



SAFEGUARDING POLICY Children / Young Persons

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IBT Travel Safeguarding Policy Statement

This policy applies to all staff, including senior managers, paid employees, volunteers and seasonal workers, agency staff, students or anyone providing services for, or working on behalf of, IBT Travel. We are committed to ensuring our policy remains effective and reflects good practice and will undertake annual policy reviews.

The purpose of this policy is:

- To protect children and young people who work at or use the services/facilities of IBT Travel. This includes the children of adults who may use our facilities/services;
- To provide staff and volunteers with the overarching principles that guide our approach to safeguarding.

IBT Travel believes that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people to keep them safe. We are committed to practice in a way that protects them.

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents:

- role description for the designated safeguarding person
- dealing with disclosures and concerns about a child or young person
- managing allegations against staff and volunteers
- recording concerns and information sharing, record retention and storage
- code of conduct for staff and volunteers
- behaviour codes for children and young people
- photography and sharing images guidance
- safer recruitment
- online safety
- anti-bullying
- managing complaints
- whistleblowing
- health and safety
- induction, training, supervision and support
- adult to child supervision ratios.

We recognise that:

- The welfare of children is paramount in all the work we do and decisions that we make
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have an equal right to protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare
- Extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse

We will seek to keep children and young people safe by:

- Valuing them, listening to and respecting them
- Appointing a nominated child protection lead for children and young people
- Adopting child protection practices through our policies, procedures and a code of conduct for staff and volunteers
- Developing and implementing an effective online safety policy and related procedures
- Providing effective management for staff and volunteers through supervision, support and training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- Recruiting staff and volunteers safely, ensuring all necessary and appropriate checks are made
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance
- Sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work and one-to-one discussions
- Making sure that children, young people and their families know where to go for help if they have a concern
- Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns

Nominated Designated Safeguarding Person: Ian Coles

Contact Details

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Email: iancoles@halsbury.com

Legal Framework

There is a substantial body law and guidance at both a national and international level that seeks to protect children, and internationally, this includes:

- United Convention of the Rights of the Child 1991
- Relevant government guidance of safeguarding children
- UK, EU and other Data Protection legislation

Signed:

A handwritten signature in black ink, appearing to be 'A. J. Smith', written over a horizontal line.

Date: 03/01/2025

Reviewed: January 2025

Position: Director

Policy Aims

To be provided to all IBT Travel staff working with children /young people in receipt of IBT services for purposes of stating and clarifying IBT's requirements for safeguarding of children /young people while in our care.

This policy applies to anyone working on behalf of IBT Travel, including senior managers and the board of trustees, paid staff, volunteers, seasonal workers, agency staff, third party suppliers and students.

IBT Travel is committed to providing, as far as is reasonably practicable, opportunities that are safe from any kind of harm, for all those who are in our care for the duration of any visit.

We aim to achieve this by:

- Including best practice* advice and policies from accreditation, and governmental and charity bodies (such as the British Council and NSPCC), into existing policies such as our
- Safeguarding Policy and Staff Code of Conduct.
- Having effective systems in place ensuring that our facilities, procedures and activities take account of the students' health, safety and welfare requirements. (Please refer to our **Safety Management System**)
- Following 'safer recruitment' guidelines carefully, for all staff, ensuring the suitability of all staff (including when relevant 3rd party suppliers) to work with students under the age of 18.
- Providing effective management for all IBT Travel staff and suppliers through supervision, support ongoing training and the auditing of external service provision.
- By ensuring that all IBT Travel staff including 3rd party suppliers understand general child safeguarding principles

IBT Travel Safeguarding Policy will be reviewed at least annually and as directed by any updated government legislation /advice and updated where relevant.

*'Best practice' is a term used to define professional procedures that are accepted as being correct and/or most effective.

Definition of a child/young person:

In the UK, the legal definition of a 'child' as anyone who has not reached their 18th birthday and a young person as someone who has reached the age of 14 and is under the age of 18 years.

As an organisation, we are committed to meeting our duty of care towards all students and safeguarding children / young persons from harm.

We understand that given the nature of our business our group members may not be aware of cultural differences including local customs and this may make them more vulnerable to possible harm.

The difference between child safeguarding and child protection:

Child safeguarding and child protection is the process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully”

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. It means protecting children from abuse and maltreatment, preventing harm to children’s health or development, ensuring children grow up with the provision of safe and effective care, taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm and includes child protection procedures which detail how to respond to concerns about a child.

Types of harm can include:

- Sexual abuse
- Grooming
- Physical and emotional abuse and neglect
- Domestic violence
- Inappropriate supervision by staff or volunteers
- Bullying, cyber bullying, acts of violence and aggression within our schools and campuses
- Victimisation
- Self- harm
- Unsafe environments and activities
- Crime
- Exploitation

Safeguarding and child protection sit alongside each other, however IBT Travel is not an investigating agency, though we acknowledge a duty of care to pass on any allegation or suspicion of abuse or significant harm to relevant bodies namely social services or police.

Staff Recruitment and Training:

Job Descriptions and Person Specifications

IBT Travel requires all staff to fill out a job application form upon application. This, like our interview process, clearly and accurately sets out the duties and responsibilities of the job role. The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job.

References

References for short listed applicants will be sent for immediately after an offer has been made. Two FULL professional/character references must be provided. These will be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions.

Interviews

There will be a face-to-face interview wherever possible for all posts. However, there may be telephone or video call interviews, for example, Tour Manager roles. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the recruiter to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant is a bona fide applicant and can meet the demands and expectations of our safeguarding criteria.

Any information in regard to past disciplinary action or allegations, cautions or convictions, will be discussed and considered in the circumstance of the individual case during the interview process.

All staff involved in staff recruitment as well as the DSP are to be provided with training in 'Safer Recruitment'.

All applicants who are subsequently appointed are required to bring evidence of their identity, right to work, address and qualifications. Unsuccessful applicant documents will be destroyed within the time scale as per current GDPR legislation.

Offer of Appointment and New Employee Process

All applicants will be required to submit identification documentation such as passport, birth certificate, driving licence, etc. with them as proof of identity and where relevant eligibility to work in UK in accordance with requirements set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations.

The appointment of all new employees who have direct contact with children is subject to the receipt of a satisfactory DBS Certificate, references (or local equivalent) and copies of qualifications and proof of identity. Where new employees have lived/live outside the UK, additional checks such as a 'Certificate of Good Conduct' or 'Police Certificate' will be required from the applicant's country of residence.

In addition, applicants must be able to demonstrate that they have legally obtained any academic or vocational qualification required for the position and claimed in their application form.

A personal file checklist will be used to track and audit paperwork obtained in accordance with guidance from the safeguarding sector.

Staff Training

Office and overseas staff are to be made aware of the content of the safeguarding policy and supporting procedures. Where relevant, in-house training in child safeguarding and related areas is to be provided as part of the staff induction process.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with or having access to children. Therefore, any convictions and cautions that would normally be considered 'SPENT', must be declared when applying for any position.

All employees commencing work will have undergone a DBS check (or local equivalent) before commencing work.

Dealing with convictions

All staff must sign a declaration of suitability to work with children at application stage.

Consideration will be given to the Rehabilitation of Offenders Act 1974 and, before any employment decision is made to:

- The nature, seriousness and relevance of the offence
- How long ago the offence occurred
- One-off or history of offences
- Changes in circumstances

Record Retention / Data Protection

All information retained on employees is kept securely.

The personal information of all applicants will be retained in line with the requirements of current GDPR legislation after which time the information will be permanently / securely removed/destroyed.

Responding to a child / vulnerable person making an allegation of abuse

General Guidance

Safeguarding is the responsibility of **ALL** members of staff. All staff are in a position of trust, and therefore, all staff are required to take a shared responsibility to safeguard children and vulnerable young people.

Staff will receive safeguarding information and training during their induction.

All staff will also be made fully aware of their duties in respect of safeguarding.

Any member of IBT Travel staff with an issue or concern relating to child protection, including but not limited to allegations of child abuse, should discuss it immediately with the group leader and/or DSP. Anyone who hears an allegation of abuse against another member of staff or has concerns about the behaviour of another member of staff, must report the matter immediately to the DSP. If the DSP is unavailable, or involved in an allegation, the matter must be referred immediately to a member of IBT Travel Management. A concern against members of Management or the DSP should be forwarded to, for example, the **School Travel Forum**.

At no point should an attempt be made to investigate the situation. This will be undertaken by relevant services/ authorities (NSPCC/Social Services and/or the Police) as necessary. IBT Travel is an 'agent of referral' and not of investigation.

How might a child/young person disclose abuse?

Children and young people may disclose abuse in a variety of ways, including:

- directly– making specific verbal statements about what's happened to them
- indirectly – making ambiguous verbal statements which suggest something is wrong
- behaviourally – displaying behaviour that signals something is wrong (this may or may not be deliberate)
- non-verbally – writing letters, drawing pictures or trying to communicate in other ways.

Responding to disclosures of abuse

Three key interpersonal skills have been identified that help a child feel they are being listened to and taken seriously:

- **show you care, help them open up:** Give your full attention to the child or young person and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Phrases such as 'you've shown such courage today' help.
- **take your time, slow down:** Respect pauses and don't interrupt the child – let them go at their own pace. Recognise and respond to their body language. And remember that it may take several conversations for them to share what's happened to them.
- **show you understand, reflect back:** Make it clear you're interested in what the child is telling you. Reflect back what they've said to check your understanding – and use their language to show it's their experience.

If a child tells you they are experiencing abuse, it's important to reassure them that they've done the right thing in telling you. Make sure they know that abuse is never their fault.

Never talk to the alleged abuser about the child's disclosure or attempt to personally investigate any allegations of abuse. This could make things a lot worse for the child and potentially impact upon any potential future criminal investigation.

Making notes

It's important to keep accurate and detailed notes on any concerns a staff member has about a child. These will need to be shared with your DSP.

Include:

- the child's details (name, age, address)
- what the child said or did that gave you cause for concern (if the child made a verbal disclosure, write down their exact words, do not ask the child/young person for a written statement)
- any information the child has given you about the alleged abuser
- a description (if applicable) of any injuries observed
- a note of the place, date, time, and names of persons to whom the information was given.

Next steps

Three key interpersonal skills have been identified that help a child feel they are being listened to and taken seriously:

- Tell them what you will do next and with whom the information will be shared.
- Reassure them that it will only be shared with those people that need to know.
- Report the incident immediately to DSP /Group Leaders/Management/STF
- DSP will guide you when dealing with any allegation or suspicion of abuse, and if applicable, report allegations and incidents of abuse to the LADO (Local Area Designated Officer) at the local County Children's Social Services.
- Hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Those dealing with such allegations must do so with sensitivity and act in a careful, measured way and in accordance with procedures. If ever in doubt as to what to do, please consult the DSP or senior management team.

Non-biased approach

It's vital that any child who is trying to disclose abuse feels that they are being listened to and taken seriously.

But there can be a risk that if professionals just believe the child's account without thoroughly investigating the situation, this can lead to unfair bias against the alleged abuser as formal investigations progress (Child Protection Resource, 2021; Transparency Project, 2018).

This means it's important to maintain an unbiased approach when responding to disclosures and follow your organisation's procedures to ensure each case is treated in a fair and transparent manner and that the child gets the protection and support that they need.

Staff Code of Conduct with Children and Young Persons

The following code of conduct relates to staff which includes any that are directly employed by, or are contracted to act on behalf of, IBT Travel.

Staff working with children/young people are acting in a position of trust and authority and have a duty of care towards the children and young people that we work with. They are likely to be seen as a role model by young people and are expected to act appropriately. IBT Travel expect their staff or contracted representatives, to display appropriate behaviour at all times. This includes behaviour that takes place outside our organisation and behaviour that takes place online.

Staff working with children/young people are responsible for:

- prioritising the welfare of children and young people
- providing a safe environment for children and young people
 - ensuring equipment is used safely and for its intended purpose
 - having good awareness of issues to do with safeguarding and child protection and taking action when appropriate.
- following IBT Travel's principles, policies and procedures, which includes our policies and procedures for safeguarding and child protection, whistleblowing and online safety
- staying within the law at all times
- modelling good behaviour for children and young people to follow
- challenging all inappropriate behaviour and reporting any breaches of the behaviour code to our DSP
- reporting all concerns about abusive behaviour, following our safeguarding and child protection
- procedures, including inappropriate behaviour displayed by an adult or child and directed at anybody of any age.

Staff should:

- Listen to and respect children and young people at all times.
- Respect a young person's right to personal privacy as far as possible - if you need to break
- confidentiality in order to follow child protection procedures, it is important to explain this to
- the child or young person at the earliest opportunity)
- Treat children and young people fairly and without prejudice or discrimination
- understand that children and young people are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the group/organisation
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

Staff are advised to avoid actions/situations that might be misconstrued, bearing in mind that even perfectly innocent actions can sometimes be misinterpreted. Staff must use common sense and professional judgement to avoid circumstances which could be perceived to be of an inappropriate nature.

Appropriate behaviour/relationships

IBT Travel Staff should:

- promote relationships that are based on openness, honesty, trust and respect
- avoid showing favouritism to any individual or group
- recognise that caution is needed when discussing sensitive issues with children or young people
- ensure that contact with children and young people is appropriate and relevant to the nature of the activity they are involved in.
- ensure that whenever possible, there is more than one adult present during activities with children and young people
 - if a situation arises where a staff member is alone with a child or young person, ensure that they are within sight of, or can be heard by other adults
 - if a child specifically asks for or needs some individual time with a staff member, ensure other staff or group leaders know where that staff member and the child are
- only provide personal care in an emergency and make sure there is more than one adult present if possible (unless it has been agreed that the provision of personal care is part of that staff member's role and they have been trained to do this safely).

Inappropriate behaviour/relationships

When working with children and young people, staff must not:

- allow concerns or allegations to go unreported
- take unnecessary risks
- smoke, consume alcohol or use illegal substances in the company of students or their group leaders, or allow any effects of these practices to affect them in any way
- develop inappropriate relationships with children and young people
- make inappropriate promises to children and young people
- engage in behaviour that is in any way abusive of including having any form of sexual contact with a child or young person
- let children and young people have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account
- act in a way that can be perceived as threatening or intrusive
- patronise or belittle children and young people
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people
- have inappropriate physical, verbal or sexual contact with children or younger people
- allow themselves to be drawn into any inappropriate behaviour
- swear or make racist, sexist or blasphemous remarks within earshot of other staff or students
- endanger the well-being of children/young people through action or inaction, whether intentional or not

- enter a child/young persons' bedroom or invite a child/young person into their own bedroom
- use the student bathroom facilities
- attempt to instigate private contact with children /young people of any age either during or after any tour.

The onus is on the member of staff – **not the young person** – to distance themselves from any potentially inappropriate situation.

Any staff member believed to have behaved inappropriately will be subject to our disciplinary procedures. Depending on the seriousness of the situation, the staff member might be asked to leave. IBT Travel may also make a report to statutory agencies such as the police and/or the local authority child protection services.

If a staff member becomes aware of any breaches of this code, they must be reported to Ian Coles, our DSP. If necessary, our whistleblowing procedure (documented within the Employee Handbook) should be followed.

Policy on Personal Communications with Children/Young Persons

Please be aware of the potential dangers of personal contact (i.e. contact beyond what is reasonably expected in performing your duties) with students, and of the following advice from child protection/ teaching agencies:

- Staff must use common sense and professional judgement to avoid circumstances which could be perceived to be of an inappropriate nature
- Staff must not add any children /young people to any social networking sites (e.g. Facebook, Instagram, Twitter, etc.), nor allow themselves to be added to any children /young people's social networking site
- Staff must not - by any means or in any circumstances - make, view or access illegal or inappropriate images of children
- Unless authorised, staff must not distribute (by any means) images or information about children /young people of any age. This includes the use of any images or details on blogs, social networking sites, messaging systems or any internet sites
- If students do try to contact you on your personal email or phone, discourage this and inform a relevant manager/group leader
- Exercise extreme caution in connection with internet sites /messaging systems, and avoid inappropriate communication with all individuals under 18, or others with whom you may be in a position of trust. This also extends to taking part or attempting to take part in on-line gaming with students or associates of students, who may well be underage or unaware that you are an adult
- Take care to avoid becoming personally involved in a student's personal affairs. Remember that your personal profiles can be viewed by anyone, and people working with children should be especially careful about their personal web presence, checking any relevant privacy settings carefully
- The legal responsibilities of people

Risks to Children/Young Persons:

- Students may be able to find information about a staff member's personal life that may be inappropriate for minors and may damage the working relationship
- By allowing students access to friendship groups, staff members may be inadvertently introducing them to a wider circle of adults, over which they have no control, and may facilitate inappropriate contacts
- Sexual predators and bullies are known to use information available on web pages and social networking sites to gain information about children, such as their interests, tastes and location
- Staff who post information about students (e.g. photos of their summer holiday, names etc.) on a personal web page may make them vulnerable to inappropriate attention

Policy on Taking Photographs of children / young persons

IBT Travel have a responsibility to ensure the safeguarding of children in our care and to meet GDPR regulations. In line with many schools and other institutions working with children and young people, the taking of pictures of children and young people is restricted for legal reasons. It is anticipated that the groups will have their own policies/guidance regarding photography/filming for personal use and Tour Reps are expected to follow the school's /group's policy – they may take photos of children/young people, providing permission has been granted.

The following policy applies to all staff and other adults providing services on behalf of IBT Travel.

The purpose of this policy statement is to:

- protect children and young people who take part in IBT Travel tours, specifically those where photographs and videos may be taken
- set out the overarching principles that guide our approach to photographs/videos being taken of children and young people during tours
- to ensure that we operate in line with our values and within the law when creating, using and sharing images of children and young people.

We will seek to keep children and young people safe by:

- obtaining written consent from a child and their parents or carers to confirm that pictures may be taken and images used
- always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of children
- making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published
- changing the names of children whose images are being used in our published material whenever possible (and only using first names if we do need to identify them)
- never publishing personal information about individual children and disguising any identifying information
- making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information)
- reducing the risk of images being copied and used inappropriately by:
 - only using images of children in appropriate clothing (including safety wear if necessary)
 - avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused
 - using images that positively reflect young people's involvement in the activity.

From time to time, tour reps may be asked to take photographs of groups using a member of the group's personal phone. Please ensure that in doing so:

- You have the group leader's permission to take the photo
- Group members are asked their permission before taking the picture
- Group members are never photographed alone, but always in pairs or groups
- Members of staff and/or group leaders of both genders must be present
- You do not use your own personal phone/camera
- You do not ask for a copy of the photo

If you are asked by the group for a photo with you in it, please ensure:

- Only have your photograph taken with the students if you feel comfortable in doing so
- You have the group leader's permission to have the photo taken
- Group members are asked their permission before taking the picture
- That there is more than one student within the photo
- That members of staff and/or group leaders of both genders must be present
- You do not use your own personal phone/camera
- You do not ask for a copy of the photo

Photography and/or filming for IBT Travel's use:

Children, young people, parents and carers must also be made aware that photography and filming may take part during tours and give written consent. If we hire a photographer for a tour, we will seek to keep children and young people safe by:

- providing the photographer with a clear brief about appropriate content and behaviour
- ensuring the photographer wears identification at all times
- informing children, their parents and carers that a photographer will be at the event and ensuring they give written consent to images which feature their child being taken and shared
- not allowing the photographer to have unsupervised access to children
- not allowing the photographer to carry out sessions outside the event or at a child's home
- reporting concerns regarding inappropriate or intrusive photography following our safeguarding procedures

If consent to take photographs is not given

If children, parents and/or carers do not consent to photographs being taken, we will respect their wishes. We will agree in advance how they would like to be identified so the photographer knows not to take pictures of them and ensure this is done in a way that does not single out the child or make them feel isolated. We will never exclude a child from an activity because we do not have consent to take their photograph.

Storing images

We will store photographs and videos of children securely, in accordance with our safeguarding policy and data protection law. We will keep any hard copies of images in a locked drawer and electronic images in a protected folder with restricted access. Images will be stored for a period of 15 years. We will never store images of children on unencrypted portable equipment such as laptops, memory sticks and mobile phones. IBT Travel does not permit staff and volunteers to using any personal equipment to take photos and recordings of children. Only cameras or devices belonging to the IBT Travel, or the group (with permission) should be used.

Distribution

- Photographs of children/young people must only be transferred via an encrypted secure file sharing service
- Images should never be sent via email to anyone
- The subjects of the photograph are entitled to keep a printed copy of the photograph provided that there are no objections from any other subjects in the photograph.

Related policies and procedures

This policy statement should be read alongside our safeguarding and child protection policy and staff code of conduct.

IBT Travel policy refers to the use of film and digital cameras, including mobile phones.

This policy covers all photographs taken by IBT Travel.

Disposal

- 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
- Anyone suspected of capturing unauthorised or inappropriate images should be reported to the group leader/school
- Photographs of children/young people should not be kept for any longer than is necessary.

FAQs

Should IBT Travel staff stop children/young people taking photos of each other?

No, the children/young people are free to take photographs of one another, unless the subject of the photograph objects, or if the taking of the photograph could be construed as a form of bullying.

A Group Leader is taking photos of students. Should we stop them?

We cannot stop a Group Leader from taking photographs of their group as many have permission through their school. However, please ensure that there is no odd behaviour, i.e. taking lots of photographs of the same individual / taking close-up photographs.

A child/young person has asked to have their photograph taken with a member of staff. Is this allowed?

This is more a question of staff protection than child protection. Only have your photograph taken with a student if you feel comfortable in doing so, and please be aware of the context in which the photograph is being taken, i.e. where the photograph is being taken. Is it in a public place? Are there other people around? What is the level of physical contact? Please also remember that you cannot ask for a copy of this photograph!

Policy on Physical Contact with children/young persons

The Children Act of 1989 places the wellbeing of the child at the centre of keeping them safe. Whilst the law does not explicitly prevent physical contact, it is the policy of IBT Travel policy to advise against any physical contact with children/young people unless in exceptional circumstances (see below).

It is crucial that staff only do so in ways appropriate to their professional role and when there are no other alternative solutions. Failure to do so may result in disciplinary action and if necessary, referral to outside authorities.

First Aid

- Emergency treatment may be required at any time and staff should never feel constrained from acting immediately to prevent harm even where this involves body contact
- Any procedure used must have a First Aid or hygiene purpose and should not involve more contact than is necessary
- Any such procedure should be undertaken by a person of the same sex as the individual if available
- Ensure that there is open access to the area where you are, whilst considering the requirement for dignity and privacy
- Wherever possible, contact should be avoided e.g. by asking the individual to clean their own cut/graze, unless they are very young.

'Positive Touch'

'Positive touch' is used to mean everyday acts of communication by physical means to indicate approval, reassurance or sympathy. Positive touch is used in schools when necessary to comfort/reassure children or to demonstrate skills e.g. in coaching sports or playing of musical instruments but should be avoided wherever possible.

Check with the school/groups policy on positive touch as this may vary from group to group.

Anti-Bullying Policy

Statement of Intent

IBT Travel is committed to providing a caring, friendly and safe environment for all of our customers. Bullying of any kind is unacceptable.

If bullying does occur:

- All group members should be aware that incidents will be dealt with promptly and effectively.
- Anyone who believes bullying is happening is expected to inform group leaders/DSP or any other relevant member of the senior management team

What is Bullying?

Bullying encompasses a range of behaviours that results in physical/emotional pain and distress to the victim.

Bullying can be:

- Emotional - being unfriendly, excluding, and tormenting (e.g. hiding belongings, threatening gestures)
- Verbal - name calling, sarcasm, spreading rumours, teasing
- Physical - pushing, kicking, hitting, punching or any other use of physical violence
- Discriminatory - based on a child's disability, race, religion or belief, gender identity or sexuality.
- Sexual - unwanted physical contact or sexually abusive/homophobic comments
- Cyber/online – exclusion from games/friendship groups, sending of threatening, upsetting or abusive messages, sharing of unwanted images, trolling, setting up hate sites/fake accounts etc

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.

Objectives of this Policy

All staff must make themselves fully aware of what constitutes bullying, and what actions are necessary. We take bullying very seriously. All parties should be assured that they will be supported when bullying is reported, and that bullying will not be tolerated.

Signs and Symptoms

A child /young /vulnerable person may indicate by their behaviour that they are being bullied. Adults should be aware of how this may manifest itself. Typical emotional effects of being bullied include:

- sadness, depression and anxiety
- low self-esteem
- social isolation
- self-harm

When responding to incidents or allegations of bullying it's important for staff to:

- listen to all the children involved to establish what has happened
- record details of the incident and any actions you've taken
- inform the DPS and group leaders
- provide support to the child/children being bullied, children who witnessed the bullying and the child/children who has been accused of bullying
- ask the child/children who have been bullied what they would like to happen next - possible outcomes include genuine apology from the bully/ies, consequences put in place such as exclusion or return home. Wherever possible, reconciliation should take place
- ensure that bullying behaviour must be investigated with the intention of stopping the bullying

When responding to online bullying:

- make sure children know not to retaliate online or reply to any bullying messages
- make sure children understand how they can take steps to prevent online bullying from happening again, for example by changing their contact details, blocking contacts or leaving a chat room
- ask the child if they have shared the bullying content with anyone else (if so, who).

If bullying content has been circulated online, take action to contain it:

- if appropriate, ask the person responsible to remove the content
- contact the host (such as the social networking site) and ask them to take the content down
- contact the [NSPCC helpline](#) for advice about what to do.

If the content is illegal, contact the police who can give advice and guidance.

Incidents of bullying or threats of bullying will be recorded in writing. After the incident(s) have been investigated and dealt with, each case will be monitored and a written report kept to ensure further bullying does not take place.

Cultural Sensitivity

Policy

IBT Travel values the individuality of all, including children and vulnerable people.

IBT Travel is committed to giving all, including children and young people every opportunity to be the 'best they can be' within our work environment and for those in receipt of IBT Travel's services.

IBT Travel does not tolerate any lack of sensitivity, disrespect, bullying or harassment of any kind.

All our policies are there to help ensure that we promote the individuality of all, irrespective of ethnicity, attainment, age, disability, gender or background.

We aim to reflect the multi-ethnic nature of modern society and ensure that the opportunities we offer include positive attitudes to all people.

Staff must take great care to respect the cultural, political and religious sensitivities of all but particularly children and young people. Comments or questions regarding background, society or beliefs, may cause offence and/or distress.

Staff members are responsible for dealing with racist /homophobic incidents and being able to recognise and tackle racial /homophobic bias and stereotyping.

If bullying does occur:

- All group members should be aware that incidents will be dealt with promptly and effectively.
- Anyone who believes bullying is happening is expected to inform group leaders/DSP or any other relevant member of the senior management team

Other people engaged in regulated activity.

This means other agencies /people involved with IBT Travel, who are not staff but are for example are 3rd party providers.

In addition to employees, it is recognised that various contractors and suppliers come into contact on a more or less regular basis with our groups.

Contractors and Suppliers

IBT Travel requires that all contracted service providers conduct relevant background checks on their staff.

All providers should ensure employees:

- Understand their duty to report any concerns, allegations or suspicions of abuse to their line manager.
- Take appropriate action when anyone discloses abuse to them
- Where CCTV is in place, ensure relevant staff members understand how it operates
- In accommodation centres ensure unsuitable (adult) channels are blocked/unavailable

Third Party Suppliers

These providers must have appropriate child and young persons safeguarding policies and procedures in place which include the requirement to contact IBT Travel should the need arise in the event of any concerns or reports of safeguarding issues.

Third party providers are required to regularly review their safeguarding policies and procedures to ensure they reflect current best practice.

Service level agreements are in place for all contracted providers of activities, that clearly states IBT Travel safeguarding requirements and expectations.

Such considerations will be made explicit in any contract or service level agreement with the provider, and any licenses or accreditations will be checked for suitability.

Third party providers must be aware of their responsibilities with regard to our safeguarding policy and procedures to ensure effective management of the various guest groups.

Third party providers must ensure that instructors/those delivering a service on their behalf are sufficiently competent to undertake the task, are adequately trained in first aid and emergency procedures and are made aware of safeguarding policies and procedures relevant to their role.

Where relevant, the activity should comply with The Adventure Activities Licensing Regulations 2004 IBT Travel will ensure that services provided are monitored to ensure compliance within their service level agreement.

Any safeguarding concerns are to be logged following IBT Travel incident management reporting procedure.