

Policy and Procedures Framework

Safeguarding Policy

We at Liverpool School of English are committed to practise that which protects students under 18 from harm.

Staff and volunteers in this organisation accept and recognise our responsibilities to develop awareness of the issues which may cause harm to students under 18.

This policy has been updated in line with current safeguarding legislation and guidance, including **Working Together to Safeguard Children (2023)** and **Keeping Children Safe in Education (KCSIE) 2024/2025**.

This policy is based on the following principles:

- The welfare of the child is paramount
- All students under 18, whatever their age, culture, disability, gender, language, racial origin religious beliefs and/or sexual identity have the right to protection from abuse;
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- All staff (paid/unpaid) have a responsibility to report concerns to the Designated Person with responsibility for safeguarding
- Staff/volunteers are not trained to deal with situations of abuse or to decide if abuse has occurred

We will aim to safeguard students under 18 by:

- Adopting safeguarding guidelines through procedures and a code of conduct for staff and volunteers
- Sharing information about safeguarding and good practice with students under 18, parents/carers/guardians, staff and volunteers
- Sharing information about concerns with agencies who need to know and involving parents and students under 18 appropriately
- Carefully following the procedures for recruitment and selection of staff and volunteers
- Providing effective management for staff and volunteers through support, supervision, observations and training
- We are committed to reviewing our policy and good practice regularly

This policy sets out agreed guidelines relating to the following areas:

- Responding to allegations of abuse, including those made against staff and volunteers
- Responding to allegations and dealing with students who are vulnerable to extremism
- Recruitment and vetting of staff and volunteers
- Supervision of organisational activities

1. Definitions of abuse



These definitions are based on those from **Working Together to Safeguard Children (2023)**

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing harm to a child.

Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described as factitious illness, fabricated or induced illness in students under 18 or “Munchausen Syndrome by proxy” after the person who first identified this situation. A person might do this because they enjoy or need the attention they get through having a sick child.

Physical abuse, as well as being the result of a deliberate act, can also be caused through omission or the failure to act to protect.

Emotional abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve making a child feel or believe they are worthless or unloved, inadequate or valued only insofar as they meet the needs of the other person.

It may feature age or developmentally inappropriate expectations being imposed on students under 18. It may also involve causing students under 18 to feel frequently frightened or in danger, or the exploitation or corruption of a child.

Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of, or *consents* to, what is happening. The activities may involve physical contact, including penetrative acts such as rape, buggery or oral sex, or non-penetrative acts such as fondling or inappropriate physical contact.

Sexual abuse may also include non-contact activities, such as involving students under 18 in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging students under 18 to behave in sexually inappropriate ways.

Boys and girls can be sexually abused by males and or females, by adults and by other young people. This includes people from all different walks of life.

Neglect

Neglect is 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. It may involve a parent or a carer failing to provide adequate food, shelter and clothing, leaving a young child home alone or the failure to ensure that a child gets appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

It is accepted that in all forms of abuse there are elements of emotional abuse, and that some students under 18 are subjected to more than one form of abuse at any time. These four definitions do not minimise other forms of maltreatment.

Bullying and Harassment



DfE guidance defines bullying as actions that are meant to be hurtful, and which happen on a regular and sustained basis. Harassment is defined as actions that are meant to cause torment or worry to an individual and which happen on a regular and sustained basis. Bullying can be direct (either physical or verbal) or indirect (for example, being ignored or not spoken to and cyber-bullying through the use of the internet and mobile phones).

Note

Recent guidance notes other sources of stress for students under 18 and families, such as social exclusion, domestic violence, the mental illness of a parent or carer, or drug and alcohol misuse. These may have a negative impact on a child's health and development and may be noticed by an organisation caring for a child. If it is felt that a child's well-being is adversely affected by any of these areas, or any other way not detailed, the same procedures should be followed.

2. Recognising and Responding to Abuse

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.

Physical signs of abuse

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or games
- Unexplained bruising, marks or injuries on any part of the body
- Bruises which reflect hand marks or fingertips (from slapping or pinching)
- Cigarette burns
- Bite marks
- Broken bones
- Scalds
- Injuries which have not received medical attention
- Neglect-under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care
- Repeated urinary infections or unexplained stomach pains

Changes in behaviour which can also indicate physical abuse:

- Fear of parents, carers or teachers being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example, wearing long sleeves in hot weather
- Depression
- Withdrawn behaviour
- Running away from home
- Inexplicable crying

Emotional signs of abuse

The physical signs of emotional abuse may include;



- A failure to thrive or grow particularly if a child puts on weight in other circumstances e.g. in hospital or away from their parents' care
- Sudden speech disorders
- Persistent tiredness
- Development delay, either in terms of physical or emotional progress

Changes in behaviour which can also indicate emotional abuse include:

- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Being unable to play
- Attention seeking behaviour
- Fear of making mistakes
- Self-harm
- Fear of parent, carer or teacher being approached regarding their behaviour

Sexual Abuse

The physical signs of sexual abuse may include:

- Pain or itching in the genital/anal area
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home, place of residence or school
- Sexual knowledge which is beyond their age or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as over-eating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way with adults
- A change in company during social periods.

Neglect

The physical signs of neglect may include:



- Constant hunger, sometimes stealing food from other students under 18
- Constantly dirty or smelly
- Loss of weight or being constantly underweight
- Inappropriate dress for the conditions

Changes in behaviour which can also indicate neglect include:

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised

3. What to do if you suspect that abuse may have occurred

1. You must report the concerns immediately to the Designated Safeguarding Lead:
Catherine Hart.

The role of the Designated Safeguarding Lead is to:

- Obtain information from staff, volunteers, and students under 18 or parents and carers who have safeguarding concerns and to record this information.
- Assess the information quickly and carefully and ask for further information as appropriate.
- They should also consult with a statutory safeguarding agency such as the local Social Services department or the NSPCC to clarify any doubts or worries.
- The Designated Safeguarding Lead should make a referral to a statutory safeguarding agency or the police without delay.

The Designated Safeguarding Lead has been nominated by LSE to refer allegations or suspicions of neglect or abuse to the statutory authorities. All designated safeguarding leads are specialist safeguarding training. The matter should be brought to the attention of **Catherine Hart.**

2. Suspicions will not be discussed with anyone other than those nominated above.

3. It is the right of any individual to make direct referrals to the safeguarding agencies. If for any reason you believe that the nominated persons have not responded appropriately to your concerns, then it is up to you to contact the safeguarding agencies directly.

Allegations of physical injury or neglect:

If a child has a symptom of physical injury or neglect the Designated Safeguarding Lead will:

1. Contact Social Services for advice in cases of deliberate injury or concerns about the safety of the child. The parents should not be informed by the organisation in these circumstances.
2. Where emergency medical attention is necessary it will be sought immediately. The Designated Safeguarding Lead will inform the doctor of any suspicions of abuse.



3. In other circumstances speak with the parent/carer/guardian and suggest that medical help/attention is sought for the child. The doctor will then initiate further action if necessary.
4. If appropriate the parent/carer/guardian will be encouraged to seek help from Social Services. If the parent/care/guardian fails to act the Designated Safeguarding Lead should in case of real concern contact Social Services for advice.
5. Where the Designated Safeguarding Lead is unsure whether to refer a case to Social Services then advice from the Area Safeguarding Committee will be sought.

Allegations of sexual abuse:

In the event of allegations or suspicions of sexual abuse the Designated Safeguarding Lead will:

1. Directly contact the Social Service duty officer for students under 18 and families. The Designated Safeguarding Lead will not speak to the parent (or anyone else)
2. If the Designated Safeguarding Lead is unsure whether or not to follow the above guidance then advice from the Area Safeguarding Committee will be sought.
3. Under no circumstances is the Designated Safeguarding Lead to attempt to carry out any investigation into the allegation or suspicions of sexual abuse. The role of the Designated Safeguarding Lead is to collect and clarify the precise details of the allegation or suspicion and to provide this information to Social Services whose task it is to investigate the matter under Section 47 of the Students under 18 Act.
4. Whilst allegations or suspicions of sexual abuse should normally be reported to the Designated Safeguarding Lead, their absence should not delay referral to Social Services.

4. Responding to a child making an allegation of abuse:

- Stay calm, listen carefully to what is being said
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others - do not promise to keep secrets
- Allow the child to continue at his/her own pace
- Ask questions for clarification only and at all times avoid asking questions that suggest a particular answer
- Reassure the child that they have done the right thing in telling you
- Tell them what you will do next and with whom the information will be shared
- Record in writing what was said using the child's own words as soon as possible, noting the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated

Helpful statements to make:

- I believe you (or showing acceptance of what the child says)
- Thank you for telling me
- It's not your fault
- I will help you
- You have done the right thing talking to someone

Do not say/do:

- Why didn't you tell anyone before?



- I can't believe it!
- Are you sure that this is true?
- Never make false promises

5. What to do after a child has talked to you about abuse:

The procedure

1. Make notes as soon as possible (ideally within 1 hour of being told). You should write down exactly what the child has said, what you said in reply and what was happening immediately before being told (i.e. the activity being delivered). You should record the dates, times and when you made the record. All handwritten notes should be kept securely.
2. You should report your discussion with the Designated Safeguarding Lead as soon as possible. If this person is implicated you need to report to Social Services. Agency contact details can be found at the end of this document.
3. You should under no circumstances discuss your suspicions or allegations with anyone other than those nominated above.
4. After a child has disclosed abuse the Designated Safeguarding Leads should carefully consider whether or not it is safe for the child to return home or to any place with potentially abusive situations. On these rare occasions it may be necessary to take immediate action to contact Social Services to discuss putting safety measures into effect.

5 Peer on Peer Abuse (child on child abuse)

Peer on Peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in Peer on Peer abuse is under the age of 18. 'Peer on Peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the child perpetrator as well as the victim.

Research suggests that girls and young women are more at risk of abusive behaviours perpetrated by their peers; however it can also affect boys and young men, those with learning difficulties or disabilities, LGBTQ Children and young people (CYP) and those who are from different communities.

Situations where young people are forced or coerced into sexual activity by peers or associates can be related with gang / serious youth violence activity but that is not always the case. Peer influence or peer pressure is a major factor in the decisions made by young people to join groups. Many young people see it as a "way out" from their day to day life and feel a strong bond with their peers, one which they may be lacking at home.

Sexual harassment usually male to female: making it clear that any incidents i.e. skirt raising, touching breasts, up skirting etc are not just 'a bit of teenage fun' but unacceptable. Since April 2019 up-skirting is illegal in the UK.

Definition There is no clear definition of what child on child abuse entails. However, it can be captured in a range of different definitions:

Domestic Abuse: relates to young people aged 16 and 17 who experience physical, emotional, sexual and / or financial abuse, and coercive control in their intimate relationships;

Child Sexual Exploitation: captures young people aged under-18 who are sexually abused in the context of exploitative relationships, contexts and situations by a person of any age - including another young person;

Harmful Sexual Behaviour: refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to abusive behaviours); sharing of sexual images, sexual harassment and sexual violence, initiation/hazing.

Serious Youth Crime / Violence: reference to offences (as opposed to relationships / contexts) and captures all those of the most serious in nature including murder, rape and GBH between young people under-18.

6. Safeguarding Students who are vulnerable to extremism

1. Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

2. Liverpool School of English values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

3. The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The Liverpool School of English is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

4. Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix Four.

5. Liverpool School of English seeks to protect students and staff against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements. Or to those in opposition to British Values.



6. Risk reduction

Domestic Abuse: relates to young people aged 16 and 17 who experience physical, emotional, sexual and / or financial abuse, and coercive control in their intimate relationships;

The Director, the Operations Director and the Designated Safeguarding Leads will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of pupils by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and

7. Response

Our school, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism. The SPOC for Liverpool School of English is the Operations Director **Catherine Hart**. The responsibilities of the SPOC are described in Appendix Five.

8. When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Leads if this is not the same person.

9. Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

7. Indicators of Vulnerability to Radicalisation

- 7.1** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- 7.2** Extremism is defined by the Government in the Prevent Strategy as:
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- 7.3** Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.
- 7.4** There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
- 7.5** Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit

vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

7.6 Indicators of vulnerability include:

- Identity Crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the student may be experiencing family tensions; a sense of isolation and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the student may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.

7.7 However, this list is not exhaustive, nor does it mean that all students experiencing the above are at risk of radicalisation for the purposes of violent extremism.

7.8 More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

8. Preventing Violent Extremism: Roles and Responsibilities of the single point of contact (SPOC)

The SPOC for Liverpool School of English is Catherine Hart, who is responsible for:

- Ensuring that staff of the school are aware that you are the SPOC in relation to protecting students from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;

- Raising awareness about the role and responsibilities of The Liverpool School of English in relation to protecting students from radicalisation and involvement in terrorism;
- Raising awareness within the school about the safeguarding processes relating to protecting students from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the school for case discussions relating to students who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information from in relation to referrals of vulnerable students / pupils into the Prevent* process;
- Attending Prevent* meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions to the Prevent* Co-ordinator; and
- Sharing any relevant additional information in a timely manner.
- Prevent is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Merseyside Police Counter-Terrorism Unit, and it aims to
 - Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
 - Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
 - Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

9. Safeguarding Students who are vulnerable to exploitation, forced marriage, female genital mutilation, or trafficking.

1. Our safeguarding policy above through the school's values, ethos and behaviour policies provides the basic platform to ensure students and young people are given the support to respect themselves and others, stand up for themselves and protect each other.
2. Our school keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
3. Our staff are supported to recognise warning signs and symptoms in relation to specific issues, include such issues in an age appropriate way in their curriculum,
4. Our school works with and engages our home stay hosts, accommodation providers and communities to talk about such issues,
5. Our Designated Safeguarding Leads know where to seek and get advice as necessary.

10. Recruitment and appointment of workers and volunteers:

In recruiting and appointing workers we at LSE will be responsible for the following:

- Identifying the tasks and responsibilities involved and the type of person most suitable for the job
- Drawing up the selection criteria and putting together a list of essential and desirable qualifications, skills and experience
- All applicants should apply in writing and their application will cover their personal details, previous and current work/volunteering experience
- We will always send a copy of our Safeguarding Policy with the application pack
- We will make sure that we measure the application against the selection criteria
- All applicants need to sign a declaration stating that there is no reason why they should be considered unsuitable to work with students under 18. The Rehabilitation of Offenders Act (1974) requires that people applying for positions which give them "substantial, unsupervised access on a sustained or regular basis" to students under the age of 18 must declare all previous convictions which are then subject to police checks. They can then only be offered a job subject to a successful police check. This includes potential employees, volunteers and self-employed people such as sports coaches. They are also required to declare any pending case against them. It is important that your applicant in this particular category understands that all information will be dealt with confidentially and will not be used against them unfairly
- We will ask for official photographic evidence to confirm the identity of the applicant e.g. their passport
- We will request to see documentation of any qualifications detailed by the applicant.
- We will always interview our candidates and ask for two references and a police check
- We will have at least two people from our organisation on the interview panel
- We will request two written references from people who are not family members or friends and who have knowledge of the applicant's experience of working with students under 18. We will ask the referee to also comment on their suitability for working with students under 18. We will also try and follow up written references with a telephone call
- The same principles apply to young people who have been involved with the organisation and have become volunteers
- We will ensure that our successful applicant obtains a Disclosure and Barring Service (DBS) from the Criminal Records Bureau

This policy works in conjunction with LSE's Safer recruitment policy

11. LSE Staff Code of Conduct regarding Under 18s

1 Overview

This Code of Conduct is contained within the LSE Staff Handbook and is discussed with all new members of staff as part of the staff induction process at the commencement of their employment.

LSE recognises the importance of creating a safe culture where trust is built between staff and under 18s and both are protected from any behaviour which runs contrary to this culture. We achieve this through adherence to the policy laid out in this document and a genuine environment of care fostered by robust procedures and recruitment and training activities.

This Code of Conduct aims to ensure that adults exercise their responsibility to ensure their behaviour is not misunderstood or misinterpreted thereby placing themselves and particularly children in compromising or potentially abusive situations.

This Code aims to help all staff understand behaviour that is, and is not, acceptable and goes hand in hand with thorough induction procedures and robust management supervision. Staff should talk to the Operations Director if any aspect of the Code of Conduct or the Safeguarding Policy is unclear. This Code also aids Under 18 students in their understanding of what they should expect of the adult members of LSE staff.

Setting standards

The key elements of our code of conduct are set out below:

- interaction
- appearance
- intoxicants
- IT
- social networks
- accommodation
- transport

We expect all adults working on behalf of LSE to be an excellent role model for all students in their care and to cultivate a respectful, safe and secure environment for staff and students.

2 Interaction

- Maintain professional physical and relationship boundaries, and act in a way appropriate to your Duty of Care
- If staff have 'favourite' students, the others feel left out and staff lay themselves open to accusations of favouritism. In some cultures giving gifts is normal, in the UK this can be seen as attempted bribery. Please inform senior management of all gifts received
- Do not make suggestive or inappropriate remarks to or about any adult or U18
 - Inappropriate remarks include innuendo, swearing and discussing their or your own intimate relationships
- Other than in exceptional circumstances do not communicate directly with U18s via email or text messages and only then with prior consent from the child's parent or guardian.
- Do not engage in behaviour that may be construed as 'grooming' an U18 for example giving money, presents or favours or talking or behaving in an inappropriate or unprofessional manner.



- Intimate or sexual relationships between staff and students under the age of 18 are an abuse of trust which may constitute a criminal offence.
- Avoid putting yourself in a situation where you are on your own with an under 18 as far as possible. Situations where there is only one staff member present with a child should be avoided. On the occasions when a confidential interview or one to one meeting is necessary, these should be conducted in a room where the exit is clearly visible and, where possible, the door to the room is left open.
- Conduct all interactions in a calm manner, and avoid shouting at U18s wherever this is possible unless there is a Health & Safety risk.
- Ensure any physical contact is within clear boundaries to avoid any allegations of inappropriate touching. Unnecessary physical contact with young people/children should be avoided, for example, gestures such as regularly putting a hand on the shoulder or arm. Whilst these gestures may be well intentioned, such acts could be misinterpreted.
- If you are required to be in a one-to-one setting with an U18, consider how this can be managed effectively i.e. Leaving a door open, using a room that has a window in the door, positioning yourself within sight of the door and considering if the one-to one setting is really necessary.
- Do not socialise with U18 students outside of school organised events.
- In situations where it is necessary for staff to restrain a young person/child in order to prevent self-injury, injury to others or damage to property, only the minimum force necessary must be used and any action taken must be only to restrain.
- Staff required to administer first aid (normally a trained first aider) should ensure, wherever possible, that another member of staff is present if they are in any doubt as to whether necessary physical contact could be misconstrued.

3 Appropriate appearance

Adults might not be aware of the effect their appearance has on students and how hard it is for some students to respect them/their role if they do not present appropriately. For this reason, the Code of Conduct includes this section regarding the appearance of adults.

Adults should present an appearance which:

- promotes a positive and professional image
- is appropriate to their role is not likely to be viewed as offensive, revealing or sexually provocative
- does not distract, cause embarrassment or give rise to misunderstanding
- is absent of any political or otherwise contentious slogans
- is not considered to be discriminatory



4 Alcohol, drugs and smoking

- Do not consume, or allow U18s to consume any alcohol, drugs, cigarettes or intoxicating substances on school premises
- Do not provide alcohol, drugs, cigarettes or intoxicating substances to U18s
- Do not work under the influence of any intoxicants or drugs

5 IT and social networks

- Do not share your personal social media details with any under 18s
- Do not take any images or videos of under 18s on your personal recording equipment

6 Accommodation

Where LSE staff is working and living on campus staff should:

- Abide by the accommodation rules and guidelines at that site
- Not enter private areas without first gaining the student's permission, or in the case of needing to search property, without informing them first and doing so in their presence.

7 Transport

- Abide by the specific guidelines of your local centre

8 Individual Privacy

While it is accepted that staff may, exceptionally, need to enter student rooms in emergencies, or to enforce disciplinary rules, in all circumstances, staff should respect students' right to privacy and staff should never normally enter a room uninvited. Staff and managers should ask to enter a room if necessary and no staff member should enter any bedroom alone when occupied by a student, particularly when a member of the opposite sex.

It is important that staff knock loudly on the door and identify themselves and state that they will be entering the room. An example may be "Hello Annalisa, it's Joanne here, please can you open the door?" Preferably staff should do this in pairs, with a member of staff of each gender, as this is likely to be less intimidating to the child.

With the exception of during a genuine fire evacuation, staff should never try and enter a room without first identifying themselves and without having stated their name and asked for permission to enter at least two times. Staff should be aware that students may be disorientated during the night and may need a few moments to collect themselves before being ready to reply in English. When it is necessary for staff to enter a student's bedroom, it is important that this is done appropriately and the bedroom door should always remain open and the staff members should leave if asked to do so. This is to ensure that students are comfortable but also to protect the staff member from mistaken or malicious false accusation of impropriety. Any breach of the above guidelines should be reported to the DSL without delay.

13. Allegations against a member of staff:

We will assure all staff/volunteers that we will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child. Where there is a complaint against a member of staff there may be three types of investigation

- A criminal investigation
- A safeguarding investigation
- A disciplinary or misconduct investigation

The results of the police and safeguarding investigation may influence the disciplinary investigation, but not necessarily.

Action if there are concerns

1. Concerns about poor practice:

- If, following consideration, the allegation is clearly about poor practice; this will be dealt with as a misconduct issue
- If the allegation is about poor practice by the Designated Safeguarding Lead or if the matter has been handled inadequately and concerns remain, it should be reported to the Director, who will decide how to deal with the allegation and whether or not the organisation should initiate disciplinary proceedings

2. Concerns about suspected abuse

- Any suspicion that a child has been abused by either a member of staff or a volunteer should be reported to the Designated Safeguarding Lead, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk
- The Designated Safeguarding Lead will refer the allegation to the Social Services department who may involve the police, or if out of hours, go directly to the police if necessary.
- The parents or carers of the child will be contacted as soon as possible following advice from the Social Services department
- If the Designated Safeguarding Lead is the subject of the suspicion/allegation, the report must be made to the Operations Director who will refer the allegation to Social Services

3. Internal Enquiries and Suspension

- The Designated Safeguarding Lead will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and Social Services inquiries
- Irrespective of the findings of the Social Services or police inquiries the organisation will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by the police. In such cases, the organisation must reach a decision based upon the available information which could suggest that on a balance of probability, it is more likely than not that the allegation is true. The welfare of the child should remain of paramount importance throughout.

4. Adults not employed by LSE

All students will regularly come into contact with adults who are not employed by LSE such as coach drivers, campus management and employees. We have made arrangements to ensure that third party contractors are equally as rigorous with their own recruitment and management as we are. Care should be taken to minimise any contact between our students who are under 18s and any external adults. Students should be warned, in an age appropriate way, of the danger strangers present. LSE may also host Group Leaders who

are employed from abroad. LSE requires that all agents obtain a police certificate of good conduct

14. Supervisory arrangements for the management of LSE activities and services:

We will aim to protect students under 18 from abuse and our team members from false allegations by adopting the following guidelines:

- We will keep a register of all students under 18 attending our activities
- We will ensure that ratios are 1:20 for 16+ and 1:15 for 10 – 15 years olds
- We will keep a register of all team members (both paid staff members and volunteers)
- We will keep a record of all sessions including monitoring and evaluation records
- Our team members will record any unusual events on the accident/incident form
- Written consent from a parent or guardian will be obtained for every child attending our activities during the booking procedure
- Where possible our team members should not be alone with a child, although we recognise that there may be times when this may be necessary or helpful
- Team members on occasion, may be required to escort students under 18 of the same sex to the toilet but are not expected to be involved with toileting, unless the child has a special need that has been brought to our attention by the parent/guardian
- We recognise that physical touch between adults and students under 18 can be healthy and acceptable in public places. However, our team members will be discouraged from this in circumstances where an adult or child are left alone.
- All team members should treat all students under 18 with dignity and respect in attitude, language and actions

15. Support and Training

We, LSE, are committed to the provision of safeguarding training for all our team members. Staff will be supplied with a copy of all policies and procedures either prior to training or at a training session. Staff who are unable to attend will be expected to read the policies and procedures and sign to say they both understand and agree with them.

Homestay hosts are also required to undertake basic awareness training to cover all roles in the organization.

16. Low -Level Concerns

Low level concerns refer to behavior that is **inconsistent with the Staff Code of Conduct** but does not meet the threshold of harm or abuse. These concerns may include, but are not limited to, boundary issues, inappropriate comments, favouritism, or breaches of professional conduct.

Liverpool School of English recognises that addressing low level concerns is essential to maintaining a strong safeguarding culture. All staff, volunteers and contractors are encouraged to **share and record concerns however small they may appear**, with the Designated



are employed from abroad. LSE requires that all agents obtain a police certificate of good conduct

14. Supervisory arrangements for the management of LSE activities and services:

We will aim to protect students under 18 from abuse and our team members from false allegations by adopting the following guidelines:

Safeguarding Lead.

Low-level concerns would be:

- Recorded in writing
- Reviewed by the DSL or senior management
- Used to identify patterns of behaviour
- Managed proportionately and confidentially

Staff should not feel that raising a low-level concern could result in victimization or detriment. Where concerns relate to the DSL, these should be reported directly to the Director or via an external safeguarding route

Reporting allegations or suspicions of abuse or terrorism

If you have any concerns about a child being abused you should inform the Designated Safeguarding Lead detailed below.

Organisation

Liverpool School of English

Name

Catherine Hart

Job/Role

Operations Director

Designated Safeguarding Lead



Address

33 Rodney Street
Liverpool
L1 9JF
England

Important Safeguarding contacts outside the organisation

Listed below are contact details for Sefton, Liverpool, Halton and Wirral which are the local councils for residents of Merseyside.

Please report to appropriate safeguarding board, i.e. if the allegation is regarding an issue in Sefton and the alleged perpetrator is a resident of Sefton then the issue needs to be reported to the Sefton Safeguarding board.

Below are the websites for each borough and a named contact and telephone number. These are correct as of 30/09/2025.

Sefton

<https://seftonscp.org.uk/scp>

0345 140 0845

Knowsley

<https://www.knowsley.gov.uk/children-young-people-and-families/child-protection-and-safeguarding/safeguarding-children>

0151 443 2600

Liverpool

<https://liverpoolscp.org.uk/>

0151 233 0493

Wirral

<https://www.wirralsafeguarding.co.uk/>

0151 677 6557

Halton

<https://haltonsafeguardingchildrenpartnership.org.uk/>

0151 907 8305

Careline - Liverpool City Council

0151 233 3700

Liverpool Safeguarding Children Board

0151 233 0493

Merseyside Police

0151 709 6010

NSPCC Safeguarding Helpline 0808 800 5000

Channel Police Practitioner

MSOC.Special.Branch@Merseyside.pnn.police.uk

Email to be entitled “Channel”

0151 777 8328



Note

This policy was adopted in June 2011
This policy was reviewed in May 2012
This policy was reviewed in June 2014
This policy was reviewed in January 2015
This policy was reviewed and amended in February 2016
This policy was reviewed and amended in August 2016
This policy was reviewed and amended in February 2017
This policy was reviewed and amended in January 2018
This policy was reviewed and amended in October 2018
This policy was reviewed and amended in October 2019
This policy was reviewed and amended in February 2020
This policy was reviewed and amended in February 2021
This policy was reviewed and amended in February 2022
This policy was reviewed and amended in March 2023
This policy was reviewed and amended in March 2024
This policy was reviewed and amended in September 2025

All policies are reviewed annually from 2015 onwards