

# LSI Education UK Schools Safeguarding Students Policy & Procedures



## Introduction

We, the Proprietor, Management and Staff of LSI Education fully recognise the responsibilities we have to safeguard all students under 18 in our care. We recognise that all staff and students, including volunteers, have a full and active part to play in protecting our under 18 students from harm. This policy applies to all staff and volunteers working for LSI Education.

All staff believe that our school should provide a caring, positive, safe and stimulating environment, which promotes the learning of English for the individual.

This policy is drawn up in accordance with Camden Safeguarding Children Board (CSCB) and in compliance with the DfE guidance: “Keeping Children safe in Education April 2014, which replaces Safeguarding Children and Safer Recruitment in Education/Every Child Matters (From January 2007)

The aims of this policy are:

- To practise safe recruitment in checking the suitability of staff and volunteers to work with students (Including ECRB/DBS checks where appropriate)
- To raise the awareness of both teaching and non-teaching staff and volunteers of the need to safeguard students, including raising awareness of signs of bullying, radicalisation and extremism.
- To ensure that all staff maintain appropriate behaviour and follow LSI Education standards and procedures when in contact with students; important not only in safeguarding students, but also in protecting staff from wrongful accusation.
- To establish a safe environment in which students can learn and develop.
- To emphasise the need for good channels of communication between all members of staff and volunteers.
- To maintain an appropriate level of separation between students under 18 on Young Learner’s Programmes and adult students when Young Learner and Adult programmes are running concurrently on a shared site. This does not apply to students aged 16 or 17 on the regular adult programme. No students under 16 are to be admitted onto the Adult programme under any circumstances.
- To put in place a structured procedure within the company to be followed in cases or suspected cases of abuse.
- To develop and promote effective working relationships and channels of communication with other agencies, including the Police and Family Services.

The emphasis of this Safeguarding Policy is on prevention. However, we recognize that there may be occasions when staff, students, or external contacts have concerns about potential or actual harm to under 18 students. This policy makes provision for such complaints, ensuring any such concerns can be acted on appropriately.

### **Procedures**

Our school procedures for safeguarding students will be in line with national guidance and the London Child Protection Procedures under the auspices of the Camden Safeguarding Children Board (CSCB).

We will ensure that:

- We have a Designated Safeguarding Lead (Fozia Niazi) who undertakes regular training (a minimum of two days every two years) in Safeguarding, Student Protection and Inter-Agency working and has successfully completed a Safeguarding Students, Designated Person, level 3 training programme.
  - He will liaise with local statutory students' agencies as appropriate.
  - All members of staff, volunteers & staff from external & supply agencies are aware that she is the Designated Safeguarding Lead, responsible for student protection matters.
- Gavin Taylor is the alternate Designated Safeguarding Lead, responsible for Safeguarding in Fozia Niazi's absence. He has successfully completed a Safeguarding Students, Designated Person, level 3 training programme with Child Protection Training UK. She will undertake regular training in Safeguarding, Student Protection and Inter-Agency working at least once every two years.
- Safer recruitment practices followed at all times for in-house staff.
  - All members of staff with regular unsupervised access to students are subject to enhanced ECRB/DBS clearance.
  - Identity checks include sight of original passport, qualifications, utility bill, bank statement and driving license.
  - References are sought and checked, gaps on CVs investigated and self-declarations signed.
  - Potential staff are advised that we are a safer recruiter and that these steps will be taken.
  - Enhanced CRB/DBS checklists are housed securely. There is also a single centralised register of all staff, including supply staff. Please see *LSI Safer Recruitment Policy 2016 for full details*.
- Written confirmation sought from all external agencies that their staff, (when given regular unsupervised access to students in our care), have been appropriately screened and that all checks have been carried out on their staff's identity, medical and physical fitness to work with students, references, right to work in the UK and their suitability to work with students.

- Student behavioural policies and student contracts implemented to work against bullying. Posters and signage to promote awareness of bullying for students. This includes cyber bullying.
- Staff training and documentation to raise awareness of the signs of bullying. This to be done at induction and included in the three year safeguarding refresher training.
- All staff to be given this Safeguarding Policy and Part 1 of Keeping Children Safe in Education (April 2014).
- Scheduling and staffing to ensure that as far as possible students under 18 on Junior programmes do not come into extended unsupervised contact with Adult students (when on a shared campus). This does not apply to students aged 16 or 17 on the regular adult programme. No students under 16 are to be admitted onto the Adult programme under any circumstances.
- Accommodation to be allocated so as to avoid housing students under 16 with students over 18. On a case by case basis accommodation of students under 18 with students over 18 to be carefully considered and a recording of decision and suitability made.
- Allegations against LSI Education staff reported to LSI Education management immediately. Set procedures in place for management response established to protect both the student and the adult. (Details below)
- Our procedures will be regularly reviewed and up-dated. All new members of staff and adult volunteers will be given basic Safeguarding training and will be alerted to the proper procedures as part of their induction into the school. They will also be given a copy of this policy. All permanent staff will receive updated training every three years.

## **Responsibilities**

The Designated Safeguarding Lead works together with the Proprietor, Mr. David Immanuel and Senior Management Advisors, Mr. Roy Immanuel and Mr. Phil Scherb, all of whom have successfully completed a Safeguarding Students, Designated Person, level 3 training programme with the NSPCC. Mr. Phil Scherb, General Manager of the LSI UK schools, performs an annual review of the Safeguarding documentation and an on-site inspection of the school to ensure that relevant staff training is appropriate and up to date. Mr. Phil Scherb reports his findings to the Designated Safeguarding Lead in each school and the proprietor, Mr. David Immanuel.

## **The proprietor is responsible for:**

- Conducting an annual review of the school's safeguarding, Student Protection policies and procedures and of the efficiency with which the related duties have been discharged.

- Ensuring that any deficiencies or weaknesses in Safeguarding, Student Protection arrangements are remedied without delay.
- Approving amendments to safeguarding, student protection arrangements in the light of changing regulations or recommended best practice.
- The Proprietor, Mr. David Immanuel has a legal duty to respond to requests from the ISA for information he holds.

**The Designated Safeguarding Lead is responsible for:**

- Adhering to Camden Safeguarding Children Board (CSCB) and national guidance, London Student Protection Procedures, and school procedures with regard to referring a student if there are concerns about possible abuse;
- Ensuring that all Student Protection takes place and that all staff are aware of their needs to safeguard students at all times.
- Keeping written records of concerns about a student even if there is no need to make an immediate referral;
- Ensuring that all such records are kept confidentially and securely and are separate from student records;
- Operating safer recruitment procedures (including ECRB/DBS checks and compliance with Independent schools Standards Regulations).
- Ensuring that any deficiencies or weaknesses in Safeguarding, student protection arrangements are remedied without delay.
- Supporting students.

**Safer Employment Practices**

LSI Education complies with all legal and regulatory requirements for safer recruitment and employment of all staff. All posts which have a clear need for direct access to students are subject to criminal records clearance. In accordance with ISI/Accreditation UK guidelines, all staff with regular, unsupervised access to students and young people up to age 18 must have ECRB/DBS checks. Written confirmation of appropriate screening is sought from supply agencies and external organisations prior to commencing work. Further identification checks are carried out upon arrival. To deter unsuitable people from applying for positions in our organization, the hiring process, including job postings and interviews, ensures that candidates know LSI Education is committed to safeguarding students in our care.

**Group Leaders**

- Where Group leaders either accompany or will have sustained unsupervised contact with students under 18, LSI Education will require that identity checks and ECRB/DBS checks are carried out.

- In cases where the group leader is not a British national or has been living outside of the country for a sustained period, a Certificate of Good Conduct/Police Clearance Certificate or equivalent will be requested.
- Clear agreements will be in place to ensure that Group Leaders are clear as to their responsibilities for their group on a case by case basis agreed in advance in writing with the school. Guidance detailing the level of care expected will be provided. This includes but is not limited to provision of meals and supervision.
- Group leaders will only be responsible for students from their own group.

### **Host families**

- Host families hosting students under 18 will be subject to the Safe Recruiting policy and procedures, as a minimum requiring ECRB/DBS checks. This will apply to at least the main carer within the household.
- Host families hosting students under 18 will be given extra guidance to raise awareness and identify the signs of abuse and bullying. This guidance will include who to contact should they have any concerns.
- Host families will also be made aware of curfew times and rules for what students under 18 may do outside of scheduled activity time. They will be aware of actions to take and procedures to be taken with the school should this not be adhered to.
- Parents and guardians will be made aware in writing through the booking process of which meals will be provided for students under 18.
- Any accommodation agencies used by LSI Education will be bound by the same conditions and procedures and written agreement will be sought from the management.

### **Residential/Homestay Accommodation**

- Where students under 18 are accommodated in residential accommodation that accommodation shall be inspected annually by the Accommodation Officer with regard to National Minimum Standards Accommodation of Students under Eighteen by Further Education Colleges. Written assurances will be obtained that the residence operates at all times in accordance with National Minimum Standards Accommodation of Students under Eighteen by Further Education Colleges.
- Students under 18 on Junior Courses (12-17) in homestay accommodation will be allocated rooms sensitively, with consideration given to their age and gender. Homestay hosts on such programmes will be subject to DBS checks every 2 years.
- Parents and guardians will be made aware in writing through the booking process of which meals will be provided and curfews will be implemented for students under 18. They will also be informed of the periods when students

under 18 will be unsupervised, such as the time spent travelling to/from school/activities.

### **Parents/Guardians**

- All parents/guardians of students under 18 will be made aware in writing of periods when their child will not be supervised by LSI Education during their stay.
- All parents/guardians of students under 18 will be required to complete a Parental Consent form prior to booking confirmation. This lays out in writing the responsibilities of LSI Education and the supervision, level of care and support to be provided, and agrees a curfew time.
- Any parents/guardians wishing to take part in any activities or parts of a school programme will not be permitted to do so unless they have, as a minimum, been subjected to the checks outlined above for all staff.

### **All Staff are aware of:**

- The contents of the Safeguarding Students Policy and have the opportunity to ask questions in relation to policy & procedures.
- Guidelines for staff, to ensure that their behavior and actions do not place students or themselves at risk of harm or of allegations of harm to a student (for example one to one tuition, conveying a student by car, engaging in inappropriate electronic communication with a student and so on). This is outlined in the Standards of Behaviour, signed by all staff.
- Procedures for dealing with abuse by one or more students against another.
- The need to support/monitor any student as required.
- Procedures for dealing with accusations of abuse.

### **Supporting Students**

LSI Education is committed to equal treatment for all students regardless of an individual's race, ethnicity, sexual orientation, social background or special educational needs. We aim to create a friendly, caring and perceptive environment in which every individual is valued the core values of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Are supported and promoted. LSI Education will support all students by:

- Encouraging self-esteem and confidence whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school.
- Providing clear guidelines to students and their parents on what behavior is unacceptable and will result in disciplinary measures and expulsion from the course; bullying, incidents of racism or attacks on ethnicity, sexual orientation,

social background or special educational needs, illegal activity or dangerous behavior that may cause harm to the student or to others.

- Providing a forum for students under 18 to raise issues with management in addition to the open door policy through regular tutorials and student council meetings.
- Promoting core values of democracy, rule of law including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs

### **Physical Intervention**

- Staff must only ever use physical intervention as a last resort, and at all times, it must be the last resort.
- We understand that physical intervention, the nature of which causes injury or distress to a student, may be considered under student protection or disciplinary procedures.

### **Standards of Behaviour**

- The standards of behaviour set out below are presented to all staff at LSI Education that come into direct and unsupervised contact with students:
- If you work with students, you are in a position of trust. It is important that you:
  - acknowledge the influence you have on students' development.
  - take care to ensure your behavior is appropriate at all times.
  - This is important not only in safeguarding students, but also in protecting yourself from wrongful accusation.
- You are expected to pay particular attention to the age, experience and cultural background of a student, and whether this makes him or her more vulnerable. You should also take into account any physical or mental disability, and whether this makes him or her more vulnerable
- Avoid unnecessary or inappropriate situations in which no other adult is present (with the exception of planned situations, such as language classes, where other staff members know where you are and for how long)
- Avoid unnecessary or inappropriate situations where you are alone with a single student.
- Do not convey students alone by car.
- Do not make relationships electronically (such as Facebook friends) with any student under the age of 18.
- Avoid sexually suggestive behaviour, or any physical contact likely to cause a student fear or embarrassment.
- Challenge aggressive or sexually suggestive behaviour.
- You should also seek to understand local and cultural norms regarding physical contact between students and adults.

- Do not participate in or encourage any illegal activity with students under 18, such as drinking alcohol.

### **Allegations against LSI staff or concerns about the wellbeing of a child**

- We understand that a student may make an allegation against a member of staff.
- If such an allegation is made, the member of staff receiving the allegation will immediately inform the Designated Safeguarding Lead (James Butcher). If the Designated Safeguarding Lead is absent, the allegation should be reported to the alternate Designated Safeguarding Lead (Katherine Holloway).
- The Designated Safeguarding Lead should record any information about dates, times location and potential witnesses.
- If the allegation made to a member of staff concerns the Designated Safeguarding Lead, the person receiving the allegation will immediately inform the UK General Manager, Mr. Phil Scherb.
- If a member of staff has any concerns about the wellbeing of a student under 18, they should inform the Designated Safeguarding Lead (James Butcher) immediately. In the absence of the Designated Safeguarding Lead, they should inform the alternate Designated Safeguarding Lead (Katherine Holloway)

### **Referrals:**

- In response to disclosures or general concern for the wellbeing of a child, referrals to social services or to the police will not be made independently by the Designated Safeguarding Lead but will be subject to consultation with the Local Authority Designated Officer (LADO) tel. 020 7974 3317. Senior Management should also be made aware of the allegation or concern. Consultation may also be sought from the NSPCC.
- In case of referrals, LSI Education will contact the Local Authority Designated Officer. In case of serious harm, the police should be informed from the outset.
  - Relevant Contact Telephone Numbers:
    - Student Protection –0345 045 5203
    - Camden Local Authority Designated Officer (LADO) – 020 7974 3317
    - Camden Emergency Duty Team- 020 7974 4444
    - NSPCC 0808 800 500
    - Childline 0800 1111
    - Camden Council Young People's Services – 020 7974 4444  
Monday –Friday 8am-8pm
    - Students' Social Care Services 0845 045 5203 and out of these hours 01733 234 724



- If anyone employed by LSI Education is deemed unsuitable to work with students, and thus their services are no longer required, the company will report to the Independent Safeguarding Authority (ISA) within one month of that person leaving. Any such report will include evidence about the circumstances as far as possible. The contact address is ISA, PO Box 181, Darlington DL1 9FA (tel 0300 123 1111). LSI Education is aware that failure to make a report constitutes an offence.
- In any and all such cases, LSI Education will not enter into any compromise agreements.
- LSI Education knows that it is an offence under the Vetting and Barring Scheme (VBS) to employ or take on as a volunteer in an ISA regulated activity anyone who is barred from such an activity. It is an offence not to refer to the ISA details of anyone who is removed from regulated activity, or who leaves while under investigation for allegedly causing harm or posing a risk of harm.

### **Staff support**

- In line with current procedures, a member of staff accused of abuse may be suspended from duty with pay, pending investigation and subject to bi-weekly internal review. Where possible, appropriate alternative duties will be carried out by the staff member accused, and suspension seen as a last resort.
- A suspension does not imply guilt: it is for the protection of both the student and the adult.
- If an allegation is not substantiated and the person returns to work, LSI Education will support that person.
- LSI Education will keep a written record of all allegations, resulting inquiries and outcomes.

***For more information please see Dealing with Allegations of Abuse – Staff Guide. This is available in the staffroom and register folders.***

### **Allegations against other students**

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Conduct Policy.

### **Safeguarding allegations**

- Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature.
  - Safeguarding issues raised in this way may include:
    - physical abuse

- emotional abuse
  - sexual abuse and sexual exploitation.
- It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found:
  - The allegation:
    - is made against an older student and refers to their behaviour towards a younger or a more vulnerable student
    - is of a serious nature, possibly including a criminal offence
    - raises risk factors for other students in the school
    - indicates that other students may have been affected by this student
    - indicates that young people outside the school may be affected by this student.

Examples of safeguarding issues against a student could include:

- Physical Abuse
  - Violence
  - Forcing other students to use drugs or alcohol
- Emotional Abuse
  - blackmail or extortion
  - threats and intimidation
- Sexual Abuse
  - indecent exposure, indecent touching or serious sexual assaults
  - forcing others to watch pornography or take part in sexting
- Sexual Exploitation
  - encouraging other children to attend inappropriate parties
  - photographing or videoing other children performing indecent acts

### **What to do**

- When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern and should discuss it with the Designated Safeguarding Lead/Alternate DSL.
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.
- The DSL should contact social services to discuss the case. It is possible that social services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.

- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both students' files.
- If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim).
- It may be appropriate to exclude or suspend the student being complained about for a period of time in line with the school's behaviour policy and procedures.
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

This policy is reviewed annually.

**Last reviewed by Gavin Taylor September 2018**

**Next review September 2019**

See also:

- ***Safeguarding Students and Safer Recruitment in Education Policy***
- ***Dealing with Allegations or Suspicions of Abuse – Staff Guide***
- ***Standards of Behaviour***
- ***Code of Conduct***
- ***Keeping Children Safe in Education - Part 1***
  - **[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418687/Keeping children safe in education part 1 only.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418687/Keeping_children_safe_in_education_part_1_only.pdf)**
- ***Anti-Radicalisation and Extremism Policy (PREVENT)***