

Safeguarding Students Policy & Procedures

This Policy is an LSI UK Policy. Local adaptations for schools are in blue text.

Introduction

We, the Proprietor, Management and Staff of Language Studies International (LSI) fully recognise the responsibilities we have to safeguard all under 18 students in our care. We recognise that all staff, accommodation providers 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, accommodation providers and volunteers working for Language Studies International (LSI).

All staff believe that our school should operate a “safe school culture”, 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 the Brighton LSCP local safeguarding agency and in compliance with the DfE guidance: “Keeping Children safe in Education (September 2021), and Working Together to Safeguard Children (2018)

The aims of this policy are:

- To practise safe recruitment in checking the suitability of staff and volunteers to work with students (Including DBS checks where appropriate)
- To practise safe recruitment in checking the suitability of accommodation providers, including those provided through agencies, to work with and host students (Including DBS checks where appropriate)
- To raise the awareness of both teaching and non-teaching staff, accommodation providers and volunteers, of the need to safeguard students, including raising awareness of signs of exploitation, harmful behaviours, bullying, radicalisation and extremism.
- To ensure that all staff maintain appropriate behavior and follow Language Studies International (LSI) procedures and Standards of Behaviour 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 stay, learn and develop.
- To emphasise the need for good channels of communication between all members of staff and accommodation providers, including volunteers. This should include the communication of low level concerns and observations about students, staff and host families.
- 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. No students 18+ are to be admitted onto the Young Learner's Programme under any circumstances.
- To maintain an appropriate level of separation between students under 16 and students 18+ in any accommodation provided by the school and during any activities organised by the school (or sub-contractors). This normally applies in the case of closed groups unless requests are made by the group leaders/sending institution.
- To put in place a structured procedure within the company to be followed in cases or suspected cases of abuse, exploitation, harmful behaviours or other safeguarding issues.
- 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 local authority procedures under the auspices of the Local Safeguarding Partnership (LSCP).

We will ensure that:

- We have a Designated Safeguarding Lead ([Principal, Anthony Drury](#)) 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.
 - The DSL will liaise with local statutory students' agencies as appropriate.
 - All members of staff, accommodation providers, volunteers & staff from external & supply agencies are aware that she is the Designated Safeguarding Lead, responsible for student protection matters.
- [Natasha Lamb](#) is the alternate Designated Safeguarding Officer, responsible for Safeguarding in Anthony's absence. They will undertake regular training in

Safeguarding, Student Protection and Inter-Agency working for at least two days every two years.

- Safer recruitment practices will be followed at all times for in-house staff: please see our safer recruitment policy and procedures.
- 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, references, right to work in the UK and their suitability to work with students.
- Student behavioural policies and student contracts implemented to work against peer on peer abuse and bullying. This includes cyber bullying.
- Staff training and documentation to raise awareness of the signs of peer of peer abuse and 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 (Sept 21).
- Homestay Hosts who host students under 18 to be given a policy summary relevant to them, and the additional guidance in Hosting Students Aged Under 18.
- Scheduling and staffing to ensure that as far as possible students under 18 on Young Learners 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 No students aged 18+ to be admitted onto the Young Learner's 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 (risk assessment).
- Social/Cultural/Leisure Activities to be organised to ensure that as far as possible students on Young Learners Programmes do not come into extended unsupervised contact with Adult students. No students aged 18+ will be permitted to attend activities where students aged under 16 are present, or where the activity is part of the designated Young Learner's Programme. No students under 16 are permitted to attend adult course activities. This does not include closed groups from school and colleges where students aged under and over 18 have the institution's consent to travel as part of a group. This does not apply to students aged 16 or 17 on the regular adult programme.
- Allegations against LSI staff reported to LSI 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. Homestay hosts who host or plan to host students under 18 to be given this policy, basic safeguarding information and training and be subject to the Safer Recruitment Policy as part of their preparation or initial recruitment. Further guidance to be provided in Information for Accommodation Providers for Under 18s, as needed and at biennial re-inspection visits.

Responsibilities

The Designated Safeguarding Lead works together with the LSI Senior Management, all of whom have successfully completed a Safeguarding Students, Designated Person, level 3 training programme. Senior management 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. Andras Zareczky, Operations Director (trained to DSL level), 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 Brighton and Hove LSCP and national guidance, Brighton and Hove 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 and host families are aware of their needs to safeguard students under 18 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 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

Language Studies International (LSI) complies with all legal and regulatory requirements for safer recruitment and employment of all staff. All posts, including those involving accommodation, 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 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 is committed to safeguarding students in our care and is a Safer Recruiter.

Group Leaders

- Where Group leaders either accompany or will have sustained unsupervised contact with students under 18, LSI will require that identity checks and 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 from the country of residence will be required in lieu of DBS checks.
- Clear agreements (Group Leader Agreement) 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.
- Group leaders to be given a relevant policy summary and supporting information.
- Where group leaders are organising their own activities, LSI will provide a checklist and a briefing covering the following:
 - Suggested supervision ratios.
 - A customisable risk assessment.
 - Advice about travelling to and from activities.
 - Agreed curfew times and free time guidelines.

Host families

- Homestay hosts hosting students under 18 will be subject to the Safe Recruiting policy and procedures, as a minimum requiring DBS checks and two character references. This will apply to all adult residents in the host household via declaring a homebased role (Q66), or in having separate checks.
- Homestay hosts hosting students under 18 will be given extra guidance to raise awareness and identify the signs of abuse, harmful behaviors and peer on peer abuse/ bullying. This guidance will include who to contact should they have any concerns. See Hosting Students Aged Under 18. Homestay hosts 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 will be bound by the same conditions and procedures and written agreement will be sought from the management.
- Accommodation to be allocated so as to avoid housing students under 18 with students 18+. On a case by case basis, requests for accommodation of students under 18 with students 18+ to be carefully considered and a recording of decision and suitability made (risk assessment).
- Students ages under 16 will not be housed with students aged 18+. Exceptions may be made in the case of siblings where written consent is sought from the parents, a risk assessment carried out and a written record of a decision kept.

Residential Accommodation

- Students under 18 on adult courses will not generally be accommodated in residential accommodation. Where an exception may be made, a risk assessment will be carried out and a written record of a decision kept. In addition, all residential providers must meet or exceed all standards laid out in the Safeguarding Policy and the Safer Recruitment Policy.
- Students under 18 on Junior Courses (12-17) in residential accommodation will be allocated rooms sensitively, with consideration given to their age and gender.
- Students under 18 on Junior Courses (12-17) in residential accommodation will be allocated rooms grouped together in separate wings/clusters as appropriate, where there is otherwise an increased chance they may come into contact with other residents aged 18+.
- LSI acknowledges that in residential situations there is an elevated potential and probability of some harmful behaviours and peer-on-peer/bullying situations.
- All wardens/supervisors on such programmes will be subject to the Safer Recruitment policy.
- At least one member of staff to be first aid trained. A first aid kit is to be held on site. An arrangement to be made with a local doctor in the case of emergencies.

- When renting residential accommodation, written confirmation will be sought that suitable checks have been carried out by the owners into the suitability of their staff who may come into contact with students under 18.
- Parents and guardians will be made aware in writing through the booking process of which meals will be provided for students under 18.
- Staff supervision to be provided at the ratio of 1:20 for 12-17 year olds.

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 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 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 as per the Safer Recruitment Policy.
- All parents/guardians of students under 18 will be made aware of the LSI Code of Conduct and disciplinary procedures and that in the event of an expulsion, they will be responsible for immediate repatriation
- LSI will, however, always ensure that expelled students under 18 continue to be safeguarded until repatriation has taken place.

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, giving personal contact details 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

Language Studies International (LSI) 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 school culture which is a safe, friendly, caring and perceptive environment in which every individual is valued and 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. Language Studies International (LSI) 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, learning journals and student council meetings.
- Promoting core values of democracy, rule of law including democracy, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- The above supported by and in conjunction with
 - DES Policy
 - Behaviour, Discipline, Attendance and Exclusion Policy.

Illness

- All students on the Young Learner's Programme will be strongly advised to purchase health insurance with example costs of access to the health services.
- Any students under 16 falling ill will be supervised either in the Homestay, or within a sickbay on school premises.
- LSI will not be responsible for keeping or administering medicine to any students unless through written agreement. In such cases, written instructions for administering medicines must be provided.
- In the event that parents/guardians cannot be contacted, LSI will act in 'loco parentis' in the event of a medical emergency.

Physical Intervention

- Staff must only ever use physical intervention as a last resort, and at all times, it must be the last resort.
- Like all schools, we reserve the right for all staff to use reasonable force to control or restrain a student in specific circumstances. The Education and Inspections Act 2006 enables school staff to use "Such force as is reasonable in the circumstances to prevent a pupil from doing or continuing to cause personal injury to any person including the pupil themselves."
- 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.

Data

- LSI understands its obligations when processing personal data under the GDPR.
- LSI is required to process data of students under 18 and their parents/guardians in order to enforce its Safeguarding Policy.
- LSI will provide details of its data processing procedures in plain, transparent language to parents/guardians of those under 18 through its Privacy Statement.
- Active consent to process personal data as laid out in the Privacy Statement will be sought, and in the case of students under 18, the active consent of the parents/guardians.
- Whilst students under 18 and their parents/guardians have the right to withhold consent to all or some of their data being processed, LSI reserves the right to refuse to enrol a student under 18, where the withholding of data prevents the effective implementation of the Safeguarding or other key policies.
 - Illustrative examples: parents' contact details, student date of birth.
- Whilst students under 18 and their parents/guardians have the right to request data be deleted or amended at any time, LSI reserves the right to terminate the enrolment of a student under 18 where the deleting of data prevents the effective implementation of the Safeguarding or other key policies.
 - Illustrative examples: student medical information, parents' contact details.
- Please see LSI Data Processing Policy for full details.

Standards of Behaviour: Staff

The standards of behaviour are set out in the staff code of conduct. These are presented to all staff at Language Studies International (LSI) that come into direct and unsupervised contact with students. All staff must agree to and sign the document below as part of the employment process.

Section 2: Processes

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. If the Designated Safeguarding Lead is absent, the allegation should be reported to the alternate Designated Safeguarding Lead.
- 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 LSI Senior Management.
- If a member of staff has any concerns about the wellbeing of a student under 18, they should inform the Designated Safeguarding Lead immediately. In the absence of the Designated Safeguarding Lead, they should inform the alternate Designated Safeguarding Lead.

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. 01273 290400](#) [Multi Agency Safeguarding Hub \(MASH\) in Children's Social Services on 01273 290400](#)
- FrontDoorForFamilies@brighton-hove.gov.uk.
- 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 will contact the Local Authority Designated Officer. In case of serious harm, the police should be informed from the outset.
 - Relevant Contact Telephone Numbers:
 - NSPCC 0808 800 500
 - Childline 0800 1111

- NSPCC 0808 800 500
 - Childline 0800 1111
 - Police Child Protection Team 101
- If anyone employed by Language Studies International (LSI) is deemed unsuitable to work with students, and thus their services are no longer required, the company will report to the relevant authority within one month of that person leaving. Any such report will include evidence about the circumstances as far as possible. Language Studies International (LSI) is aware that failure to make a report constitutes an offence.
 - In any and all such cases, LSI will not enter into any compromise agreements.
 - Language Studies International (LSI) knows that it is an offence to employ or take on as a volunteer in a regulated activity anyone who is barred from such an activity. It is an offence not to refer to the relevant authorities 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, Language Studies International (LSI) will support that person.
- Language Studies International (LSI) 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.

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 UK Policy Committee October 2021 localised for Brighton by Anthony Drury October 2021

Next review January 2022/following changes to guidance or legislation/following an incident that requires review of this policy.

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/publications/keeping-children-safe-in-education--2>
- ***Anti-Radicalisation and Extremism Policy (PREVENT)***