

LanguageUK

Safeguarding Policy for Under-18 Students & Adults at Risk 2022

Each child's welfare is paramount. Regardless of age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, each child has the right to protection from abuse. We will take seriously and respond appropriately to all suspicions and allegations of abuse. All staff and group leaders working with children and vulnerable adults, whether paid or unpaid, have a responsibility to report concerns to the appropriate officer.

COVID-19 Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (COVID-19).

Date Introduced: 2015

Date Modified: October 2016

Next review date: October 2017

Reviewed September 2017

Reviewed November 2019

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Reviewed by: Verity Sessions

Next Review October 2021

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1. Safeguarding Policy Statement

LanguageUK provides a safe environment for its learners, staff, and visitors.

LanguageUK has a duty of care to safeguard the wellbeing of all children and vulnerable adults in its care. Each child has the right to protection from abuse, regardless of gender, ethnicity, disability, sexuality or belief, and the school will consider the needs of disabled children and others who may be particularly vulnerable.

LanguageUK will ensure the safety and protection of all children and vulnerable adults enrolled on its programmes through adherence to the Safeguarding Guidelines adopted by the school.

LanguageUK has a designated Specialist Safeguarding Lead responsible for child protection and supporting staff in carrying out their safeguarding duties, together with recording and monitoring the process.

It is our condition that all staff are all trained to a level appropriate to their safeguarding responsibilities.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who encounters children, and their families has a role to play in identifying concerns, sharing information, and taking prompt action.

The school considers maintaining a safe and supportive environment for all its students to be of paramount importance and to adopt a culture of vigilance.

This Safeguarding policy is issued to all full- and part-time staff members and Homestay providers that work with U18 students.

1.1 Policy Overview – Document purpose

Context

This document's purpose is to support a safe school environment and culture, and to help maintain trust between under-18s and adults. It aims to protect minors from abuse and to protect staff and other adults from suspicion of abuse. It aims to raise awareness of child protection issues and to ensure every adult involved with the school is aware of their responsibilities. The school meets its child protection responsibilities through safer recruitment, regular staff training, a clear code of conduct, safeguarding policies and effective communication.

LanguageUK has a duty of care to all its students, especially the under-18s. English law states that those who work with children must keep them safe. The safeguarding legislation is set out in the 1989 and 2004 Children's Acts, and the Safeguarding Vulnerable Groups Act 2006. It also features in the United Nations Convention on the Rights of a Child, which sets out the rights of children to be free

from abuse. The UK government has also issued two guidance papers: Working Together to Safeguard Children 2018

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

and Keeping Children Safe in Education (KCSIE) September 2020

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

1.2 Contact Numbers and Named Staff with Safeguarding Responsibilities

All adults who have any contact with the school's students, such as all members of staff, group leaders, homestays, coach, and taxi drivers and all involved with the provision of activities, have a legal duty of care and responsibilities to safeguard the children they come into contact with.

The school makes all such adults aware of their responsibilities under this policy.

They must report any concerns or allegations, however small. First contact should normally be with Verity Sessions who is the Designated Specialist Safeguarding Lead within the school:

T: 01227455556

email: verity@languageuk.com

Mobile 07956992354

Verity has the overall responsibility for Safeguarding as detailed above. In addition, she will ensure this policy is updated annually, compliant with legislation, is fully embedded within LanguageUK and is effective in protecting and supporting the wellbeing of children and adults at risk.

Kasia Malowska is an Advanced Safeguarding Lead:

Kasia will support the DSSL in all safeguarding functions as above and cover her on occasions where necessary. Email: kmalowska@languageuk.com

If neither are not available, Kerem Sahin

Email: ksahin@languageuk.com

Any concerns or allegations can also be reported to these external agencies:

Kent Safeguarding Board on the phone number **0300 042 1126 260**,

Sessions House, County Hall, Maidstone ME14 1XQ

or their website:

Early Help Front Door on the phone number **03000 41 11 11**

Out of hours (after 5pm / urgent calls only) please call **03000 41 91 91**, Canterbury **03000 41 62 22** or email to: CanterburyEarlyHelp@kent.gov.uk

County Local Authority Designated Officer (LADO) Service deals with allegations against staff who work with children either in education or the wider children's workforce:

T: 03000 41 08 88

Email: kentchildrenslado@kent.gov.uk **Contact Name: Ali Watling**

Postal address: County LADO Manager, County LADO Service, Kroner House-Eurogate Business Park, Ashford, Kent TN24 8XU

The **Police** on **111** or, for emergencies, **999**.

Canterbury Police Station on **01622 690690**

NSPCC - National Society for the Prevention of Cruelty to Children - on the phone number **0808 800 5000**, their website: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/> or email: help@nspcc.org.uk

1.3 LanguageUK Operates out of One Site and Online

The main school and Head Office are in Canterbury, and we run:

1. General English Courses for Adults (including age 16 /17)
2. IELTS
3. 30plus Professional English
4. 50plus Professional English and Culture
5. Private English
6. Junior Summer School
7. English for Business and Work
8. Schools English Programme
9. English for Families
10. English for Teachers
11. Online Intensive IELTS
12. Online Junior English
13. Online English for Adults

Accommodation provided by LanguageUK:

1. Homestay provider
2. Residency (for over-18 only)
3. Self-catering houses, apartments, and studios recommendations
4. Hotels

Contact details:

LanguageUK
 9 St Georges place
 Canterbury
 Kent
 CT1 1UT
 Telephone number: 01227 455556
 Emergency number: **07467144234**
 Email: info@languageuk.com
 Web: <https://www.languageuk.com/>

1.4 Terminology

A **child** is defined by the Children Act 1989 as a person under the age of 18 – also referred to in this document as ‘U18 students.

An **adult** is a person aged 18 years or over.

An **adult at risk (vulnerable)** is an adult experiencing, or at risk of, abuse or neglect and is unable to protect themselves because of their care and support needs.

SEND (Special Educational Needs and Disability)

Some children and young people may require more help to learn and develop than children and young people of the same age. If this is the case, they may be classed as having special educational needs (SEN) so they can get extra support. This could include anything from more accessible information to one-to-one support at LanguageUK.

Junior students refer to all students aged between 12 and 17 attending our Canterbury junior school. Students on this programme are supervised and must follow the terms and conditions of the junior school programme.

Individual students under the age of 18

Students aged 16 or 17 whose parents/guardians signed the parental agreement, consent to travel, study, and medical forms. Individual U18 students can attend adult courses and are treated as adults in accordance with current legislation.

Child abuse (or 'maltreatment') constitutes all forms of physical and or emotional ill-treatment, sexual abuse, neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development, or dignity in the context of a relationship of responsibility, trust or power. **It identifies five main types of abuse: physical, emotional, sexual, neglect and bullying (including cyber bullying).**

Child protection -protecting children from abuse.

A duty of care is a legal responsibility on adults to look after the children they work with, either as professionals or volunteers. Children depend on adults for their safety and wellbeing.

Disclosure refers to the act of telling others about abuse a person has been subjected to.

Concern is anything that causes us to suspect that a child's safety and welfare might be compromised in some way.

Allegation refers to an accusation that a person or persons have harmed a child in some way.

Prevent – an important tool in safeguarding learners, is a government strategy to reduce the likelihood of people becoming involved in violent extremism and/or in supporting terrorism It applies to all forms of extremism, including racism, far-right ideology, religious extremism, or homophobia.

Safeguarding is an umbrella term which in this context means 'looking after'.

An individual's **welfare** refers to their physical and mental health, and their sense of happiness.

A **Designated Specialist Safeguarding Lead (DSL)** is the person or persons who have the overall responsibility for all matters of safeguarding at the school and are involved with any major decisions concerning safeguarding.

An **Advanced Designated Staff** are the members of the school staff who look after all day-to-day matters concerning safeguarding.

Education Tour Operator (ETO) is an organisation which sends groups of students to the school.

Group Leader refers to the leaders accompanying closed groups of students.

Transfer Leaders are members of the school's staff and taxi drivers who meet students on their arrival at an airport and accompany them to Canterbury and accompany them back to their airport at the end of their course.

Safer recruitment refers to recruitment procedures and practices designed to prevent the appointment of people who may pose a risk to children. LanguageUK screens all applicants, a process which itself acts as a deterrent to offenders seeking employment with access to children.

Suitability checks refer to checks designed to identify any factors that render a person unsuitable to work with U18s. A criminal record check is a common example.

DBS is the acronym used for the **Disclosure and Barring Service**. The DBS is a governmental body that was established in 2012 through the Protection of Freedoms Act. It was the merger of two former organisations, the CRB and the ISA.

Enhanced checks are extended to taxi drivers who assist us in delivering students, Homestay hosts and all full- and part-time staff.

Enhanced with list checks – as above but also include the **Disclosure & Barring Service (DBS)** barred lists. The DBS maintains a 'barred lists' of individuals who are unsuitable to work with children and vulnerable adults.

TYPE OF CHECK	THE CHECK INVOLVES	POSITIONS ELIGIBLE FOR THIS LEVEL OF CHECK
Standard check	Check of the Police National Computer records of convictions, cautions, reprimands, and warnings.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.
Enhanced check	Check of the Police National Computer records plus additional information held by police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002.
Enhanced criminal record check with children's and/or adult's barred list information	Check of the Police National Computer records plus additional information held by police plus check of the DBS Children's Barred List plus check of the DBS Adults' Barred List.	The position must be eligible for an enhanced level criminal record check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check.

A police **Certificate of Good Conduct** is a general term covering criminal record checks outside the UK.

DASH is short for domestic abuse, stalking and harassment and 'honour' based violence.

Prevent duty is a requirement defined by the Counterterrorism & Security Act 2015 on schools (as well as other relevant organisations) to minimise support for terrorism and extremism among students. 'Prevent' refers to all ages, not just the U18s.

Radicalisation is the act of making a person more sympathetic and supportive of extreme or fundamental changes in political, economic, or social conditions.

Extremism is the holding of extreme political or religious views that support the denial of rights to any group of individuals. Such extremism might be expressed vocally and promote active opposition to 'core British values. Extremism can refer to a range of activities, such as racism, homophobia, right-wing ideology, or hard-line religious views.

GDPR stands for the General Data Protection Regulation. This is an EU regulation and law on data protection and privacy for all individuals within the EU and EEA.

LSAB stands for the Local Safeguarding Adults Board, which is a statutory, multi-organisation partnership committee. This committee gives strategic leadership for adult safeguarding and is coordinated by the local authority.

MASH stands for Multi-Agency Safeguarding Hub. This service is made up of Police, Adult Services, NHS, and other organisations. MASH helps agencies to act quickly in a coordinated and consistent way. This means that the person at risk is kept safe.

Significant harm refers to any ill-treatment (including sexual abuse and forms of ill-treatment which are not physical), that has resulted in the impairment of physical, intellectual, emotional, social, or behavioural development.

Vital interest permits sharing of information where it is crucial to prevent harm or distress or in life-threatening situations and is used under the Data Protection Act 1998.

Wilful neglect or ill treatment refers to the intentional, deliberate, or reckless omission or failure of a person who fails to carry out an act of care for a person who does not have the capacity to care for themselves.

Community Safety Partnership a tactical forum that brings agencies and communities together so that they can tackle crime within their communities. This partnership is comprised of local authorities such as Police and Fire and Rescue.

Core British values are democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Section 17 children in need.

Section 47 child at risk or significant harm

1.5 Availability

This document is available from:

- The LanguageUK website (full version)
- LanguageUK Canterbury office (full version)

1.6 Associated Policies and Documents

- ADMISSIONS POLICY
- ATTENDANCE POLICY
- ONLINE SAFETY (E-SAFETY)
- BULLYING, ABUSIVE BEHAVIOUR, HARASSMENT & VICTIMISATION POLICY
- CODE OF CONDUCT FOR TEACHERS AND ALL STAFF WORKING WITH U18
- CODE OF CONDUCT FOR TEACHING AND NON-TEACHING STAFF
- COMPLAINTS
- CONDENSED VERSION OF THE SAFEGUARDING POLICY
- CONTINUING PROFESSIONAL DEVELOPMENT (CPD)
- CORPORATE SOCIAL RESPONSIBILITY POLICY
- EQUALITY & DIVERSITY POLICY
- LEARNING DIFFICULTIES AND DISABILITY POLICY
- EMERGENCY ACTION PLAN
- FIRE SAFETY AND EVACUATION POLICY
- LOCK DOWN POLICY AND PROCEDURES
- MENTAL HEALTH POLICY
- PREVENT POLICY
- PRIVACY AND DATA PROTECTION
- PASTORAL CARE POLICY
- CODE OF CONDUCT FOR TEACHERS AND STAFF ONLINE AT LANGUAGEUK
- ONLINE SAFETY POLICY
- RISK ASSESMENT POLICY
- SAFER RECRUITMENT POLICY

1.7 Structure Roles and Responsibilities

Everyone who meets children /adults at risk and their families has a role to play in safeguarding. All staff and homestay providers have a responsibility to identify people who may need extra help or who are suffering, or are likely to suffer, significant harm. All staff and homestay providers then have a responsibility to take appropriate action as LanguageUK policy to support working with other services if needed.

The welfare and safety of young people and adults at risk however are the responsibility of all LanguageUK staff and ANY concern for a child/adult at risk welfare MUST be reported to the DSL.

To protect confidentiality, safeguarding information about individual children/Adults at risk is shared on a need-to-know basis only.

The Specialist Designated Safeguarding Lead (DSL) has overall responsibility for the the day to day oversight of safeguarding practice and procedures within LanguageUK. This includes:

- be at senior management level, and/or able to make decisions
- have safeguarding knowledge and overview of organisation's safeguarding needs and the drive and resources to make sure the needs are met
- raise awareness amongst staff and stakeholders so that a positive safeguarding ethos becomes embedded in the organisation
- provide advice and support on child welfare and protection issues
- ensure safer recruitment practices are in place for staff and homestays
- acting as a consultant for staff, homestay providers to discuss concerns
- be able to produce a fit-for-purpose safeguarding policy
- ensure various records are kept, if necessary, securely
- know obligations surrounding Prevent
- **child protection** be able to manage referrals, which means having knowledge of LSCP, who to contact, when to contact and what will happen
- understand thresholds for referring and the difference between Sections 17 & 47
- know official government documents to refer to
- maintaining a confidential recording system

1.8 Policy Aims:

The aim of the LanguageUK Safeguarding Policy is to promote good practice by:

- Providing children with appropriate safety and protection while in LanguageUK care.
- Allowing staff to make informed and confident responses to specific child protection issues.
- Giving all U18 students an induction on the first morning that covers all aspects of the policy relevant to them.

This safeguarding policy is available to everyone on the school's website.

- Parents or guardians are asked to discuss the student code of conduct with their children and to make them aware of the need to follow the school's rules and guidelines to stay safe.
- Parents or guardians sign a declaration to confirm that they have done this. Students are provided with another copy of the code of conduct during their induction on their first day at school, when a member of staff explains each point with them.
- They are also informed about looking out for one another.
- Students are provided with ID cards with contact details for the school, including a 24-hour emergency number which is manned by a member of the school's safeguarding team, as well as contact details for any group leaders. Students are always told to keep this card with them and to contact one of these people if they have any safeguarding concerns at any time.
- Important cultural differences are discussed with the students during a special cultural differences lesson on their first day at school.
- Information specific to safety relating to individual activities or excursions is given to all the students on the activity.

Legal Framework and Documents

This policy takes into consideration the following **legislation and guidance**:

- July 2018 Working Together to Safeguard Children
- September 2018 Keeping Children Safe in Education
- Children and Social Work Act 2017
- Children Act 1989
- Children Act 2004
- Sexual Offences Act 2003

1.9 Designated Team Working Method

The safeguarding team meet every month and decide on a plan of action, including a timetable with deadlines. This plan of action may be carried out by the designated Specialist safeguarding lead or any other member(s) of the safeguarding team, as considered best and appropriate by the designated specialist safeguarding lead.

The designated safeguarding team reviews the safeguarding policy at the end of each summer season, considering the feedback and suggestions from other members of staff, particularly any who have been involved with any safeguarding issues during the season. This review considers all aspects of the safeguarding policy and assesses the effectiveness of existing procedures in the light of any issues which have arisen since the previous review.

As a team we review this policy quarterly together.

All minutes are kept in the administration office.

The welfare office is open to all staff and students throughout the day.

Additional meetings will be held if any allegation is made about a member of staff or student.

2. Welfare and Implementing Safeguarding

2.1 Safety and Welfare of U18 Students

Language UK provides:

- Students, parents, guardians, and group leaders with all the information about the course, including transport, accommodation, activities, contact details and emergency numbers.
- Each student with an ID card and a welcome pack (or for junior's groups in Canterbury. All students will receive lanyards.
- An induction briefing about our rules and regulations, the social programme and curfew times, protecting their health and safety, and living in Canterbury. (Junior groups in Canterbury are only allowed out on designated evening activities only.)
- A safe environment for all students at school and in their Homestay accommodation.

LanguageUK aims to ensure:

- All staff wear a visible ID card.
- All U18 students are aware of the school's safeguarding and welfare representatives and know who to turn to if they need advice or support.
- All staff and Homestay hosts share the responsibility to protect U18 students from harm, know how to identify possible protection issues and follow the Safeguarding for Homestays guidance.
- All staff are made aware of any student requiring special attention.
- All reasonable steps are taken to prevent any staff member, person working for us or member of the public from putting any of our students at an unreasonable health and safety risk.
- Any evidence or reasonable suspicion that a child or vulnerable adult has been physically, emotionally, or sexually abused during their time at LanguageUK is reported to the appropriate manager.
- Procedures are implemented in line with relevant legislation in case of incidents, concerns, and reports.

2.2 Risk Assessments

Risk assessments are carried out on all aspects of the school's work.

Due to Covid-19 new risk assessments will be put into place for both staff and students.

The risk assessments are available for all members of staff, students, homestay providers and others to see. The importance of risk assessments and how to use them forms part of the training in the school's induction sessions for new and returning staff.

The appropriate risk assessment is included in the activity leaders' pack for each activity or airport transfer.

The senior activity leader/course co-ordinator discusses each activity with the activity leaders in advance and ensures that they understand the risk assessments. Activity leaders are observed regularly and the provision of information to students according to the risk assessments is assessed as part of this observation, with feedback to the activity leaders immediately afterwards where possible, otherwise normally the next day.

The risk assessments are reviewed regularly. Activity notes are given to each activity leader about each activity they go on and the school asks for their feedback about any additions or changes that they feel should be made to the risk assessments.

Any suggestions are incorporated into revised risk assessments as soon as possible, normally within 48 hours.

2.3 Supervision Ratios

The supervision ratios for U18 students' activities and excursions are agreed according to the relevant risk assessment, but for 12- to 17-year-olds, we apply a ratio of between 1:15 and 1:20.

Students aged 16 or 17 on day trips as part of their adult course are allowed unsupervised time to go shopping before reporting back to a member of staff.

Group excursions are decided between the leaders and LanguageUK in agreement with the party's agent.

2.4 School

All current students are sent out a Pre-arrival/Welcome Pack with all the information you will need while studying at LanguageUK and during COVID-19. This can be found on our website or a hard copy in in the administration office.

From Monday to Friday, they have lessons at LanguageUK, normally from 09:30 to 16:pm for adult course and students aged 16/17 with a coffee break with staff at 11am. Junior programmes in Canterbury start at 9:am to 4:pm with supervised break in the morning and afternoon. All Junior Students must remain on the school premises during these breaks.

On their first Monday, most students will make their own way to the school or be shown directions by the homestay host, this also includes the bus stop for all students who are staying more than 25 minutes away from the school. Students are also provided with detailed street maps of Canterbury the school's main meeting places are shown, as well as the bus stops for the journey home. Students take their own pack lunch into the school's canteen and eating area and remain under supervision on the premises until their programme of activities starts.

Weekday Afternoons junior groups only

These activities start from the school at various times between 13:00 and 14:00. Local activities finish at or soon after 16:00. Weekday excursions finish between 17:00 and 18:00. Students must be home for their evening meal by the time set by the homestay, which is usually 18:00/18:30pm. All students on junior groups will return to their houses either on foot or by bus this is not supervised.

Weekday evenings junior groups

On three weekday evenings there is a programme of evening activities, where most activities start at 19:30 and finish at 9:00pm Juniors who are staying outside of the catchment area will go home in our minivan. Junior groups are not allowed out at any other time.

Students Aged 16/17

Weekday afternoons depending on if they are taking a full time or part time course will either leave at 12.45pm or 4pm. Students will return to their house unsupervised for dinner with their homestay provider.

Evening activities

This age range of students can join in any of the activities and are unsupervised. They must tell their hosts where they will be going, who they will be with and what time they will be home.

Provided the homestay is happy with the arrangement, they may go out locally.

Saturdays

Each Saturday there is a full day trip to a place of interest.

On these trips a coach stops at a fixed pick-up point or meeting at a train station.

Depending on the destination and pick-up point, the departure time can be between 07:00 and 08:00 for a trip to London and between 08:00 and 09:00 for all other destinations. Students usually get some free time during day trips. They are told to stay in small groups and to remain within designated areas during this time. This free time can be for a maximum of two hours.

At the end of the day the coach drops the students off at a central point or the train at the station. Close. The students then either walk back or take a bus to their homestay providers under the instructions of the leaders if they are in a group.

Some trips can arrive later than 19:30 all other trips arrive by about 18:30.

Activity leaders ensure that each student gets on the right bus, and they wait until the last students have left. Students spend the rest of the evening with their homestays. On all day trips and weekday excursions, all the students receive a card with the mobile telephone numbers of the activity leaders as well as the emergency number of the school.

Sundays

Each week is very full on, and students enjoy some free time to relax. Sundays are free days to spend with the students' homestays providers.

For Junior groups this is normally the day of departure.

Missing Students

The school encourages parents and guardians to give their permission for their children to install **What's app** on their smartphones. This app enables members of the school's staff to monitor the location of the students.

Help with the installation of the app is given during the student induction on the first day of school in the induction.

A register is taken at the start of each lesson session and recorded on Demicks.

If a student is not present and has not already been reported as sick, the absence is reported to the school's administrative staff if he or she is not part of a group.

If the student has installed What's app on his/her phone, the school's staff first try to locate the student using that app.

If they can see that student is on the way to school, they monitor the student's progress until he or she has arrived.

If the student cannot be located on what's app the school's administrative staff first call the student's mobile to find out where he or she is. If this is not successful, the administrative staff call the student's homestay to ask the same information. If there is no response, they speak to any other students who are staying with the same host family to establish when and where the student was last seen and to gather any other relevant information as to where the student might be.

If this does not produce any results, the administrative staff call all the mobile and work phone numbers the school holds for each adult member of the homestay. If the student still cannot be located, a member of the safeguarding team must be informed, and that member of staff will decide at which point to report the matter to the police.

Weekday and Evening Activities

The school holds a list of all the students booked onto each of the activities. Students' names are checked off this list by an activity leader responsible for each activity.

If a student is missing, the activity leader reports this to the school's administrative staff. If the student is a member of a group, the group leader is informed and involved in the attempt to locate the student.

The school's staff (or group leader) call the student's mobile phone to establish his or her whereabouts.

If the school's staff can get the student to the group before it leaves the premises, the student can join the activity. Any students who arrive or are located after the group has left for the activity are collected by members of staff who accompany them to a classroom where they spend the afternoon until 16:00.

Activity leaders are aware that they must only take with them the students on their list for that activity. If a student cannot be located then a member of staff searches the canteen, outside area and toilets. If the student is still not found, then a member of the safeguarding team is informed. At this stage, the staff start to contact the student's friends on the course to see who saw him/her last and search for clues as to where the student might be.

The member of the safeguarding team will decide when it is appropriate to call the police. After the afternoon activities, students make their own way back to their homestays. There is usually a small amount of free time between the afternoon activity and the evening meal with the homestay. Students have contact numbers for their homestays, their group leaders (if they are part of a group) and the school's emergency number in case they have any problems. Students are asked to return home for the evening meal at the time stipulated by the homestay. Homestays will decide as appropriate according to the individual circumstances.

Excursions

All students on excursions are provided with the school's 24-hour emergency number and the number of the activity leader and their own leaders. They are told that if they get lost or detached from the group, they are to remain where they are and call one of the numbers.

The activity leaders will then establish where they are and come and get them.

If a student goes missing, the activity leaders on the excursion try to locate the student on their WhatsApp group. If successful, they can either guide the student to the group by using the integrated messaging function within What's app, one of them can go and collect the student.

If the student cannot be located then the activity leaders question the other students, particularly those who were with the missing student, to find out where he/she was last seen. At this point a member of the safeguarding team is informed and this person directs the search from now on. The member of the safeguarding team will decide when the group should return to Canterbury, who should stay at the location until the student has been found and when to involve the police.

Students returning to their homestay providers after activities

If a student has not returned to the homestay by the evening mealtime stipulated by the homestay or shortly after 22:30 in the evening, the homestay notifies the school.

If the student is part of a group, then a group leader is also informed. School staff then try to locate the student by means of What's app if they are using this. If the member of staff can see that the student is on his or her way home, they inform the homestay and monitor the student's progress until they have arrived home.

If it is not apparent that the student is on his or her way home or if the student's location cannot be established, then the member of staff tries to contact the student by mobile phone to find out where he/she is and to tell him/her that he/she must go home. The homestay is then told and asked to inform the member of staff if the student is not home within an appropriate period.

If the school is not able to contact the student, then a member of staff contacts the activity leader of the activity that the student was on to find out if there were any problems or delays and when and where the activity leader last saw the student.

The member of staff will then call the student's friends, particularly any who were on the same activity, to see if they know where the student is.

Unless the student can be located at this stage, a member of the safeguarding team is now informed, and this person will decide when to call the police.

The homestay is asked to inform the school as soon as the student arrives home. Any students who are late home are spoken to at school the next day so that the school can establish whether there were any problems that need to be addressed.

The students are reminded that they have a duty to be punctual and that it is not fair on their homestay or the school's staff if they are not home by the agreed times. They are warned that there will be a penalty if they are late again.

Unsupervised Periods (Please see our Risk assessment for U18 when not in school)

Students are not supervised whilst travelling from their homestays to the school and back or from their homestays and the venues for the programme of activities and back. As far as possible, the school places students with homestays in areas where other students from the school are staying so that students can travel on the buses or walk together. Activities finish at around the same time so the students can walk home or travel on the buses together. Students in groups will be escorted home by minivan if required.

After the evening activities, activity leaders take the students to their bus stops, make sure that each student gets on the right bus and wait until the last students have left. If students are not home by 22:30 the homestays call the school and the procedure for dealing with missing students as described will start.

If students go out, they must first get permission. If any students are not home by 22:30 then homestays call the school and the procedure for dealing with missing students as described is started. Sundays are normally free days to spend with the homestay or friends. During this time, the homestay is responsible for the students while they are at home. If students leave their homestays, they must follow the procedure.

If any students are not home soon after the expected time or by 18:00 at the latest, homestays call the school and the procedure for dealing with missing students as described is started. Any students leaving their homestays for more than three hours and not attending an event supervised by the school's activity leaders or their own group leaders are required to "check in" with the school. Alternatively, and with the permission of their parents or guardians, they may install the What's App on their smartphones during their induction on their first school day: this enables a designated activity leader to monitor their location.

2.5 Airport Arrivals and Departures

2.6 Transport

Please see airport arrivals and departures for our full information on our taxi and coach companies.

If a member of staff must use their own vehicle to transport U18, preferably have another adult in the car, or the U18 should sit in the back. Please inform your Designated Specialist lead or the Advanced lead if you are taking a student out in your own car.

LanguageUK offers safe and reliable transfers, both on arrival to and departure from Canterbury. We use Taylor Travel, , phone number 07753 467510 for all our group pick-ups and Star Taxi, 112 Old Park Ave, Canterbury CT1 1DN, phone number 01227 464646 and Vinod taxi service on 07846841275 for transporting all individuals aged under 18. We take safety very seriously and all the drivers must have criminal record checks performed by the DBS – the Disclosure & Barring Service.

The students' parents are required to provide details of their child's/children's travel arrangements on our booking and consent-to-travel forms, and the school must be notified immediately of any changes. Any changes to flights are subject to additional fees to cover our costs. LanguageUK also offers an airport meet-and-greet service.

Homestay who are unable to collect students from their arrival point or return them to the departure point may use another homestay or adult member of their family who they trust to collect the students.

All students must bring their passport and signed parental agreement and booking form, as well as a visa letter, if required.

U18 students can travel independently to and from the airport with parental consent. However, these arrangements must be confirmed in writing to the student and their parents/guardian at least 10 days before arrival and LanguageUK is not liable for any problems that may occur whilst travelling.

If a student becomes detached from their group at the airport, the leaders must call the student's mobile phone to try to locate him/her. The leaders question the other students to find out who last saw him/her and where. One leader supervises the group and keeps them together while another leader goes to look for the missing student.

If the group is at the airport, the airport staff are asked to broadcast a message to the student on their public address system. If the leader is unable to find the student after a quick search, a member of the safeguarding team is informed, and this person will now direct the operation and decide when the police and the student's parents should be informed.

When using trains:

- Staff will be in the same carriage/coach as the students to be able to carry out their safeguarding duties appropriately.
- students will be made aware of which stop to get out at, and how many stops there are before that.
- When boarding or alighting from a train, one staff will be at the head and another at the tail of the group
- Staff will perform headcounts at regular intervals, and especially before and after boarding and alighting.
- Staff will have a list of student profiles for all the students in their group, including full name, telephone number and photo, in case someone gets lost, and help is required.

When using buses:

- Staff will whenever possibly ensure students sit together
- Staff will whenever possibly ensure students sit downstairs on double-decker buses.
- Students will be accompanied by a member of staff in the area where they sit, for staff to be able to carry out their safeguarding duties appropriately.

When walking with the students:

Before leaving

- Staff will have familiarised themselves thoroughly with the route
- Staff will instruct all students to stay together as a group
- Staff will remind students of the dangers involved in crossing roads or railway crossings
- Staff will ensure all students have their student cards, mobile phones and, if appropriate, map of the area with them
- Staff will take the lead, the tail, and the middle for larger groups
- When crossing roads, pedestrian crossings will always be used
- When crossing railway crossings, staff will man the gates and ensure students cross one-by-one, quickly and calmly

2.7 Welfare Provision

The DSL holds overall responsibility for ensuring that the school looks after the well-being of all its students.

The course coordinator, administration manager and homestay officers are contact persons for homestays, students, members of staff and any other persons who are concerned about any aspect of student welfare.

The senior activity leader and the activity leaders are responsible for the welfare of students on all the activities.

Teachers are responsible for the welfare of students during lesson times.

The accommodation officer and the course coordinator are contact persons for all matters regarding accommodation.

Activity leaders/staff are on duty inside the school and in the canteen and grass areas outside during lesson and lunchtime breaks and available to students to discuss any problems.

Homestays are responsible for the welfare of the students whilst they are at home. They are also responsible for providing all meals to their students at weekends and breakfast and a main evening meal on weekdays as well as ensuring that the students have clothes appropriate to the weather conditions and planned activities or reporting to a member of the school's staff should the student not have appropriate clothing available.

During their induction session on their first school day, all students are given details of the members of staff who are available to answer questions or deal with problems.

All students have ID-cards with contact numbers for the school, including a 24-hour emergency number. Contact numbers are also shown on each student's individual programme, a copy of which is provided to each student's host family.

The emergency mobile telephone is manned 24 hours a day, seven days a week and can be called about any emergency problems only.

2.8 Fire Safety and Lock Down

All students are given a site tour as part of their first-day induction, in which they are shown the fire escapes and evacuation routes, all of which are clearly visible. Students are also guided through the fire alert process and shown the assembly point.

LanguageUK keeps copies of the current gas safety certificates, fire risk assessments for all its Homestay properties, which must be equipped with smoke detectors and carbon monoxide alarms.

All our fire safety is monitored by Suleyman Erdogan in building maintenance and Verity Sessions, we also use Red Alert and Southern Monitoring Services for all our regular checks and for the latest information.

We have a full evacuation process which can be found on our website and in the administration Office.

Lock down Policy and Procedures

On very rare occasions it may be necessary to seal off the school so that it cannot be entered from the outside. This will ensure that students, staff, and visitors are safe in situations where there is a hazard in the school grounds or outside the school in the near vicinity. A lockdown is implemented when there are serious security risks for the premises due to, for example, nearby chemical spillage, proximity of dangerous dogs, serious weather conditions or attempted access by unauthorised persons' intent in causing harm/damage.

2.9 First aid and medical care

Non-EU and EU students are required to arrange health insurance before coming to England.

All students U18 are required to submit a parental consent form please see a new sample consent form.

We now require two emergency contact numbers for all students U18, and these numbers can be found on the student database. Access to this is now with Fresh Works our CRM the Safeguarding team has access to these numbers. These members of staff have 24-hour access to this information. If the students are travelling as a group their leaders will also have all the emergency contact details and the Agents. Please see **Appendix A** for the new copies of the parental consent form.

LanguageUK are equipped with first aid kits.

If a student requires medical attention during the school day, Student Services will help organise a GP appointment for them. If they need attention while at home, their Homestay host must help them find appropriate care and inform the school immediately.

In the case of a student requiring medical or dental treatment whilst at a homestay, the homestay will arrange an appointment with their GP or dentist where possible or call the school to arrange for a member of staff to take the student to the doctor or dentist.

In case of emergency while a student is with the homestay, the homestay will call for an ambulance and inform the school via the school's 24-hour emergency number.

In the case of a student from a group, the group leader will also be informed. In the event of a student from a group requiring medical attention whilst not with the homestay, the group leader will take the student to the local clinic or hospital. If this is not possible or the student is not part of a group, the school will arrange to take the student to the clinic or hospital.

In any event the school must be contacted before any medicine or treatment is given as the school must first check that permission has been given by the student's parents or guardians and that the student does not have any allergies or medical history that needs to be considered. Students' relevant medical histories, any allergies or other relevant information together with parental wishes concerning medicines and treatment are contained in confidential lists which are available online to authorised members of staff. They are also available in printed form and provided in confidence to all activity leaders. First aid trained staff are present on activities. The activity leaders carry mobile phones and can call an ambulance in the case of emergencies.

Kent & Canterbury Hospital
 Ethelbert Road
 Canterbury
 Kent CT1 3NG
 Tel: 01227 766877

The nearest 24-hour AEDs (Automatic Defibrillators) are located at Waitrose next door.

Accidents

During off-site activities, supervising staff carry a First Aid Pack for responding to minor injuries such as grazes or minor sprains, and they should call the school if they need further support, such as a taxi service. Staff will carry an emergency fund to cover unforeseeable events.

Should an accident of a more serious nature occur, staff should inform the school and seek the help of emergency services.

All accidents, whether occurring on or off-site, must be properly recorded in the Accident Book, located in the administration office.

Certain injuries are required to be reported to the Health & Safety Executive (HSE) under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, <http://www.hse.gov.uk/riddor/reportable-incidents.htm>). These include any injury for which the patient is taken directly from the scene of the accident to hospital for treatment.

Entitlement to NHS Treatment

Some visitors to England do not have to pay for NHS hospital treatment because they are within one of the exemption categories.

The exemption categories only apply to people who are not ordinarily resident in the UK. People covered by the immigration health surcharge and some visitors from EEA countries and Switzerland may also be exempt from charges for NHS healthcare.

Visitors from non-EU countries that have a reciprocal healthcare arrangement with the UK may be covered for some treatment needs.

<https://www.gov.uk/guidance/nhs-entitlements-migrant-health-guide>

<https://www.nhs.uk/nhs-services/visiting-or-moving-to-england/visitors-who-do-not-need-to-pay-for-nhs-treatment/>

3. Accommodation

3.1 Homestay Accommodation

Families in Canterbury can provide Homestay accommodation to LanguageUK students once they have been checked and approved by our Accommodation Officer and DSL.

All Homestay hosts must provide LanguageUK with the following:

The homestay must first be visited by the accommodation officer, who inspects the home, interviews at least the main carer and satisfies herself that the homestay is able to provide a suitable and caring environment for the school's students.

- A completed registration pack from LanguageUK
- A fire risk assessment and fire escape plan.
- A gas safety inspection certificate.
- All adults staying at the address pass a criminal records check (DBS). Until a satisfactory DBS has been obtained, no students can stay at the homestay.

- Receive and understand all relevant information about curfew times, medical requirements and –if hosting a group with leaders – a full itinerary.
- The homestay accepts and signs an agreement with LanguageUK. This agreement details guidelines and rules about accommodating and looking after students.
- The main carer in the homestay completes a basic safeguarding training course and provides the accommodation officer with a copy of the certificate.
- A responsible adult (known to and vetted by the provider) will always be present overnight and will normally be present when students under 16 are at home.
- The homestay agrees not to provide accommodation for students aged 18 or older from other schools.
- The homestay agrees not to provide accommodation for more than a total of four students at any one time.

Please see [Appendix B](#) for homestay advice and risk assessment.

The school will not accept bookings for U18 who are not placed in homestay by LanguageUK.

If a student who is travelling independently U18 would like to stay away at the weekend we must have specific parental consent for this.

We do not accommodate adult in the same house unless

- the leader or agent has requested that a leader stay in the same house – though in separate rooms
- a group includes a student, who has turned 18 and is part of the same year group
- the children are with their parents on our family-run programmes

We do not mix male and female U18 students in the same Homestay accommodation.

3.2 CCTV / Security Cameras and Accommodation, particularly for under 18 International Students

A recent incident in an ELT organisation where a homestay suspected a student of thieving based on evidence captured on a security camera in the home has raised questions in domestic security cameras in homestays with international students, particularly those aged under 18. The group leader accompanying the student was concerned that the parents would be extremely upset that their child had been recorded on camera without them knowing it was happening and giving their agreement.

Advice was gathered from the EUK Legal Helpline and the UK Safer Internet Centre who specialise in all things online. Both gave broadly the same verbal advice, extending it beyond homestays to include all accommodation. There is also information from the Information Commissioners Office here about security in the home <https://ico.org.uk/your-data-matters/domestic-cctv-systems-guidance-for-people-using-cctv/>.

Here is our interpretation of their advice as it affects ELT organisations, which should check their procedures considering the information and recommendations.

1) Using a camera for security/insurance purposes, which may incidentally capture images of students of any age, is permissible. However, the camera must not intrude unnecessarily into private areas where a person might reasonably expect privacy, such as bathrooms, toilets, or bedrooms. It is also advisable to switch off any audio recording equipment within the camera.

2) A camera in a family home that films only within the perimeter of the property is not subject data protection laws. If it films beyond the perimeter, e.g., onto the street outside which is a public place, it is subject to data protection laws.

3) Any camera in a public space such as a boarding school or university campus being used for international students is subject to data protection laws.

4) A camera in a homestay property with international students is a 'grey area' because money is given for hosting students, which could be argued makes the home a public place and therefore subject to data protection laws. It would be prudent of ELT organisations and accommodation agencies to treat homestays in this way, as public places.

If a student (or their parents – see next point) is not happy with camera surveillance in a homestay it should be easy enough to find a home without a camera.

Existing homestays must be contacted to ascertain their camera status and discuss how it is used and all homestays told that they must inform accommodation staff immediately if they install a security camera at any time.

Homestay

Homestay providers must make sure that all their guests have a right to privacy.

3.3 Homestay Code of Practice (Copy)

I/We agree to abide by the English UK Homestay Code of Practice for providers of homestay accommodation for English Language Students and to:

- Encourage the student to speak English as much as possible in our home.
- Encourage the student to feel at home and to treat him/her as a member of the family rather than a paying guest.
- Not host another student of the same native language at the same time unless there is a special arrangement with the students and the schools.
- Not host more than four students at any given time and keep the Accommodation Officer informed of any changes that may occur in bookings.
- Inform the Accommodation Officer if accommodating students from another school at the same time as students from LanguageUK.
- Provide a clean and comfortable student room, meeting the requirements laid down by the British Council.
- Provide a home environment in which it is possible for the student to carry out his/her English Studies properly.
- Provide the student with a balanced and appropriate diet.
- Show due concern for the welfare, safety, and security of the student during his/her stay.
- Give the student reasonable and regular access to bathroom and laundry facilities.
- Maintain a close liaison with the student's school and be able to help resolve any problems that the student may encounter during his/her stay.
- Respect the student's different cultural background and to be sensitive to the needs of the student.
- Notify the Accommodation or Welfare Officer of any concerns regarding lateness home.
- Report any concerns.
- Not go away and leave the student alone in the house overnight, unless agreed with the school and the student.

General Behaviour

- All behaviour must be appropriate to and respectful of the Homestay Student and his/her religious, ethnic, or cultural background.

In addition, the Homestay Student will not be:

- subjected to aggressive, violent, or intimidating behaviour or bullying.
- subjected to behaviour which threatens or vilifies the student.
- subjected to jokes, suggestive comments or offensive gestures related to the Homestay Students race, colour, ethnic origin, disability, or gender.
- subjected to the distribution or display of material (including through e-mail, text messaging or social media) which may be offensive.
- made to be in the presence of drunken or intoxicated individuals.
- provided with alcohol.
- provided with cigarettes or permitted to smoke.
- permitted to drive a car unless they are lawfully licensed to do so in the UK.
- subjected to persistent questions about the student's private life.

Sexual Harassment

- Homestay Providers are reminded that, prohibiting sexual any inappropriate behaviour that makes the student uncomfortable.

- Examples of behaviour that may be deemed to constitute sexual harassment may include any unwanted, deliberate and/or inappropriate physical contact.
- suggestive remarks or action of a sexual nature.
- demands for sexual favours, either directly or by implication.
- behaviour that may be deemed flirtatious or to be expressing romantic feelings.
- sexual exhibition of any kind.
- obscene gestures, language, jokes containing sexual references or deliberate exposure to the sexual behaviour of others in any form.
- conduct that would constitute a criminal offence of a sexual nature.
- any other behaviour that might reasonably be interpreted as being designed or intended to arouse or gratify sexual desires.
- distribution or display of material (including through e-mail, text messaging or social media) which may be offensive, such as sexually explicit posters or pictures. Any advances of a sexual nature from a Homestay Student must be rejected and will be reported to LanguageUK immediately.

Host Family Code of Conduct Specifically Relating to Students Under-18 (copy)

The Homestay must:

- Treat students with dignity and respect.
- Provide a safe, clean, and tidy living environment for the student.
- Unacceptable behaviour such as discrimination, bullying, harassment, or intimidation will not be tolerated. This includes physical and verbal abuse and use of inappropriate language or unprofessional behaviour.
- Show tolerance towards religious beliefs.
- Act in an open and transparent way that would not lead any reasonable person to suspect their actions or intent.
- Protect young people from discrimination and harm and to maintain appropriate professional boundaries because they are in a position of trust. It is equally important to avoid behaviour that might be misinterpreted by others, to protect both the interests of yourself and your younger learner student.
- Read and understand school policies on child protection.
- Not have any inappropriate relationships with students under the age of 18.
- Not engage in any inappropriate physical contact with students. Certain nationalities are more tactile than others: if a greeting (for example, a brief kiss on the cheek) is initiated by the student then this is acceptable. No other physical contact that is ever initiated by a host family will be accepted.
- Not enter the student's bedroom without knocking twice before.
- Not offer cigarettes or alcohol to any students under the age of 18.
- Inform the school before 8:45am if their student is going to be absent.
- Not accept money or expensive gifts from their students.
- Not have adult overnight guests while hosting a Younger Learner.
- If under-18s are using a computer in their homestay accommodation, Homestay should assume responsibility to supervise what the students accesses on the internet to ensure that it is age appropriate.
- A responsible adult will always be present overnight and normally present when students under 16 are at home. This should normally be the host but if occasionally the 'responsible adult' is someone other than the host, LanguageUK must be informed and the person suitably vetted.
- Under-16s should not be left unsupervised except for short periods.
- Students under 16 in Homestay accommodation will not be lodged with students of 18 years or older.

- Report any family's living arrangements change (e.g., an adult child returns from university, another relative move in) to LanguageUK.

Students do like to get to know their hosts prior to arrival but it is advisable for host families not be friends on Facebook with any of their students under 18 years old. We strongly suggest that students and host conduct all communication via email so that both parties can limit the information available to one another.

3.4 Private Fostering

This occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Whilst this is not a difficult process, it does involve a visit to the property and discussion with the host by Social Services.

For this reason, LanguageUK does not accept any bookings of more than 26 nights from any students aged under 16 or any disabled students aged under 18. No exceptions can be made to this rule.

3.5 Student Code of Conduct, Behaviour and Discipline

We maintain good standards of safety and welfare with the support and co-operation of students, particularly the U18s. Students are made aware they should report any concerns about other students or staff to a DSP (designated specialist safeguarding person).

When groups arrive in Canterbury they are briefed on the code of conduct, our rules and safeguarding policy. This is also the case for the adult's students' induction meeting on the Canterbury site.

Posters listing LanguageUK rules are prominently displayed on both sites. Students must:

- Be nice to everyone.
- Be on time for all classes, activities, and excursions.
- Notify the school and/or their leaders of any absence from classes.
- Tell someone if you or a fellow student is unhappy about any aspect of their stay.
- Not leave the Abbey School or the Canterbury site between classes unless they are aged 18 or over or studying on an adult course.
- Not smoke or drink alcohol.
- Not drop litter.
- Engage in any illegal activities.
- Engage in racial, religious, sexual, or homophobic harassment.
- Show respect to their Homestay hosts.
- Show respect for all staff, leaders, and other students at the Abbey School.
- Avoid bad language, fighting or bullying. This is not tolerated on either site or will be dealt with accordingly.
- Take care of other people's property, as well as your own. Damage to property at the school or Homestay is not acceptable.
- Students must return to their homestays by 22:30. If this rule is broken, a member of staff will speak to the student and warn him or her that there will be a penalty if it happens again. If the student is late a second time, the school will contact the student's parents or educational tour operator and inform them that the school is not able to accept responsibility for the student if he or she continues to return home late and that he or she will be sent home if there is any repetition.
- Students are guests in private homes and must abide by the rules of their homestay. They must ask their homestays before taking other students back to their homes.
- Students should not use their homestays' telephones to make calls. If any of these rules is broken, a member of staff will speak to the student and make them aware that any further breaches might result in the homestay asking them to leave, in which case the students' parents will have to pay for substitute accommodation.

- It is not permitted for any students to smoke. If a student is found to have broken this rule, he or she will be given a warning. If the warning is ignored, a member of the safeguarding team will be informed. In the case of a private student, a member of the safeguarding team will contact the student's parents to inform them and tell them that the student will be sent home if found smoking again. In the case of a group student, a member of the safeguarding team will ask a group leader to make this call.
- It is illegal for students to drink or buy alcohol. If a student breaks this rule, a member of the safeguarding team will be informed. He or she, or a group leader if applicable, will inform the parents or educational tour operator and tell them that if there is any repetition, the student will be sent home.
- It is illegal for students to have knives or other weapons or drugs or other banned substances. If any of these rules is broken, a member of the safeguarding team will be informed, and the student will be sent home.
- The school will not tolerate bullying or physical violence of any kind. If a student is involved in such activity the designated safeguarding lead will be informed, investigate the incident, and decide on any action to be taken. This can include reporting the incident to the police or sending the student home. The student's parents will always be informed.

Students can report any inappropriate adult behaviour if they have any concerns within the school or the homestay provider to the Designated Specialist lead, please be reassured you will not get into any trouble for doing so and all your information is treated with the strictest of confidence depending on the level of concern.

4. E-Safety

- To educate all students about being safe on-line.
- To provide an environment in which students are protected from exposure to illegal, offensive, or otherwise inappropriate material online.
- To ensure the security of LanguageUK computer and network systems.

Internet Access:

LanguageUK is wireless enabled, and every classroom and office has at least one computer with internet access. LanguageUK staff may use the school's computer systems in the conduct of their duties, including lesson preparation, ensuring that any material accessed is appropriate for use with their class, considering the age and cultural sensitivities of the students.

Students may use their own devices to access other websites to assist them in their studies.

However, staff and students are strictly forbidden to access, either on the school system or their own 4G or 5G networks, any site which is deemed inappropriate, in line with the Government's Prevent Policy.

Unless it is for a class activity, students are not allowed to use the class computer.

Firewalls are in place on the LanguageUK own networks, but all staff must be aware that students will have their own 4G/5G networks roaming which may not have the same protection. Whilst LanguageUK accept that it is impossible to control what a device with a 4G/5G network can access, it is nonetheless the responsibility of all staff to be alert and ensure, as far as humanly possible, that students do not access any websites which may be prohibited by this policy. The firewalls in place on LanguageUK networks prevent the user accessing websites in the following categories, on the grounds that they are illegal, potentially illegal, inappropriate, offensive, or potentially threatening to the security of the school's systems:

- Violence/hate/racism
- Nudism
- Pornography
- Weapons
- Adult/mature content
- Cult/occult

- Drugs/illegal drugs
- Illegal skills/questionable skills
- Gambling
- Games
- Military
- Political/advocacy groups
- Hacking/proxy avoidance systems
- Personals and dating
- Usenet news groups
- Freeware/software downloads
- Pay to surf sites
- Advertisement
- Web hosting
- Malware
- Any other potentially illegal / inappropriate website not covered by the above

LanguageUK Internet safety tips:

- Never give out your real name.
- Never tell anyone where you go to school.
- Only meet someone from a chatroom in a public place with one of your parents or another adult. If they are genuinely who they say they are they will be happy to do this.
- Never give out your address or telephone number.
- Never agree to meet anyone from a chatroom on your own.
- Tell an adult if someone makes inappropriate suggestions to you or makes you feel uncomfortable online.

Helping U18 students stay safe online

LanguageUK recognizes responsibility to ensure safety of U18s when they are using the internet, social media, and other forms of media. Maximum effort is made to guide them in making good choices.

Cyber Bullying is the misuse of digital technologies or communications to bully a person or a group, typically through messages or actions that are threatening and/or intended to cause offence, anxiety, or humiliation. It comes in many different forms and is particularly damaging as the abuse is inescapable - it follows the target everywhere.

Privacy and information sharing

Most social media sites allow young users to host a public profile, which presents many concerns regarding their privacy. If privacy settings are not applied, the content they publish on their profiles will be accessible to millions of people worldwide.

This information can potentially include:

- Personal contact details.
- Photographs or videos of themselves and their friends.
- The names and addresses of the schools and clubs they attend.
- Their exact locations at any given time using location tagging features.

Digital footprint

Due to the lack of face-to-face communication in cyberspace, there is a tendency for the offline world to be referred to as the 'real world'. This can be a damaging notion, as it often leads children to act with less caution when using the internet. Behaviour can include:

- Involvement in visible, public arguments
- The expressing of opinions that can be interpreted as offensive or aggressive
- Participation in bullying through commenting on or sharing malicious content

The internet is like a giant USB that saves all the things that we publish online. The collective history of this activity is often referred to as a digital footprint and can be accessed by anyone through a

simple online search. If a child or adult uses privacy settings on social media platforms, they will not be able to stop their connections from passing the content they post on to others.

If the activity is offensive, they may find themselves in trouble with peers, the school or even the police. Universities and employers have been known to check the online profiles of applications, so negative activity can also affect a young person's educational and professional opportunities later in life. It is therefore extremely important that young people understand that the cyber world is the real world, with very real consequences.

Grooming and sexual abuse

Online grooming is the action of an adult befriending a U18 with the intent to prepare them for sexual abuse. It is not a one-off event but a process of engaging with them, tapping into their hobbies and vulnerabilities, and building a falsely perceived connection.

Social media, interactive gaming and chat rooms can be the first point of contact. Abusers can hide behind false online identities and talk to young people with greater ease, out of the direct observation of others.

If a student U18 has been receiving inappropriate communications from an adult, LanguageUK will report this on

Exposure to pornographic or violent material

Inappropriate content does not have to be intentionally sourced. Often U18 will stumble across it by chance; disguised under seemingly innocent attachments, or even circulated on leading social media sites. The most concerning material includes:

- Extreme or abusive pornography
- Excessive violence or explicit physical attacks
- Hateful material expressing racist, sexist, homophobic or transphobic opinion
- Harmful advice encouraging eating disorders, self-harm, or suicide

Sexting or youth produced sexual imagery

Young people, most commonly girls, often feel under pressure to act provocatively or be perceived in a sexual way. This pressure can come directly from peers or partners, or indirectly through the commercialisation of sex in mainstream media and marketing industries. When using the internet, this can motivate young people to:

- Post provocative images of themselves on social media
- Perform sexual acts over webcam, send sexually explicit photographs to another person or pressurize others into doing so
- Search for pornographic images and videos
- Sharing sexual images between under 18s is illegal and risky, but often the result of teenage curiosity. Young people need education and safeguarding support rather than criminalisation
- Adults sharing sexual imagery of under 18s is child abuse and must be reported to the police

LanguageUK is committed to:

- Ensure all staff are aware of the issues involving U18 students
- Advising students to stay safe online
- All students

Alcohol, drugs, and smoking

Staff must not do the following in the presence of an U18 student:

- Smoke or consume alcohol
- Be intoxicated, under the influence of drugs or alcohol or on legal highs
- Encourage or endorse the use of tobacco, alcohol, or drugs

Failure to meet these standards of behaviour may result in disciplinary action or dismissal.

Acceptable Use Agreement How children will be kept safe when they are accessing 'online learning' whilst in school and out of school.

Background

Aim of the document is to set sensible and safe limits for your students regarding their online behaviour whilst on a course at your ELT organisation. Sometimes known as a 'safe-user contract'. Please see **Appendix C** for the Acceptable use Agreement.

5. Radicalisation, Extremism and Prevent

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The prevention of radicalisation and extremism at the school falls under the Safeguarding against Any Other Vulnerability category. All staff are expected to remain vigilant to the threat of potential radicalisation and to uphold and promote equality and individual liberty, as well as respect for other cultures, faiths and beliefs, and respect for the rule of law. Children are vulnerable to extremist ideology and radicalisation.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alerted to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated specialist safeguarding lead making a Prevent referral.

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Extremism is defined as the vocal or active opposition to our fundamental human values of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Radicalisation is defined as the act or process of encouraging extremist views or actions in others, including those which could lead to terrorism.

Although no incidents involving either of these have occurred at LanguageUK to date, it is important for all staff to be consistently vigilant. Staff should report any instances or suspicions arising from behaviours, conversations, or comments – within or outside of the classroom – which might indicate a person's extremist sympathies to their director.

Staff have a duty to report:

- Graffiti symbols, writing or artwork promoting extremist views
- Where students have accessed extremist material online/through social media
- Where students voice opinions drawn from extremist ideologies
- Where individuals have tried to impose extremist views or practices on others
- Where individuals have expressed anti-western or anti-British views
- Suspicious changes of behaviour, friendships, and actions

Please see our Prevent policy for more details.

5.1 Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at:

<https://www.gov.uk/government/publications/channel-guidance>

The Home Office has developed three e-learning modules:

<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

- offers an introduction to the Prevent duty.

https://www.elearning.prevent.homeoffice.gov.uk/prevent_referrals/01-welcome.html

- supports staff to make Prevent referrals that are robust, informed and with good intention.

https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html

- is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

6. The Responsibility for the Staff When There Is a Concern

No member of staff is expected to make a judgement about whether someone is at risk of being drawn into terrorism or not. This is the responsibility of those key staff identified as key to the addressing of the Prevent duty. However, all members of staff have a responsibility to report internally any matters of concern, so that appropriate assessment can be undertaken by key staff.

LanguageUK approach is to address any vulnerability of a student as a safety guarding issue. Therefore, the Prevent duty is exercised as part of the general approach of addressing matters that are an identifiable concern, which can include matters of mental health, substance abuse, isolation, serious aggression, and significant behavioural change. Members of staff are not to report any concerns externally, this will only be done by a small number of individuals who would review a case carefully before an external reference is made.

You may be concerned that the person is a risk, to themselves or to others. Perhaps you have noticed a change in behaviour. You might notice that the person has stopped turning up. The person might have become withdrawn or are acting differently. Maybe something the student has said something that concerned you, or it is something that someone else has said. There can be a variety of things, or it could just be one thing that causes you concern. Teaching staff and homestay providers may often be the first to notice if a student is experiencing difficulties.

6.1 Child Protection

While abuse of young children is unlikely at LanguageUK, we should not assume it could never happen. Being alert to situations where abuse could take or have taken place is central to our duty of care. It is also our duty to follow the correct procedure for handling allegations. If any member of staff is unhappy with the way a child protection matter has been dealt, they should speak to the Vice Principal Ece Inan, Designated Specialist lead Verity Sessions or use the whistleblowing procedure.

Underpinning principles:

- The welfare of the child is paramount
- Staff should understand their responsibilities to safeguard and promote the welfare of pupil
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Staff should work, and be seen to work, in an open and transparent way
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded
- Staff should discuss and/or take advice promptly from their line manager if they have acted in a way which may give rise to concern
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief, and sexual orientation
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children
- Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the Teaching Regulation Agency (TRA).

6.2 Child abuse

Child abuse is a term to describe a range of ways in which people, harm children.

Definition of abuse:

- Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

The five main categories of abuse are:

- **Physical** - a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Sexual** - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education see Peer on Peer Abuse.
- **Emotional** - the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Neglect** - the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sexting (also known as youth produced sexual imagery) put children in danger.

Cyber-bullying (bullying via technology)

Abuse can become apparent in several ways. A child may:

- Tell someone they are being abused.
- Show unexplained signs of physical injury.
- Exhibit behaviour that indicates he/she is being abused.

Alternatively, the behaviour of a member of staff towards a child could cause concern.

Typical symptoms of neglect or abuse:

- Sleeping problems
- Withdrawn, disruptive, neurotic, or aggressive behaviour
- Absence from school
- Changes to eating patterns
- Being clingy with staff
- Homesickness
- Lack of hygiene
- A desire not to return home
- Signs of self-harming
- Unexplained bruises

In addition to all these signs and types of abuse, staff must also be aware of child sexual exploitation (CSE) and female genital mutilation (FGM).

6.3 Mental Health Students

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated Specialist safeguarding lead.

Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance <https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

Here is a list of numbers locally to help our students if they have a risk of mental health concerns and even more so due to the pandemic.

Kent Together

A **24-hour helpline** has been set up to support vulnerable people in Kent who need urgent help, supplies or medication: **phone line 03000 41 92 92** or www.kent.gov.uk/KentTogether

Need help in a mental health crisis or emergency during COVID-19?

- ➡ Call the **24-hour helpline** on **0300 222 0123** if you need urgent mental health support, advice, and guidance
- ➡ Call **0800 107 0160** to release the pressure if you are feeling stressed
- ➡ Text "Kent" to **85258** for **24-hour** mental health crisis support via text from trained volunteers
- ➡ **Under 18s:** call the **24-hour** Single Point of Access on **0300 123 4496** (select option one, then option three)

Shout

Shout is the UK's first **24/7 text service**, **free** on all major mobile networks, for anyone in crisis anytime, anywhere. It is a place to go if you are struggling to cope and you need immediate help.

Shout is a national charity powered by a team of volunteers, who are at the heart of the service. They take people from crisis to calm every single day.

This service is for all age groups.

Support is now available simply by texting the word "**Kent**" or the word "**Medway**" to **85258**.

- ☒ 24/7 text service
- ☒ Support to take you from a hot moment to feeling calmer
- ☒ A safe space where you are listened to by a trained Crisis Volunteer
- ☒ Our service is based on a tried and tested model of crisis support
- ☒ Shout Clinical Supervisors work alongside our Volunteers and monitor conversations 24/7
- ☒ An anonymous, free conversation that will not show on your phone bill
- ☒ Professional support creating a simple plan of action to manage your crisis

You can read more about the service on

<https://www.giveusashout.org/>

6.4 Definition of Child sexual exploitation – CSE - and Child Criminal exploitation – CCE

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, the power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Child sexual exploitation does not always involve physical contact and may only occur online.

Some of the following can be indicators of CCE:

...children who

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs and alcohol
- go missing for periods of time or regularly come home late
- regularly miss school or education or do not take part in education.

The above CCE indicators can also be indicators of CSE, as can:

...children who

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections or become pregnant

6.5 Definition of Female Genital Mutilation - FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Teachers and Safeguarding staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out.

6.6 Honour Based Abuse – HBA

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

6.7 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. ELT Schools can play an important role in safeguarding children from forced marriage.

6.8 Peer on Peer Abuse

All staff should recognise that children are capable of abusing their peers. Peer on peer abuse can take, different forms such as

- bullying (including cyberbullying)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals

If a member of staff has a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated specialist safeguarding lead. As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care.

6.9 County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

6.10 Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

<https://www.gov.uk/government/news/upskirting-know-your-rights>

6.11 Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>

<https://safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

Sexual Offences Act 2003 and abuse of a position of trust

It is important for all staff to understand that the Sexual Offences Act 2003 covers the 'abuse of a position of trust' and considers all children under the age of 18 to be minors in this context. It defines the abuse of trust as 'causing or inciting a child to engage in sexual activity' and includes 'sexual activity in the presence of a child'.

Copies of the Sexual Offences Act can be found online or provided on request.

7. Legal duties

It is a legal duty to report if an adult discovers or has been told that the offence of sexual abuse has happened.

It is essential to act quickly if any allegations are made, or if there is a suspicion of concern about a staff member's relationship with a child.

If an allegation is made or a concern arises, the designated safeguarding leads and the Vice Principle should be informed immediately.

LanguageUK assures all staff that it will fully support and protect anyone who reports, in good faith, their concern that a colleague is, or may be, abusing a child.

What happens when an allegation is made against another student?

In such circumstances, the school has a duty of care to both parties involved. The procedure is the same as for dealing with an allegation of abuse made by an adult. No decisions will be made without referring to the appropriate local authorities.

If a child tells you they are being abused, react as follows:

What to Do	What <i>Not</i> to Do
Stay calm.	Do not panic. Do not over-react. It is unlikely that the alleged victim is in immediate danger.
Listen and be child focused.	Do not probe for more information or ask leading questions. Questioning the participant may affect how the disclosure is received later.
Give the person the chance to say what they want to say. Use TED to help you: Tell me Explain to me Describe to me	Do not assume, do not paraphrase, and do not offer alternative explanations.
Reassure them that they have done the right thing by telling you. Explain that you will need to inform your line manager to provide the best possible help.	Do not promise to keep secrets or that everything will be OK. You cannot guarantee this.
Act immediately in accordance with the procedure in this policy.	Do not wait or try to deal with it yourself. Listen and refer.
Record in writing exactly what the student said as soon as possible.	Do not make negative comments about the alleged abuser. Do not 'gossip' with colleagues about what has been said to you. Do not make a child repeat a story unnecessarily.

Staff have concerns about a child and take immediate action.

Staff follow their child safeguarding policy and speak to a designated specialist or advanced specialist in safeguarding.

Referral not required pastoral support with safeguarding leads and leaders

Immediate danger urgent response.
Designated lead makes a referral to Kent social services, Kent safeguarding Board, LADO, or the police.

Once a concern is raised it is the designated team's responsibility to RESPOND, REASSURE, RECORD REFER and REPORT IF NECESSARY.

Monitor as required until No Further Action (NFA) can be noted.

7.1 Identifying Vulnerable Students and Early Help

LanguageUK is aware there are factors that that might make certain students more vulnerable.

Examples include:

- SEND (Special Educational Needs and Disability)
- Different cultural/social background and codes of interaction to local context and/or peers

- Family backgrounds which afford low levels of emotional support or well-being

Such students will be identified via:

- parental information (enrolment form)
- parental information (direct communication)
- observation by staff on and after arrival at LanguageUK

Any concerns will be reported to the Safeguarding team as soon as possible, allowing for early help and thus improving the chances of avoiding abuse and abusive behaviour towards more vulnerable members of the school.

7.2 Keeping Records and Information Sharing

Records of concerns, allegations and disclosures will be kept in a secure file to which only the Safeguarding Team and if necessary, outside agencies such as Kent Safeguarding Board or the police have access. Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is important for all staff to recognise the importance of information sharing between practitioners and local agencies.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Retention of Records

The Information Commissioner Code of Practice: Employment Records 2002 states that **“records of allegations about workers who have been investigated and found to be without substance should not normally be retained once an investigation has been completed. There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example where the allegation relates to abuse and the worker is employed to work with children or other vulnerable individuals.”**

7.3 Data Protection

The Data Protection Act 1998 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes:

- allowing practitioners to share information without consent

Those likely to be affected give their consent or

- the public interest in safeguarding the U18 student's welfare overrides the need to keep information confidential

or

- disclosure is required under a court order or other legal obligation

Remember...

- Refusal to consent does not mean you cannot share information
- Professional judgement and advice are needed to consider the consequences of sharing or not sharing
- Sharing information in good faith to safeguard a child/child will usually be considered of public interest

Please see <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

7.4 Allegations

LanguageUK will deal with allegations quickly, providing effective protection for the child and support for the subject of the allegations.

The following procedures will be followed if there is Information which indicates 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

Procedure for Allegations against Members of Staff / Supply Staff:

- Make sure the child is not in immediate danger
 - Inform the designated safeguarding lead
 - Ensure a written record is made by the person making allegation
 - Do not talk to anyone else about the matter
 - The DSL contacts Kent Safeguarding Board for guidance before informing the accused person
- The Safeguarding Team will follow guidance from Kent safeguarding Board, such as:
- What immediate action should be taken to protect student
 - When and what parents should be told
 - What should be said to the person facing the allegation and should s/he be suspended
 - Suspension is not an automatic response and will be considered where students are at risk of serious harm, or the concern is so serious that it would result in immediate dismissal
 - LanguageUK will provide a named contact for anyone suspended, and will inform the accused of the reason for suspension within one day
 - We will refer any adult allegation to LADO if needed to determine a suitable outcome.

If an allegation of abuse is made against a member of staff, a referral is to be made to the County LADO service within 24 hours. **This referral and or contact with the LADO service must take place prior to any form of investigation being undertaken by the school or service and before the member of staff is made aware of the allegation.** Any allegation against an employee should lead to careful consideration of the possibility of abuse and of a referral being made of any concerns to the statutory agencies if it is considered that the harm threshold has been reached and a person who works with children has:

- behaved in a way that has harmed, or may have harmed a child
 - possibly committed a criminal offence against or related to a child
- or
- behaved towards a child or children in a way that indicates s/he poses a risk of harm if they work regularly or closely with children.
 - if safe / appropriate, try to return child to normal routine

While weighing the factors as to whether suspension is necessary, available alternatives to suspension should be considered. This may be achieved by:

- leave of absence
 - undertaking different duties which do not involve direct contact with the individual child or other children
 - providing a classroom assistant or other colleague to be present throughout contact time
- If the member of staff is not based in a school, then an alternative may be to undertake:
- office duty
 - non-contact tasks only

Referral to the Disclosure and Barring Service

The Secretary of State's powers to bar or restrict a person's employment are contained in section 142 of the Education Act 2002. The relevant regulations, setting out the procedure to be followed now sit under the Vulnerable Groups Act 2006 (List 99 was replaced by the ISA Barring list which in turn has now been replaced by the **Disclosure and Barring Service**).

LanguageUK is required to provide a report to the DBS where they cease to use a person's services, or a person is dismissed or resigns before a disciplinary process is completed, because they are considered unsuitable to work with children, because of misconduct, or because of a medical condition that raises a possibility of risk to the safety or welfare of children. **A compromise agreement does not override the statutory duty to report the matter and such an arrangement should not be considered if the concern was of a safeguarding nature.**

Procedure for Allegations against the DSL:

- Make sure the child is not in immediate danger
- Inform the Principal

- Ensure a written record is made by person making allegation
- Do not to talk to anyone else about the matter
- The principal contacts Kent Safeguarding Board for guidance before informing the DSL of the allegations

The principal will follow guidance from Kent safeguarding board:

- What immediate action should be taken to protect student
- When and what parents should be told
- What should be said to the DSL facing the allegation and should s/he be suspended
- Suspension is not an automatic response and will be considered where students are at risk of serious harm, or the concern is so serious that it would result in immediate dismissal.
- LanguageUK provide a named contact for anyone suspended, and will inform the accused of the reason for suspension within one day
- If safe / appropriate, try to return child to normal routine

Procedure for Allegations against Children:

- Make sure the alleged victim is not in immediate danger
- Inform the DSL, Principal
- Ensure a written record is made by person making allegation
- Do not to talk to anyone else about the matter
- The DSL contacts Kent Safeguarding board for guidance before informing the child or children facing the allegation

The Safeguarding Team will follow guidance from Kent Safeguarding board, such as on:

- What immediate action should be taken to protect student
- When and what all the parents of the children involved should be told
- What should be said to the person facing the allegation
- The child or children facing the allegation will be given support throughout the process. They are also victims, whether the allegations are founded or not
- If safe / appropriate, try to return the victim and/or the accused child to normal routine

7.5 Dealing with Disclosures Appendix D

It takes a lot of courage for a child/adult at risk to disclose that they are being neglected and/or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. If a child/adult at risk talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets or promise confidentiality. The point at which you do this is a matter for professional judgement. If you jump in immediately, they may think that you do not want to listen; if you leave it till the very end of the conversation, they may feel that you have misled them into revealing more than they would have otherwise.

In the event of a member of staff or homestay provider receiving a disclosure of abuse, s/he will:

- Listen carefully to what the child/adult at risk is saying without interrupting, remain calm and not over-react – the child/adult at risk may stop talking if they feel they are upsetting another person.
- Make clear that s/he is taking the child/adult at risk seriously and acknowledge how difficult it must be for them; give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Explain, at an appropriate time as early as possible, that because of the seriousness of the matter and our concern for the child/ adult at risk health, safety and well-being, the information provided by them will need to be shared with others strictly on a need-to-know basis.

- Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, only ask questions for clarification and avoid asking questions that suggest answers or are in any way probing.
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child/adult at risk who has been abused.
- Avoid admonishing the child/adult at risk for not disclosing earlier – saying ‘I do wish you had told me about this earlier’ or ‘I can’t believe what I’m hearing’. It may be a way of being supportive but the child/adult at risk may interpret it that they have done something wrong.
- Let the child/adult at risk know what will happen next, to whom the information is to be passed on, and what will happen once it has been passed on.
- Undertake to keep the child/adult at risk informed as to any action that is proposed and to offer support through that process, if that is requested.
- As soon as possible, record all the details of what was said, using the exact words that the child/adult at risk has used and not interpreting any of the information.
- Seek support for her/himself from her/his line manager if s/he is distressed.
- Immediately inform the DSL or Deputy DSP of the situation and a decision will be made whether to make a referral to either the children’s/adults services duty team or the police. All serious allegations of abuse will be referred. A Safeguarding and Concern Form must be completed, signed, and dated by the member of staff/homestay provider and the DSL/ DSP.

7.6 What to Do on Suspicion of a Young person Being at Risk of Significant Harm

There may be occasions when a member of staff or homestay suspects that a child/adult at risk may be at serious risk, but you have no ‘real’ evidence. The child/adult at risk behaviour may have changed or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child/adult at risk the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child/adult at risk if they are alright or if you can help in any way. If the child/adult at risk does begin to reveal that they are being harmed or at risk of significant harm you should follow the advice above: Dealing with Disclosures.

Concern about the possibility of abuse or significant harm must be reported at the earliest opportunity to the DSL, or DSP. Use the Safeguarding and Concern Form to record these early concerns and pass it to the DSL immediately. If there is a risk of immediate serious harm to a child or adult at risk a referral should be made immediately. Once a concern has been raised the DSL will decide on an appropriate course of action:

- Further clarification is needed
- There is no cause for concern and no further action is necessary
- There is no cause for immediate concern, but the situation should be monitored and recorded
- Consultation with children/adults’ services is required within a defined timescale
- There is immediate cause for concern and the matter will be referred to children’s/adult services

Criminal Offences

If the allegations involve a criminal offence and the police become involved, the Safeguarding team will follow their guidance.

The Role of Integrated Children’s Services

Children, Young People & Education (CYPE) has a duty to investigate cases where there is reasonable cause to believe that a child has suffered, or is likely to suffer, significant harm.

The Role of the Police

The Vulnerable Investigation Teams (VIT) within Kent Police comprises of a team of officers specialising in safeguarding children. The officers are specially selected and trained for working with vulnerable children and they will undertake most interviews with children in line with Achieving Best Evidence procedures.

In the event of an allegation being made against a member of staff, it is possible that they will be invited for interview at a police station or arrested by Kent Police.

The Role of the Local Authority Designated Officer

The Local Authority Designated Officer (LADO) is responsible for the oversight and management of allegations. Any allegation against a member of staff must be reported within 24 hours to the County LADO Service. This referral will determine whether the allegation reaches the harm threshold to justify involvement from a LADO in the management of the allegation.

A copy of the Kent Safeguarding Children Board Safeguarding Procedures is available to any member of staff, on request. This Procedure outlines the principles of child protection, definitions of abuse, powers of statutory agencies and roles and responsibilities of multi-agency staff within the children's workforce. A copy of the KSCB procedures can also be accessed online at <https://www.kscmp.org.uk/>

Support to deal with the aftermath of abuse

Consideration should be given to the support that children, parents, members of staff and volunteers may need. Use of helplines, support groups and open meetings can maintain an open culture and help the healing process.

Contact the Safeguarding team:

- **Designated Specialist Safeguarding Lead (DSSL): Verity Sessions (Administration, Homestay and Safeguarding Officer Safeguarding Level 3 and Mental Health First Aider Lite. Mental Health First Aider in the workplace.**
Tel: 07956992354 Emergency Number 07467144234
- **Designated Safeguarding Person (DSP): Ece Inan (Vice Principal) Safeguarding Level 2**
- **Designated Advanced Safeguarding Person (DASP): Kasia Malkowska**

Anyone who reports concerns about other members of staff will not be penalised, and their identification will remain confidential.

All concerns or incidents should be reported, however small. The safeguarding team may have received other reports, and frequency of concerns is an important factor.

Concerns will be dealt with sensitively and carefully

8. Code of Conduct

8.1 Code of Conduct for Adults

LanguageUK Students at the school come from a variety of different cultures, where acceptable or expected behaviour can also vary considerably. Many of these students will not be aware of what is considered appropriate or inappropriate behaviour in the UK. The school needs to protect both students and adults from any behaviour or actions which might be misunderstood. The code of conduct aims to create a safe culture within the school and build trust between students and adults. The code of conduct for adults applies to all adults who encounter the school's students, including the school's staff, homestays, group leaders and providers of activities and transport.

The Code of Conduct

- supports and protects students and staff, homestay providers and ensures they treat one another with respect
- sets firm boundaries and gives clear guidelines on the standards of behaviour LanguageUK expects to help create and warm friendly environment, with specific reference to U18 students
- makes clear that failure to meet these standards could result in disciplinary action
- promotes all reasonable measures to ensure the safety and welfare of U18s in our care
- promotes high standards and integrity in our work
- discourages conduct within or outside the school which could damage or compromise LanguageUK, or the reputation of its staff
- promotes caution in the use of information technology
- spreads an awareness that some actions can be misinterpreted

The Code of Conduct states that

- smoking is not allowed in front of any U18 students
- staff should never drink alcohol while on duty. Even when not on duty, members of staff continue to be role models and reflect the school in public.

- excessive consumption of alcohol and bad behaviour is not acceptable and may lead to a disciplinary procedure
- it is better to educate students about the dangers of using drugs. It is against the law to supply any drugs to any students and will lead to instance dismissal.
- anyone with safeguarding or health and safety concerns should any relevant information to the Designated Specialist Lead and the Advanced Safeguarding Person
- staff should never become drawn into attention-seeking situations, such as crushes or tantrums
- all adults who meet all our students are in a “position of trust”. The sexual offences Act 2003 states that any person in a position of trust who becomes engaged in any form of sexual activity of any sort with students under 18 is breaking the law.
- staff should dress smartly and with sensitivity to their students’ cultural backgrounds. Jeans and trainers are not permitted.
- both staff and students should avoid displaying bare skin
- staff should always treat colleagues with professional respect and especially in front of the students. Staff are expected to create a productive working atmosphere and develop positive relationships with students, group leaders, agents, travel services and Homestay hosts.
- staff should be conscious of professional boundaries, especially when dealing with children
- staff should be aware of body language and avoid physical contact, except where it is intended to prevent harm
- Staff should avoid being alone with a student in a room when the doors are closed

Attitudes and Standards

Staff and Homestay providers must be committed to:

- treating everyone with respect and dignity
- always listening to what a child or young person is saying
- valuing each child and young person
- recognising the unique contribution everyone can make
- encouraging and praising each child or young person
- being excellent role models
- behaving professionally
- using appropriate language
- contributing to discussions about safeguarding
- positively involving people in developing safe practices

Student Interaction

When interacting with students, all adults should be positive and use praise whenever possible rather than negative language.

They should be fair and deal evenly with students.

They should use appropriate behaviour and language.

Physical contact of any kind between adults and students is not acceptable except under some special and exceptional circumstances (for example when comforting a student under distress, but then only for a short time and in an appropriate manner, such as putting an arm round the student's shoulder. This should be for a short time only and a fellow member of staff should be informed at the earliest opportunity).

Physical contact during sports activities should be kept to an absolute minimum.

There should be no physical contact in the classrooms.

IT and Social Networks

Electronic contact is defined as the communication, publication, or exchange of information, including images and videos, between two or more people using an electronic device. This may occur using text and voice text, instant messaging, emails, blogs, social networking services, such as Facebook, and social media apps, such as WhatsApp, snapchat etc.

This policy applies to the relationship between U18 students and staff before, during and after their course.

Adults should not give students their email address and they should not ask any students for their email addresses.

While requesting students' mobile numbers from students is necessary when arranging the school's social programme, all group leaders in Canterbury will have all their students' numbers and so other staff will have no need to keep their numbers themselves.

Favouritism and Gifts

No member of staff should show favouritism towards any one student. We do accept that, in some cultures, giving gifts is acceptable. All staff must be aware that gifts can also lead to accusations of bribery. Anything you are not sure about please see Head of Welfare Verity Sessions.

Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation, sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **CONTENT:** being exposed to illegal, inappropriate, or harmful material; for example, pornography, fake news, racist or radical and extremist views.
- **CONTACT:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults
- **CONDUCT:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online bullying.

Please see **Appendix E** for Code of Conduct for Teachers and All Staff Working with U18.

Please see **Appendix F** for Code of Conduct for Teachers and Staff Online Adults.

Please see **Appendix G** for Online Parental Consent Form.

9. Whistleblowing

All staff, homestay, transport should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. Everyone is required to inform the Vice Principal and Designated Specialist Lead of any instances where they suspect a colleague to have engaged in any inappropriate or illegal activity. Any concerns raised will be treated in the strictest confidence, and the staff member will be supported by the school.

<https://www.gov.uk/whistleblowing>

- general guidance on whistle blowing

An alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by LanguageUK is to call 0800 028 0285 – the line is available from 8:00 to 20:00, Monday to Friday; email:

help@nspcc.org.uk

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>

10. Training

It is important that all staff are aware of their responsibilities under current child protection legislation and have a complete understanding of LanguageUK safeguarding procedures.

All members of staff need to have training in basic awareness in safeguarding.

The main carer in each homestay needs to have training in basic awareness in safeguarding and prevent. We offer yearly training to our Homestay providers with Q & A sessions. These sessions are taken with the DSSL, and accommodation team.

All designated staff need to have advanced safeguarding training.

All Designated Safeguarding Leads need to have specialist safeguarding training for the Designated Lead and Advanced Safeguarding for the DSP.

The Principal, HR and Head of Administration are responsible for implementing all training courses and ensuring they are adhered to.

Provision of Training:

- All staff receive a basic awareness in safeguarding and prevent via an on-line training course to encourage good practice and foster a positive child protection culture at the school.
- In house training for safeguarding, prevent is held at least twice a year and all new legislation is updated by Verity Sessions who in turn will inform members of staff.
- There is an open-door policy to any staff enquiries re the training and if you see a course you want to do, please pass this through your line manager.
- Senior staff have enough up-to-date knowledge on child protection legislation and issues and information will be shared in meetings and updates learning also from the experiences from the previous season.
- Relevant, nominated personnel hold recognised and appropriate first-aid qualifications
- Staff confirm in writing that they have read and understood this Safeguarding Policy and agree to the Code of Conduct.
- Homestay providers attend at least one in-house basic awareness training session each year and are updated on any new policies and legislation. The homestay is then responsible for training all other adults in the household about safeguarding issues.
- Designated staff and safeguarding leads receive specialist training via English UK and attend a refresher course every 2 years.
- Safeguarding leads take over any safeguarding incidents and know who to contact locally for outside help.

Ensuring and Understanding

Safeguarding issues are discussed regularly during staff meetings, when staff are asked random questions as a means of checking that they are up to date with the school's policies and have understood the issues and procedures that the school has in place to deal with them. The accommodation officers discuss safeguarding matters during visits to homestays and Q & A evenings to ensure that homestays have understood them, and they provide any further help and information that they deem necessary or advisable.

Recording Training

All training at the school is recorded, with a note of the date, the name of the participant, the contents of the course and confirmation that the participant completed the course. Participants on external courses are required to provide the school with copies of their certificates.

11. Safer Recruitment

Safe recruitment is central to the safeguarding of children and young people. LanguageUK employ staff, homestay providers, bus companies, private taxi firms to work with children and young people have a duty to safeguard and promote their welfare.

LanguageUK is committed to safeguarding and promoting the welfare of all students in its care. As an employer, LanguageUK expects all staff and volunteers to share this commitment.

Aims and Objectives

The aims of the Safer Recruitment Policy are to help deter, reject, or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

The aims of LanguageUK recruitment policy are to ensure:

- that the best possible staff are recruited based on their merits, abilities, and suitability for the position
- that all job applicants are considered equally and consistently

- that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex, or sexual orientation, marital or civil partner status, disability, or age
- compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2020 (KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS)
- that the school meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

LanguageUK has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification the person best suited to the job at the school based on the applicant's abilities, qualification, experience, and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance (including KCSIE 2020 and Prevent Duty Guidance).

Recruitment Materials

All recruitment materials will include the following statement:

LanguageUK operates a strict Safer Recruitment Policy, and all staff will have checks made on their suitability to work with children.

All applicants will be required to supply an up-to-date CV, and gaps in employment history must be explained. Applicants will also provide contact details of 2 suitable referees (including former employers) which will be checked prior to employment. The referees will be asked specifically about applicants' suitability to work with children.

All employees will be required to provide proof of identity and qualifications (originals only – copies will be taken for our records) and undergo an Enhanced DBS (Disclosure & Barring Service) check and a Prohibited List check.

All employees will be expected to share the school's commitment to safeguarding and actively engage in looking after Under-18s safely.

Job descriptions will include references to our duty of care to children, promoting a strong whole-school ethos of safeguarding, child protection and vigilance, and maintaining confidentiality in cases of allegations and disclosures.

Recruitment Stages & Information for Candidates

Application documents:

- Any gaps in CVs will be explained and original qualification certificates and ID documents will be shown
- Candidates will be asked at interview about their attitude to working with children
- Candidates will be reminded that if they are successful, their references (a minimum of two including former employers) will be followed up including a question about their suitability to work with children, and DBS & Barred List and Prohibited List checks will be carried out
- Any job offers will include the phrase "subject to receipt of a satisfactory DBS check"
- Pre-Service Safeguarding training (see 'Training' section) emphasises our commitment to a whole-school safeguarding ethos designed to maximise protection for children from abuse
- Contracts will reflect the job description by including references to our duty of care to children, promoting a strong whole-school ethos of safeguarding, child protection and vigilance, and maintaining confidentiality in cases of allegations and disclosures
- All staff will sign the Code of Conduct.

Applicants Awaiting DBS Clearance

Any successful applicants whose DBS checks are delayed for any reason will

- undergo a Barred List check

- sign a self-declaration
- not be allowed to work with or be with children unsupervised until the DBS check comes through
- only commence work subject to a risk assessment which evaluates the reasons to start work before clearance is received, the impact this may have on the students and the possible safeguarding risks involved.

Applicants with a Criminal Record

- having a criminal record does not disqualify a candidate, and various factors will be considered:
 - the seriousness and nature of the offence
 - the frequency of offences
 - the age of the offence
 - the concealment offences during the application process
 - verification of the disclosure will be sought, and it will be discussed with the candidate
 - two members of Language will be involved in the decision
 - if appropriate, the Kent safeguarding board will be asked for advice
- There will be a clear record of the decision, signed by the Vice Principle. This will not contain details of the offences

When Criminal Checks Are Not Possible?

For British nationals who have been living in a country which does not provide a criminal records check, we will:

- carry out a UK DBS check, Barred List check and Prohibited List check
- thoroughly check their ID and references, requesting further references if appropriate
- thoroughly check any gaps in employment history
- In the light of the above, decide on whether to employ the applicant for the job and on the level of supervision required, and in no case allow students to be under exclusive supervision of the employee without other members of staff on hand.

For overseas nationals, we will:

- document what action has been taken to obtain a check and why this has not been possible
- thoroughly check their ID and references, requesting further references if appropriate
- thoroughly check any gaps in employment history
- In the light of the above, decide on the level of supervision required, and in no case allow students to be under exclusive supervision of the employee without other members of staff on hand.

Single Central Record

A single central record of pre-appointment checks on all staff will be kept, to include:

- identity – name, address, DOB, ID evidence (photo), evidence of check made and date
- start date
- role in organisation
- qualifications – required, evidence of check and date
- DBS certificate – Disclosure number, date issued, type, evidence of check and date
- Barred List check (part of enhanced DBS) – evidence of check and date
- overseas Police check – check required (Y/N), evidence of check and date
- right to work in UK – evidence of check and date
- Prohibited List check – evidence of check and date
- Restriction check for teachers who have worked in EEA countries
- section 128 Prohibition Check for Directors
- at least 2 references

Adults Working with Children U8 Years Old

In addition to all the above, we ask additional questions that would not appear on DBS checks or Prohibited List checks.

- Have they ever had a child placed under a Care Order?
- Have they ever had a Childcare Registration cancelled?

A final decision will be made by the Vice Principle.

KCSIE 2020 includes a new statement relating to a person conduct outside the school and need not to include a child, for example, domestic abuse of a partner.

Appendix A

PARENT OR GUARDIAN CONSENT FORMS FOR STUDENTS AGED U18 2022

U18 Face to Face Groups

We want to make sure that your child is safe while studying in the UK. To help us, we ask you as a parent or guardian to complete this form for your child aged under 18 who is enrolled on a course provided by LanguageUK. Please discuss this consent form with your son/daughter and complete it.

The consent form must be returned to your school as you are coming as part of a group.

Please complete all sections and give a copy to your son/daughter to travel with.

The information you provide us will be dealt with in the strictest confidence and only shared with the required persons to deliver a service such as healthcare and welfare professionals or for legal reasons. For any paper copies we will hold this information below for a period of 2 years and then securely destroy this information. In providing the information requested below, you should note that LanguageUK promotes equality of opportunity and will take action to ensure that no individual suffers discrimination, directly or indirectly, on the grounds of gender, disability, colour, race, religious beliefs, sexual orientation, age, nationality, ethnic or national origin.

1. Personal Details and Emergency Contact Information

To be completed for all students under the age of 18

Student name	
Gender M or F	
Date of Birth	
Nationality	
Email address	
Personal Mobile Number	
Date of arrival in UK:	
Date of departure from UK:	
Parent/Guardian 1 Name	
Parent/Guardian 1 contact number	
Parent/Guardian 1 email address	
Parent/Guardian 2 Name	
Parent/Guardian 2 contact number	
Parent/Guardian 2 email address	
Please give another TWO emergency numbers and their relationship to you.	

PASTORAL CARE

The level of care offered to your child is outlined in our policies and T & C We have an emergency 24-hour contact phone number, which is 0044 (0)7467144234

Travel

I understand and agree that:

- my son/daughter will travel accompanied to and from Canterbury at the start and end of their course.

Attendance

I understand and agree that:

- my son/daughter is expected to attend all scheduled classes and activities.
- he/she understands that he/she must follow the school's 'attendance policy'.
- CURFEW TIME for students on the Summer Course and groups are not allowed out in the evening unless organised with LanguageUK and their leaders.

Unsupervised times

I understand and agree that:

- my son/daughter can travel unaccompanied between the school and his/her accommodation.
- **Other:**
- I understand and agree that:
- it is illegal to buy alcohol under the age of 18 and illegal to buy cigarettes under the age of 18 or to smoke in public under the age of 16, and that the school will enforce these laws. If necessary, the school may search students' belongings and confiscate illegal or other items deemed to be inappropriate.
- we (the parents/guardians) are financially responsible for any damage that our son/daughter causes during his/her stay in the UK.
- if the school believes that the safety of my son/daughter is compromised, LanguageUK /homestay provider may impose further restrictions or rules as required.
- it is important to discuss staying safe online with our son/daughter and we have explained that he/she should not share personal information with strangers on the internet.
- my son/daughter must have adequate travel and medical insurance and will ensure they have this before they travel.
- my son/daughter understands that he/she must follow the school and homestay rules.
- my son/daughter must follow the school's policy on unreasonable behaviour:
Please see our **WITHDRAWAL PROCEDURES FOR THE REMOVAL OF A STUDENT 2022**
- In the first instance, our staff will speak to the student explaining why the behaviour is unreasonable. If necessary, the student will then receive an official warning in writing with a copy sent to the parents.
- If unreasonable behaviour continues the student may be sent home immediately without a refund. The parents will be asked to pay for the return flight.

2. Medical Information: Please tell us about any problems. If we are not told in advance about a physical or mental condition, we reserve the right to terminate the student's course

Does your son/daughter have any medical conditions/ illnesses?	YES/NO
*Please give details:	
Does your son/daughter require a special diet?	YES/NO
*Please give details:	
Allergies, please include any allergies to food, materials, plasters:	YES/NO
*Please give details:	
Does your child always carry an Epi Pen?	YES/NO
*Please specify the course of action to be taken by LanguageUK staff or the host family in case of an emergency:	
In case of minor pain or illness such as a headache, mild cold, sore throat, do you agree to your son/daughter be given over the counter medicine.	YES/NO

(e.g., paracetamol, ibuprofen, cough medicine, throat pastilles, antihistamine, or travel sickness tablets?)		
Is your son/daughter taking any medication?		YES/NO
Does your son/daughter require regular hospital treatment?		YES/NO
Do you consent to your child being given non-prescription medication / emergency aid?		YES/NO
Do you authorise a doctor to give any medical treatment considered necessary including the administration of an anaesthetic and operation if you cannot be contacted in an emergency?		YES/NO
Is there anything else we should know about?		YES/NO
*Please give details:		
<p>LanguageUK will require proof of any allergies by way of medical certificate, doctor's note, or letter from parents.</p> <p>LanguageUK takes no responsibility for medical emergencies arising from non-disclosure of current medical information.</p>		
Does your son/daughter have any of the following: (please circle)		
Asperger's	Autism	Heart condition
ADHD	Dyslexia	Diabetes
Dyspraxia	Mental Health Issues	Bed-wetting
Eating Disorders	Severe Headaches	Hearing Impairment Visual Impairment

3. Insurance

<p>I hereby have provided full health and travel insurance for my child. (We do not recommend students to travel without travel insurance before arriving in the UK). Due to the pandemic covid-19 please make sure your child is covered appropriately. We recommend you use the service of guard.me https://www.guard.me/</p> <p>If any student or Leader with Covid-19 must stay on in the UK due to their quarantine period, they would still receive online (hybrid) classes if the school has another suitable course for them to join. There is no charge for this. The cost of the longer accommodation period and any change to their flight booking must be covered by their own travel/medical insurance or by the agent.</p> <p>If the homestay provider is not happy to keep the student at home, we have Emergency rooms subject to availability, if not the cost of alternative accommodation would have to be covered by your insurance or student insurance and a leader would have to stay with them.</p>	YES/NO
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4. Accommodation

I understand that the accommodation will be supplied by LanguageUK.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Our son/daughter will follow the homestay host rules and requirements and will be responsible for any damage they may cause. <input type="checkbox"/> YES <input type="checkbox"/> NO	
LanguageUK reserve the right to charge £100 for an unnecessary change of home stay host.	
Under no circumstances, without the host consent, must a student take photos inside the house and use the photos on social media including Facebook, WhatsApp, Snapchat, Instagram, Twitter, and any other application. This is a serious invasion of privacy.	

All our homestay providers are DBS (Disclosure and Barring Service) checked before any U18 students are placed. We provide regular checks to all our homestay providers and all staff and Homestay hosts share the responsibility to protect U18 students from harm, know how to identify possible protection issues and follow the Safeguarding for Homestays guidance. All Accommodation will be up to a 30 minutes' walk away or a small bus ride away.

Some homestay providers use CCTV/security cameras do you give your consent for this? YES/NO

5. CONSENT

Photographing and filming:

We occasionally take photographs and videos of classes or other school activities during your child's time with us, which may be used for promotional purposes, including social media. These will not be shared without your permission.

We consent for images of our child to be used in the School's and School's partners' external marketing materials **Yes/No**

Agreement

We, the parents/guardian's consent that our son/daughter can take part in a language course at LanguageUK. We confirm that our child has enough sense of maturity and responsibility to study at a school where there will be students aged 18 and over.

Please note that by signing this declaration you agree to all selections you have made on this form, and you confirm that all the information you have given is true and accurate. You also confirm that without this form the school has the right to terminate or cancel the booking or the study period and that your son or daughter may be asked to leave the school and return home at your own cost. I have read, understood, and accept the LanguageUK terms and conditions that accompany this consent form for the placement of junior students.

Student Name-----

Parent's Name-----

Parent's Signature-----

Parent's Mobile number-----

Date-----

Parent/guardian: I agree to the terms and conditions. I have discussed the agreed arrangements and rules with my son/daughter. **Yes/No**

Student: I have discussed the agreed arrangements and rules with my parent/guardian **Yes/No**

Terms & Conditions Please read carefully:

- Students will be placed 2,3 or 4 per homestay accommodation depending on the size of the house. All junior group students' accommodation is based on shared rooms. We **do not provide single rooms** for junior group students.
- Your son/daughter will follow the homestay host rules and requirements. Any damages committed by a student must be paid for by that student in full.
- We work very closely with the hosts, and we consider all the students' comments about them. We only move students if we feel the circumstances are correct and in an emergency. Students or leaders cannot decide for themselves that they want to be re housed before consulting with the accommodation officer. In Canterbury, we have designated welfare officers who oversee any accommodation moving and any welfare issues.
- LanguageUK reserves the right to charge a student on a group course £100 for a non-valid reason change of host family.
- **Under no circumstances, without the host's consent, must a student take photos inside the house and use this photo on social media including Facebook, WhatsApp, Snapchat, Instagram, Twitter, and any other application. This is a serious invasion of privacy.**
- LanguageUK are not liable for any videos, photos that are downloaded onto social media that causes distress or any legal action. The students who take the videos are responsible and liable Any students who are caught invading privacy will be expelled from the course.
- We understand the school reserves the right to terminate the course of any student who persistently breaks the rules seriously misconducts himself/herself at the school or in the homestay. In such cases there will be no refund for fees, and we will be responsible for our child's return and all costs. Misconduct may include possession/consumption of illegal drugs/alcohol, intentional damage of the school or homestay property, repeated disturbance in class and at the homestay, repeated breaking of the rules, criminal activity, and bullying.
- All students must attend all classes. LanguageUK has a strict attendance Policy. Students can be absent when they are not well and in such case the student must inform their group leader who will then inform the school and the welfare department straight away and a doctor's appointment can be booked if needed.
- Failure to sign and return this form back to the school, agent then LanguageUK when asked to do so may result in problems with your booking.
- Please note there will be no movement of homestay and classes once your child has been allocated a home and class at these present times.
- **I am fully and personable responsible for my own safety and actions while and during my participation with LanguageUK on a course and I recognise that I may be at risk of contracting COVID-19.**
- With full knowledge of the risks involved, I hereby release waive, discharge to LanguageUK its board of directors, employees and representatives and assign from any and all liabilities claims, demands, actions, and causes of actions whatsoever directly or indirectly arising out of a related to any loss or damage injury or death that may be sustained by me related to, COVID-19 while participating in any activity while in, or around the school or homestay provider that may lead to unintentionally exposure or harm due to COVID-19.
- I agree to indemnify, defend, and hold harmless LanguageUK from any costs, expenses, damages, lawsuits and or liabilities or claims due to injury loss or death related to COVID-19.
- By signing the consent, I acknowledge that I have read the foregoing Liability Release Waiver and understand its contents; that I am (18) years old and over, a group student aged U18 whose parents or legal guardians are fully competent to give my consent; That I have been sufficiently informed of the risks involved and give my voluntary consent in signing it as my own free act and deed.
- This waiver will remain effective until laws and mandates relevant to COVID-19 are lifted.

- Revised October 2021

LANGUAGEUK CORONAVIRUS SELF DECLARATION FORM U18 2022

For the health and safety of LanguageUK and our community, declaration is required. Be sure the information you give is correct and complete.

TO BE COMPLETED BY ALL STUDENTS ARRIVING INTO THE UK U18			
NAME:			
PASSPORT NUMBER:			
HAVE YOU TRAVELLED ABROAD IN 2022? YES		NO	
NAME COUNTRIES VISITED INCLUDING CITIES AND TOWNS. PLEASE INCLUDE DATES OF TRAVEL AND RETURN DATES FOR EACH AREA.			
HAVE YOU BEEN IN CONTACT WITH ANY PEOPLE BEING INFECTED, SUSPECTED OR DIAGNOSED WITH COVID-19? YES/NO PLEASE STATE YOUR RELATIONSHIP WITH THE PEOPLE AND YOUR LAST CONTACT DATE WITH THEM.			
PLEASE STATE WHETHER YOU'VE EXPERIENCED OR ARE EXPERIENCING THE FOLLOWING:			
COUGH	YES	NO	
FEVER	YES	NO	
SHORTNESS OF BREATH	YES	NO	
LACK OF TASTE AND SMELL	YES	NO	

- .
- .

Child's temperature before departure: (do not allow your child to travel if they have a fever higher than 38.0 C.)	Date:
---	-------

- To ensure traceability, please notify us immediately if any of your students are diagnosed with Covid-19 after their return.
- I acknowledge that the information I have given is accurate and complete.

DATE:
SIGNATURE:

Appendix B

Fire Safety Homestay Risk Assessment 2022

If you have a paying guest in your home, you have a responsibility to keep them safe. This includes updating gas safety certificates/annual gas service records, which must be certified by Registered Gas Safe engineers, and carrying out a fire risk assessment of the home every 12 months.

It is also recommended that you fit carbon monoxide detectors. These should be British Standard approved, with a battery life of up to five years. Fit them in each room with a gas appliance.

Every homestay host is subject to common law and has a duty to make sure their property is safe. We therefore ask that all hosts follow this fire safety advice:

- All new properties must have mains-operate smoke alarms fitted on every floor of the property. Older properties should have standard battery-operated smoke alarms.
- If you fit battery-operated smoke alarms in your property, you should test them regularly.
- Provide all guests with a fire escape plan so they know what to do in the event of a fire.
- The electrical system in your home should be in good working order.

Fire Safety Risk Assessment Guidelines

Here are five easy steps to help you complete your fire risk assessment:

Step 1 – Identify the fire hazards in your home

- Things that might ignite such as plug-in convector heaters or candles
- Things that can burn such as refuse and stacks of paper, magazines, combustibles
- Things that can accelerate a fire such as ceiling/desk fans and air conditioning units

Step 2 – Identify those at risk

- Children
- Parents with babies
- Those who have hearing impairment may not be alerted to a standard smoke alarm and disabled people may find it difficult to get out of the home quickly.

Step 3 – Evaluate, remove, reduce, and protect from risk

- Replace highly combustible materials with less combustible ones
- Ensure adequate separation between combustibles and ignition sources

Step 4 – Record and plan

- Have a fire safety record book
- Record the hazards and people identified as especially at risk in Steps 1 and Step 2
- Record what you did for Step 3
- Ensure guests are made aware of fire exit routes in your home
- Keep a record of having informed guests about the emergency evacuation plan
- Keep a record of weekly checks made to battery-operated fire alarms and fire extinguishing equipment, e.g., fire extinguishers and fire blankets

Step 5 – Review

- Risk assessments should be kept up to date and reviewed every 12 months
- Ensure your Gas Safety Certificate/Gas appliance service record is renewed every 12 months

RESPONSIBLE PERSON		
Surname		
Forename		
Telephone number		
Email		
Property Address		
Are there any areas of concern in the homestay? E.g., live, and exposed wires, trip hazards, loose stairs or banisters/railings, blocked exits, and loose carpets.		Notes
Written fire escape plan	YES	NO
Smoke alarms on each floor	YES	NO
Smoke alarms last tested date		
Smoke alarms testing frequency		
Carbon monoxide monitor	YES	NO
A valid Gas Safety Certificate is obtained every year and a copy is available on request	YES	NO
What Firefighting equipment is present in the property. Please list any details of items such as fire blanket(s), extinguisher(s) including their locations.		
Emergency exit routes are always kept clear	YES	NO
Guests are informed if the house has any specific features that might be hazardous (e.g., balconies, steep stairs etc).	YES	NO
Guests are briefed about evacuation procedures and where to assemble.	YES	NO
Guests are given the Emergency Contact Number 999 and your personal mobile number to keep in touch?	YES	NO
<ul style="list-style-type: none"> • Please remember to discourage guests from using candles and electric blankets. • Please note that homestay providers, because they are paid to have people sleeping in their home, are legally required to have a fire risk assessment to comply with fire safety law. This is evidence that the homestay provider has not been negligent. • Remember that risk assessments are for the benefit and safety of guests as well as your family. 		
Assessment Date		
I confirm all statements above are accurate to the best of my knowledge	YES	NO
I understand and agree that the risk assessment form is provided to help eliminate any risks at homestay providers properties and LanguageUK will not be liable for any accidents, fire, or explosions within the home.	YES	NO
Signed:		
Date:		

Reviewed November 2021

Appendix C

Section heading	Content
Title	LanguageUK School Student Acceptable Use Agreement for U18
Statement	<p>The internet is a powerful tool giving great opportunities to everyone. Most things about the internet are good; some are not so good.</p> <p>This agreement aims to keep under 18 students safe online when they join a course at LanguageUK.</p> <p>LanguageUK has online safety measures (<i>e.g., filters, passwords, monitoring of online activity, etc.</i>) to help protect students.</p> <p>All under 18 students need to be responsible online, use the internet legally and follow these rules.</p>
Acceptable Use Agreement	<p>I will be responsible in my online behavior whilst on a course at LanguageUK. I will not do anything that might risk</p> <ul style="list-style-type: none"> * My own safety * The safety of other users (students, staff, homestays) connected to the school * The safety and security of the school's or other users' systems.
My Safety	<ul style="list-style-type: none"> * I understand LanguageUK will monitor my online behaviour * I will not share my username or password, or use another person's username or password * I will be aware of 'stranger danger' online and not share personal information (<i>e.g., contact details</i>) about myself or others online * I will not meet anyone off-line who I have met online unless I have staff or a homestay with me * I will immediately report to staff or homestay, any unpleasant or inappropriate material or messages that make me feel upset or unhappy.
Proper (legal) online activity and school rules.	<ul style="list-style-type: none"> * I will only use personal devices (<i>mobile/iPhone, USB devices etc.</i>) and school devices at times allowed in the school rules * I will not create, access (<i>download or upload</i>), share or store any illegal or inappropriate material, using my own or the school's equipment while on the course at LanguageUK * Illegal and inappropriate online materials include: <ul style="list-style-type: none"> - gambling, pornography, age-rated games/films, websites, or games showing violence, any sort of extremism or being unkind to others (<i>intolerance</i>) based on

	<p>race, religion, disability etc., sending or receiving words or pictures about sex, accessing, and not paying for music and films that are protected</p> <p>* I will not install or store programmes on school or other users' equipment that will alter or affect that equipment.</p>
My behaviour	<p>* I will act as I want others to act towards me</p> <p>* I will not access, copy, remove or alter other people's or the school's online materials or settings without their permission</p> <p>* I will be polite when I communicate with others online. I will not use unkind, angry, or bad language in texts, emails, or any other online messages.</p> <p>* I will not take, send, or share on social media, pictures of anyone without their permission</p>
I am responsible	<p>* I understand that I have broken the LanguageUK rules if my online behaviour does not follow this Agreement and that I can be disciplined. If it is serious (e.g. breaking UK law) I might be sent home or taken off the online course.</p> <p>* This Agreement includes my time in school and away from school for the duration of the course, particularly my behaviour to other members of the school community</p>
Student signature	<p>* I understand this Agreement and that it is important</p> <p>* I will follow it when using my own equipment (e.g., phones / cameras / all other technology equipment), always during the course.</p> <p>Name: _____ Signed _____ Date _____</p>
Parent signature	<p>* I understand this Agreement and have helped my child understand his/her responsibilities and the importance of acting safely and legally online. I accept that this Agreement is part of LanguageUK rules for under 18s</p> <p>Name: _____ Signed _____ Date _____</p>

Online Safety

Acceptable Use Agreement for very young U12

Section heading	Content
Be safe online	<ul style="list-style-type: none"> * I be careful when I am online * I will not tell people my name or anything about me or send pictures of me if I do not know them * I will not take or send pictures or other people unless they say it is OK * I will not use another person's iPhone/laptop/game machine * I will only use kind and good words in my messages * I will not send pictures or messages that make another person sad or unhappy * I will tell my teacher/homestay if I get any messages or pictures that make me sad or unhappy * I will not look at any websites or pictures if they show people being violent or unkind. * If I am not sure about anything online or how to be safe, I will ask my teacher / homestay for help
Student signature	<p>* I know I must follow the rules about being safe online and I will while I am on the course at LanguageUK</p> <p>Name: _____ Signed _____ Date _____</p>
Parent signature	<p>* I understand this Agreement and have helped my child understand his/her responsibilities and the importance of acting safely and legally online. I accept that this Agreement is part of LanguageUK rules for under 18s</p> <p>Name: _____ Signed _____ Date _____</p>

Appendix D

Safeguarding Incident/Concern Referral Form 2022: (U18 only and vulnerable adults)

Remember T.E.D when talking to an under 18:

- Explain to me
- Receive (describe to me)
- Reassure
- React
- Record

Date:	
Name:	
Date of birth:	
Gender:	
Nationality:	
Group /individual:	
Passport No or ID:	
Name of Person reporting:	
Role /connection with school:	
Name of anyone else present and position in school:	
Date and time noted:	
Location:	
Concern: (please provide as much detail as possible) NB if reporting a disclosure/allegation made by a student, please use this space to describe verbatim or as close as you can remember the conversation. Please think of the following: What has prompted the concern? Does the child understand what is happening? Did someone speak to the child about this? Has any individual been identified in the allegation? Are/could other people be involved? Any immediate action taken?	
Signed:	
Date:	

Please take this form to the Designated Safeguarding Person or Leader.

If you have any concerns, please contact Verity Sessions on verity@languageuk.com

Action taken by the DSL: Details of the disclosure by child/incident/child protection concerns:
Description of injury (if seen)
Notes of feedback between DSL and the DSP and the person who raised the child protection concern:
Details of Other Agencies contacted (please state the Agency, purpose of contact and outcome)
Signed:
Date:

Points:

Accept what is being said without judgment.

Take it seriously.

Do not promise confidentiality-never to agree to keep secrets.

Always acknowledge how difficult it must have been to talk.

Do not investigate, interrogate, or decide if the student is telling the truth.

Ask open questions like "Is there anything else that you want to tell me?"

Communicate with the student appropriate to age.

Explain what you must do next.

Keep it factual

Appendix E

CODE OF CONDUCT FOR TEACHERS AND ALL STAFF WORKING WITH U18 2022

This conduct code outlines LanguageUK expectations from all our staff working with U18 online. The conduct code aims to help us protect children and young people from abuse and reduce the possibility of unfounded allegations being made. It has been informed by the views of children and young people.

LanguageUK is responsible for making sure everyone taking part in our services has seen, understood, and agreed to follow the code of behaviour, and that they understand the consequences of inappropriate behaviour.

The role of all staff:

In your role at LanguageUK you are acting in a position of authority and have a duty of care towards the children and young people we work with. You are likely to be a role model and are expected to act appropriately.

Responsibility:

You are responsible for:

- prioritising the welfare of children and young people
- providing a safe environment for children and young people
- ensuring equipment is used safely and for its intended purpose
- having good awareness of issues to do with safeguarding and child protection and acting when appropriate.
- following our principles, policies, and procedures
- including our policies and procedures for child protection/safeguarding, whistleblowing, and online safety
- staying within the law always
- modelling good behaviour for children and young people to follow
- challenging all unacceptable behaviour and reporting any breaches of the behaviour code to DSL Lead and DoS
- reporting all concerns about abusive behaviour, following our safeguarding and child protection procedures

Rights:

You should:

- treat children and young people fairly and without prejudice or discrimination
- understand that children and young people are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability, and religious belief systems, and appreciate that all participants bring something valuable and different to LanguageUK
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

Relationships:

You should:

- promote relationships that are based on openness, honesty, trust, and respect
- avoid favouritism
- be patient with others
- exercise caution when you are discussing sensitive issues with children or young people
- ensure your contact with children and young people is appropriate and relevant to the work of the project you are involved in

- ensure that whenever possible, there is at least one adult present in the room during online activities with children and young people
- if a situation arises where you are alone in the online classroom with a child or young person, ensure that you are within sight or hearing of other adults.
- if a child specifically asks for or needs some individual time with you, ensure other staff have access to the class as well. Please contact Verity Sessions immediately if this should occur
- only provide personal care in an emergency and make sure there is more than one adult present if possible

Respect:

You should:

- Always listen to and respect children
- value and take children's contributions seriously
- respect a young person's right to personal privacy as far as possible.
- if you need to break confidentiality to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity.

Unacceptable behaviour:

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

- allow concerns or allegations to go unreported
- take unnecessary risks
- smoke, consume alcohol or use illegal substances online at any time
- develop inappropriate relationships with children and young people
- make inappropriate promises to children and young people
- engage in behaviour that is in any way abusive
- including having any form of online sexual contact with a child or young person.
- let children and young people have your personal contact details (mobile number, email, or postal address) or have contact with them via a personal social media account
- act in a way that can be perceived as threatening or intrusive
- patronise or belittle children and young people
- make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures to or in front of children and young people.

Upholding the code of conduct

You should always follow this code of behaviour and never rely on your reputation or that of LanguageUK to protect you.

If you have behaved inappropriately, you will be subject to our disciplinary procedures. Depending on the seriousness of the situation, you may be asked to leave LanguageUK.

We may also make a report to statutory agencies such as the police and/or the local authority child protection services.

If you become aware of any breaches of this code, you must report them to Verity Sessions. If necessary, you should follow our whistleblowing procedure and safeguarding and child protection procedures.

This website is very good for information.

<https://www.saferinternet.org.uk/helpline/professionals-online-safety-helpline>

I have read the above and agree to fulfil its requirements.

Name:

Date:

Written June 2020

October 2021

Next review Oct 2022

Appendix F

Code of Conduct for Teachers and staff online at LanguageUK Adults

1. Staff are expected to act responsibly when considering the academic needs and welfare of all our students online.
2. Professional appearance online. Staff should dress smartly and with sensitivity to the students' cultural backgrounds. Please remember to keep your background neutral to avoid the students seeing any personal things that they may want to discuss.
3. We discourage staff from giving out their personal contact details to current students over 18.
4. Staff should be conscious of professional boundaries, with all students online.
5. All staff shall respect the learner's right and dignity without prejudice to gender, colour, age, race, place of origin, language, sexual orientation, socio-economic background, family status, religion, physical characteristics, disability, etc.
6. All classes must be carefully prepared and should aim to provide students with enjoyable and motivating lessons using a variety of resources and materials. Keeping it real some people have a different persona online, speak to your students by their first name and remember to disable the chat within the classroom. Ensure you can see all your students.
7. Teachers should ensure that classes start and finish on time, leaving adequate preparation time before the start of lessons. When your students are waiting for the class to begin, please remembering to have the microphone set on mute for all students
8. Teachers are required to submit weekly work records, to keep an attendance register for all classes, and to ensure as far as possible the students' attendance and good conduct in their class. Teachers will be asked to contribute to reports on students' progress and achievement. Teachers must ensure that all documentation is fully completed, accurate and up to date. Teachers to report any issues that may need following up.
9. Teachers shall not favour or disadvantage certain students, when marking or correcting (because of nepotism, payment of bribes, sexual or religious discrimination, etc.).
10. Teachers and staff shall prohibit physical, verbal, psychological or sexual violence against a student in any form, coercive or consensual (gender-based violence).
11. Teachers and staff shall not take advantage of his/her professional relationship with students for private gain.
12. Shall not harass a pupil in any way (including sexual harassment)
13. Shall not exert pressure on students to take additional paid courses.
14. Shall not collect illegal fees from pupils (for admission, organizing exams, etc.).
15. Shall not divulge confidential information about other students. You must treat sensitive, personal information about students with respect and confidentiality and not disclose it unless required to do so by your employer or by law. You must be truthful, honest, and fair in relation to information you provide about students.
16. All staff should always treat their colleagues with professional respect, especially in the presence of students. Staff are expected to foster a happy and productive working atmosphere and develop positive relations with students, other staff members. On occasions you may have other staff pop into your classroom you will be notified in advance when this will occur. You must also inform your students as well.
17. Please make sure your students cannot record your lessons and if you record your own lesson, please make sure you inform the safeguarding officer especially if you want to archive it. If you should have any concerns over any of your students on a safeguarding issue, please report your findings to Verity Sessions DSL and Claire Roberts DSP.
18. Data Protection Act: It is the responsibility of all employees to ensure the school's compliance with the Data Protection Act. Personal data must only be used to assist you to carry out your work; it must not be given to people who have no right to see it. All staff should maintain the security of all computerized databases of information on individuals, whether they are staff or students. Staff should refer any queries to the principal.

<https://www.saferinternet.org.uk/helpline/professionals-online-safety-helpline>

This website has some very useful information.

I have read the above and agree to fulfil its requirements

Name:

Date:

Appendix G

ON-LINE PARENTAL CONSENT FORM U18 2022

We want to make sure that your child is safe and happy while studying online. To help us, we ask you (the parent or legal guardian) to complete this form for any student aged under 18.

Please note that the student will not be able to start the course until the form is received by LanguageUK.

We, the parents/guardian's consent that our son/daughter can take part in an online language course at LanguageUK.

We promise to keep this information secure and will only give it to people who are directly involved in caring for your child on a need-to-know basis. We will not pass on any details to 3rd parties to be used in marketing. For any paper copies we will hold this information below for a period of 2 years and then securely destroy this information. In providing the information requested below, you should note that LanguageUK promotes equality of opportunity and will take action to ensure that no individual suffers discrimination, directly or indirectly, on the grounds of gender, disability, colour, race, religious beliefs, sexual orientation, age, nationality, ethnic or national origin.

1. Personal Details and Emergency Contact Information

To be completed for all students under the age of 18

Student name	
Male or Female	
Date of Birth	
Parent/Guardian 1 Name	
Parent/Guardian 1 contact number	
Parent/Guardian 2 Name	
Parent/Guardian 2 contact number	
Email address of parent/guardian	

- I agree that my son/daughter will attend an online course at LanguageUK and agree that he/she will follow the rules and regulations of the school. If I wish my son/daughter to be absent at any time, I must contact the school.

2. Any extra help we need to provide (for example because of a disability):

To be completed for all students under the age of 18

Is there anything else you think we should know?

3.Information for Parents and Carers:

To be completed for all students under the age of 18

All questions on the consent form must be completed and signed by the parent or carer before any child takes part.

Parents and carers must ensure they notify us of any changes to the information given on the form.

Parents and carers must make sure their children are on line 10 minutes before the class starts.

Any lesson a student books and fails to attend for 20 minutes after the scheduled start time will be abandoned and will still be deducted from his/her allocation.

LanguageUK online services currently provide:

- individual email accounts for all students
- access to the learning materials, with all reasonable care taken by LanguageUK to monitor and control access to the online teaching and learning services such as using Notebook
- digital resources and online learning activities
- access to online file storage and sharing services

ONLINE ACCOUNT DETAILS:

STUDENTS FIRST NAME:

STUDENTS LAST NAME:

STUDENTS PREFERRED NAME:

5. I agree please tick

Please complete details below

I----- (print name) give my full permission for my Son/Daughter to attend online lessons with LanguageUK.

- My child taking part in the stated online class.
- My child taking part in the stated online activity.
- LanguageUK keeping a record of this form.
- My child being filmed or photographed during the class.
- Photographs/media recordings may be used for publications or marketing publicity.
- The lessons being recorded (please note recordings cannot be accessed by anyone, only key staff members.
- Note: if consent is not given, LanguageUK will not use any images taken during the class that contain the child/young person.
- I understand that my child needs to follow the behaviour code and any safety rules so that LanguageUK can keep them and other children safe.
- Do you give permission for your child to have an online account? Yes / No (circle one)
- I agree to and understand the responsibilities my child has using the online services provided at LanguageUK for educational purposes.
- I also understand that if my child breaks any of the rules in the agreement, that LanguageUK may take disciplinary action.

- Please note if your child is part of a closed online group with the same school, age 16 to 19 years will be in the same online class.

Note: while every reasonable effort is made by LanguageUK to prevent student exposure to inappropriate online content when using LanguageUK Services, it is not possible to eliminate the risk of such exposure. LanguageUK cannot filter Internet content accessed by your child from home or from other locations. LanguageUK recommends the use of appropriate Internet filtering software.

6. Teachers and Staff:

Please note all our staff and teachers have had many years of experience. They are all DBS Enhanced checked for suitability for people working with children and adults and are all qualified in Prevent and Safeguarding Level 1 to 3.

A **DBS check** is a record of a person's criminal convictions and cautions – carried out by the Disclosure and Barring Service.

We ensure privacy settings are enabled to the most secure setting. Any geolocation capabilities must be switched off and our users are instructed not to share photos, last names, addresses or other personal information.

One-to-one contact between our teachers and children is not allowed. Teachers will never contact students privately, and there should be measures in place to enable moderation of communications, including random spot checks by our Designated Safeguarding lead. All our teachers and staff have been made aware of how to report concerns regarding the misuse of digital/online products. All our teachers, and administrators must complete relevant training to ensure they understand online risk and know how and when to report concerns.

Here you can find all the links to parental guidance for Microsoft teams 365:

https://www.microsoft.com/en-gb/microsoft-365/microsoft-teams/group-chat-software?ef_id=EAAlQobChMIwdWI5rGD6gIVBLDtCh1VSgfDEAAYASAAEgKLnPD_BwE:G:s&OCID=AID2000956_SEM_EAAlQobChMIwdWI5rGD6gIVBLDtCh1VSgfDEAAYASAAEgKLnPD_BwE:G:s

<https://support.office.com/en-us/article/turn-on-parent-and-guardian-access-for-onenote-class-notebook-it-admins-dc15e180-e447-4e09-ba79-6ad07f6a54e8>

E safety awareness:

For general e-safety awareness use an age-appropriate video; there are many available online, for example,

<https://learnenglishteens.britishcouncil.org/uk-now/video-uk/online-safety-tipsraising>

Or access advice from the NSPCC and O2 <https://www.net-aware.org.uk/online-safety-lockdown/>

Reporting on-line:

If you have fallen victim to **cybercrime**, click on the link below to be redirected to the reporting website of your country. Reporting mechanisms vary from one country to another. In Member States which do not have a dedicated online option in place, you are advised to go to your local police station to lodge a complaint. If you need to report any abuse or concerns, please contact our Designated Safety lead on verity@languageuk.co.uk

<https://www.europol.europa.eu/report-a-crime/report-cybercrime-online>

<https://www.saferinternet.org.uk/advice-centre/need-help>

<https://report.iwf.org.uk/en/>

<https://www.gov.uk/report-terrorism>

<https://www.report-it.org.uk/>



CHILDREN ONLINE SAFETY

Cyberbullying is when someone uses technology, like the internet or a mobile phone, to deliberately hurt, humiliate, harass, intimidate, or threaten someone else. It is different from bullying at school or in the community because it can happen at any time of the day or night and it may feel like you cannot get away from it. This may leave you feeling scared and unsafe at home.

We have created top tips on how to deal with cyberbullying, how to stay safe online and how to stay safe using mobile phones.

Staying Safe Online

- 1) Do not post any personal information online – like your address, email address or mobile number.
- 2) Think carefully before posting pictures or videos of yourself. Once you have put a picture of yourself online most people can see it and may be able to download it, it is not just yours anymore.
- 3) Keep your privacy settings as high as possible
- 4) Never give out your passwords
- 5) Do not befriend people you do not know
- 6) Do not meet up with people you have met online. Speak to your parent or carer about people suggesting you do
- 7) Remember that not everyone online is who they say they are
- 8) Think carefully about what you say before you post something online
- 9) Respect other people's views, even if you do not agree with someone else's views does not mean you need to be rude
- 10) If you see something online that makes you feel uncomfortable, unsafe, or worried: leave the website, turn off your computer if you want to and tell a trusted adult immediately.

Tips for mobile phone safety

- 1) Remember if you are being bullied it is not your fault and there is nothing so awful that you cannot speak to someone about it. Talk to a trusted adult at home or at school.
- 2) Do not reply to any nasty messages you receive.
- 3) Do not reply to a text from someone you do not know.
- 4) Keep the messages you have been sent so you can show them to a trusted adult and make a note of the time and date of the messages or calls you receive.
- 5) Do not answer calls from withheld numbers or numbers you do not recognise, let it go to voicemail.
- 6) Block numbers from people who are sending you nasty messages.
- 7) If you are bullied repeatedly can change your number.
- 8) Do not give your mobile number to someone you do not know.
- 9) Do not send pictures to someone you do not know.

Tips if you're being bullied online

- 1) Tell an adult you trust if you are being cyberbullied

- 2) Do not respond or retaliate to bullying messages – it could make things worse
- 3) Block users who send you nasty messages
- 4) Save abusive emails or messages (or texts) you receive
- 5) Make a note of dates and times you receive bullying messages, as well as details you have of the user's ID and the url.
- 6) Do not pass on any cyberbullying videos or messages – this is cyberbullying
- 7) If you are bullied repeatedly change your user ID, or profile, and use a name that does not give any information away about you.

TEENAGERS ONLINE

Teenagers use digital technologies for everyday activities like keeping in touch with friends on social media, relaxing and doing schoolwork. They also go online to look for support for physical or mental health problems, and sometimes to experiment with different ways of expressing themselves. Because they are online so much without your supervision, teenagers need to be able to identify acceptable and unacceptable online content independently. They also need to know how to behave respectfully online and avoid online risks.

Internet safety risks for teenagers

There are three main kinds of internet risks for teenagers.

Content risks

For teenagers, these risks include coming across material that they might find upsetting, disgusting or otherwise uncomfortable, especially if they encounter it accidentally. This material might include:

- real or simulated violence
- pornography
- hate sites
- terrorist sites
- harmful user-generated content like sites about drug use, self-harm, suicide, or negative body image.

Contact risks

These risks include meeting adults posing as children online or with strangers who persuade teenagers to meet them in real life or becoming the victim of online scammers.

Conduct risks

Conduct risks include behaving in inappropriate or hurtful ways or being the victim of this kind of behaviour. Examples include:

- misusing people's passwords and impersonating people online
- cyberbullying
- sexting
- making unauthorised purchases using other people's financial details
- creating content that reveals information about other people
- having trouble regulating online time, which can develop into problem internet use.

Protecting your child from internet safety risks

Your child is probably an independent internet user now, but you can help her keep building the skills and knowledge she needs to identify and manage internet safety risks.

Here are some basic things you can do to protect your child from internet safety risks:

- Create a family media plan. It is best to negotiate your plan with your child. Your plan could cover things like screen-free areas in your house and what online behaviour is OK.
- Talk with your child about upsetting and inappropriate content. If you can talk with him in an open and non-judgmental way, he is more likely to talk with you if he comes across something disturbing online or has a bad online experience.
- Stay in touch with what your child is doing online and how much time she is spending online. This will help you to spot when your child might be having problems.
- Ask your child to 'friend' you on social media. Younger teenagers might be OK with this, but older teenagers might prefer not to friend you.

- Encourage and remind your child to explore and use the internet safely – for example, it is OK to remind him to check his privacy settings.

Technical internet safety tools like **internet filters can increase risk** for children over 14 years. If children are using filters at this age, they might not be developing the skills they need to avoid disturbing content. They might take risks either accidentally or on purpose when they use the internet in unfiltered environments.

Helping your child to identify and manage internet safety risks

It is important to **help your teenage child manage internet safety risks for herself**. This lets your child build digital resilience which is the ability to respond positively and deal with risks they come across online.

You can do this by:

- being a role model for healthy internet use
- talking with your child about online content and behaviour
- reminding your child about privacy and personal information
- teaching your child about online purchases.

It is all about trusting your child to become a responsible digital citizen.

Being a role model for internet use

All children – including teenagers – do as you do, so being a role model for your child is a powerful and positive way to guide your child's behaviour when it comes to internet use.

You can be a role model for safe and healthy screen use by using digital media and the internet in the way you want your child to use it. For example, you might keep internet-connected devices out of bedrooms or avoid using your phone during mealtimes.

It is also good to model positive technology use like sending supportive messages to friends.

Talking about online content

Talking openly about your own digital media and internet use and encouraging your child to do the same will help your child feel able to talk to you if he has a bad experience online.

You can get your child talking by asking her to explain the apps, games, and content she is interested in, so that you understand why she uses them. You might say, 'Snapchat posts disappear quickly, but a screenshot can capture what's been said. Is that right?'

It is good to encourage your child to develop a sense of what he likes and does not like online and to defend his choices with friends. For example, you could say, 'It's great that you chose to block that content and didn't get involved in that online argument'.

Talking about online hoaxes and fake news with your child will help her develop the ability to tell whether a website has good-quality information. [Hoax-Slayer](#) is a site that can help you and your child uncover online scams and hoaxes.

This is all part of digital and media literacy.

Taking care with privacy, personal information and personal safety

You can help your child look at and choose appropriate privacy, location and safety settings on any devices, programs, or social media that he uses, and explain why this is important. For example, you might say, 'Employers often do online searches to find out about job applicants. Make sure that anything you make public online is OK for future employers to see'.

It is also important for your child to be careful about sharing personal information. Remind your child not to give out her name, address, date of birth or other identifying information to people she does not know in person.

And it is a good idea to update 'stranger danger' advice with your child as he moves towards adulthood and meets online dating. For example, you might say, 'There's always a risk if you go to meet someone you only know online. It can lead to dangerous situations. For example, the person might want to hurt you'.



FIFTEEN APPS

PARENTS SHOULD KNOW ABOUT

MEETME



MEETME IS A DATING SOCIAL MEDIA APP THAT ALLOWS USERS TO CONNECT WITH PEOPLE BASED ON GEOGRAPHIC PROXIMITY. AS THE APP'S NAME SUGGESTS, USERS ARE ENCOURAGED TO MEET EACH OTHER IN PERSON.

GRINDR



GRINDR IS A DATING APP CEARED TOWARDS GAY, BI AND TRANSGENDER PEOPLE. THE APP GIVES USERS OPTIONS TO CHAT, SHARE PHOTOS AND MEET UP BASED ON A SMART PHONE'S GPS LOCATION.

SKOUT



SKOUT IS A LOCATION-BASED DATING APP AND WEBSITE. WHILE USERS UNDER 17-YEARS-OLD ARE UNABLE TO SHARE PRIVATE PHOTOS, KIDS CAN EASILY CREATE AN ACCOUNT USING A DIFFERENT AGE.

WHATSAPP



WHATSAPP IS A POPULAR MESSAGING APP THAT ALLOWS USERS TO SEND TEXTS, PHOTOS, MAKE CALLS AND VIDEO CHATS WORLDWIDE. WHATSAPP USES AN INTERNET CONNECTION ON SMART PHONES AND COMPUTERS.

TIKTOK



TIKTOK IS A NEW MOBILE DEVICE APP POPULAR WITH KIDS USED FOR CREATING AND SHARING SHORT VIDEOS. WITH VERY LIMITED PRIVACY CONTROLS, USERS ARE VULNERABLE TO BULLYING AND EXPLICIT CONTENT.

BADOO



BADOO IS A DATING AND SOCIAL NETWORKING APP WHERE USERS CAN CHAT, SHARE PHOTOS AND VIDEOS AND CONNECT BASED ON LOCATION. WHILE THE APP IS INTENDED FOR ADULTS ONLY, TEENS ARE KNOWN TO CREATE PROFILES.

BUMBLE



BUMBLE IS SIMILAR TO THE POPULAR DATING APP 'TINDER' HOWEVER, IT REQUIRES WOMEN TO MAKE THE FIRST CONTACT. KIDS HAVE BEEN KNOWN TO USE BUMBLE TO CREATE FAKE ACCOUNTS AND FALSIFY THEIR AGE.

SNAPCHAT



SNAPCHAT IS ONE OF THE MOST POPULAR APPS IN RECENT YEARS. WHILE THE APP PROMISES USERS CAN TAKE A PHOTO/VIDEO AND IT WILL DISAPPEAR, NEW FEATURES INCLUDING 'STORIES' ALLOW USERS TO VIEW CONTENT FOR UP TO 24

KIK



KIK ALLOWS ANYONE TO CONTACT AND DIRECT MESSAGE YOUR CHILD. KIDS CAN BYPASS TRADITIONAL TEXT MESSAGING FEATURES. KIK GIVES USERS UNLIMITED ACCESS TO ANYONE, ANYWHERE, ANYTIME.

LIVE.ME



LIVE.ME IS A LIVE-STREAMING VIDEO APP THAT USES GEOLOCATION TO SHARE VIDEOS SO USERS CAN FIND OUT A BROADCASTER'S EXACT LOCATION. USERS CAN EARN 'COINS' AS A WAY TO 'PAY' MINORS FOR PHOTOS.

HOLLA



HOLLA IS A SELF-PROCLAIMED 'ADDICTING' VIDEO CHAT APP THAT ALLOWS USERS TO MEET PEOPLE ALL OVER THE WORLD IN JUST SECONDS. REVIEWERS SAY THEY HAVE BEEN CONFRONTED WITH RACIAL SLURS, EXPLICIT CONTENT AND MORE.

WHISPER



WHISPER IS AN ANONYMOUS SOCIAL NETWORK THAT PROMOTES SHARING SECRETS WITH STRANGERS. IT ALSO REVEALS A USER'S LOCATION SO PEOPLE CAN MEET UP.

ASK.FM



ASK.FM IS KNOWN FOR CYBER BULLYING. THE APP ENCOURAGES USERS TO ALLOW ANONYMOUS PEOPLE TO ASK THEM QUESTIONS.

CALCULATOR%



CALCULATOR% IS ONLY ONE OF SEVERAL SECRET APPS USED TO HIDE PHOTOS, VIDEOS, FILES AND BROWSER HISTORY.

HOT OR NOT



HOT OR NOT ENCOURAGES USERS TO RATE YOUR PROFILE. CHECK OUT PEOPLE IN THEIR AREA, AND CHAT WITH STRANGERS. THE GOAL OF THIS APP IS TO HOOK UP.