken lightly.

14. Whistleblowing Policy

Policy

The Ardmore Group is committed to the highest possible standards of:

- Openness and inclusiveness.
- Accountability.
- Integrity in-line with that commitment.

Aims

- Encourage those working in a The Ardmore Group setting to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- Provide guidance on how to raise concerns.
- Reassure those raising concerns that they are able to raise genuine concerns “made in the public interest” without fear of reprisal, even if they turn out to be mistaken.

The Ardmore Group will provide all reasonable protection for those who raise concerns “made in the public interest”. The Ardmore Group will be responsible for ensuring that appropriate personal support is offered both to a staff member raising a concern and to any staff member against whom allegations have been made under this policy.

What is whistleblowing?

Whistleblowing is defined as ‘raising concerns about misconduct within an organisation or within an independent structure associated with it’ (Nolan Committee on Standards in Public Life). In the legislation it is called a protected disclosure. The Public Interest Disclosure Act 1998 protects staff from suffering a detriment in their employment or being dismissed by their employer if they make disclosures in accordance with the legislation.

A staff member has certain common law confidentiality obligations to their employer. However, in a limited set of circumstances whistleblowing may override these obligations if a staff member reveals information about their employment or the work of The Ardmore Group. This guidance sets out the circumstances under which these disclosures may lawfully be made.

A concern must relate to something which:

- Is a breach of The Ardmore Group policies.
- Falls below established standards or practice.
- Amounts to improper conduct, including something that may be:
 - A breach of the law.
 - A failure to comply with a legal obligation.
 - A possible miscarriage of justice.
 - A Health & Safety risk.
- Is damaging the environment.
- Is corruption or unethical conduct.
- Involves the abuse of children or other adults.
- Deliberately conceals any of these matters.
- Is of any other substantial or relevant concern.

These issues could have arisen in the past, be currently happening or likely to happen in the future. The law does not protect a staff member who would be breaking the law in making the disclosure.

How to raise a concern

All concerns will be treated sensitively and with due regard to confidentiality and where possible every effort will be made to protect identity. Nevertheless, this information will need to be passed on to those with a legitimate need to have this information and it may be necessary for the whistle-blower to provide a written statement or act as a witness in any subsequent disciplinary proceedings or enquiry. This will always be discussed first.

Step 1

To raise a concern you should normally raise it with your line manager. This can be done in person or in writing. The Ardmore Group recognises that sometimes it may be inappropriate for you to approach your line manager with your concern. In these circumstances, a number of alternatives are available depending on the nature of your concern. You can contact any of the following:

- **DSL Team**
- **Operations Management Team**
- **The British Council**
- **Local Safeguarding Services.**

Although you are not expected to prove beyond doubt the truth of your concerns, you will need to demonstrate that you have sufficient evidence or other reasonable grounds to raise them.

Step 2

The person with whom you have raised your concern will acknowledge its receipt as soon as possible and will write to you within 10 days to let you know how your concern will be dealt with. The information you can then expect to receive is:

- An indication of how the concern will be dealt with.
- An estimate of how long it will take to provide a final response.
- Whether any initial enquiries have been made.
- Whether further investigations will take place, and if not why not.
- Information about support available for you.

The person with whom you have raised your concern will at the same time notify the **HR Manager** that a whistleblowing allegation has been made.

Step 3

Initial enquiries will be made to decide whether an investigation is appropriate. Where an investigation is necessary, it may take the form of one or more of the following:

- An internal investigation by the manager, which may, for example, take the form of a disciplinary investigation.
- An investigation by the HR Manager.
- A referral to The British Council or the police.
- The setting up of an external independent inquiry.

Step 4

You will be informed of the outcome of any investigation, in writing, and/or of any action taken, subject to the constraints of confidentiality and the law. If you do not feel your concern has been addressed adequately you may raise it with an independent body such as one of the following as appropriate:

- The Citizen’s Advice Bureau.
- A relevant voluntary organisation.
- The Police.
- The British Council
- The Local Government Ombudsman.
- Equality and Human Rights Commission.

You must make a disclosure “in the public interest”: and in the circumstances it must be reasonable for you to make the disclosure. If there is an issue of an exceptionally serious nature which you believe to be substantially true, then you may disclose the issue to someone other than those listed above. In determining whether it is reasonable for you to have made a disclosure the identity of the person to whom the disclosure is made will be taken into account. Disclosures to anyone outside of the recognised bodies specified may not be protected under the Disclosures Act.

You have a duty to The Ardmore Group not to disclose confidential information. This does not prevent you from seeking independent advice at any stage.

15. Confidentiality and Recording Information

GDPR (2016) and the Data Protection Act (2018) do not prevent or limit the sharing of information for the purposes of keeping children safe. However, all staff must understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student and/ adult involved but also to ensure they do not compromise evidence. Staff should only discuss concerns with the (D)DSP on Centre who will report it to the (D)DSL. That person will then decide who else needs to have the information if necessary. All records, information and confidential notes are stored securely with restricted access only to the Deputy and Designated Safeguarding Lead.

Safeguarding Team				
DSL Team	Designated Safeguarding Lead & Prevent Lead	David Bridges Operations Director	The 24-hour emergency phone will always be	davidbridges@theardmoregroup.com
	Deputy Designated Safeguarding Leads	Martin Corr Managing Director	carried by one of the	martin@theardmoregroup.com
		Owen Jones Operations Manager	Designated Safeguarding Lead or	owen@theardmoregroup.com
		Louisa Pridham Recruitment Manager	Deputies. 07983 358942	jobs@theardmoregroup.com

Designated Safeguarding Persons on Centre				
	Bedales School	The Emergency Centre Mobile will always be carried by the Centre Director (DSP on Centre) or member of Centre Management.	TBC	alsc-bedales@theardmoregroup.com
	Berkshire College		TBC	alsc-bca@theardmoregroup.com
	Brighton College		TBC	alsc-brighton@theardmoregroup.com
	Brunel University		TBC	alsc-brunel@theardmoregroup.com
	Croydon		TBC	alsc-croydon@theardmoregroup.com
	Eastbourne		TBC	alsc-UEA@theardmoregroup.com
	Fulmer Grange		TBC	alsc-fulmer@theardmoregroup.com
	Oxford		TBC	alsc-oxford@theardmoregroup.com
	Imperial College		TBC	alsc-imperial@theardmoregroup.com
	Leith Academy		TBC	alsc-leith@theardmoregroup.com
	Liddington		TBC	alsc-liddington@theardmoregroup.com
	LVS Ascot		TBC	alsc-lvs@theardmoregroup.com
	London Harrow		TBC	alsc-harrow@theardmoregroup.com
	Royal Hospital School		TBC	alsc-rhs@theardmoregroup.com
	Shiplake College		TBC	alsc-shiplake@theardmoregroup.com
	Cambridge		TBC	alsc-stedmunds@theardmoregroup.com
	University of Bath		TBC	alsc-bath@theardmoregroup.com
University of Reading	TBC		alsc-reading@theardmoregroup.com	
	Kings College		TBC	<u>TBC</u>
	University of Hertfordshire		TBC	<u>TBC</u>

Contacting Ardmore

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