



Safeguarding Policy

**New Barratt House
47 North John Street
Liverpool L2 6SG**

POLICY STATEMENT

CONTEXT

LILA* is an English language school which accepts 12-17 year olds on its courses and activities (students under the age of 12 may be accepted for private lessons at LILA*'s discretion).

We offer Junior Programmes for 12-17 year olds which consist of General English courses exclusively for under 18 year olds, a supervised social programme and supervised hotel/residence or homestay accommodation.

Young Adult courses are available to 16 and 17 year olds and include General English classes integrated with our adult courses. Homestay accommodation only is available to Young Adults.

TERMINOLOGY

The definitions that apply are those set out as follows:

“**Child/ren**” is defined as anyone less than 18 years old.

“**Juniors**” are defined as any student aged 12-17 years joining a LILA* Junior Programme.

“**Young Adults**” are any students aged 16 or 17 joining a LILA* General English programme.

By “**Staff**” we mean all adults working at LILA* doing paid or unpaid work, including directors, managers, sessional workers, interns or anyone working on behalf of LILA*.

“**Group Leaders**” refers to individuals employed by LILA* or participating agents to act as supervisor of Juniors in LILA*, hotel accommodation and on social activities for the duration of their course at LILA*.

“**Managers**” refers to Directors, the Director of Studies and Operations Manager. Some or all of the Senior Managers will have an overall picture of safeguarding and will be involved with any major matters or decision making.

The **Designated Safeguarding Lead (DSL)** will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children’s social care

The **Designated Safeguarding Person (DSP)** is responsible for the day to day matters, training, recording systems and acts as the point of reference for all external policies affecting the role of safeguarding.

When the term ‘**Safeguarding**’ is used it is as an umbrella term which means to ‘look after’ children and maximise their learning potential, environment and safety. “Child protection” means protecting children from direct harmful behaviour.

The term '**Allegation**' means any information that suggests an adult or another child has caused or may cause hurt or harm to a child.

The **Local Authority Designated Officer (LADO)** is the official designated by the Local Safeguarding Children Board (LSCB) to deal with allegations of crime, harm or unsuitable behaviour against children.

STATEMENT

This guidance has been prepared to help LILA* create the safest possible learning and working environment which will safeguard children and reduce the risk of staff being falsely accused of improper or unprofessional conduct. The students' welfare is of paramount importance.

LILA* fully recognises the contribution it can make to safeguard and support students at the school. There are 3 main elements to our Safeguarding Policy:

1. Prevention (e.g. positive atmosphere, teaching and pastoral support to students)
2. Protection (by following agreed procedures, ensuring staff are appropriately recruited, trained and supported to respond appropriately and sensitively to Child Protection concerns)
3. Support (to students and LILA* staff who may have been abused or accused)

UNDER 18's ENTITLEMENT

This policy is for all children who enrol at LILA* regardless of race, gender or religion etc. as all children are entitled to be protected.

ASSOCIATED POLICIES

This policy has been formulated in accordance with the provisions of the Children Act 1989 and 2004,, Working Together to Safeguard Children 2013 and the Sexual Offences Act 2003.

This policy makes reference to LILA's documents below, all of which are held separately to this policy:

- Recruitment and Appointment Procedure
- Risk Assessment – New staff awaiting DBS
- Social Media Policy
- Whistleblowing Policy
- U18 Homestay Travel Policy
- U18 Breaks Policy
- Staff procedures of Reporting Lateness or Absence of Students U18
- Welfare of U18s – Procedures and practices
- Level 2 Safeguarding Framework Documents

POLICY REVIEW

This policy will be reviewed every 12 months by the DSL and Senior Managers.

ADULT'S RESPONSIBILITIES

The guidance contained in this document is an attempt to identify what behaviours are expected of adults who work with children at LILA*, whether in a paid or voluntary capacity. Staff whose practice deviates from this guidance and/or their professional or employment related code of conduct may bring into question their suitability to work with children.

All adults working with or with substantial access to Juniors and/or Young Adults (including LILA* staff, Group Leaders, accommodation providers and transfer suppliers) are expected to fully comprehend and abide by this policy. Failure to do so will result in the appropriate disciplinary action being taken as laid out in the policy.

POLICY AVAILABILITY AND FORMAT

This policy will be made available on the internal server and the company website <http://www.lilalovetolearn.com/about-lilastar/lilastar-policies/>.

CODE OF CONDUCT

OVERVIEW AND PRINCIPLES

This Code of Conduct is relevant to all staff and students at LILA* and is intended to create a safe school culture, build trust between staff and students, and protect both adults and children from any behaviours or actions which may be misconstrued as inappropriate. All new staff will be made aware of this as part of their induction procedure and all staff will partake in refresher training workshops twice a year, usually preceding the arrival of our summer and winter Junior groups.

POSITION OF TRUST

This policy is written with reference to the Sexual Offences Act 2003.

The Act states that any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law **even though the legal age of consent is 16**.

ADULT INTERACTION

DO:

- Treat all children with respect
- Operate within LILA*'s principles, procedures and guidance
- Ensure that you are within sight or hearing of others when working alone with a child
- Avoid any type of inappropriate verbal or physical contact
- Encourage children and adults to feel comfortable and caring enough to point out attitudes or behaviour they don't like
- Challenge unacceptable behaviour and report any allegations/suspensions of abuse to the DSP
- Ensure that gifts received or given in situations which may be misconstrued are declared to your line manager
- Report any incidents or indications (verbal, written or physical) that suggest a child may be infatuated with a member of staff to the DSP
- Always have any planned social contact with children or parents approved by the DSP and your line manager
- Always refer children to LILA*'s public social media sites if they indicate they'd like to communicate with staff outside of school activities

DON'T:

- Don't trivialise child abuse issues
- Don't make suggestive or derogatory remarks in front of children
- Don't use force as a form of punishment
- Don't give your personal contact details including your telephone number, home email address or details of any social media accounts you have to children
- Never accept a friend request from a child on any form of social media, or make such request

APPROPRIATE APPEARANCE

All staff should be aware and respectful of students' age, culture and religion. Staff appearance at LILA* and on school activities must be appropriate to ensure respect from students and staff.

Examples of acceptable clothing:

Trousers
Skirt
Jumper/Cardigan
Blouse
Shirt/ Polo
Shoes

Examples of unacceptable clothing:

Jeans
Sweat shirts/hooded tops
T-shirts
Trainers
Flip-flops
Visible underwear
Short/revealing/provocative skirts or shorts

This list is not exhaustive and staff should use their discretion.

ALCOHOL, DRUGS AND SMOKING

It is illegal for people under the age of 18 years to buy or drink alcohol or buy cigarettes in the UK. It is illegal to smoke under the age of 16 in the UK and use of any form of recreational drug is illegal at any age. This may not always be the case in our students' home countries so it is LILA*'s responsibility to advise them of the law in the UK. Staff should educate children about addictive substances rather than make light of them.

Students are advised of UK law in the Junior Welcome Pack and induction.

Staff should report and suspicions of a child's use of alcohol or drugs, or of underage smoking to the DSP.

ELECTRONIC CONTACT WITH CHILDREN

Staff must exercise the same discretion and maintain the same professional distance in any electronic contact with children as they would in normal day-to-day life.

Electronic contact includes telephone communications (including texting) and on-line environments:

- Never initiate electronic contact with a child;
- Never accept 'friend requests' from under 18s;
- If a child contacts you electronically, keep your tone friendly, professional and neutral;
- Avoid situations that involve the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings;
- If a child seeks to develop an inappropriate personal relationship with you electronically, do nothing to encourage this; inform your employer and send a copy of any relevant communications.

All staff are expected to also refer to **SOCIAL MEDIA POLICY** which provides further guidance on this matter.

WHISTLEBLOWING

All staff have a legal obligation to inform management of any concerns about colleagues not following the company's Code of Conduct and/or Policies relating to the safeguarding of under 18s.

Staff will not be penalised for this communication and their report will remain confidential.

Staff can refer to the **WHISTLEBLOWING POLICY** which provides further guidance on this matter.

CHILD PROTECTION

OVERVIEW

LILA* meets its child protection policies by regular policy and procedure reviews and staff training.

NOMINATED/DESIGNATED SAFEGUARDING STAFF

All staff are expected to know the identities of the Designated Safeguarding Lead and the Designated Safeguarding People.

Designated Safeguarding Lead (DSL)

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

In addition the DSL will:

- Complete Advanced Safeguarding for Designated Lead (Formerly Level 3) training
- Update and review policy documents;
- Organise suitable training and CPDs;
- Organise DBS (Disclosure and Barring Service) on staff or police letter checks in the case of group leaders;
- Ensure that all staff are given a statement (either written or electronically) on the school's policy and procedures and that they understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns first verbally, and then in writing, to the designated senior person responsible for child safeguarding;
- Ensure that referrals, where appropriate, are made to the Local Authority Designated Officer (LADO) within 24 hours of receiving an allegation;
- Ensure that, where there are deficiencies or weaknesses recognised in arrangements or procedures, these are remedied immediately and without delay.

The Designated Safeguarding Lead is **Victoria Lee** (Director of Operations)

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.

In addition the DSP will:

- Complete Advanced Safeguarding for Designated Person (Formerly Level 2) training
- Act as a student 'listening adult'
- Day to day safeguarding – including Child Protection
- Implementing LILAs* guidelines on activities and outings
- Record and report issues/allegations
- Deliver in-house staff training and ensuring new staff are aware of LILA's safeguarding procedures

The Designated Safeguarding People are **Valentina Ballan** (Operations Manager) and **Sandra Escamilla** Gomez (Student Support Officer)

WHAT IS CHILD ABUSE AND NEGLECT?

There are four main types of child abuse:

PHYSICAL ABUSE	hitting, shaking, squeezing etc.
SEXUAL ABUSE	inappropriate physical contact, the taking of indecent images of children, or the encouragement of sexual activity by children for the purpose of adult gratification
EMOTIONAL ABUSE	persistent lack of affection, unrealistic adult demands, bullying (including cyber-bullying)
NEGLECT	failing to provide basic needs of food, proper clothing, safe supervision

RECOGNISING SYMPTOMS OF CHILD ABUSE

It can be difficult to identify child abuse as it has various forms. Below are some typical indicators to watch for:

- unexplained injuries;
- a child describing an abusive act that has happened to them;
- another child telling you of their concern about a friend / fellow student;
- sexually explicit behaviour in games / activities;
- serious distrust of adults;
- difficulty in making friends / socialising with other children.

You may become aware of a child abuse concern in a number of ways:

- From the child telling you themselves;
- From another person (adult or child);
- From observations of the child's behaviour;
- From visual signs, e.g. injury.

WHEN ADULTS NEED TO RESPOND

All adults have a duty to report **any** signs of abuse.

HOW TO REACT IF YOU SUSPECT CHILD ABUSE

If you notice any physical or behavioural signs, tell the DSP.

If you suspect an adult is a threat to a child in some way tell the DSP or Senior Managers and continue to monitor the situation.

If a child tells you they are being abused react calmly, as described in the table below and then contact the DSP.

A CHILD TELLING AN ADULT

Remember, students may feel more comfortable talking to you rather than the DSP or a Manager so please remember the prompts below to ensure you respond correctly.

What to do	What not to do
Stay calm	Don't panic. Don't over-react. It is extremely unlikely that the participant is in immediate danger.
Listen, hear and believe. Treat the matter seriously.	Don't probe for more information. Questioning the child may affect how their disclosure is received at a later date.
Reassure & explain that they have done the right thing in telling you	Don't promise confidentiality to keep secrets or that everything will be OK (it might not).
Explain that only those professionals who need to know will be informed	Don't try to deal with it yourself
Act immediately in accordance with the procedure in this policy	
Record in writing as soon as possible what was said.	
Report to the Designated Safeguarding Person	

The DSP will then ensure that, where necessary, the child receives appropriate medical attention and/or protection.

The DSP will liaise with the DSL and discuss whether a referral to the Local Authority Designated Officer (LADO) is necessary.

KEEPING RECORDS

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

All files will be stored for a minimum of 2 years.

IF AN ADULT IS ACCUSED

Any issues or concerns relating to child safeguarding must immediately be escalated to the DSL who will consult the **LEVEL 2 SAFEGUARDING FRAMEWORK DOCUMENTS** to ensure protocol is followed in a timely and appropriate manner.

Workflows may vary according to the specific situation but will typically result in any adult who is accused of abuse or inappropriate behaviour being removed from site and suspended pending an investigation.

Information relating to the case will be gathered as quickly as possible in a sensitive & appropriate manner by the DSL and may be passed on to the police, local LADO and DBS. Advice may also be sought from ELAS in relation to any disciplinary or dismissal issues.

IF A CHILD IS ACCUSED

Any issues or concerns relating to inappropriate behaviour of a minor must immediately be reported to the DSL who should act quickly and sensitively.

Outside agencies will be contacted immediately to ensure appropriate action is taken. Parents/carers may be contacted once the relevant bodies have approved it.

CHILD SEXUAL EXPLOITATION (CSE)

CSE is defined as:

“[the] exploitation of people under 18 where they receive ‘something’ (gifts, money, attention, alcohol, drugs) as a result of sexual activity with others.

The power of the exploiter[is] based on gender, age, physical strength, intellect, economic resources; it’s not a balanced relationship, which allows the exploiter to achieve sexual gratification from the under 18.

Violence, coercion and intimidation are common; [it] may start as regular relationship then become abusive. In extreme situations, [it] involves multiple partners / buying & selling victim / criminal gangs.

Signs: unexplained gifts, older boy/girlfriends, start missing education, associating with bad company”¹

Any issues or concerns relating to Child Sexual Exploitation must immediately be escalated to the DSL who will consult the **LEVEL 2 SAFEGUARDING FRAMEWORK DOCUMENTS** to ensure protocol is followed in a timely and appropriate manner.

FEMALE GENITAL MUTILATION (FGM)

FGM is defined as:

[the] non-medical, partial or total removal of external female genital organs. [The procedure is] typically done to young girls from African countries. [It is] illegal in UK if done here, or if [a] UK resident [is] taken to another country to have it done.”¹

To clarify, this issue should be “*known from disclosure, not physical examination*”¹.

Any issues or concerns relating to Female Genital Mutilation must immediately be escalated to the DSL who will consult the **LEVEL 2 SAFEGUARDING FRAMEWORK DOCUMENTS** to ensure protocol is followed in a timely and appropriate manner.

¹ English UK Advanced Safeguarding Training (Level 2) for Designated Staff Handout 2 – Side 1, March 2016
Safeguarding Policy (Updated April 2017)
LILA Liverpool Ltd

TRAINING

RESPONSIBILITY

The DSL will ensure all staff are trained to Safeguarding Level 1 and will keep records of staff training and levels.

HOW TRAINING IS DELIVERED

All staff will receive a copy of this policy on their induction and will be provided with a copy following any updates.

Training will be conducted as part of induction and all staff will partake in refresher training workshops once a year, usually preceding the arrival of the Junior Summer Programmes.

ADVANCED TRAINING

Designated Safeguarding staff will receive specialist training, provided by English UK.

Records of training will be kept on their Learner Logs and HR files.

Designated staff are also expected to 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 monthly newsletter/newsflashes
- English UK Conferences
- English UK Webinars

SAFER RECRUITMENT

RECRUITMENT MATERIALS

LILA*'s full recruitment policy and procedures are available from the Human Resources Department. These include information and guidelines on advertising, selection procedures, and offers of employment, checks and references.

RECRUITMENT STAGES

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

- Completion of an application form that elicits information regarding an applicant's past
- Completion of a self-disclosure form, which requires any applicant to declare past offences
- Verification of identity and eligibility to work in the UK
- Verification of professional qualifications screening via the Disclosure and Barring Service (DBS, formally CRB)
- Two references, including one regarding the applicant's most recent post working with children where possible.
- A complete employment history with a reasonable explanation for gaps

Staff are particularly referred to the **RECRUITMENT AND APPOINTMENT PROCEDURE**.

APPLICANTS AWAITING DBS

Newly appointed staff who are due to work with children but whose disclosure has yet to arrive will be required to sign a self-declaration form and their access will be limited and supervised. A Risk Assessment will be undertaken as necessary (see **RISK ASSESSMENT – NEW STAFF AWAITING DBS**)

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 – All staff are required to have a DBS check every 3 years. This is monitored using the company's specialist HR software.

Hosts – All hosts who are to accommodate student under the age of 18s are required to have a DBS check every 3 years. This is monitored using the company's specialist school software (Class).

Group Leaders – All group leaders are required to have appropriated suitability checks which have been approved by the authorities 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. A record of this verification is monitored using the company's specialist school software (Class).

The monitoring of all of the above records is the responsibility of the Designated Safeguarding Lead.

IMPLEMENTING SAFEGUARDING

USE OF RISK ASSESSMENTS

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

- School premises;
- Accommodation;
- Social Activities.

Risk assessments are produced and reviewed by the appropriate staff member under the supervision of a Manager.

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 members are made aware of and given a copy of the risk assessments.

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 through which to convey the contents of a risk assessment to an under 18 student. 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.

SUPERVISION RATIOS

In accordance with British council and the Independent Schools Inspectorate guidelines, LILA* follows the ratio of 1:20 when supervising children aged 12-17 and 1:15 for those 12 and under.

MISSING STUDENTS

Staff are expected to be aware of the contents of **THE STAFF PROCEDURES OF REPORTING LATENESS OR ABSENCE OF STUDENTS U18.**

WELFARE PROVISION

Staff are expected to be aware of the contents of the **WELFARE OF U18s – PROCEDURES AND PRACTICES**

TRANSPORTING CHILDREN

It is inappropriate for adults to offer lifts to a child/ young person outside their normal working duties (i.e. an emergency situation), unless this has been agreed by the parents and the activity designated person

The transportation of children will normally be the responsibility of parents, or authorised coach or mini-bus drivers who have the appropriate licences/insurances.

Parental consent will be sought to permit transportation of their child(ren) including but not limited to; by a host, an airport transfer company, a coach company.

TRIPS AND TOURS

Staff must always remember professional boundaries whether in the classroom or in a more informal environment.

Staff must ensure that they do not work alone with children when on trips or activities.

Staff must also access or undertake a formal risk assessment for any trips/activities and follow the specific guidelines.

Staff must also ensure that parents/carers have given formal consent for their child to be included on any trips or activities

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.”²

LILA is required to report any such arrangement to the local authority at least six weeks before the start. This duty is responsibility of the Designated Safeguarding Lead.

² “Children Act 1989: private fostering” <https://www.gov.uk/government/publications/children-act-1989-private-fostering> (Accessed 06/04/2017)

SAFEGUARDING CERTIFICATE

All staff, paid or volunteer, working at LILA* must know the name of the Designated Safeguarding Person (DSP).

All staff, paid or volunteer, have a duty to report any safeguarding concerns to the DSP.

I have read, understand and agree to abide by the Safeguarding Policy, Procedures and Guidance for Safe Working' Practice and the Protection of Children (under 18 years old).

I understand that if I do not abide by this aforesaid guidance, I may be subject to immediate disciplinary action.

Name.....

Signature

Date.....

Position within LILA*

Countersigned by Line Manager.....

Date.....

Position within LILA*

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