Safeguarding Policy

Key Safeguarding Personnel

Role	Photo	Name	Telephone	Email
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A: POLICY STATEMENT

A1: CONTEXT

LILA* is a Liverpool-based English language school which provides programmes for international students aged *12+. In addition to English language tuition, LILA* provides accommodation, leisure activities and pastoral care.

The pastoral support that LILA* provides can be critical for the well-being of its students as:-

"Students arrive in the UK and many find that "normal" life as they have known it thus far is turned upside down – in almost every way. They have a lot of adjusting to do, as well as studying in or trying to improve their English.

Students often don't understand the social or behavioural signals or their surroundings, which makes them vulnerable. Teenagers and young adults are particularly vulnerable because they think they are grown up when usually they are not"

Heritage, N (2017) 'ELT students – how to help', ***Advanced Safeguarding for Designated Lead***

LILA* categorises foreign students learning English using three age groups; **ADULT STUDENTS** (18+), **YOUNG ADULTS** (16-17 attending on an adult course) and **JUNIORS** (*12-17 attending a specialist programme for **CHILDREN**).

Students under the age of 18 (**YOUNG ADULTS** and **JUNIORS**) are **CHILDREN** in England and additional measures must be taken to ensure their safety and well-being (**SAFEGUARDING**).

LILA* has a legal **DUTY OF CARE** to its **STAFF** and its students, regardless of age, to ensure that all individuals can work and learn in a safe environment. LILA* operates a whole school approach to safeguarding and recognises that safeguarding and child protection should be at the forefront and underpin all relevant aspects of process and policy development.

Secondary policy

A secondary safeguarding policy exists to cover LILA College's sixth form students. That policy applies to students under the sixth form / A-levels / university foundation programmes specifically, as, for instance, requirements for entry to the UK and attendance measuring, among other things, are monitored differently. This policy applies to students undertaking language courses, also referred to as EFL students.

A2: TERMINOLOGY

The definitions that apply are those set out as follows:-

TERM	DEFINITION
ABUSE	Any kind of harm, which can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.
ADULT	Anyone aged 18+ in a **POSITION OF TRUST**. E.g. staff, group leaders, hosts, accommodation providers, transfer providers, activity providers etc.
ADULT STUDENT	Any student aged 18+. They are not normally in a **POSITION OF TRUST**.
AGENT / EDUCATIONAL TRAVEL PROVIDER (ETO)	A company or person with whom LILA* has an agreement that they recruit students on LILA*'s behalf.
ALLEGATION	Any information reported that suggests an **ADULT** or another **CHILD** has caused or may have caused hurt or harm to a **CHILD**.
CHILD/REN	Anyone younger than 18 years old.
CHILD PROTECTION	Part of the **SAFEGUARDING** process: protecting a **CHILD** from abuse. I.e. harm from others by intention or neglect, and which exploits the vulnerability of the **CHILD.**
CONCERN	Anything noticed or divulged about a **CHILD** that is – or is potentially – detrimental to their well-being.
LOCAL AUTHORITY DESIGNATED OFFICER (LADO)	The official designated by the Liverpool Safeguarding Children Partnership (LSCP) to deal with allegations of crime, harm or unsuitable behaviour against children.
DESIGNATED STAFF (DS)	Roles appointed by LILA* to specific members of **STAFF** and involve specialist knowledge, duties and authority. These roles are the Designated Safeguarding Lead (DSL) and the Designated Safeguarding Person (DSP).
DUTY OF CARE	The legal obligation to safeguard others from harm while they are in your care, using your services or exposed to your activities.[1]
HOST / HOMESTAY	A local host(s) who takes a student into their home and provides room and board.
GROUP LEADER	An individual employed by a partner **AGENT** to act as supervisor of **JUNIORS** who attend a LILA* programme. They are not employees of LILA* but play a critical role in the safeguarding of **CHILDREN**.
JUNIOR	Any student aged 12-17 years on a LILA* Junior Programme.
MANAGERS	Directors, the Director of Studies and those whose job title includes "Manager". Some or all of the Managers will have an overall picture of safeguarding and will be involved with any major matters or decision making.

[1] Collins Dictionary, https://www.collinsdictionary.com/dictionary/english/duty-of-care (Accessed 31/01/2018)

POSITION OF TRUST	A person in a position of power or influence over another; it can never be a relationship of equals, by definition. All **ADULTS** working with **CHILDREN** are in a position of trust.
REGULATED ACTIVITY	Any activity which may involve unsupervised access to a **CHILD** by an **ADULT**, specifically where the activity forms part of the **ADULT'S** role.
SCHEDULED ACTIVITY	Any period of time led by, facilitated by, supervised by, or for which LILA* **STAFF** are otherwise primarily responsible for the care of a **CHILD,** e.g. lessons, trips, activities, sleeping time, meal times or allocated free time.
SAFEGUARDING	An umbrella term which means to 'look after' a **CHILD**. It includes "ensuring children grow up with the provision of safe and effective care", and, "taking action to enable all children and young people have the best outcomes".[2] It also means providing help and support to meet the needs of children as soon as problems emerge, and protecting children from maltreatment, inside or outside the home, including online.
SAFEGUARDING TEAM	A collection of safeguarding specialists and managers whose purpose is to meet throughout the year, review LILA*'s response to any incidents and ensure that suitable provision is in place for the future.
SEXUAL ACTIVITY	Can be physical or non-physical. **physical**: penetrative or non-penetrative (eg: kissing, touching) **non-physical**: watching sexual activities, looking at pornographic images, encouraging sexual behaviour, taking sexual images, talking in a sexually explicit or suggestive manner, sending messages (e.g. text, instant messaging, GIFs, Memes) with sexual or sexually suggestive content, up-skirting, skirt raising, touching breasts or other forms of harassment.
STAFF	Anyone working for LILA*, doing paid or unpaid work. This includes Directors, managers, sessional workers and interns in addition to administrative and academic staff.
YOUNG ADULT	Any students aged 16 or 17 on a LILA* Adult programme. A Young Adult, despite the label, is still a **CHILD**. **ADULTS** have the same **DUTY OF CARE** to act as a responsible UK parent towards **YOUNG ADULTS**, in accordance with the **CODE OF CONDUCT** and safeguarding policy.

A3: STATEMENT

Safeguarding is everyone's responsibility. All staff have a duty to safeguard and promote the welfare of children and adults at risk, and must act in the best interests of the student at all times.

LILA* fully recognises the contribution it can make to safeguard **CHILDREN** and this policy has been prepared to help create the safest possible learning and working environment. As a core principle, LILA* undertakes to always act in the best interests of the **CHILD**.

There are 3 main elements to LILA*'s safeguarding strategy	
PREVENTION	**STAFF** are carefully recruited and trained. Clear expectations and boundaries for the responsible behaviour of **CHILDREN** and **ADULTS** are set and enforced, reducing the risk of harm.

[2] NSPCC, https://www.nspcc.org.uk/preventing-abuse/safeguarding (Accessed 17/04/2026)

PROTECTION	LILA* cultivates an open, positive and considerate culture. With its caring ethos alongside robust company procedures, LILA* proactively promotes the welfare of **CHILDREN.**
SUPPORT	LILA* responds to welfare concerns in a timely and diligent matter, and provides support for any students or **STAFF** who may have been abused or accused.

A4: UNDER 18's ENTITLEMENT

All **CHILDREN** are entitled to be safeguarded and protected from harm whatever their:-

- Race, religion, or ethnicity,
- Gender or sexuality,
- Age,
- Physical or mental health,
- Political or immigration status,
- Economic status.

A5: ADULTS' RESPONSIBILITIES – DUTY OF CARE

All **ADULTS** working with **CHILDREN** are expected to take reasonable steps to ensure the well-being and safety of the young people in their care. This includes: following the policy; sharing the organisation's commitment to safeguarding; undertaking training as relevant (see section D1); knowing who to contact; and reporting any **CONCERNS**. Failure to do so may be regarded as neglect. Where there is a safeguarding concern, children's wishes and feelings should be taken into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously and they can safely express their view.

*"All **ADULTS** have a legal '**DUTY OF CARE**' to act as a responsible and caring UK parent; how can they help?*

- *Help students understand,*
- *Assist them in making sensible decisions,*
- *Set safe and clear boundaries,*
- *Respond and react; don't ignore,*
- *Be interested,*
- *Be responsible and a good role model,*
- *Show that you care, which can mean 'tough love,'*
- *Be alert for situations which might not be straightforward."*

Heritage, N (2017) 'ELT students – how to help', *Advanced Safeguarding for Designated Lead*

A6: ASSOCIATED POLICIES

This policy refers to LILA*'s associated policies below, all of which are held separately. Information or copies can be made available upon request: -

- Recruitment and Appointment Policy,
- Social Media Policy,
- Whistleblowing Policy,

- Prevent Policy,
- Employment of Ex-Offenders Policy,
- Emergency Response Policy,
- Student Lateness Procedure,
- Bullying Policy,
- Recruitment and Appointment Policy,
- Safe Recruitment – Managers Guide,
- Unsupervised Free-time Guidelines.

A7: POLICY REVIEW

This policy is reviewed annually and updated in line with current legislation and safeguarding best practice or change of safeguarding staff, by the **SAFEGUARDING TEAM** and changes authorised by the **DSL** and approved by the management team.

A8: ROLES & RESPONSIBILITIES

The below table summarises the key roles and their responsibilities in the delivery of this policy.

Role	Responsibilities
Child/ren	• Follow the **STUDENT CODE OF CONDUCT** • Look out for each other and report any concerns to an **ADULT** • Follow the rules that have been put in place for their safety
Staff	• Be familiar with the responsibilities which are part of their employment or role and the consequences if those responsibilities are not fulfilled • Discuss any uncertainties with their **MANAGER** or LILA*'s **DESIGNATED STAFF**
Adult Student	• Follow the guidelines that have been put in place for the safety of the **CHILDREN** E.g. respecting the personal space of **CHILDREN**, out-of-bounds residence blocks etc. • Report any **CONCERNS** they see or hear to **STAFF**
DESIGNATED STAFF	• Provide support and training to **STAFF** to carry out their safeguarding duties • Liaise closely with external services such as children's social care • Responsible for day-to-day safeguarding matters • Act as the point of reference for all policies and procedures affecting the implementation of safeguarding ***See C2 for further information about the roles and responsibilities of the DSL & DSP***
LILA*	• Set clear boundaries of acceptable behaviour for all (See **B2: CODE OF CONDUCT**) • Provide clear policies and procedures which are understood and implemented by all • Ensure that the appropriate resources are made available for the fulfilment of its safeguarding responsibilities
External Adults **e.g. Agents, Hosts, Service providers**	• Be aware of the role that LILA* plays in the safeguarding of **CHILDREN** • Understand the responsibilities which are part of their role and the consequences if those responsibilities are not fulfilled

- Communicate any concerns about a **CHILD'S** welfare to LILA* **STAFF** in a timely manner

A9: U18S INVOLVEMENT

CHILDREN input on LILA*'s safeguarding measures through channels such as initial and end-of-programme feedback and LILA*'s complaints procedure. Any such feedback, positive or negative, is reviewed as part of the quarterly safeguarding meetings. See C2: DESIGNATED SAFEGUARDING STAFF

A10: DOCUMENTS / LEGAL FRAMEWORK

This policy has been formulated in accordance with the provisions of the below legislation:-

- The Children Act 1989
- Local Government Act 2000
- The Sexual Offences Act 2003
- The Children Act 2004
- The Equality Act 2010
- The Protection of Freedoms Act 2012
- The Children and Social Work Act 2017
- The Equality Act 2010
- The Data Protection Act 2018 (UK GDPR)

And the below key publications:-

1. Keeping Children Safe in Education (KCSIE) 2025 (or latest version)
2. Working Together to Safeguard Children (2023)
3. Prevent Duty Guidance (latest version)
4. British Council Accreditation UK Safeguarding Requirements (latest edition)
5. What to do if you're worried a child is being abused (HM Government – current guidance)
6. Information Sharing: Advice for Safeguarding Practitioners (HM Government, 2018)
7. Use of Reasonable Force (DfE guidance – current)
8. British Council Accreditation UK Handbook (current edition)

A11: POLICY AVAILABILITY AND FORMAT

Tailored information from the Safeguarding Policy is made available to the below stakeholders; these versions will highlight the information most relevant to their role:-

- Support Staff,
- Teachers,
- Hosts,
- Agents,
- Group Leaders,
- External suppliers.

The **SAFEGUARDING POLICY** itself will be available on the internal server for **STAFF,** and for external stakeholders at: https://lilalovetolearn.com/wp-content/uploads/2026/04/U0001_Safeguarding-Policy-3.pdf

B: CODE OF CONDUCT

B1: OVERVIEW AND PRINCIPLES

A Code of Conduct's purpose is to facilitate a safe learning environment which is built on trust between **ADULTS** and **CHILDREN.** It is a critical component of a successful safeguarding strategy and must be embedded into a school's culture and ethos.

This Code of Conduct sets out safe and professional boundaries for interactions between **ADULTS** and **CHILDREN.** These boundaries are intended to protect both **CHILDREN** and **ADULTS** from inappropriate situations and the risk of abuse or an accusation of abuse.

B2: POSITION OF TRUST

A **POSITION OF TRUST** can be defined as a relationship in which a person is in a position of power or influence over another.

All **ADULTS** working with **CHILDREN** are in a **POSITION OF TRUST** and it can never be a relationship of equals. Therefore, any **ADULT** engaged in **SEXUAL ACTIVITY** with students under the age of 18 is breaking the law, even though the legal age of consent is 16[3]. Even after the student turns 18, as long as the **ADULT** met the student in a **POSITION OF TRUST**, the **ADULT** would still be breaking the law and liable to prosecution if he/she subsequently engaged in **SEXUAL ACTIVITY** with the same student, despite the student becoming an adult.

B3: SETTING STANDARDS FOR STAFF

All **STAFF** are required to:-

- Be a good role model by acting with integrity, maturity and good judgement,
- Be positive,
- Be even-handed with praise and discipline,
- Ensure language is always professional and appropriate (no profanities),
- Work, and be seen to work, in an open and transparent way,
- Always act in the best interests of a child; the well-being of a child is of paramount importance,
- Follow the **CODE OF CONDUCT** at all times,
- Treat all safeguarding **CONCERNS** as confidential; this means not discussing any such sensitive information about a **CHILD** with anyone but the appointed **DESIGNATED STAFF**. The **DESIGNATED STAFF** will decide with whom to share the information.
- Treat any safeguarding **CONCERNS** (however minor or significant) with the highest priority and report those **CONCERNS** in a timely manner to **DESIGNATED STAFF.**

B4: STAFF INTERACTION WITH CHILDREN

The below guidelines are provided so that **STAFF** understand the professional boundaries they are expected to maintain when working with **CHILDREN**.

[3] Sexual Offences Act 2003

If these guidelines are not followed then **STAFF** expose themselves to the risk of an accusation of abuse and possible disciplinary or legal action.

GIFTS - GIVING AND RECEIVING	Ensure that any prizes given to **CHILDREN** are part of a structured, approved reward scheme. Do not give **CHILDREN** gifts; it may be misconstrued as grooming. If a **CHILD** offers you a gift of significant value, or of personal value, you should politely decline. **ADULTS** may accept certain gifts as long as they are made in an appropriate social context, in the normal course of events and with suitable intentions (e.g. a thank you gift for a teacher or host). However, to reduce any risks of liability, the **ADULT** should notify LILA*'s **DESIGNATED STAFF**. The giving of a gift by a **CHILD** may indicate infatuation, which can be high risk for **STAFF**. See **INFATUATION** below for more information.
INFATUATION	**CHILD** infatuation can pose a high risk situation for **STAFF** as the **CHILD'S** heightened emotions increases their vulnerability. **STAFF** should handle the matter sensitively and must ensure that they maintain a professional relationship with the **CHILD** at all times. If you suspect a **CHILD** may be infatuated with you or a colleague speak with LILA*'s **DESIGNATED STAFF** who are available to provide advice.
COMMUNICATION	Always contact **CHILDREN** through official LILA* channels. E.g. LILA* email address (@lilalovetolearn.com), LILA* Emergency Phone. Do not share your personal contact details with **CHILDREN**. This includes your telephone number, home email address or details of any social media accounts. Always refer **CHILDREN** to LILA*'s official communication channels if they indicate they would like to communicate outside of a **SCHEDULED ACTIVITY**. If, for some emergency reason, a personal email or phone must be used to contact a **CHILD** then you must report the details to LILA*'s **DESIGNATED STAFF** at the first opportunity. Exceptions are made for hosts, who could not all be expected to have a company phone/phone number in use. Guidance is provided in the Homestay Guidelines for Hosting Children, for hosts to keep communication professional and appropriate. Never accept a friend request from a **CHILD** on any form of social media. Use the "block user" facility on platforms which do not allow you to decline a friend request. **STAFF** are referred to the **SOCIAL MEDIA POLICY** for more information.

SOCIAL CONTACT	Always have any planned social contact with **CHILDREN** approved by LILA*'s **DESIGNATED STAFF.** This is typically a **SCHEDULED ACTIVITY**. If the social contact is unplanned e.g. a chance meeting at a shop, follow the **STAFF CODE OF CONDUCT** and take particular care to maintain a friendly yet professional distance i.e. interact with the **CHILD** in the same way as you would in the workplace. If the contact is in a high risk social context e.g. in a bar and/or under the influence of alcohol/drugs then the first priority to is to get the **CHILD** to a place of safety. Once there, call the school's Emergency Phone which is available 24/7. The person on emergency phone duty will contact the supervisory **ADULT** for the **CHILD** and facilitate the safe return of the child. The safety of the **CHILD** is the primary concern and a disciplinary would follow. See **F6: U18 BEHAVIOUR AND DISCIPLINE**. Depending on the severity of the incident, a review will be held by the **SAFEGUARDING TEAM** immediately or during the quarterly safeguarding meeting. An HR disciplinary or terminating an **ADULT**'s contract may be deemed an appropriate response if the **ADULT** has been in breach of their Duty of Care in relation to the incident. **Contact after LILA*** Contact with a **CHILD** is permitted after a programme on the condition that it remains on a professional basis and **through official channels** e.g. @lilalovetolearn.com email. Contact with a student who was first known to a **STAFF** member as a **CHILD** may be misconstrued as grooming.
PHYSICAL CONTACT	A "no touch" policy is impractical and **STAFF** are instead advised to avoid physical contact as much as possible. **STAFF** should be self-aware of their actions as even good intentions may be misconstrued. Broadly speaking, "safe" zones are above the shoulders and any contact should be light and brief. Be aware of religious or cultural views about touching, which can have particularities about specific parts of the body or between people of different genders. Government guidance is available which provides information on how to safely restrain a **CHILD** who may be a danger to another or themselves; **USE OF REASONABLE FORCE**. **STAFF** who are expected to work in close contact with **CHILDREN** (i.e. Activity Leaders, Teachers assigned to Junior classes etc.) are provided with a copy of this document during their induction or on assignment to a Junior class. **STAFF** are advised to report any physical contact with a **CHILD** which may be misconstrued as abuse or unreasonable force to the **DESIGNATED STAFF** at the soonest possible opportunity**.** Reporting the incident demonstrates transparency and can mitigate any allegation of abuse.

	STAFF must <u>never</u> use force as a form of punishment and any instance of this will be treated as a HR disciplinary matter with potential criminal charges.
ONE TO ONE WORKING	It is advised that **STAFF** avoid being alone with a **CHILD** as this can present a high risk situation. Where possible, seek to have another **ADULT** present or be within sight or hearing of others**.** If a one-to-one situation is unavoidable then **STAFF** are advised to notify a colleague about the meeting so another **ADULT** knows where they are, and why. **STAFF** are advised to report any one-to-one contact which might put them at risk of accusation to the **SAFEGUARDING STAFF** at the soonest possible opportunity. Reporting incidents demonstrates transparency and can mitigate any allegation of abuse. **STAFF** should use their best judgement about notifying one of the **SAFEGUARDING STAFF**.
INTERNET USE	Accessing or sharing inappropriate websites/electronic content with **ADULTS** or **CHILDREN** is unacceptable and any instance of this will be treated as an HR disciplinary matter with potential criminal charges.
PHOTOGRAPHY / VIDEOING	Taking photos or filming **CHILDREN** is subject to parental and child consent and may only be done using company equipment during **SCHEDULED ACTIVITIES** for marketing purposes. Use of personal equipment and/or photographing/filming of **CHILDREN** outside of **SCHEDULED ACTIVITIES** is unacceptable and any instance of this will be treated as an HR disciplinary matter with potential criminal charges.

<u>B5: APPROPRIATE APPEARANCE</u>

All **STAFF** and **ADULTS** should be aware and respectful of students' age, culture and religion. Clothing should be clean and not be revealing or feature slogans/images which may be offensive. **ADULTS** are encouraged to follow the general principles within their relevant Code of Conduct and the Safeguarding Policy with respect to their appearance (see section B11).

STAFF appearance at LILA* and on **SCHEDULED ACTIVITIES** must be appropriate for a professional, educational environment. The below list is not exhaustive, and **STAFF** should use their discretion.

Acceptable clothing:	Examples of unacceptable clothing:
Smart casual clothing	Visible underwear
Clean casual clothing for excursions	Short/revealing/skirts or shorts
Footwear appropriate for the activity undertaken	Clothing with potentially offensive slogans or images on

B6: ALCOHOL, DRUGS AND SMOKING

It is unacceptable for **STAFF** to be under the influence of alcohol or drugs when working with **CHILDREN** and any instance of this will be treated as an HR disciplinary matter.

It is not permitted for **STAFF** to smoke in the company of **CHILDREN;** this includes if they are outside and in a public area. **STAFF** may smoke if they remove themselves from the vicinity and on the strict condition that enough **ADULTS** remain to maintain supervisory ratios.

It is illegal for people under the age of 18 years to buy or drink alcohol or buy cigarettes in the UK. Police have the right to confiscate cigarettes for anyone under the age of 16. Use of any form of recreational drug is illegal at any age. Use of new psychoactive substances (NPS) a.k.a. "legal highs" is also not permitted. This may not always be the case in a student's home country and it is LILA*'s responsibility to advise students of the law in the UK.

CHILDREN are advised of UK law in their induction and rule breaking will have disciplinary consequences. See **F6: U18 BEHAVIOUR & DISCIPLINE**

ADULTS should report any suspicions of a **CHILD'S** use of alcohol or drugs, or of underage smoking to the **DESIGNATED STAFF** and, where possible, should educate **CHILDREN** about addictive substances rather than make light of them.

B7: IT & SOCIAL NETWORKS

LILA* recognises the need to safeguard **CHILDREN** online. A number of measures are in place to ensure that the **CHILDREN** in their care will be responsible users and stay safe while using the internet.

- LILA* has a comprehensive set of filters and blocks on its network which aim to set safe limits for use. **CHILDREN** have no access to illegal or inappropriate materials, including but not limited to; pornography, gambling, alcohol and drugs abuse, violence, any sort of discrimination and extremism, self-harm etc.
- **CHILDREN** must sign LILA*'s **ONLINE SAFETY - ACCEPTABLE USE AGREEMENT**. The agreement sets out rules to protect students' personal safety, regulate their behaviour and states their responsibilities while using the internet.
- **LILA*** recognises that education in safe use plays a critical role in protecting **CHILDREN** online. See **F9: E-SAFETY** for more information.
- LILA* uses an external company, **127 Solutions**, for all relevant IT work, including filtering and monitoring. The **Designated Safeguarding Lead** is responsible for ensuring all standards of filtering and monitoring are met. They are also responsible for making sure that all staff: understand their role; are appropriately trained; follow policies, processes and procedures; and act on reports and concerns.
- The DSL takes lead responsibility for safeguarding and online safety, which includes overseeing and acting on:
  - filtering and monitoring reports
  - safeguarding concerns

    - checks to filtering and monitoring system
- The IT service provider, **127 Solutions**, has technical responsibility for:
    - maintaining filtering and monitoring systems
    - providing filtering and monitoring reports
    - completing actions following concerns or checks to systems
- **127 Solutions** should work with the senior leadership team and DSL to:
    - procure systems
    - identify risk
    - carry out reviews
    - carry out checks

STAFF must comply with the **SOCIAL MEDIA POLICY** whose purpose is to encourage good practice and to protect the school, **CHILDREN** and **STAFF** from the risks of abuse or accusation of abuse. Guidance is also available in **B4: STAFF INTERACTION WITH CHILDREN – COMMUNICATION.**

Furthermore, **ACCOMMODATION PROVIDERS** must confirm they have the appropriate internet filters in place to safeguard **CHILDREN** using their facilities.

B8: ACCOMMODATION

ADULTS who are responsible for a **CHILD'S** care in accommodation must be aware of and demonstrate the below additional conduct points: -

- Respecting the student's privacy in their bedroom is important. If waking a **CHILD** in the morning, the **ADULT** should always seek to do this verbally without entering the room.
- **ADULTS** will not enter the student's room without permission (knocking or calling from the corridor to ask the **CHILD** if it is okay to enter), with the following exception.
- A staff member should only enter a **CHILD**'s bedroom (or the bathroom) without permission if they have good reason to suspect the **CHILD** is inside and needs help (e.g. if the child is audibly in distress or is non-responsive). They should call the **CHILD**'s name several times for a response. If there is no response, before entering, they should explain slowly and clearly in simple English that they need to enter to see if the **CHILD** is okay.
- Care should be taken to keep the bedroom door open if the host is invited into (or needs to enter) the **CHILD**'s bedroom (or bathroom) and avoid closing the space.
- In the **CHILD**'s accommodation, it is especially important to avoid body contact and respect the **CHILD**'s personal space. **ADULTS** should **not** employ a level of body contact they would with a friend or their own children. They should bear in mind that often when **CHILDREN** are at their most vulnerable and in need of support, they are also more sensitive to perceiving certain body contacts to be inappropriate. In these circumstances, they may also be more likely to later suggest an **ADULT** has acted inappropriately towards them. To protect themselves against accusations, **ADULTS** should aim to show the necessary care and compassion without touching the **CHILD**. Where **ADULTS** do employ suitable and appropriate body contact, other safeguards include:

- The **CHILD** is always the one that initiates the contact,
- The **ADULT** keeps the contact to the shoulder area or high up the back, rather than lower down the **CHILD**'s back or bottom area, and keeps the contact light and brief,
- If other **ADULTS** (and **CHILDREN**) are present to witness the contact, this reduces the risk of anxiety, misinterpretation or accusation,
- An established and responsible relationship of trust, based on the **CHILD**'s best interests, has already built up between the **CHILD** and the **ADULT**
- If the **CHILD** needs urgent medical help,
- If it is necessary to separate the **CHILD** from a present danger, or to prevent harm from/to another person in a situation of physical conflict (see '**USE OF REASONABLE FORCE**' for advice on restraining a **CHILD**).

B9: TRANSPORT

It is inappropriate for an **ADULT** to transport a **CHILD** outside their normal working duties, unless it is an emergency situation, or it has been agreed by the parents and the **DESIGNATED STAFF** in advance. If staff have to use their own vehicle, children should sit in the back. If multiple children are present the child to be dropped of first should sit in the front.

The transportation of **CHILDREN** will normally be the responsibility of parents, a guardian, a **HOST** or external providers who have the appropriate licences/insurances (see **E8: SAFER RECRUITMENT - RECRUITMENT OF HOST FAMILIES** and **E12: SAFER RECRUITMENT – EXTERNAL ADULTS**)

Use of public transport is necessary for those who are staying in homestay accommodation and, from time to time, for social activities. Where this is applicable, a risk assessment is undertaken to safeguard the safety of the **CHILD/REN.**

Taxis are sometimes required in emergency situations; an **ADULT** will travel with the **CHILD** wherever possible**.** In circumstances when this is not possible, LILA* will use an approved private-hire taxi service which has the appropriate checks in place to transport **CHILDREN**.

YOUNG ADULTS are given information on transportation options available to them, including guidance on safe use of public transport. They are encouraged to avoid taking taxis and told LILA* emergency staff can book them one if needed. However, for unforeseen circumstances, **YOUNG ADULTS** are also given safety advice on booking/taking a taxi which hasn't been arranged by LILA* (e.g. on an evening before curfew if the public transport options are cancelled, if their walking is impaired from an injury etc.).

Parental consent is sought for all the transportation options prior to the start of the **CHILD'S** programme.

LILA* policy is that NO **CHILDREN** studying at LILA* are allowed to rent or drive a vehicle in the UK.

B10: WHISTLEBLOWING

All **STAFF** have a legal obligation to inform management of any **CONCERNS** about **CHILDREN** at risk and/or a colleague's behaviour, particularly if that colleague is not following the company's **CODE OF CONDUCT** and/or policies relating to the safeguarding of **CHILDREN**.

STAFF should not challenge or confront a colleague about their actions and should instead use the whistleblowing channel to voice any concerns (i.e. normally the **DSL**; or another member of the safeguarding team if the **DSL** is unavailable or implicated). **STAFF** will not be penalised for this communication and their report will remain confidential. **STAFF** raising concerns in good faith will be protected from victimisation or detriment. Concerns may also be raised directly with external agencies where necessary.

STAFF should refer to the **WHISTLEBLOWING POLICY** which provides further guidance. The NSPCC helpline – **0800 028 0285** – provides impartial guidance for situations where staff have any doubt, or do not feel comfortable reporting an issue to the suggested channels at LILA*.

B11: CODE OF CONDUCT FOR ADULTS (NON-STAFF)

All **ADULTS** in contact with **CHILDREN** will be provided with guidelines on their conduct which is tailored to their specific circumstances. In particular, this relates to: **HOSTS**, **GROUP LEADERS**, guardians, visitors, suppliers and **ADULT STUDENTS**. See also **A8: ROLES & RESPONSIBILITIES**.

B12: CODE OF CONDUCT FOR CHILDREN

All **CHILDREN** are required to sign a **CODE OF CONDUCT** which is age-appropriate and written in clear, accessible English. This document sets out the standards of behaviour expected and that there will be disciplinary action if they break the rules. See also **F6: U18 BEHAVIOUR & DISCIPLINE.**

C: CHILD PROTECTION

C1: OVERVIEW

LILA* ensures that it meets its **CHILD PROTECTION** responsibilities by putting in place the appropriate policies and procedures, training its **STAFF** so they are able to recognise child abuse and know what to do if they have concerns, and ensuring that the necessary resources are in place to support **CHILD PROTECTION** duties.

C2: NOMINATED/DESIGNATED SAFEGUARDING STAFF

LILA* has nominated specific staff members to fulfil the duties of a **DESIGNATED SAFEGUARDING LEAD** and **DESIGNATED SAFEGUARDING PERSON**.

All **STAFF** are expected to know the identities of the **DESIGNATED SAFEGUARDING LEAD** and the **DESIGNATED SAFEGUARDING PERSON**. In addition to the **SAFEGUARDING POLICY**, the identity of these members of **STAFF** is highlighted in training sessions, communicated in year-round email communication and on posters throughout the school's premises.

Any changes to the named persons are updated in the policy and communicated to **STAFF** in email updates.

DESIGNATED SAFEGUARDING LEAD (DSL)

The **DSL** will lead the **DSP**(s) to carry out LILA*'s safeguarding duties and will liaise closely with other services such as children's social care.

DESIGNATED SAFEGUARDING PERSON (DSP)

The **DSP** will provide support to **STAFF** members to carry out their safeguarding duties and will liaise closely with the **DSL** about any safeguarding issues.

LILA* has appointed a **SAFEGUARDING TEAM,** a collective of safeguarding specialists and managers whose purpose is to meet on a quarterly basis, review LILA*'s response to any incidents and ensure that suitable provision is in place for the future.

The **SAFEGUARDING TEAM** includes representatives from different departments across the organisation, to ensure cross-departmental approach.

The general 24-hour emergency phone is available as an alternative contact point for out-of-hours emergency support if, for some reason, there is no response on the Safeguarding Phone **(+44) 7721 050 262.** This number is shared with all **STAFF**, **CHILDREN,** their parents, **AGENTS** and any other relevant stakeholders.

THE SAFEGUARDING STAFF HIERARCHY & CONTACT DETAILS

The **SAFEGUARDING TEAM** are identified, and their contact details can be found on Page 2 of this policy. This is reviewed and updated throughout the year and shared with the stakeholders**.**

When a member of the **SAFEGUARDING STAFF** is absent then the staff member who is a step below in the hierarchy provides cover for that role.

If both the **DSL** and **DSP** are absent staff can seek the advice of the **SAFEGUARDING TEAM** members.

Where a concern or allegation needs to be escalated to the LADO contact details are :

Liverpool: lado@liverpool.gov.uk
Mark Goddard, LADO & Risk Manager: Tel: 0771 670 2034
Pauline Trubshaw, Deputy LADO: Tel: 0784 172 7309
Catherine Ballanss, LADO & Risk Manager: Tel: 0771 670 2034

Wirral: Pamela Cope
safeguardingunit@wirral.gov.uk

Sefton:
safeguardingunitadmin@sefton.gov.uk

C3: WHEN & HOW ADULTS NEED TO RESPOND

It can be hard to distinguish between general welfare and safeguarding issues and **STAFF** should never go home worrying about a **CHILD**. Always report any worries to one of the **DESIGNATED STAFF** who will be able to investigate further.

STAFF may become aware of a child abuse **CONCERN** in a number of ways:-

WHEN TO RESPOND	HOW TO RESPOND
From the **CHILD** telling **STAFF** themselves	See **C5 – A CHILD TELLING AN ADULT**
Another **CHILD** telling **STAFF** of their concern about a friend / fellow student	See **C5 – A CHILD TELLING AN ADULT**
From another **ADULT**	Refer them to the **DESIGNATED STAFF** and report the conversation to the **DESIGNATED STAFF** yourself
From observations of the **CHILD'S** behaviour	Tell a member of the **DESIGNATED STAFF**
From visual signs, e.g. injury	Tell a member of the **DESIGNATED STAFF**

From observations of an **ADULT'S** behaviour	Any suspicion that an **ADULT** is a threat to a **CHILD** must be reported to a member of the **DESIGNATED STAFF.** If the **ADULT** is a member of **STAFF**, refer to **B10 – WHISTLEBLOWING.**

REMEMBER:

- All **ADULTS** have a duty to report **any** signs of abuse.
- The **first** priority is to ensure that the **CHILD** is in no immediate danger.
- Tell the **DESIGNATED STAFF** at the first possible opportunity. This can be verbally, or, if that is not possible, by text or email.
- **STAFF** must officially write their **CONCERNS** – this may be done after verbally reporting to the **DESIGNATED STAFF** but should be done as soon as possible after.

WRITING A SAFEGUARDING REPORT

All safeguarding **CONCERNS** must be officially recorded; this is a legal requirement.

STAFF who report a safeguarding **CONCERN** must complete the **STAFF REPORTING FORM – CONCERN FOR U18** and either email or give a hardcopy to one of the **DESIGNATED STAFF**.

The form will be made available on the internal server in the administrative (S:/) and academic (T:/) drives to ensure ease of access for all **STAFF.**

The DSL will also keep a record of the rationale for any decisions made.

C4: RECOGNISING SYMPTOMS OF CHILD ABUSE

WHAT IS CHILD ABUSE AND NEGLECT?

There are four main types of child abuse and all **ADULTS** are expected to be familiar with both the types and common symptoms.

The below table shows common symptoms for each type of abuse; however, the signs do not correlate strictly to one type or other. Symptoms will be different for each child depending on situation and age. Staff should recognise that children and young people might not find it easy to talk about their abuse verbally. They may not know how to ask for help. Consider also language & cultural barriers. Staff should be aware of signs and behaviours that might indicate abuse. Staff might also overhear conversations that suggest a child has been harmed or might receive a report from a friend of the child.

THE FOUR MAIN TYPES OF ABUSE		
PHYSICAL ABUSE	This is potentially the most dangerous. It includes; hitting, shaking, squeezing, scalding, suffocating etc.	▪ Has unexplained bruises, burns etc. ▪ Wearing clothes to cover injuries, even in hot weather. ▪ Refusal to undress for sports or join swim sessions. ▪ See **APPENDIX 3** for additional information.
SEXUAL ABUSE	Can be physical or non-physical. ▪ **physical**: penetrative or non-penetrative e.g kissing; or touching, including up-skirting, skirt raising, touching breasts or other forms of harassment. ▪ **non-physical**: Watching sexual activities, looking at pornographic images, encouraging sexual behaviour, taking sexual images, talking in a sexually explicit or suggestive manner, sending messages (e.g. text, instant messaging, GIFs, memes) with sexual or sexually suggestive content;	▪ Acting in inappropriate sexual ways with objects or peers. ▪ Nightmares, sleeping problems. ▪ Becoming withdrawn or clingy. ▪ Personality changes, seeming insecure. ▪ Unaccountable fear/dread of particular places or people. ▪ Changes in eating habits. ▪ Physical signs such as soreness around genitals or sexually transmitted diseases. ▪ Becoming secretive.
EMOTIONAL ABUSE	▪ Persistent lack of affection. ▪ Unrealistic adult demands. ▪ Bullying & cyber-bullying; taunting, humiliation, shouting. ▪ Racism.	▪ Delayed physical or emotional development. ▪ Shows extremes of passivity or aggression. ▪ Sudden speech disorders. ▪ Overreaction to mistakes or continual self-depreciation. ▪ Neurotic behaviour e.g. rocking, hair twisting, self-mutilation. ▪ Difficulty making friends/socialising

		with peers. ▪ Serious distrust of adults.
NEGLECT	▪ Failing to provide basic needs of food, proper clothing and/or safe supervision. ▪ This can be at an organisational level as well as individual e.g. LILA* could be found to be neglectful as an organisation.	▪ Often hungry; may beg or steal food. ▪ Badly dressed in clothes that need washing. ▪ Poor appearance and personal hygiene; unwashed, hair not brushed. ▪ Lacks needed medical or dental care. ▪ Often tired. ▪ Might abuse alcohol or other drugs. ▪ Unused to supervision and/or boundaries.
Heritage, N (2017) , *Advanced Safeguarding for Designated Lead*		

The below forms of abuse are less likely to occur in the context of the EFL industry; however, all **STAFF** should be aware of their existence and be prepared to act if they recognise the signs and understand the importance of challenging inappropriate behaviour between children and young people. Staff should also recognise that downplaying certain behaviours as 'banter' or 'boys being boys' can lead to a culture of that normalises abuse. Just because there are no reports of abuse in our school, it doesn't mean it's not happening. If staff have any concerns about child-on-child abuse they should speak to the DSL or a deputy.

ADDITIONAL TYPES OF ABUSE		
<u>BULLYING AND Child-On-Child ABUSE</u>	▪ Child-on-child abuse features physical, emotional, sexual and/or financial abuse of a child by their peers. ▪ It can affect any child: sometimes vulnerable children are targeted. May occur through hazing-/"initiation"-type violence, or cyberbullying.	▪ Absences / disengagement – unexplainable and/or persistent absences from education ▪ Struggling with school related tasks ▪ Physical injuries

	▪ Child-on-child abuse involves someone who abuses a 'vulnerability' or power imbalance to harm another ▪ While perpetrators of child-on-child abuse pose a risk to others they are often victims of abuse themselves. Sources: http://www.arboretum.derby.sch.uk ^^	▪ Poor mental health and/or emotional/ physical wellbeing ▪ More withdrawn and/or shy ▪ Headaches, stomach aches, anxiety; panic attacks; nightmares; lack of or over-sleeping ▪ alcohol or substance misuse ▪ changes in appearance and/or behaviour inappropriate for age ▪ abusive behaviour to others
TEENAGE RELATIONSHIP ABUSE	▪ High incidence of teen abuse of other teens. ▪ Befriending/loving a needy friend, then turning on them. ▪ Forced sexual activity, repeated insults/put downs/stopping partner from seeing friends/family, checking on partner all the time (texts/social media), using physical violence, taking money, controlling what partner wears. ▪ May use threats, humiliation and intimidation to harm and punish their victim.	▪ Repeated insults/put downs. ▪ Stopping partner from seeing friends/family. ▪ Checking partner all the time (texts/social media). ▪ Forced sexual activity. ▪ Physical violence. ▪ Taking money. ▪ Controlling what partner wears.
CHILD SEXUAL EXPLOITATION (CSE) And Child Criminal	▪ The exploitation of people under-18 with a power deficit, where they are coerced, manipulated or deceived into sexual activity for either: the financial advantage or status enhancement of the perpetrator; the exchange of 'something' the victim needs or	▪ Unexplained gifts. ▪ Older boyfriends / girlfriends. ▪ Start missing education, regular absences, or lateness. ▪ Associating with bad company

Exploitation (CCE)	wants (gifts, money, attention, alcohol, drugs, clothes etc.). ▪ [The] power of the exploiter [is] based on gender, age, physical strength, intellect, economic resources. It is not a balanced relationship, which allows the exploiter to achieve sexual gratification from or otherwise exploit the under-18. ▪ Violence, coercion and intimidation are common; may start as a regular relationship then become abusive. CSE may be happening even where the activity appears consensual. ▪ In extreme situations, involves multiple partners / buying & selling victim / criminal gangs/ county lines ▪ CSE does not always involve physical contact – technology may be involved. ▪ Indicators of exploitation may be different for boys and girls	or known gang members. ▪ Changes in friendship groups ▪ Concerns with performance in class
HONOUR BASED VIOLENCE or Honor based Abuse (HBV/HBA)	▪ Crimes committed to protect the honour of a family and/or community. ▪ May include FGM or forced marriage. ▪ Whatever the motivation, these are abuse according to UK law.	▪ Persistent absence. ▪ Decline in engagement/ behaviour/performance. ▪ Lower than expected exam results. ▪ Depression. ▪ Family member keeping close eye on student.
FEMALE GENITAL MUTILATION (FGM	[The] non-medical, partial or total removal of external female genital organs, typically done to young girls from African countries. Illegal in the UK if done here, or if [a] UK resident [is] taken to another country to have it done.	▪ Known from disclosure, not physical examination.

DOMESTIC ABUSE	An incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer	• can be psychological, physical, sexual, financial, or emotional • can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.
Heritage, N (2017) , *Advanced Safeguarding for Designated Lead*		

ABSENCE

It is significant to note that periods of absence from class/school, or students being absent for long periods of time during the day, can be a warning sign of a range of safeguarding concerns, including (but not limited to):

- Neglect
- Sexual abuse
- Sexual exploitation
- Child criminal exploitation (particularly county lines)

LILA* has a policy of reporting absence (See **F3: MISSING STUDENTS**).

CHILDREN WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES

Children with special educational needs or disabilities (**SEND**) or certain medical or physical health conditions can face additional safeguarding challenges, both online and offline. There may be additional barriers to recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in the school, or the consequences of doing so.

Any reports of abuse involving children with SEND requires liaison with the DSL and, in more serious cases, the LADO, to ensure due diligence is done regarding accounting for these characteristics.

LILA* staff will refer to specialist organisations such as The Special Educational Needs and Disabilities Information and Support Services (SENDIASS) for information and support for young people with SEND.

LILA* will provide extra pastoral support (e.g. one-to-one meetings) for these children, and ensure appropriate

support for communication is in place.

CHILDREN WHO ARE LESBIAN, GAY, BI, TRANS OR QUESTIONING* (LGBTQ+)

*"Questioning" refers to children who are unsure of their sexuality and gender, or do not fit into a binary understanding of sexuality or gender and may consider themselves to be part of the LGBTQ+ community.

The fact that a child or young person who may be LGBTQ+ is not an inherent risk factor or harm, however, these children can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

LILA* staff are encouraged to promote a safe environment for LGBTQ+ students in line with safeguarding level 1 training and take into consideration their situation when dealing with accusations or suspected bullying. LILA* staff endeavour to reduce the additional barriers faced and provide a safe space for these children to speak out and share their concerns. Any concerns related to (perceived) LGBTQ+ students should be taken to the **DSL**.

REMEMBER:

It is **not** your duty to decide whether or not child abuse has taken place or if a **CHILD** is at significant risk; however, **YOU HAVE A RESPONSIBILITY TO ACT IF YOU HAVE A CONCERN.**

C5: LOW LEVEL CONCERNS (concerns that do not meet the harm threshold)

A low-level concern is any concern that an adult has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work • does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO). Examples of low-level concerns could include:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child one-to-one in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language.

SHARING A LOW LEVEL CONCERN:

Low-level concerns about a member of staff should be referred to the DSL/Directors. If there are concerns about the DSL or Director(s) these concerns should be reported directly to the local authority designated officer. Staff are encouraged to self-refer to the DSL or DSP if they have found themselves in a situation which might be misinterpreted or they have behaved in a way that falls below professional standards

RECORDING A LOW LEVEL CONCERN:

All low-level concerns should be recorded in writing via the low level concern form attached to the safeguarding policy. Records should include the details of the concern, how the concern arose, the actions taken and the name of the person sharing their concerns. If the individual wishes to remain anonymous, this should be respected as far as possible. Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action can be taken. All low-level concerns are recorded in a central log and reviewed regularly by the DSL to identify patterns of behaviour. Where patterns emerge, appropriate action will be taken in line with staff disciplinary procedures.

LEARNING LESSONS: Following any incident, allegation or concern, an internal Safeguarding review meeting will take place with all members of the safeguarding team in order to review processes and policy. Learning lessons applies to all cases, not just those which are concluded and found to be substantiated.

C6: A CHILD TELLING AN ADULT (DISCLOSURE)

A **CHILD** may not be comfortable disclosing to the **SAFEGUARDING TEAM** and a **CHILD** may choose any **ADULT** to talk to. It is therefore necessary for all **ADULTS** to know what to do in these circumstances. Additionally a child may not feel ready or know how to tell someone they are being abused.

LISTEN

- Stay calm.
- Listen, hear and believe. Treat the matter seriously.
- Don't panic or over-react. It is extremely unlikely that the participant is in immediate danger.

ASK

- Ask "open" questions: Can you tell me who was there when this happened? Can you tell me what happened? Can you describe to me where this happened? Can you tell me when this happened? Can you explain to me how this happened?
- Don't probe for more information. Questioning the child may affect how their disclosure is received at a later date. Do make the interaction as relaxed as possible and give the child all the time they need to respond.

REASSURE

- Reassure & explain that they have done the right thing in telling you.
- Don't promise that everything will be OK (it might not).
- Don't promise to keep secrets.
- Explain that only those professionals who need to know will be informed.

RECORD

- Write your record as soon as possible after the event.
- Record the date and time that you made the record.
- Make sure that the record is legible and kept in a safe place.
- Make sure that the record is accurate, balanced, and objective.
- Include facts and observations - if you are recording an opinion state clearly that is what it is.

REPORT

- Don't try to deal with it yourself
- Report to the Designated Staff

C7: KEEPING RECORDS

Records of suspected or alleged abuse are confidentially stored in password-protected document on the internal server and access is limited to the **DSP**, **DSL** and Directors.

Safeguarding records will be managed in accordance with the organisation's **Data Retention Policy**. All safeguarding records will be stored securely, accessed only by authorised personnel, and disposed of confidentially in line with data protection legislation and the organisation's data retention procedures.

Child protection records should include a clear and concise summary of the concern, details of how the concern

was followed up and resolved, a note of any action taken, decisions reached and the outcome.

C8: IF AN ADULT IS ACCUSED

Any **CHILD PROTECTION CONCERNS** must be escalated to the **DESIGNATED STAFF** immediately who will ensure protocol is followed in a timely and appropriate manner. If an accusation is made against an individual or an organisation using school premises, such as subcontractors, external catering or IT staff, or visitors, LILA* will follow the reporting policy outlined in this document and will also inform the **LADO**.

Where the allegation concerns the **DSL**, **STAFF** are to report to the Managing Director or appropriate senior manager.

Each case is assessed based on its own particular circumstances but the overall procedure will be as follows: -

IS THE CHILD SAFE?

- The first priority is to ensure the **CHILD** is not in any immediate danger. If there is danger, they should be taken to a safe place.

- The **CHILD** should be returned to their normal routine as soon as it is safe to do so.

INFORM THE DSL

- If the **DSL** has not yet been involved (the **DSP** may have been coordinating the initial response) the **DSL** should now be informed.

RECORD

- A written record must be provided by the person who raised the **CONCERN**.

- Once the initial record has been submitted it is the responsibility of the **DSL** to keep the record up-to-date with actions taken and why.

INVESTIGATION OF THE CONCERN

- Not all **CONCERNS** relate to **CHILD PROTECTION**, some may be a more general welfare concern.

- Notifying an external body indicates that a **CONCERN** has been escalated to an **ALLEGATION.** This is triggered if information indicates that an **ADULT** may have: behaved in a way that has/may have harmed a **CHILD**; possibly committed a criminal offence against or related to a **CHILD**; behaved towards a **CHILD** in such a way that indicates s/he would pose a risk of harm if working closely or regularly with a **CHILD**.

- The **DSL** will undertake only the basic enquiries permitted by local procedures and will consult the LADO to agree the next steps. No internal investigation will begin before this consultation unless specifically agreed with the LADO.

- The **DSL** may discuss their investigation with the **SAFEGUARDING TEAM** but the decision for further action lies with the **DSL.**

POSSIBLE OUTCOMES OF AN INVESTIGATION

- **No further action.** The **DSL** assesses that no further action is required.

- **Internal disciplinary.** Where appropriate, HR advice will be sought by the **DSL** for possible disciplinary action where inappropriate, but not necessarily criminal, behaviour is identified. i.e. not supervising properly etc.

- **Monitoring**. The situtation will be monitored until "No Further Action" is required or referral is made to the authorities once there is a better understanding of the situation.

- **Referral of an ALLEGATION.** The situation is referred to the authorities and action will be taken based on their direction. This may include a criminal investigation. The authorities will determine what immediate action is required to protect the **CHILD**, when and what the parents should be told and what should be said to the person facing the allegation, and if/when they ought to be suspended. Suspension is not automatic and, if suspended, the reason must be communicated to the member of **STAFF** within one day.

INTERNAL REVIEW

- Following the resolution of a **CONCERN** or **ALLEGATION**, the **SAFEGUARDING TEAM** will review the response to the incident and update policies/procedures as appropriate. This is done in the quarterly safeguarding meetings.

C9: IF A CHILD IS ACCUSED

If a **CHILD** is accused the same steps are followed as set out in **C7: IF AN ADULT IS ACCUSED**.

If the outcome of the investigation is deemed to require an internal disciplinary then **F6: U18 BEHAVIOUR AND DISCIPLINE** would be in effect, rather than an HR disciplinary.

C10: SUPPORT FOR THOSE INVOLVED IN AN ALLEGATION

The alleged victim should be kept calm and will be given any appropriate support. A **SAFEGUARDING TEAM** member will be assigned to monitor the **CHILD** and provide pastoral support.

DESIGNATED STAFF and **SAFEGUARDING TEAM** must be aware of the role of the Appropriate Adult. In cases of allegations being made against a **CHILD**, especially during ongoing enquiries under section 47 of the Children Act 1989, and police investigations, it is necessary for the **CHILD** to have an appropriate adult to provide support. In the case of a juvenile (**CHILD**), the 'appropriate adult' refers to:

(i) the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation;
(ii) a social worker of a local authority;
(iii) failing these, some other responsible adult aged 18 or over who is not:

- a police officer;
- employed by the police;
- under the direction or control of the chief officer of a police force; or
- a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

whether or not they are on duty at the time.

The appropriate adult is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons who are currently involved in an allegation and in police detention.

Referenced from 'Police and Criminal Evidence Act 1984 (PACE) Code C, revised 2019

A named contact will be assigned to provide HR/pastoral support for the alleged perpetrator (where they are a member of **STAFF/ ADULT STUDENT/ CHILD STUDENT**), and the latter will be removed from **REGULATED ACTIVITY** where applicable. The supporting contact would be a different staff member to the person supporting the alleged victim. If the alleged perpetrator is a **CHILD**, the extra Duty of Care applies to this person too, and the responsibility to do what is in each **CHILD**'s best interest. This may be via liaison with any external agencies where necessary.

Any **ADULT** or **CHILD** will be informed where relevant that an **ALLEGATION** has been made against them within 24 hours of the incident being reported. Details will not be discussed, and confidentiality insisted upon, so as not to disrupt any subsequent external investigation.

It is important to explain to children that the law is in place to protect rather than criminalise them

It is necessary to consider possible intra-familial harms, and any necessary support for siblings following incidents

If any member of the safeguarding team were implicated in an **ALLEGATION**, the person reporting should contact another member of the safeguarding team. Those safeguarding team members not implicated would then co-ordinate the response as per the steps above. The NSPCC whistleblowing helpline – **0800 028 0285** – is an alternative reporting channel for anyone concerned about the company's response to any **ALLEGATION**.

UNSUBSTANTIATED, UNFOUNDED, FALSE OR MALICIOUS REPORTS

In cases where an allegation is found to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child or person who has made the allegation is in need of support or may have been abused by someone else.

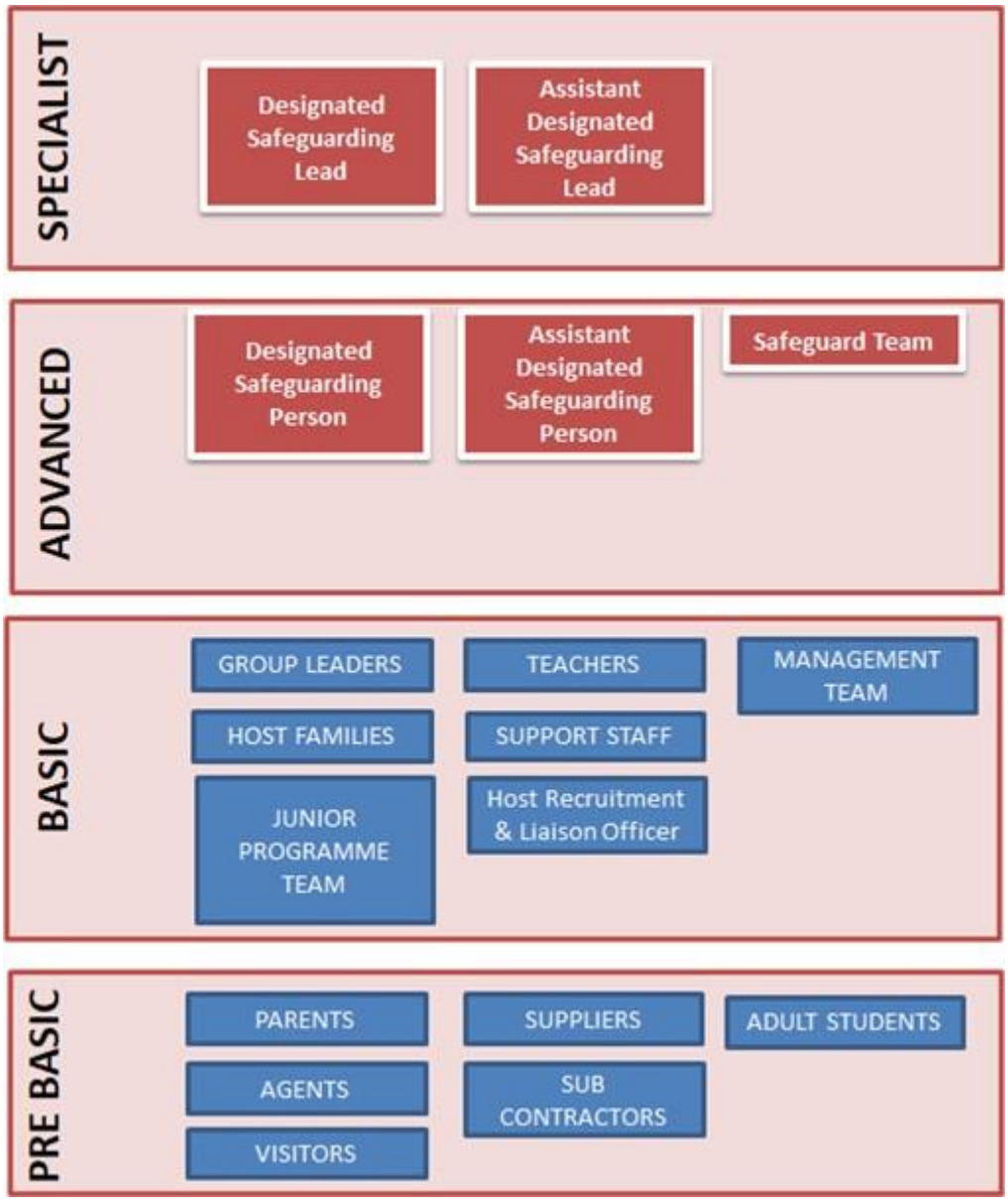
D: TRAINING

D1: RESPONSIBILITY

The **DSL** will ensure all **ADULTS** are appropriately trained via English Uk's Safeguarding courses and will keep the relevant records of such training within the company Employersafe portal.

Training requirements will be determined by the level of interaction an **ADULT** will have with **CHILDREN**, the seniority of the role and whether the **ADULT** is a member of **STAFF**.

Records of training will be kept on Employersafe and within HR files. The **DSL** liaises with recruitment staff to ensure records and training are kept up-to-date.



D2: HOW TRAINING IS DELIVERED

The **DSL** will undertake formal safeguarding training every two years and will receive regular updates (at least annually) to maintain up-to-date knowledge of safeguarding practices and legislation.

PRE BASIC TRAINING

Parents / Agents / Visitors / Suppliers / Sub-contractors / Adult students
Not all **ADULTS** are required to receive **LILA*** training sessions. The above stakeholders will instead receive guidance documents which highlight applicable content from the LILA* **SAFEGUARDING POLICY**.

BASIC TRAINING

Support staff / Junior Programme Staff / Teachers / Accommodation Team / Management
All **STAFF** will receive a copy of this policy on their induction and will be provided with a copy following any updates. Where appropriate, a condensed version of the policy will be provided.

All new **STAFF** complete a certified online training module in Basic Awareness. This is supplemented with face-to-face training from one of the **SAFEGUARDING TEAM** which highlights the safeguarding content most relevant to their role.

All **STAFF** take part in refresher training workshops once a year delivered by the DSL.

DESIGNATED STAFF update **STAFF** throughout the year about any pertinent changes to policy/procedures etc; this is typically through email but may be supported with face-to-face briefings.

HOSTS

A copy of this policy will be made available to all **HOSTS** who accept **CHILDREN** when they are recruited. They will also be notified following any relevant updates.

HOSTS will also be provided with **GUIDELINES FOR HOSTING UNDER 18S** with which they must comply, as per the terms of the **HOST AGREEMENT.**

HOSTS providing accommodation to **CHILDREN** will be invited to host-events throughout the year, usually preceding the arrival of a **JUNIOR** group or the summer peak season. These briefings will provide an overview of the programme, what is required of them and other pertinent information. If attendance is not possible, the **HOST** is given guidance materials and they will be offered a phone meeting to answer any questions.

The Host Recruitment and Liaison Officer will update **HOSTS** as necessary throughout the year about any pertinent changes to policy/procedures etc; this is typically through email but may be supported with face-to-face briefings.

GROUP LEADERS

GROUP LEADERS will be sent pre-arrival information which includes information from the **SAFEGUARDING POLICY** tailored to their role, access to the full version, and their **GROUP LEADER AGREEMENT**. See also **E12: SAFER RECRUITMENT, EXTERNAL ADULTS.**

GROUP LEADERS will receive an induction from the **DSL** or their appointed nominee. In this induction they will again be made aware of their safeguarding responsibilities and LILA*'s policy and procedures.

On-going support and advice will be provided during the course of their stay with daily meetings with the LILA* team and other communications, as appropriate.

ADVANCED TRAINING

STAFF requiring advanced knowledge will receive in-house training provided by LILA*'s specialists. This is in addition to the basic training for general **STAFF** members. Advanced training is refreshed on a biennial basis.

SPECIALIST TRAINING

The **DESIGNATED LEAD** will receive specialist training provided by English UK or other external training providers. Specialist training is refreshed on a biennial basis and those who attend will disseminate the content to their colleagues on their return with an emphasis on any changes in legislation or best practice guidelines.

DESIGNATED STAFF (Advanced & Specialist level) are expected to self-access additional training as and when necessary to ensure they are up-to-date with relevant legislation and best practice. This includes but is not limited to:-

- Accreditation UK monthly newsletter,
- English UK and Gallery Teachers monthly newsletter/newsflashes,
- English UK Conferences,
- English UK Webinars,

- Local Child Safeguarding Partnership and/or Partnership updates,
- NSPCC updates.

LILA will promote Equality in Safeguarding

STAFF, HOSTS, **GROUP LEADERS** ,**ACTIVITY LEADERS, STUDENTS and other key adults:**

- must not unlawfully discriminate against pupils because of their protected characteristics
- must consider how they are supporting pupils with protected characteristics
- must take positive action, where proportionate, to deal with the disadvantages these pupils face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

LILA promotes equality for LGBTQ+ pupils through an open and caring culture, safe spaces, supportive signage in-school, and listening adults as well as through the promotion and support of local Pride events.
Children with special educational needs, disabilities, or health issues can face additional safeguarding challenges both online and offline. LILA* staff are trained to adhere to LILA*'s child protection policy and to recognise additional barriers when recognising sings of abuse, neglect etc.

LILA takes a zero-tolerance approach to discriminatory language or behaviour.

E: SAFER RECRUITMENT

E1: OVERVIEW

LILA* educates **CHILDREN** year-round, either on specialist **JUNIOR** programmes or via the **YOUNG ADULT** route. It is therefore imperative that **STAFF** are recruited with the **SAFEGUARDING** of **CHILDREN** as a priority.

It is also necessary to ensure that LILA* works with non-staff **ADULTS** (including but not limited to **HOSTS**, **GROUP LEADERS** & activity providers) who have had the appropriate suitability checks undertaken.

STAFF should refer to the **RECRUITMENT AND APPOINTMENT POLICY** and/or **STAFF RECRUITMENT – MANAGER'S GUIDE** for additional information.

E2: RECRUITMENT MATERIALS

LILA* makes specific reference to safeguarding in the following recruitment materials:-

Job description	All job descriptions specify that adults associated with the school will be expected to share the school's ethos and actively engage in looking after U18s safely.
Job advert	Adverts notify applicants that appointment to the role will be subject to checks. See E4: APPLICANTS INFORMED THAT.
Interview pro-forma	Interviews may include questions relevant to safeguarding children; this is determined by the nature of the role and whether the applicant would have significant contact with **CHILDREN**.
Reference requests	All references enquire whether the referee has any concerns about the applicant working with **CHILDREN**.
Job offer	Offer of Employment letters notify applicants that they must provide the necessary documentation for a DBS check to be carried out. They are also asked for their referees if this check is not yet complete.
Induction document(s)	Inductions are standardised with the use of checklists. The checklists highlight the safeguarding training required.

E3: RECRUITMENT STAGES FOR STAFF

When recruiting for a position that involves contact with **CHILDREN** LILA* operates a comprehensive recruitment procedure that includes:

- Submission of a CV with a complete employment history and a reasonable explanation for gaps
- Two people screening applicants' CVs and present during the interview. This may include an external recruitment company
- Use of interview questions which determine a candidate's attitude towards and suitability to work with **CHILDREN**. These questions would be determined by the nature of the role
- Verification of identity and eligibility to work in the UK
- Verification of professional qualifications
- Enhanced screening via the Disclosure and Barring Service (DBS, formerly CRB)
- Two references which includes specific enquiry about a candidate's suitability to work with

CHILDREN. Where possible, one reference should be from a recent post working with **CHILDREN**.

- The College will carry out online searches on shortlisted candidates as part of its due diligence, in line with safer recruitment practices.

E4: APPLICANTS INFORMED THAT

Applicants are informed that appointment to the role will be subject to DBS clearance / an overseas police check (see **E7: APPLICANTS WHERE A CRIMINAL CHECK IS NOT POSSIBLE**) and satisfactory references. Work/unsupervised access to under 18s can not begin without sight of a DBS/overseas police check. Additionally, shortlisted candidates will be informed that online searches may be done as part of pre-recruitment checks.

E5: APPLICANTS WITH A CRIMINAL RECORD

LILA* recognises that a criminal record does not automatically make an applicant unsuitable to work with **CHILDREN.** In any circumstance in which an applicant's disclosure has a criminal record LILA* will ensure that it complies with its **EMPLOYMENT OF EX-OFFENDERS POLICY.** A summary of this policy is below:

LILA* will: -

- Discuss the contents of the disclosure with the applicant to confirm that the information contained on the DBS check is accurate. This will happen before any decision is made.
- Conduct an assessment of the application on a case-by-case basis considering:
  - The seriousness/nature of the offence/s,
  - The nature of the appointment,
  - The age of the offence/s,
  - The frequency of the offence/s.
- Ensure that at least two people are involved in the decision-making process
- Seek external advice (if appropriate) e.g. LSCP/Partnerships and/or LILA*'s HR consultancy
- Ensure that no record is kept of what the criminal record consisted of (i.e. specific offences)
- Ensure that a record is kept of the process that was followed in deciding to (not) appoint the applicant.

At all times the matter will be kept in strict confidence.

E6: APPLICANTS FOR WHOM A UK CRIMINAL CHECK (DBS CHECK) IS NOT POSSIBLE OR INSUFFICIENT

STAFF recruited from outside the UK are required to have a Police Certificate from the country in which they worked.

If an applicant has spent more than 6 months outside of the UK within the last 3 years, then an overseas police check will be requested in addition to a DBS check. Whether they have been resident outside the UK in the last 3 years will be ascertained from their CV and communications with the applicant.

If the police certificate provided is not in English, an online translation will be done by LILA*. If there is any content which is cause for concern, then a certified translation will be required.

Where an applicant cannot obtain foreign police check due to complications e.g. for the relevant authorities to provide one, a further risk assessment *may* be accepted with regard to certain periods abroad as an alternative. To qualify to work in **REGULATED ACTIVITY**, this risk assessment would necessitate further references to cover the candidate's period abroad, plus other safeguards to be available to reduce the risk to

an acceptable level.

LILA* reserves the right to request as a condition of employment a foreign check for any period within the last 10 years.

E7: RECRUITMENT OF Homestay Hosts

Those applying to become a **HOST** must successfully complete the following steps: -

- Completion of an application form
- Inspection of property
- Interview of the main carer
- Completion of a risk assessment
- Submission of gas safety certificate (if applicable)
- Submission of a fire risk assessment
- Receipt of two references
- DBS checks for eligible members of the household (see below)
- Agreement via the host agreement to follow the *Homestay Guidelines For Hosting Children* and LILA*'s *Safeguarding Policy*

HOSTS who are to accommodate **CHILDREN** must have an Enhanced DBS check for each eligible member of their household. A DBS check for the main carer with "Home Based Provision" check undertaken is not accepted for the household.

HOSTS who are to accommodate **CHILDREN** in their homes must have checks undertaken for every **ADULT** (18+) in the household.

LILA* will accept a 3rd party Enhanced DBS check on the conditions that it is:-

a) Less than 3 months old AND
b) A similar role in the Children's workforce

If the 3rd party DBS is accepted, then LILA* will also check the Children's Barred List before they may start hosting **CHILDREN**. For more information about this refer to **APPENDIX 4.**

HOSTS who due to work with **CHILDREN** and are waiting for their DBS check to clear are not permitted to host **CHILDREN.** This is because it is not possible for them to be removed from **REGULATED ACTIVITY** (i.e. they cannot always be supervised).

E8: SINGLE CENTRAL RECORD

LILA* makes use of a number of tools to ensure the necessary checks are complete for all staff/homestay/groups leaders: -

STAFF – monitored using the company's specialist HR software.

HOSTS – monitored using the company's specialist school software (Class).

GROUP LEADERS – monitored using the company's specialist school software (Class).

Monitoring all DBS records is the responsibility of the **DESIGNATED SAFEGUARDING LEAD**.

E9: DISQUALIFICATION BY ASSOCIATION

LILA* recognises the requirement to perform additional screening for **STAFF** who work with **CHILDREN** under the age of 8. This check screens applicants to ensure that they do not live with anyone who is barred from working with **CHILDREN**.

LILA* is ineligible for this check as LILA* does not provide services to those under the age of 8.

E10: RETURNING STAFF

It is common practice in the language travel industry for **STAFF**, particularly teachers and activity leaders, to have seasonal employment.

When a member of **STAFF** has a break in their employment with LILA* then checks are required before they may return.

Period of absence	Checks required
< 3 years	• Suitability checks (dependent on location during absence) ○ Overseas police check

3+ years	• Suitability checks (dependent on location during absence)
	  ○ Enhanced DBS check and/or
	  ○ Overseas police check
	• Two references which includes specific enquiry about a candidate's suitability to work with **CHILDREN**. Where possible, one reference should be from a recent post working with children.

E11: EXTERNAL ADULTS

Group Leaders	**GROUP LEADERS** are required to have appropriate suitability checks e.g. a "Police Certificate of Good Conduct" or a "Certificate of Criminal Record". **AGENTS** acting on behalf of a **GROUP LEADER** are required to provide verification that this check has been carried out. LILA* reserves the right to request to see evidence of this check and/or carry out their own suitability assessment. Furthermore, **GROUP LEADERS** are required to sign and follow the **GROUP LEADER CODE OF CONDUCT** and **GROUP LEADER AGREEMENT.**
External Providers	External providers are required to sign a disclaimer which confirms that they comply with all applicable laws and regulations.

(airport transfers/ activities / other services)	In addition, they must confirm that their staff members have been screened with an Enhanced DBS check to work in the children's workforce within the last 3 years. This is relevant to those who may have unsupervised access to **CHILDREN**. External providers may also be required to provide copies of their risk assessments or their own safeguarding policy.

E12: DELAYED DBS CHECKS

Staff, volunteers or contractors must not undertake regulated activity with anyone under 18 until the required DBS and suitability checks have been completed and approved.

A pending DBS application is not treated as clearance. While checks are outstanding, the individual must not teach, supervise, accompany, transport or have unsupervised contact with under-18s, and must not be included in staffing ratios.

They may only undertake duties that do not involve regulated activity or access to under-18s.

F: IMPLEMENTING SAFEGUARDING

There are a range of ways LILA* looks after the **CHILDREN** in its care to ensure their safety and promote their well-being.

F1: USE OF RISK ASSESSMENTS

LILA* uses risk assessments whenever a situation/environment is deemed to have risk elements. This includes but it not limited to: -

- School premises,
- Accommodation,
- Social activities.

Where the risk assessment relates to services using an external provider, the supplier's own risk assessment/s may be used, but only as a starting point. This is because their risk assessments are (generally) based on the premise of providing services for UK residents. LILA* has a duty to ensure that the risk assessment used is relevant to those who might be **CHILDREN,** whose first language is not English and who are not necessarily familiar with UK cultural norms.

Risk assessments are produced and reviewed by the appropriate **STAFF** member under the supervision of a **MANAGER** or the DSL.

All risk assessments are formally reviewed on an annual basis but can also be updated as circumstances dictate (e.g. in response to an incident/a best practice update).

Affected **STAFF** are made aware of and given a copy of risk assessments in advance of them taking a supervisory role. These **STAFF** are expected to be fully aware of the content of the risk assessments and

provide feedback on improvements/omissions.

LILA* uses a range of age-appropriate techniques and mediums to convey the contents of a risk assessment to **CHILDREN**. Examples include verbal inductions, leaflets, safety cards, diagrams etc. The content is also reinforced on an ongoing basis by **STAFF** acting in a supervisory capacity.

F2: USE OF SUPERVISION RATIOS

Supervisory ratios are not prescribed in law[4] and may vary according to the activity but with a minimum of 1:20 when supervising **CHILDREN** aged 12-17 and 1:15 for those 11 and under.[5] LILA* aims to have at least 2 **ADULTS** acting in a supervisory capacity at all times. This is to ensure that there are sufficient safeguards in place to be able to deal with an emergency. Supervisory ratios may be adjusted as a result of the risk assessment process. See **F1: USE OF RISK ASSESSMENTS** for more information.

GROUP LEADERS may be included in calculation of supervisory ratios; however, they may only be responsible for **CHILDREN** in their own group.

When a **YOUNG ADULT** attends an **ADULT** programme social activity led by LILA* **STAFF**, supervisory ratios will be based on those for an **ADULT** event and/or the risk assessment. In the event of a first aid incident or similar, the member of **STAFF** attending will prioritise the safety of the **CHILD** and, if necessary, will terminate the activity. They may also contact LILA* and request that an additional member of **STAFF** attend the activity so that they can supervise the **CHILD** in distress and continue the planned activity.

F3: MISSING STUDENTS

Persistent absence or a student going missing from education is treated as a safeguarding concern and will be followed up immediately in line with safeguarding procedures.

It is critical that LILA* has a robust system to identify when a **CHILD** is missing and have procedures in place to respond to such an incident. Monitoring attendance and reporting absences are everyone's business; reporting lateness/absence is usually done by the teachers within the classroom, or the activity leader; the **DSL** / **Senior Teacher** will monitor attendance and report on it regularly.

F3.1 REPORTING LATENESS/ABSENCE

When a **JUNIOR** or **YOUNG ADULT** is travelling as part of a group then it is the responsibility of their **GROUP LEADER** to communicate, maintain contact and liaise with LILA* over any lateness or absences.

When a **YOUNG ADULT** is travelling as an individual, they should maintain contact with and advise the DSL of any lateness or absences. Their **HOST** may also communicate this information on behalf of the **YOUNG ADULT**.

When **YOUNG ADULTS** or **JUNIORS** are too late to enter the class (per the **LATENESS PROCEDURE**) they are supervised by a **STAFF** member on the school premises. Repeated lateness will be subject to disciplinary action. See F6: U18 BEHAVIOUR & DISCIPLINE.

F3.1.1 JUNIOR OR YOUNG ADULT STUDENTS TRAVELLING WITH GROUP/ACTIVITY LEADERS

The **GROUP/ACTIVITY LEADER** will contact LILA* to report any lateness or absence before the start of the first lesson (check group timetable: normally to arrive from 9am for a 9.15am start) by contacting reception (+44)151 707 0909 and providing the student's name and reason for absence. This information will be passed to **DS** and the **CHILD'S** teacher/activity leader will be notified.

The **DS** will monitor the situation in the case of lateness and will maintain contact with the **CHILD**/**GROUP LEADER** until the **CHILD** arrives at the school.

[4] **"**Frequently asked questions **–** Education**"**, Health & Safety Executive (HSE),

[5] "Health & Safety of Pupils on Educational Visits", Department for Education & Employment, 1998

F3.1.2 YOUNG ADULT STUDENT TRAVELLING AS AN INDIVIDUAL

The **YOUNG ADULT** or their **HOST** will contact LILA* to report any lateness or absence before the start of the first lesson (normally to arrive from 8:45am for a 9.00am start) by contacting reception (+44)151 707 0909 and providing the following information: student's name and reasons for absence. This information will be passed to **DS** and the **CHILD'S** teacher/activity leader will be notified.

The **DS** will monitor the situation in the case of lateness and will maintain contact with the **CHILD** until they arrive at the school.

F3.2 IDENTIFYING CHILDREN MISSING FROM A SCHEDULED ACTIVITY

There will be a **REGISTER** check by a member of **STAFF** to ensure that all **CHILDREN** are present. All checks must be done within 15 minutes of the scheduled start time.

In the case of classes, a check will be done at the start of the first, second, and third lessons.

In the case of social activities, checks will be done at the start and during the course of the activity.

F3.3 IDENTIFYING MISSING CHILDREN (NON-SCHEDULED ACTIVITY TIME)

CHILDREN on a **JUNIOR** course attend a complete programme which is closely supervised, and all time is designated as a **SCHEDULED ACTIVITY**.

LILA* staff can assign Juniors up to 2 hours of unsupervised free time, with several safeguards employed to mitigate the risk of harm, including e.g. staying in pairs or groups depending on their age. For more information, request a copy of LILA*'s *Unsupervised Free-time Guidelines*.

CHILDREN on a **YOUNG ADULT** programme have non-supervised time when they are not in lessons or with their **HOST**. This is always with the consent of the parent/s.

The **HOST** has a duty to maintain contact with the **CHILD** in their care in the same way as a caring and responsible UK parent would with their own **CHILD**. The **HOST** also has a duty to notify **LILA*** if the **CHILD** does not come home as expected; this might be the evening curfew or a more general absence on a weekend etc.

F3.4 CONTACTING AN ABSENT CHILD

If a **CHILD** is absent from class, they will be contacted by the **DS** or their nominated representative.

The **DS** will contact the missing **CHILD**, ask for their reasons of lateness/ absence and will monitor the situation until the **CHILD** arrives at their expected destination.

F3.5 LOCATING AN ABSENT STUDENT WHEN CONTACT WITH STUDENT IS NOT POSSIBLE

If the missing **CHILD** cannot be reached, the **DS** will contact the **CHILD'S** 'supervisor(s)' i.e.

a) an **AGENT** (if booked with one)
b) a **HOST** (if with a host family)
c) a **GROUP LEADER** (if with a group)
d) the accommodation provider (if at a hotel/residence).

In a situation when both the **CHILD** and the 'supervisor' are unreachable or if the supervisor doesn't know the **CHILD'S** whereabouts, the **DS** will notify the **DSL** and the School Directors.

The **DS** will continue to try to contact the **CHILD** and related contacts until 3pm of the working day. If the **CHILD** can still not be located at this time, a home visit will be conducted by a member of the accommodation and/or safeguarding team. If, at this point, the **CHILD** cannot be located, the **DSL** or other **DS** staff will contact the police and the **LADO** to report and receive further advice.

F3.6 CHILDREN AND ADULTS ON SITE

When both **CHILDREN** and **ADULTS** are on site, i.e. with the **JUNIOR** programme, the break times of each will be staggered so they have less chance of interaction. Additionally, there will be separate toilets for adults and children.

F4: WELFARE PROVISION

The welfare of **CHILDREN** is a broad area; LILA* therefore makes use of a number of policies, procedures and service provisions to protect and promote the well-being of those in LILA*'s care.

F4.1 CONSENT FORMS

It is critical that parents have a clear understanding of the programme their **CHILD** will attend and what LILA*'s duties will be. Parental consent is required before a **CHILD** may begin their programme of study.

A selection of consent forms is available which cover a range of circumstances including course, accommodation, transportation and activity participation.

The **DSL** is responsible for checking that all **CHILDREN** have the appropriate consent forms on file before the start of their programme.

F4.2 PRE-ARRIVAL INFORMATION

Prior to the start of a programme, the parents, **CHILD**, transfer company, accommodation provider and relevant LILA* **STAFF** will receive pre-arrival information. This will be age-appropriate and written in clear English, and/or online translation tools will be available, for those where English is not their first language.

The pre-arrival information will include (as appropriate):-

- Contact details, including emergency contacts,
- Itinerary,
- Airport transfer details,
- Medical details,
- Student **CODE OF CONDUCT** & disciplinary information.

F4.3 WEEKEND SUPPORT

Managers and **STAFF** on weekend duty are provided with the details of all **CHILDREN** arriving, departing or remaining over the course of the weekend. This information includes: -

- Contact details, including those of the accommodation,

- Emergency contact details,
- Flight & transfer information.

In the event of a serious incident, the **MANAGERS**, **SAFEGUARDING TEAM** and weekend staff communicate as required by the needs of the student and the severity of the incident. See LILA*'s **EMERGENCY POLICY & PROCEDURES** for more information.
Where students wish to travel to various places over the weekend, which may or may not be within the borough, staff members are on hand to advise them of travel plans, especially those who are under the age of 18. Any student who is under 18 who wishes to stay overnight outside of their agreed accommodation must have a guardian / parent sign an Overnight Trip Request Form, which then has to be approved by the **DSL** following a meeting with the **CHILD** to double check that arrangements are viable and feasible.

F4.4 LISTENING ADULTS

Listening Adults are trained to an advanced level and are there to act as an initial port of call for **CHILDREN** with something that is worrying them. Wherever possible, a female and a male Listening Adult is made available to all students, for any discomfort they may have discussed an issue with **STAFF** of another gender. They can give general advice and signpost students to other agencies if a situation requires further intervention. Listening Adults will convey welfare issues and **CONCERNS** to the **DS/DSL** in the appropriate way.

The Listening Adults are identified during both the **JUNIOR** and **YOUNG ADULT** inductions. There are posters with this information in the common room and in all of the classrooms which show photos of the **STAFF** for easy identification and in which office they can be found.

F4.5 RECORD KEEPING

STAFF are required to keep records of welfare issues on the school administration software (Class). In circumstances in which the details may be sensitive the **DS** will keep the details in a password protected file on the internal server.

F4.6 STAFF AWARENESS OF WELFARE ISSUES

If a **CHILD** has personal problems of a sensitive nature, the **DS** shall exercise their discretion and share only the basic details with other **STAFF** and maintain confidentiality about the specifics.

F4.7 IDENTIFICATION OF CHILDREN

Identifying **CHILDREN** enables **STAFF** to have a heightened awareness for their well-being and safety.

CHILDREN are identified to **STAFF** though a number of means, including but not limited to: -

- Clearly named booking names where service provision may differ e.g. "Young Adult Homestay, Half board",
- Pre-Arrival reporting which identifies **CHILDREN** starting a course,
- Dates of birth/ages on registers (which are highlighted by senior teacher),
- Photos from official identification document on system accessible to administrators
- Lanyards (colour-coded: Adults red; Visitors green; Young Adults white; Children blue),
    - At off-site campuses where only under-18 students are present and adult students are not enrolled, under-18 students will wear red lanyards for identification purposes. This variation recognises the different student population at these sites and ensures that children and young people can be clearly identified by staff, visitors, and contractors.
- The standard lanyard colour-coding system remains applicable across college sites, with this site-specific adjustment in place where there are no adult learners present.
- A weekly register downloaded by the **DSL** to check which under-18s are present

- A Young Adult Class Register which can be run via Class by senior leaders and administrators

F4.8 INDUCTION

CHILDREN attending LILA* will receive an age-appropriate induction which will orientate them to the school, the city, their programme of study and relevant aspects of life in the UK. **YOUNG ADULTS** attending an adult course receive this young person's induction in addition to the adult induction.

JUNIORS receive their induction as part of their programme with a range of interactive tasks and activities designed to encourage participation and improve their learning.

The induction is delivered by a member of the **SAFEGUARDING STAFF,** or their appointed nominee, during absences or peak season. The appointed nominee would receive appropriate training to ensure effective session delivery.

F4.9 ONGOING WELFARE SUPPORT FOR CHILDREN YOUNG ADULTS

LILA* implements the following measures to provide welfare support for **YOUNG ADULTS** in its care including:-

- Weekly check-ins with **YOUNG ADULTS** from a member of the **SAFEGUARDING STAFF**
- Dedicated member of **STAFF** available in the office to assist with any problems/queries
- 24/7 support with both the LILA* Emergency Phone and Emergency Safeguarding Phone
- On-going contact with the **CHILD'S** parents to share feedback, progress and promote a relationship between the **CHILD'S** parents and LILA*
- On-going contact with the **HOSTS** and **TEACHERS** to facilitate sharing any worries about the well-being of the **CHILD** as well as highlight their progress/successes

JUNIORS

JUNIORS attending LILA* have an **AGENT**-appointed **GROUP LEADER** who is their primary source of welfare care. LILA* ensures that the **GROUP LEADER** has access to LILA*'s welfare **STAFF** who can assist with the needs of their group members. This includes access to the Emergency Phones and programme **STAFF**.

Furthermore, **STAFF** working with **JUNIORS** receive training to respond to welfare issues; this is to provide auxiliary support in the event that a **CHILD** prefers to speak to an **ADULT** who is not their **GROUP LEADER.**

F5: FIRST AID & MEDICAL CARE

LILA* ensures that it cares for the health of **CHILDREN** by appointing **STAFF** trained in first aid. LILA* ensures that a trained first aider is available for all scheduled activities and training is refreshed on a biennial basis. The identity of first aiders is promoted in school literature and student inductions.

LILA* is situated within a 15-20 minute radius of both a walk-in GP clinic and a hospital with an Accident and Emergency department.

When a **CHILD** is offsite the nearest medical facilities are identified during the risk assessment process; the details of which are shared with the appropriate supervisory **ADULTS.**

If a **JUNIOR** requires a visit to any medical facility then a responsible **ADULT** attends with them. If a **YOUNG**

ADULT requires assistance in attending a medical facility, the same applies. LILA* will also notify and update the **PARENTS**, as appropriate.

Parents are required to notify the school at the point of enrolment about any medical needs of their **CHILD** (see also **F11: PROVISION FOR THOSE MORE VULNERABLE**). The **DSL** will determine with whom the information ought to be shared and how e.g. conditions that may require an emergency response by **STAFF** will be communicated on the **REGISTER** for the **SCHEDULED ACTIVITY**.

HOSTS, GROUP LEADERS and/or Residence **STAFF** will keep a **CHILD'S** medicine and ensure that it is administered.

A **CHILD** aged 16/17 may be responsible for keeping and administering their own medicine with parental consent.

HOSTS and residence **STAFF** may give selected over-the-counter medicine to **CHILDREN** provided that the parents have given their consent**.** LILA* provides guidance for **HOSTS** about this.

F6: U18 BEHAVIOUR & DISCIPLINE

All **CHILDREN** are required to sign a **CODE OF CONDUCT** as part of their induction. This document is written in accessible, age-appropriate English and sets out the rules and responsibilities of the students while on their LILA* programme.

The induction will also cover information about possible consequences should students break the rules. These include sanctions, exclusion from activities, and in serious incidents, being sent home. In any instance where a **CHILD** has broken the rules causing/in a high risk situation, **STAFF** will focus on the safety of the **CHILD** first and disciplinary consequences later. E.g. inebriation, under the influence of drugs etc.

Both the **CODE OF CONDUCT** and the **DISCIPLINARY PROCEDURES FOR CHILDREN** are made known to the parents in the pre-arrival information.

F7: FIRE SAFETY

LILA*'s premises at New Barratt House has an annual risk assessment performed to specifically address potential risks to **CHILDREN.** See LILA*'s **HEALTH AND SAFETY POLICY** for more information.

All accommodation, including that of **HOSTS** is subject to a fire risk assessment which is updated annually. See also **F15: SELECTION OF ACCOMMODATION.**

CHILDREN will be given information on fire safety such as evacuation procedures and meet up locations during their induction and as required during their stay.

F8: AIRPORT TRANSFERS

CHILDREN under the age of 16 must have a chaperone for their arrival and departure transfer. The chaperone must fly with the **CHILD** and ensure their safety. As LILA* does not accept students under 16 unless on a group programme, chaperoning responsibility falls to the **GROUP LEADER**.

CHILDREN aged 16 or 17 may travel unaccompanied when they are attending a **YOUNG ADULT** course and LILA* has received parental consent. The **CHILD** is encouraged to use LILA*'s airport transfer service for both the arrival and departure, however, if the **SAFEGUARDING TEAM** are satisfied that an appropriate plan is in place for the arrival and transfer departure (following the completion of a NO TRANSFER form) then the student may travel following those plans, provided they are given LILA emergency contact details.

YOUNG ADULTS and their parents are provided with the information about the transfer company, their host's contact details and LILA*'s Emergency Phone (see **F4.3 WEEKEND SUPPORT)**. A member of **STAFF** on weekend duty will be available to liaise between all parties and, if necessary/feasible, will attend the airport.

F9: E-SAFETY

LILA* recognises its duty to educate its students, whether **CHILD** or **ADULT**, about e-safety. A range of educational materials on online safety are provided which are age-appropriate and written in clear, accessible English.

In addition, all students are required to consent to LILA*'s **ONLINE SAFETY - ACCEPTABLE USE AGREEMENT**, or receive instruction on the same, before they can access the school's internet. This agreement sets out the rules for their online behaviour and that there will be disciplinary action if they break the rules.

Finally, LILA* ensures that the necessary blocks and filters are in place to restrict access to inappropriate online content. This is implemented by LILA*'s external IT consultants, 127 Solutions Ltd. Filtering and monitoring also applies to the use of generative AI in education; this should be used safely and appropriately.

Disinformation, misinformation and conspiracy theories are listed as content risks under online safety. LILA* staff, especially teachers, monitor critical thinking and online awareness in classroom situations to help students navigate and avoid this content.

The College recognises the increasing risks associated with digital environments, including:

- online grooming
- sextortion and image-based abuse
- sharing of nudes/semi-nudes
- exposure to harmful or extremist content
- risks associated with AI-generated content
- live streaming and gaming platform risks

The College maintains appropriate filtering and monitoring systems, **Domain Name System (DNS) Filter**, which are reviewed regularly for effectiveness. Safeguarding and IT leads work together to ensure systems are appropriate to the level of risk.

Refer to **B7: IT & SOCIAL NETWORKS** for more information.

F10: RADICALISATION & EXTREMISM (PREVENT)

ADULTS must be aware of the vulnerability of **CHILDREN** to the risks posed by radicalisation and extremism. **STAFF** are trained to recognise signs of radicalisation and extremism. Concerns will be referred through safeguarding procedures, including referral to Channel where appropriate.

LILA*'s **PREVENT POLICY** sets out the measures in place to effect the government's legislation but in summary: -

- LILA* aims to educate its students about acceptance, tolerance, the rule of law, and individual liberty

- **ADULTS** should be alert to the signs of extremist views influencing a **CHILD** and report any concerns to the **PREVENT LEAD**.
- Staff are trained to recognise signs of radicalisation and extremism. Concerns will be referred through safeguarding procedures, including referral where appropriate.

Please refer to the full policy for more information.

F11: PROVISION FOR THOSE MORE VULNERABLE

From time-to-time **CHILDREN** who are more vulnerable may attend a LILA* programme. This vulnerability may be as a result of their physical and/or mental health, or they may come from a difficult home situation.

When issues are made known to LILA* pre-enrolment, the **SAFEGUARDING TEAM** will risk assess whether LILA* can ensure the well-being of the **CHILD**. Some measures, such as providing additional welfare support, may be offered. If the team are not satisfied that LILA* can care for the **CHILD,** then LILA* reserves the right to decline the enrolment.

Some parents do not disclose such information to LILA* prior the **CHILD'S** arrival. In such cases, LILA* will endeavour to meet the needs of the **CHILD** but reserves the right to cancel the booking and request the parents to arrange a flight/come to the UK for their **CHILD'S** safe return.

If an adult student or responsible **ADULT** has an extra vulnerability – whether a physical or mental issue – those who need to know for his/her safety are made aware. Any concerns should be reported to welfare/safeguarding staff at the earliest opportunity.

F12: PRIVATE FOSTERING

A private fostering arrangement is defined as:

"… essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more."[6]

LILA* is required to report any such arrangement to the local authority at least six weeks before the start of the **CHILD'S** programme.

For its general provisions, LILA* does not normally need to follow private fostering legislation as there are limits on the length of time a **CHILD** under the age 16 may study at LILA*. See APPENDIX 1 which sets out the decision-making process for **STAFF**. However, LILA* does in exceptional cases employ private fostering in order to cater for under-16 **JUNIORS** staying for more than 26 nights / 27 days in homestays. The school follows the local safeguarding boards'/partnerships' policies on foster care recruitment and aims to notify the relevant council by 6 weeks in advance of any such arrangements.

It is the responsibility of the **DSL** to ensure that LILA* does not breach company policy.

F13: INDEPENDENT LIVING

LILA* does not normally accept enrolments in which a **CHILD** would live independently. All **CHILDREN** must have a LILA*-approved **ADULT** onsite (host / family / LILA* staff / guardian) at their accommodation arrangement.

In exceptional circumstances, LILA* may permit under-18 students (**YOUNG ADULTS** – not **JUNIORS**) to live in an approved residence which has a complete and appropriate under-18 safeguarding policy and has been in communication with the **CHILD** and the safeguarding team prior to booking. This is pending approval from the safeguarding team and the collection of relevant compliance documents / policies from the residence.

F14: LIVING WITH A GUARDIAN

[6] "Children Act 1989: private fostering" https://www.gov.uk/government/publications/children-act-1989-private-fostering (Accessed 17/04/2026)

If a **CHILD** does not have accommodation arranged by LILA*, parents are required to elect a guardian (often a legal guardian, though a relative or close family friend of parental age and responsibility may be accepted, subject to an assessment of the proposed guardianship arrangement).

The elected guardian must accept and be able to provide full parental responsibility for the student outside of LILA* **SCHEDULED ACTIVITIES**.

Standard considerations when assessing guardian suitability include but are not limited to: -

- The guardian's age – there should be a generation gap between the guardian and the **CHILD,**
- Overnight availability of the guardian to respond to welfare concerns,
- Their general availability and other commitments which may impact on their effectiveness in fulfilling their parental responsibility,
- The nature/origins of the relationship with the family where the proposed guardian is not a legal parent of the **CHILD**.

LILA* may request further information from the parents or a third-party referee as to the suitability of the living arrangements or the guardian.

LILA* reserves the right to decline a booking if the **DESIGNATED STAFF** do not approve the guardian arrangement proposed by the parents.

If the guardian arrangement is accepted, LILA* reserves the right to: -

- arrange a viewing of the accommodation and/or,
- to speak with the parents' elected guardian to check their suitability and/or,
- to speak with the child to reassure itself that the child is being adequately cared for.

These checks may be done at any point in the **CHILD'S** enrolment.

F15: SELECTION OF ACCOMMODATION

All accommodation is inspected by a member of **LILA* STAFF** or their appointed nominee for safety and suitability. This includes checks that fire risk assessments and gas safety certificates are in place.

Suitability checks/risk assessments are performed at the start of the relationship between the provider and LILA*. Subsequent inspections/risk assessments are carried out; Homestay accommodation is inspected biennially, and residence/hotel accommodation is inspected annually. An additional site visit may be triggered if LILA* is notified of a change in circumstance or receives a welfare complaint.

Where the premises are to be used for accommodating **CHILDREN** a specific risk assessment is conducted which considers elements such as: -

- Route between school and accommodation,
- Building security features (residence only),
- Unauthorised access to **CHILDREN** areas (non-homestay),
- Student placement options (gender separations etc),

- Access to dangerous objects (oven, knives),
- Access to inappropriate material (adult tv channels, internet filters).

Guidance materials are provided for those undertaking risk assessments for **CHILD** accommodation.

Homestay accommodation is subject to additional recruitment measures (see **E8 RECRUITMENT OF HOST FAMILIES**).

F16: ACCOMMODATION OPTIONS AND STUDENT PLACEMENT

LILA* works within UK legislation, British Council guidelines and best practice to offer accommodation which is safe and appropriate for its students. This takes into account the age and gender of a student as well as the length of the period of study.

See **APPENDICES 1 & 2** for guidance assessing what accommodation is available and placement options.

F17: GCSE / A-LEVEL TUITION & FOREIGN LANGUAGE CLASSES

LILA* also arranges GSCE/A-level tuition on its premises. Suitable parental agreements/consents are exchanged with the school, recruitment checks made and suitable reception **STAFF** onsite.

Further to this, the school has an arrangement with a foreign language course provider for them to provide evening lessons on its premises, available to local students aged 16+. Suitable reception **STAFF** are employed and aware of their responsibilities towards any minors onsite.

SAFEGUARDING CERTIFICATE

I have read, understand and agree to abide by the Safeguarding Policy.

I understand that if I do not abide by this aforesaid guidance, I may be subject to disciplinary action and/or criminal charges.

Name……..

Signature .....

Date.....

Position within LILA*.....

Countersigned by.....

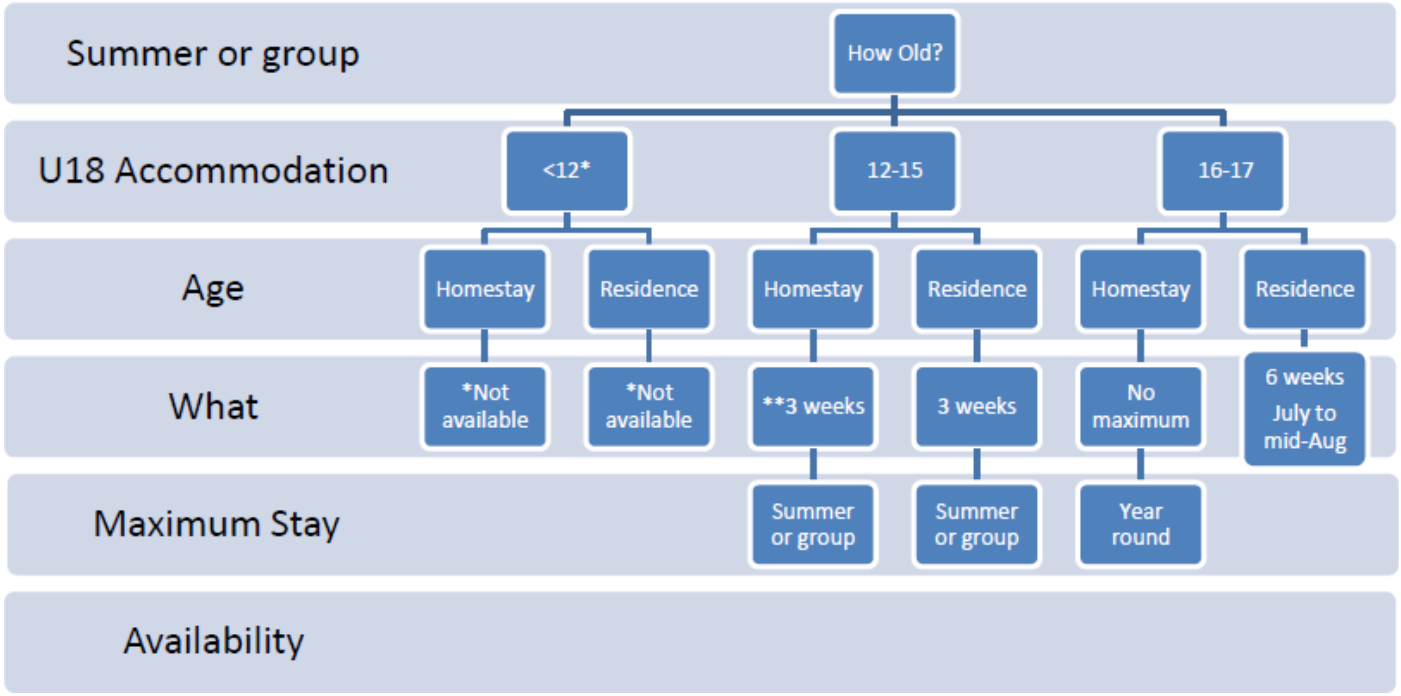
Date.....

Position within LILA*..... .....

Please sign both copies, and forward one copy, via your line manager, to the DSL.

APPENDICES

APPENDIX 1 – Under 18 Accommodation



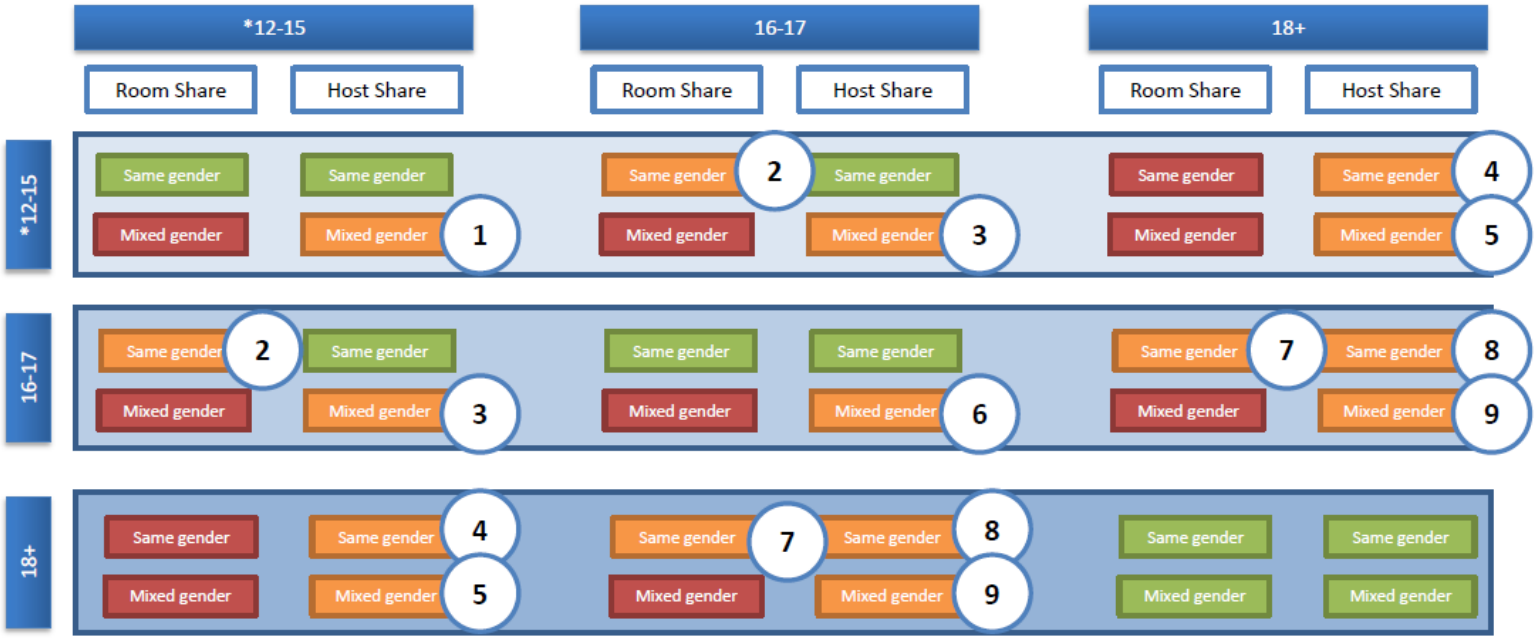
- **Homestay students will be charged a £20.00 per week supplement when under 18.**
- **Residence students MUST have a chaperone or be in an accommodation situation with a security arrangement and under 18 policy.**
- **Additional nights are permitted to allow for flight availability but the stay MUST NOT exceed 27 nights.**
- **A booking CANNOT BE SPLIT TO PERMIT A STAY LONGER THAN 3 WEEKS.** *E.g. a 5 week booking of 3 weeks in Homestay and 2 weeks in residence.*

**LILA* may accept an 11 year-old as part of a group booking, subject to an extra risk assessment. The child would stay in accommodation with their parent(s), or a group leader with an evidenced police check, for a maximum of 26 nights. Or the parent(s) may book their own risk-assessed accommodation arrangement.*

***LILA* may make available a limited number of foster care arrangements, under which junior students can stay for longer.*

APPENDIX 2 – Age/Gender Accommodation Sharing

HOMESTAY ACCOMMODATION SHARING OPTIONS



NOTES

Where **may do** is indicated, a risk assessment may be required. The risk assessment must be completed by the DSL before placement.

U18s sharing rooms or hosts with other U18s should have **no more than 3 years age difference** (i.e. 12,13,14 or 13,14,15, or 14,15,16 etc.). A greater age difference may require parental consent & a risk assessment.

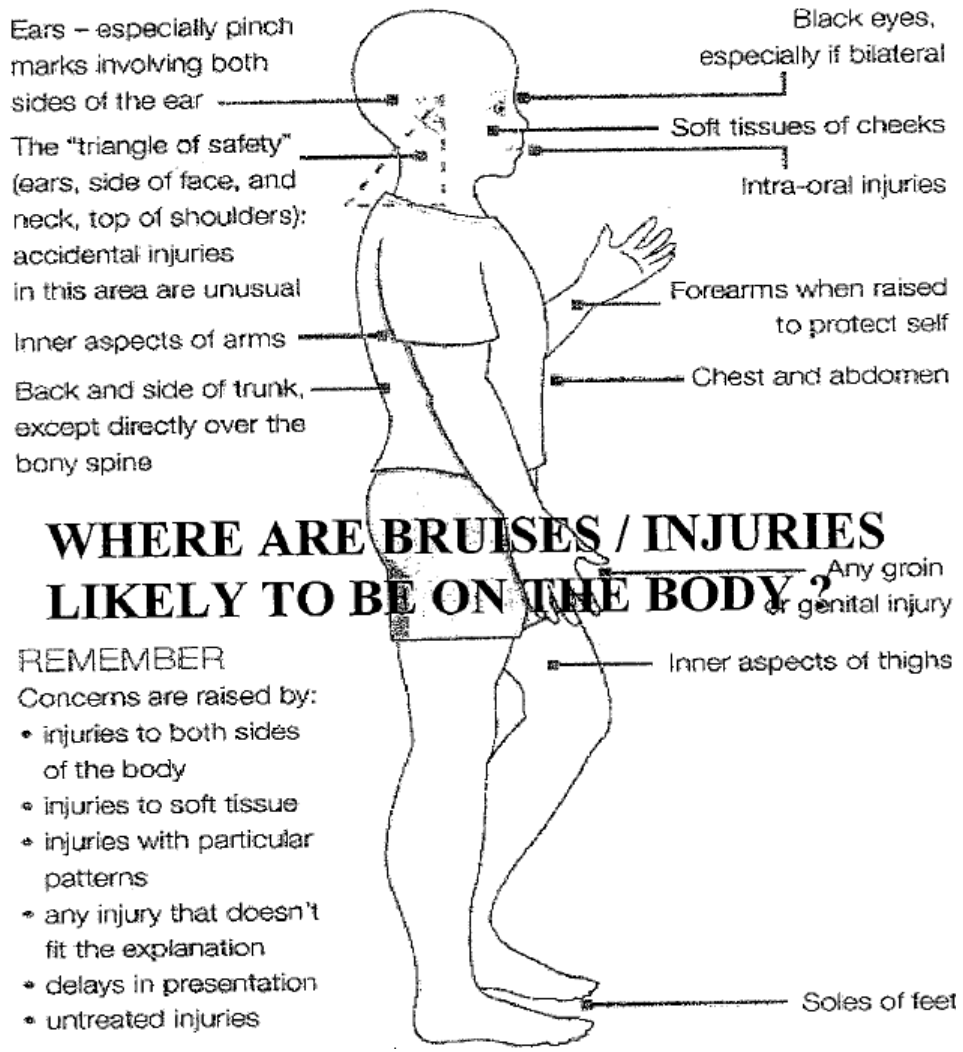
Room Shares must be agreed by parents/18+ students prior to placement i.e. "twin room" bookings.

Any host/room share where the students have the **same first language** must have prior consent from parents.

*11 year-old occasionally accepted within a Junior group subject to extra risk assessment.

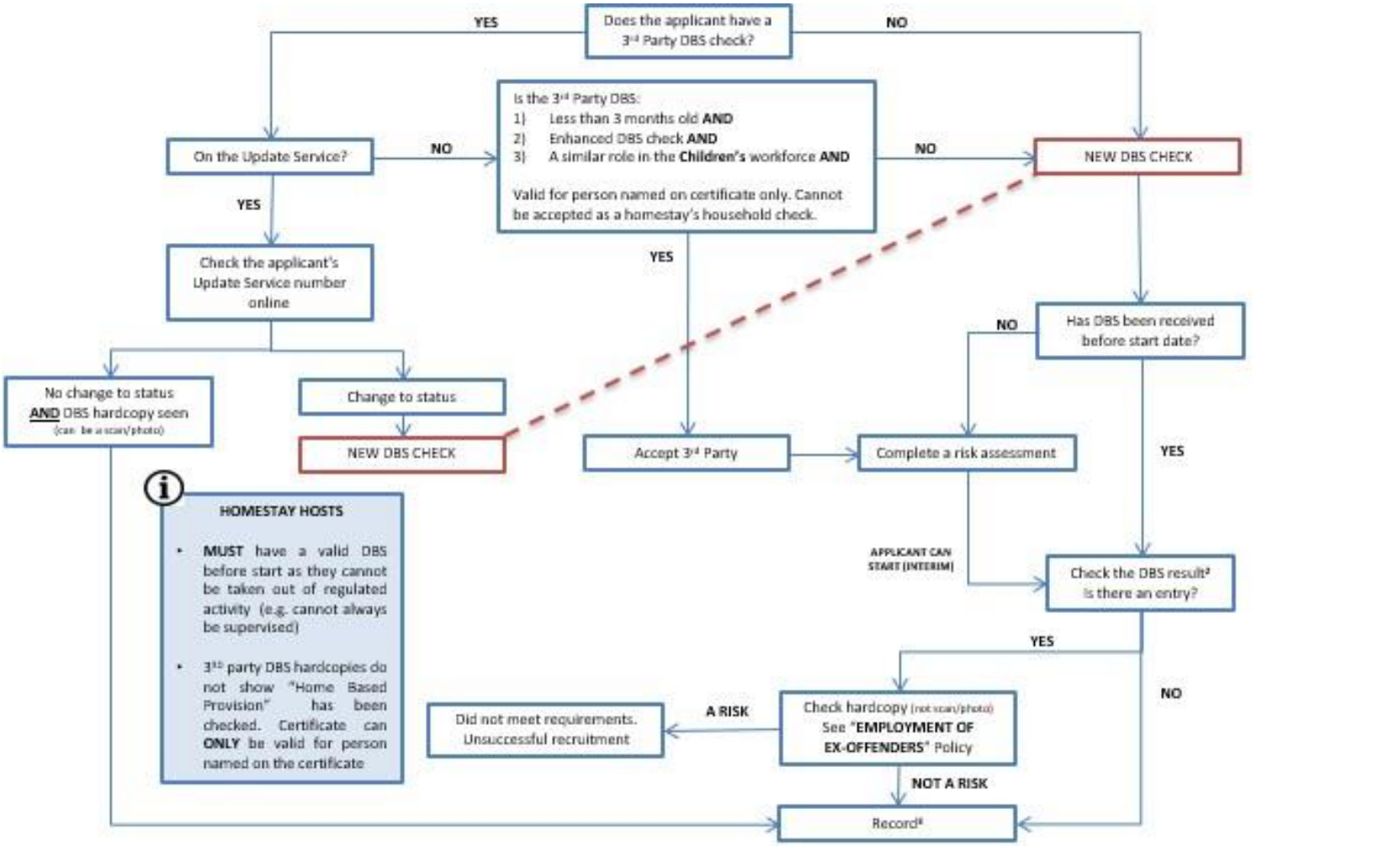
22/02/2018

APPENDIX 3 – Recognising signs of physical abuse



Heritage, N (2017), *Advanced Safeguarding for Designated Staff* (Mar 2016)

APPENDIX 4 – DBS Checks



[1] **BARRED LIST**
If Enhanced DBS with list check has not come back before a candidate is due to start work, the employer **MUST** check that the candidate is not on the barred list. To apply to access the Barred List contact tp_support@teacherspensions.co.uk

[2] **DBS RESULT**
If the employer uses an online service it is not necessary to see the candidate's DBS hardcopy when the employer can check there is a record of:
(1) the certificate reference
(2) the date of the result
(3) a result of "contains no information".

If the employer uses a paper application route, or if a 3rd party DBS has been accepted, the employer **MUST** see the candidate's hardcopy (not scan/photo) for result.

[3] **RECORDING DBS**
(i) the DBS certificate number
(ii) the type of DBS, i.e. Enhanced with Barred List check
(iii) the date of issue
(iv) evidence of who checked it (i.e. signature of LILA staff member) and on which date they checked it

If you have decided to recruit somebody as a staff member or homestay who has a past criminal record, **you must NOT record** what that criminal record consisted of, only record the process you followed to decide to appoint the person

10/02/2022 SA

Bibliography

Legislation

- The Children Act 1989
- The Children Act 2004
- The Children and Social Work Act 2017
- The Protection of Freedoms Act 2012
- The Sexual Offences Act 2003
- The Equality Act 2010
- The Data Protection Act 2018 (UK GDPR)

Statutory Guidance & Government Publications

- Keeping Children Safe in Education (KCSIE) 2025 (or latest version)
- Working Together to Safeguard Children (2023)
- What to do if you're worried a child is being abused (HM Government – current guidance)
- Information Sharing: Advice for Safeguarding Practitioners (HM Government, 2018)
- Prevent Duty Guidance (latest version)
- Use of Reasonable Force (DfE guidance – current)

Sector Guidance (British Council / ELT)

- British Council Accreditation UK Handbook (current edition)
- British Council Safeguarding and Welfare Requirements (ELT sector)

Additional Guidance & Resources

- Health & Safety of Pupils on Educational Visits (DfE – current guidance)
- Health and Safety Executive (HSE) – Education Guidance (current)

Professional / Sector-Specific Reading

- Heritage, N. (2017), *Advanced Safeguarding for Designated Staff*
- Heritage, N. (2017), *Advanced Safeguarding for Designated Lead*
- Heritage, N. (2018), *Guide to Assist ELT Organisations Writing and Updating a Safeguarding Policy*

"Children Act 1989: private fostering" https://www.gov.uk/government/publications/children-act-1989-private-fostering (Accessed 17/04/2026)

Collins Dictionary, https://www.collinsdictionary.com/dictionary/english/duty-of-care (Accessed 17/04/2026)

NSPCC, https://www.nspcc.org.uk/preventing-abuse/safeguarding (Accessed 17/04/2026)

PACE, https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

Version History

Date	By
July 2026	Keerttiga Ravi
April 2026	Keerttiga Ravi
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September 2024	Laurie Chase
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April 2019	Victoria Bligh
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March 2018	Fergus Cook
April 2017	Fergus Cook
January 2015	
June 2014	

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