

Live Language – Safeguarding policy – 11th October 2023

## **Live Language Safeguarding Policy Policy Relating to Students Under 18 Years and Vulnerable Adults**

### **A: Policy Statement**

Live Language makes a positive contribution to a strong and secure community and recognises the right of every individual to stay safe. We accept students onto our English language courses from the age of 16. Many of our learners are adults and so it is highly likely that an under 18-year-old will study, work with, and learn from a grownup for at least 3 hours per day, 5 days per week. Students may also book homestay accommodation with us, meaning they will live with adults who are not their parents or legal guardians.

All adults who are working with or looking after children, including teachers, administrators, and managers (“Staff”), Homestay Families (“Hosts”) in addition to all other students must follow this policy. There are Designated Safeguarding Leads responsible for Safeguarding and Child Protection issues in the school. They will also manage the training of Staff and Hosts in these matters. The School Manager is involved in all major decisions relating to this policy.

“**Safeguarding**” refers to the prevention of maltreatment to children and vulnerable adults physical and mental wellbeing.

“**Child Protection**” refers to direct action to be taken when we believe a child/vulnerable adult is at risk of being harmed e.g., Physical/Sexual/Emotional Abuse, Blackmail, Bullying, Neglect. In Scotland, a child is referred as anyone up to the age of 18. (The Children and Young People Act 2014 Scotland)

We expect **all staff** to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

We expect **all students** to share active responsibility for under 18s and vulnerable adults and must look out for each other and raise concerns with adults or the Designated Safeguarding Leads within the organisation if necessary.

This policy seeks to ensure that Live Language undertakes its responsibilities regarding safety of under 18-year-olds and vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid Staff in their practices and clarifies the organisation’s expectations.

This policy applies to all staff, hosts and students includes under 18-year-olds and vulnerable adults regardless of race, religion, or personal beliefs.

This policy is reviewed annually unless circumstances require a more urgent review. As with all other Live Language policies, feedback will be sought from all staff, homestay providers and relevant students before the review takes place.

This policy is available on our website and in electronic pdf format. It is available upon request.

## B: Safeguarding

Live Language takes the well-being of children and vulnerable adults seriously. It is the responsibility of every adult in the school to ensure a safe environment.

We enforce this safe environment by:

- Ensuring staff read, and sign the school's Code of Conduct
- Training and Communicating with Staff, ensuring they have at least Level 1 Safeguarding accredited by English UK, or equivalent with the NSPCC.
- Implementing Safeguarding Procedures, as outlined in this policy.
- Reviewing these procedures annually, or sooner if necessary.
- Making sure Staff have Disclosure Scotland/Criminal Record Checks.
- Record keeping.
- Obtaining online consent forms from the child's parents/legal guardian, including medical information.

Children may be subject to different types of abuse, including but not limited to:

- Physical Abuse
- Sexual Abuse
- Neglect
- Online Abuse
- Bullying
- FGM
- Domestic Abuse
- Emotional Abuse

The following staff members are Designated Safeguarding Leads (DSL):

Sharon Chalmers | DSL – School Manager, Office, 9 Somerset Place, Glasgow, G3 7JT,  
[sharon.chalmers@live-language.com](mailto:sharon.chalmers@live-language.com), +44141 221 0793

Glenn Moffat | Deputy DSL – Administrator, Office, 9 Somerset Place, Glasgow, G3 7JT,  
[glenn.moffat@live-language.com](mailto:glenn.moffat@live-language.com), +44141 221 0793

Jane Mair | Deputy DSL – Teacher, Office, 9 Somerset Place, Glasgow G3 7JT,  
[jane.mair@livelanguage.com](mailto:jane.mair@livelanguage.com), +44141 221 0793

It is important for all adults to report or respond to any concerns that they witness or are told of. Designated Persons should be informed immediately. The ideal scenario being:

- Child informs adult.
- Adult informs designated person.
- Designated person and manager discuss if the child is in immediate danger and what action is to be taken.
- Designated person keeps an eye on child who gave disclosure.
- Follow up with local Child Protection authorities or the police (in an emergency).

A full process for responding to safeguarding concerns can be found in the following flowchart, along with contact information for Local Authority Child Service Partners.

# Flowchart of procedures for responding to safeguarding concerns

The Local Authority Designated Officer (LADO)

Name: HEALTH & SOCIAL CARE CONNECT

Contact Details: 0141 287 0555  
Out of Hours: 0300 343 1505

Staff member/volunteer has a safeguarding concern about a child

Concern is reported to the Designated Safeguarding Lead and a Safeguarding Concern Report Form is completed

Local Safeguarding Children Partnership

Name: HEALTH & SOCIAL CARE PARTNERSHIP

Contact Details:  
[www.glasgowchildprotection.org.uk](http://www.glasgowchildprotection.org.uk)

Designated Safeguarding Lead(s) (DSL)

Name: SHARON CHALMERS,  
GLENN MOFFAT,  
JANE MAIR

Contact Details: 0141 221 0793  
[dos@live-language.com](mailto:dos@live-language.com),  
[glenn.moffat@live-language.com](mailto:glenn.moffat@live-language.com),  
[jane.mair@live-language.com](mailto:jane.mair@live-language.com)

Designated Safeguarding Lead reviews the report

No Referral

Designated Safeguarding Lead decides a referral is not required. Organisation takes relevant action, e.g. early help and monitors the situation within an agreed timescale

Referral Required

Designated Safeguarding Lead makes a referral to children's social care and contacts police if appropriate

Referral is made if things escalate

Children's social care will decide what response is required within one working day

The child is in need of immediate protection

The referrer will be informed of this

A section 47 enquiry is required by children's social care if they have reasonable cause to suspect a child is suffering or likely to suffer significant harm

The referrer will be informed of this

A section 17 enquiry is required if children's social care believe the child needs extra help from professionals or services

The referrer will be informed of this

No formal assessment is required

The referrer will be informed of this

Appropriate emergency action is taken by children's social care, the police or the NSPCC

Child is identified as being at risk of significant harm

The need for a child protection plan is agreed by professionals

Child is identified as being a child in need

With parental agreement, appropriate support that the child needs is identified

Organisation considers pastoral support, an early help assessment and accessing universal services and other support

All concerns and correspondence will be kept in a secure, confidential file. The child's circumstances will be kept under review at all stages and a referral will be made again if needs be. The child's best interests must always come first.

If the concern is about a staff member/volunteer in your organisation, the DSL should refer this to the LADO who will determine the best route of action to be taken.

If your concern would involve a Prevent/Channel referral, contact:  
SHARON CHALMERS: 0141 221 0793  
[dos@live-language.com](mailto:dos@live-language.com)  
POLICE SCOTLAND: 999 (Emergency)

If you have a concern that a child has undergone, or is about to undergo, FGM, contact:  
HEALTH & SOCIAL CARE CONNECT:  
0141 287 0555 | 0300 343 1505  
POLICE SCOTLAND: 999 (Emergency)

**All adults and students should report any concerns they have.** An example of concern could be:

- A child or vulnerable adult becomes withdrawn and isolated, when previously they were very social.
- A child or vulnerable adult displays inappropriate behaviour, such as making sexual comments or becomes aggressive.
- There are signs of physical abuse (e.g., bruising, burns, cuts) on a child or vulnerable adult.
- A child or vulnerable adult shares their worry for the wellbeing of themselves or another.

As outlined in Section A, aside from physical abuse, the child or vulnerable adult may also be experiencing sexual abuse, emotional abuse, or neglect.

In the event a child or vulnerable adult discloses abuse to an adult or a designated person, it is important to:

### **Receive**

Listen to what the child/vulnerable adult has to say without shock, fear or denial. Displaying such emotions may make the victim regret their decision to come forward. It is also good practice to sit at right angles with them rather than face to face to avoid intimidation.

### **Reassure**

It is important not to over-promise when reassuring e.g. "It's going to be ok". Instead, tell them that they did the right thing by talking with you and acknowledge how difficult it must have been coming forward with this information.

Do not promise complete confidentiality, even if it is asked of you. Explain to the child/vulnerable adult that you may need to tell another person, such as a designated person, but only those whose job it is to protect children and can help.

### **React**

Listen to what they say. Do not interrupt, make assumptions, or ask accusatory questions. Instead ask open ended questions such as "Is there anything else you want to tell me?" so the child/vulnerable adult can explain their situation in their own words.

Communicate with the victim in a way that is appropriate with their age, and then refer the matter to the designated safeguarding leads outlined in the policy. **Do not discuss the matter with anyone else inside or outside the school.**

### **Record**

Make some brief notes that can be written up in detail afterwards. Keep a record of any notes you make and do not dispose of them. When writing notes record the date, time, place, the **exact** words used and the victim's appearance.

**Do not record assumptions or suspicions – keep any written statements factual based on what you observed and heard.**

Written records are filed in a secure location for 2 years. Only designated safeguarding leads have access to these records. In the event an external Child Protection authority requires access, this will be provided.

Live Language has a duty to report any accusations against its staff or another adult inside the school or from another organisation. The safeguarding process outlined in the previous flowchart should be followed and company disciplinary procedures will be enacted if necessary.

Inappropriate student behaviour (including children/vulnerable adults) will be investigated per the safeguarding flowchart and local authorities will be contacted if necessary. Further breaches of the school's code of conduct may result in the student being suspended.

### **Associated Policies and Procedures (see Staff Handbook)**

Alcohol and Drugs Policy  
Computers, Internet, and Email Policy  
Equal Opportunities Policy  
Bullying and Harassment/ Anti-Bullying Policy  
Grievance Procedure  
Health and Safety Policy  
Monitoring Policy  
Appointments Policy  
Complaints Procedure  
Student Journey  
Under 18s Journey  
Homestay Journey  
General Absence Procedure  
Under 18s Absence Procedure  
Disciplinary Procedure

At the time of writing this policy, no under 18-year-olds were involved in its production.

## **C: Code of Conduct**

### **Overview and principles**

Live Language aims to build trust between under 18s and adults aiming to create a safer school environment where there is a need to provide protection from any behaviours/actions which might be misconstrued. It is therefore necessary to have a Staff Code of Conduct to be followed by all staff and responsible adults.

### **Position of trust**

Live Language expects staff and hosts to protect the professional integrity of themselves and the organisation. As per the Sexual Offences Act 2003, any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law. If the professional boundaries and/or policies are breached, involving a student under the age of 18, this could result in disciplinary procedures or enactment of the allegation management procedures.

### **Setting standards**

Staff must be always excellent role models by demonstrating the following behaviours/actions-

- Being positive, fair, professional, punctual, and sociable.
- Developing and preserving positive relationships with customers, clients, or the public.
- Being able to meet the standards of performance required of their job role.
- Conducting themselves in an appropriate manner.
- Safeguarding the company's public image.
- Behave in such a way as that does not constitute unlawful discrimination.
- Adults should not post on blogs or social media any comments which could be regarded as derogatory about any students, colleagues, or the company.
- Do not use abusive language and be sure to respond to inappropriate behaviour / language.
- Use of punishment or chastisement to ensure adherence to the Code of Conduct in lines with the Disciplinary procedure.
- Observe confidentiality – do not pass on student or staff personal contact details.
- Degree of accessibility to service users. (e.g., not providing personal contact details)

- Do not sell or buy items from a student.
- Do not accept responsibility for any valuables on behalf of a client.
- Do not accept money as a gift or borrow money from or lend money to students.
- Think twice about personal relationships with a third party related to or known to students.
- Do not accept gifts/ rewards or hospitality from students as an inducement for either doing/ not doing something in their official capacity.
- Cautious or avoidance of personal contact with clients.

If you experience any of these, please discuss with your Line Manager or School contact immediately.

### **Interaction**

Staff are encouraged to adopt professional curiosity as a means of exploring a student's wellbeing inside and outside the school. These may be questions about a student's background, family, friends, hobbies etc. Questions should be assertive but always respectful.

Staff are expected to socialise with students at organised school events, but again, behaviour is expected to always remain professional.

Physical contact between adults and under 18s/vulnerable adults is usually not acceptable, except in some special cases e.g., being positive and using praise, playing a learning game which requires physical contact, shaking hands in a normal greeting which is culturally appropriate.

Live Language does not allow staff to give gifts to students, which ensures that nobody gets into a situation which could be misunderstood. However, gifts may be provided by the organisation as part of a planned activity.

If an adult involved with students under 18 or vulnerable adults feels that the interaction they have is inappropriate, or they feel uncomfortable about any aspect of the relationship, they should contact their Line Manager or the DSL at Live Language immediately for further guidance.

All students, including under 18s and vulnerable adults, should speak to the Designated Safeguarding Leads or an adult they trust if they felt that the contact they have with someone is inappropriate or they feel uncomfortable about any aspect of a relationship with an adult.

### **Appropriate Appearance**

Staff and adults are expected to have high standards of appearance and hygiene at all times. They must be smart, clean, and dressed appropriately. As a rule, and to avoid culturally offending any students, avoid exposure of any flesh, exposing tattoos or piercings. Live Language believes that staff and adults' appearance affects students and that some students may find it hard to respect them and their role if they do not present appropriately.

**In class** - Teachers must dress smart-casual. Shoulders should not be exposed, nor should toes or heels.

**On Activities** – Staff and adults should dress appropriately and practically for the task or activity they are involved in. Jeans are acceptable on social programme activities, as are trainers. As usual, avoid exposing flesh.

**Around accommodation**- Staff and adults can dress comfortably as they would normally in their home. As usual, they should avoid exposing flesh. They should ensure they are wearing a bathrobe or dressing gown over their nightwear when they are entering or exiting the bathroom or especially at night.

### Alcohol and drugs

For all staff and employees, please refer to the Live Language Employee Handbook 'Alcohol and Drug Policy' and 'Disciplinary Procedures' sections for full guidance. Employees are expressly forbidden to consume alcohol, or drugs when at work or bring them onto Company premises. Any breach of this rule will be treated as gross misconduct and is likely to result in summary dismissal. If an employee shows the effects of alcohol or drug use during working hours, e.g., slurred speech, the smell of alcohol on the breath etc., they will be subject to disciplinary action. Smoking tobacco products is permitted outside in designated smoking areas.

**On activities** – If an activity takes place off school premises, staff are not permitted to use drugs or alcohol when looking after students who are under 18 or vulnerable adults.

**In accommodation** – Live Language asks that accommodation for under 18s and vulnerable adults are non-smoking, or the accommodation provider smokes outside the property in a designated area. While adults are permitted to use alcohol in their own homes, Live Language asks that they drink responsibly and behave as role models to students who are under-18 or vulnerable adults. The use of illegal drugs is strictly forbidden.

- **At 16, you can buy and consume beer, wine, or cider with a meal in a restaurant, at the manager's discretion in Scotland.**
- **At 18, you can buy alcohol in licensed premises and consume alcohol in a bar in Scotland.**
- **At 18, you can buy cigarettes or tobacco products in Scotland.**

### IT and Social Networks

Adults are encouraged to develop positive relationships with students and are expected to behave in a professional manner while in contact with students, both inside and outside the school, including through the internet. Behaviour is expected to always remain professional.

For all staff and employees, please refer to the Live Language Employee Handbook 'Computers, Internet and Email Policy', 'Anti-Bullying Policy', 'Disciplinary Procedure' and 'Monitoring Policy' sections for full guidance.

Live Language will not tolerate the use of the Internet (including social media, blogs and emails) for illegal or inappropriate activities. Such activities include (but are not limited to):

- online gambling.
- participating in online chat rooms.
- accessing offensive, obscene, or indecent material, including pornography.
- downloading or distributing copyright information.
- sending or posting abusive, rude, or defamatory messages or statements about people or the company.
- stalking.

### Accommodation – Homestay

Students under 16 will not be lodged with students of 18 years or older. Full-time students aged 16 and 17 can be placed with older students, provided the parent/guardian or agent is advised of this when the Homestay is arranged.

House Rules - Hosts are encouraged to communicate with the student's parent/guardian about house rules, and what is acceptable, and particularly what time they are expected home at night and will work with the school to ensure these rules are adhered to. This includes clarity about what time students are expected to be home for dinner and the process to follow if students break the rules.

While hosts should respect all students' privacy, including under 18s and vulnerable adults, it is important to discuss with the student on which occasions it is appropriate for an adult to enter the students' bedroom, for example, when cleaning or if the student asks you to enter. Generally, hosts

should try to have contact with students in the common areas of the accommodation, such as the kitchen or living room. Likewise, the host and the student should lock bathroom doors while in use to avoid any uncomfortable situations.

Hosts and students are encouraged to contact the Designated Persons of any concerns that arise during the accommodation booking duration. Further guidelines on hosting students can be found in the “Guidelines for Homestay Hosts” document.

### **Whistleblowing**

As mentioned previously in this policy, if there is a breach in the code of conduct, line managers should be contacted immediately. Staff who report this (or any other problems) will (a) not be penalised and (b) their report will remain confidential.

### **D: Training**

#### **Responsibility**

Sharon Chalmers is responsible for ensuring that all adults have training to the appropriate level, as follows-

- All staff/homestay hosts - Level 1 Safeguarding / Basic Awareness
- Designated Safeguarding Leads - Level 3 Safeguarding / Advanced training for the DSL and or multi-agency training

#### **Delivery**

All adults will be given a copy of the Safeguarding Policy and are asked to sign receipts to say they have read and understood it.

Level 1 training for all adults will be the Basic Safeguarding Awareness training provided free by the British Council - <https://accreditation-uk.english.britishcouncil.org/>. There are different versions of the training with examples for different roles: language centre management, teachers, Homestay hosts, activity and group leaders, customer service staff and staff accompanying student groups from abroad. Copies of completion certificates will be kept on file. If this is not possible, then transcripts of the training will be kept on file and refresher courses will be delivered once a year at Live Language as part of the CPD Plan for all staff.

#### **E : Safer Recruitment**

“Live Language is committed to safeguarding and promoting the wellbeing of children, young people and vulnerable adults and expects all staff, including Homestay hosts, group leaders, and outside agencies to share this commitment.” This is demonstrated in the following ways-

- Providing the above safeguarding statement in recruitment adverts, application forms, job pack and job descriptions.
- All Job Packs will include the Safeguarding Policy and all prospective staff (those invited to interview) will be sent a copy of the Safeguarding Policy before attending an interview. This includes hosts, and all staff and adults who will encounter under 18s and vulnerable adults.
- Job or role descriptions for all roles involving contact with children and / or vulnerable adults will contain reference to safeguarding responsibilities.
- There are person specifications for roles which contain a statement on core competency regarding child/ vulnerable adult protection/ safeguarding.

Live Language will inform applicants that:

- References will be followed up.
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification. This will include interview questions that ask about a candidate’s attitude to working with under 18s and vulnerable adults.



- All gaps in CVs must be explained satisfactorily.
- Proof of identity and qualifications will be required.
- Reference requests will ask specifically whether there is any reason that they should not be employed in situations where they have responsibility for, or substantial access to, persons under 18.
- Appropriate suitability checks will be required prior to confirmation of appointment.
- Appropriate Disclosure Scotland disclosure may be required prior to confirmation of appointment.

Additional Procedures are as follows:

- All new and existing staff are Disclosure checked or required to sign a declaration that they are not unfit to be working with students under 18 and are informed in writing that Disclosure checks may be required. (See Section C of this Policy)
- Short listing is based on formal application processes/forms and not on provision of CVs.
- Disclosure checks will be conducted for specific roles for all staff (paid or unpaid) working with children and vulnerable adults. Portable/ carry over Disclosure checks from another employer will not be deemed to be sufficient. It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable adults in a wide range of posts.
- All references sought by Live Language will include questions that ask about a candidate's suitability to work with under 18s and vulnerable adults.

### **Applicants awaiting DBS/Disclosure Scotland checks**

For new employees there should be exceptional circumstances for employment to take place before receiving criminal clearance. This would only occur if unavoidable. It is necessary to have a record of the decision, including a sign-off by the relevant senior manager which ensures audit and accountability of the judgement. If a new employee does commence employment prior to clearance being received, they must have signed a self-declaration and their access should always be supervised; they must not be left alone with children. The new starter should never commence employment prior to the submission of their completed application or paperwork to obtain criminal clearance.

### **Criminal Records Bureau/ Disclosure Scotland checks**

Live Language will maintain and review a list of roles across the organisation which involves contact with children/ vulnerable adults.

Live Language will ensure that their established staff and roles are regularly reviewed throughout the year.

- A 4-year rolling programme of re-checking Disclosure is in place for holders of all identified posts.
- Existing staff (paid or unpaid) who transfer from a role which does not require a Disclosure check to one which involves contact with children / vulnerable adults will be subject to a Disclosure check.
- Hosts – the main caregiver will be checked. Checks on other adults in the home (spouse, adult children) may be required by the local authorities. They are also made aware of the Safeguarding Policy and trained on safeguarding under 18s and vulnerable adults from any adult visitors in the home. [Hosts must have Level 1 Safeguarding training from the British Council.](#)

### **Applicants with a criminal record**

An applicant's suitability to work with under 18s should be judged on a case-by-case basis and following the results of the relevant checks carried out. Live Language will make a judgement about suitability taking into consideration only those offences which may be relevant to the job or situation in question. Various points are considered when deciding the relevance of convictions-

- *Seriousness and nature of offence/s* – in general, serious convictions for sexual, violent or drug offences will be particularly strong contra-indicators for work with children. This includes assault and violence against a person, affray, riot and violent disorder, aggravated criminal damage, arson, drink and drug induced driving, drug offences, robbery and sexual offences.

- *Nature of appointment* – will help to assess the relevance of the conviction. For example, serious sexual, violent, drug or drink offences would give rise to particular concern where a position involves the care or supervision of children or teaching, training or instruction of children. Driving or drinking offences would be relevant in situations involving transport of children.
- *Age of offence/s* – offences which took place many years in the past may often have less relevance than recent offences. However, convictions for serious violent or sexual offences are more likely to give cause for concern than for instance an isolated case of dishonesty committed when the person was young. The potential for rehabilitation must be weighed against the need to protect children.
- *Frequency of the offence/s* – a series of offences over a period of time is more likely to generate cause for concern than an isolated minor conviction.

The disclosure will be discussed with the (prospective) employee. It is necessary to verify that the information contained on the disclosure does indeed relate to the person concerned. This verification must be sought prior to any judgements being made. The discussion will also aid the decision making process, and should again broadly focus on the seriousness and nature of the offence/s, the nature of the appointment, age of offence, frequency of the offence/s and any concealment of offences at the application process.

Based upon the findings of this discussion, a judgement should be made about the suitability of the prospective employee. Two people will make the decision and the Local Safeguarding Children Board may offer support. There will be a clear record made of the decision, bearing the judgement, and signed by recruitment manager. This record will not contain details of the offences.

### **When a criminal check is not possible**

If a British national returning to the UK after working overseas where the authorities have refused to provide a record check, a DBS check can be requested. This should include, checking identification and qualifications and obtaining proper references, and supervision.

If an overseas national experiences the same issue, you should document what action has been taken to obtain a check and why this has not been possible, take additional care with identity and qualification checks, exploring employment history and obtaining references. A judgement should then be made regarding suitability for the role and the level of supervision following any findings made.

### **Recruitment of Homestays**

The main caregiver within a Homestay must be checked. Checks on other adults within the home may be required by local authorities. They should be informed of Live Language's safeguarding policy and any relevant code of conduct. Guidance to hosts on safeguarding their student guests from any adult visitors will be given, as well as guidance to ensure their own children are kept safe when hosting older students.

### **Single Central Record**

Although rare, in the event that Live Language receives group bookings, then all staff including Homestays and group leaders who have unsupervised access to under 18s should have formal agreements in place with their agents that ensure suitability checks have been done. In addition to this, providers should obtain signed self-declaration forms from all group leaders and ensure they are made aware of the organisation's safeguarding policy and practices.

Teachers will have their qualifications checked, in addition to their eligibility to work. Since 01 January 2021, checks for teachers from the European Economic Area (EEA) are no longer available from the GTC in **Scotland**. Employers will need to obtain the applicant's proof of past conduct as a teacher and criminal records check from the country/countries the teacher has lived and worked in. For teachers that have worked or trained overseas you should request a Letter of Professional

Standing from the professional regulating authority in the relevant country.

Non-teaching staff, school managers and governors should also undergo vetting and barring checks.

When recruiting temporary or agency staff, checks should also take place to ensure suitability to work with under 18s. This also includes if someone is visiting the organisation to participate in an event with the students.

When recruiting staff, a grid with required headings is made and boxes are ticked to ensure that nothing is missed.

### **F: Welfare & Safeguarding Implementation**

To keep under-18s and vulnerable adults safe, we carry out risk assessments (including fire safety) on an annual basis.

The following rooms/areas within the school are assessed:

- All classrooms
- All working areas
- All common areas
- All accommodation
- All social programme activities
- All activities within the school and outside the school

In addition, we will risk assess:

- Moving from one school to the other
- All staff and responsible adults

All risk assessments are reviewed annually by the School Manager. Training is arranged for staff during their induction, probationary meeting, and bi-annual appraisal meetings as and when required.

Key safety information is given to all students in the form of our student app, login details to which are emailed out prior to their arrival, and the student handbook. Under-18s/vulnerable adults are sent an additional consent forms, which will gather emergency contact information from their parent/guardian/agent/group leader, their address (if they have not booked accommodation with Live Language) & medical information with the usual welcome materials. Under-18s are introduced to the Designated Persons during induction and made aware that they can come forward with any concerns or issues they have.

If they have requested accommodation, then this is only provided with homestay families. Students under 18 are not permitted to stay within our residence accommodation or student houses. The homestay families are specially selected based upon their experience with under 18s or vulnerable people and go through Basic Disclosure checks every 4 years.

If the student is staying in an accommodation of their own choosing i.e., with friends or family – we require confirmation on our online consent form.

Live Language provides students, agents, and parents/guardians with an out of hours emergency contact number, as detailed in the booking confirmation email, student handbook and, student app.

### **Supervision Ratios**

Within the classroom, student numbers are small enough to constitute 1 adult supervising – i.e., the teacher. The minimum age to study at our school is 16, and class numbers do not exceed 14 students.

The NSPCC guidelines recommend that 1 adult per 10 children aged 13 – 18 is optimum. The number of under-18s we receive onto our courses fit well within this advice.

In commons areas, it is recommended that at least 1 Designated Person be present to supervise. More may be necessary if child numbers are higher than normal.

Social programme activities are risk assessed if an under-18 decides to join an event or trip. If student numbers reach more than 20 in one activity, then an additional member of staff is required to supervise all students. This includes trips outside the school premises.

### **Missing Students**

There is a clear attendance and absence policy explained to the students in the student handbook and app. Attendance is recorded in every class by the teacher.

Under-18s who do not arrive in class 15 minutes after the scheduled time are reported to the DSL/Deputy DSL by their teacher. The DSL/DeputyDSL will then call the student on their mobile number, then follow up with a text and email. The student will be asked to explain their absence. If the student cannot be reached, their listed emergency contact will be telephoned to confirm the student's whereabouts. In the event the emergency contact cannot locate the student, the school will work with them to contact the local authorities.

Under-18s who are absent during a social activity will be telephoned, texted, and emailed. If no contact is made – the local authorities are involved.

### **Welfare Provision**

All students are presented with the information they need to be able to live safely and comfortably in Glasgow and to benefit as much as possible from their learning experience at Live Language. This includes-

- Student Handbook & App which covers topics such as laws relevant to young people, staying safe in the UK, and what to do in case of emergency. The Student App login/download link is sent to the student before starting their course, and the handbook is given as part of their induction.
- A team of Designated Safeguarding Leads, who students can approach at any time to discuss any issues or problems.
- Administrative support staff on hand always to offer help or advice, or a friendly face.
- A busy and varied social programmes for all students.
- An emergency phone number to contact a member of staff 24/7.

### **First Aid**

As our students have a minimum age of 16, it is not deemed necessary to train First-Aiders on First Aid for children, as the British Red Cross consider that “children” have not reached puberty. At the time of writing this policy, Glenn Moffat & Sharon Chalmers are trained First Aid Officers. The first aid kit is in the staff kitchen. Host families are advised to keep a first aid kit in their homes. Further information can be found in the school's health and safety policy.

### **Behaviour and Discipline**

All Live Language students are expected to follow the Live Language Code of Conduct. All students are expected to behave with responsible attitudes and treat fellow staff, school property or fellow students with respect. Ignoring school guidelines may result in expulsion without a refund of course fees.

The Code of Conduct is provided in the Student Handbook and a summarised version is given out on the student's first day as part of their induction. The Code of Conduct can also be found within Live Language's Terms and Conditions on the school website.

The following are examples of systems in place for students and adults who cannot follow the Live Language Code of Conduct –

- Students will be refused entry to class 15 minutes after the start of the lesson.
- Students will be marked absent in the above case for that lesson.
- Live Language may contact the student's sponsor or the Home Office in the case of repeated absence.
- Students will be denied the ability to move up to another level if they are found to have cheated on a test or with homework tasks, have poor attendance or display a lack of participation in their class.

### **Fire Safety**

Live Language takes into account-

- the vulnerability and supervision need of children and vulnerable adults.
- the lack of awareness and immaturity of young people.
- the mobility of children and vulnerable adults.
- children or parents who have some form of disability and may have difficulty understanding or reacting to a fire or in leaving the premises unaided.

Fire drills are carried out every month, along with maintenance from a licensed Security Company. Students are informed of potential fire hazards, what to do if there is a fire risk and what to do if there is a fire within the student app.

Further information can be found in the school Health and Safety Policy.

### **E-Safety**

At Live Language we can manage our own web content filtering, meaning we can respond quickly to any issues. Students who bring their own Smart Devices and connect to our Wireless network will be subject to web content filtering protocols.

Students are asked not to use devices within class, unless it pertains to a specific activity that is organised by the teacher.

If a student becomes a victim of cyberbullying or experiences any other type of unwanted contact via social media/text they are encouraged to come forward with any issues and speak to one of the designated persons.

More information on this can be found in the school's Telephone, Email, and Internet Policy.

### **Photography**

Live Language will seek permission from parents or guardians for photographs of children to be taken. This is done via submission in our online consent form.

We recognise that:

- Sharing photographs/videos of activities can be a way to celebrate student success story, or promote awareness of our school
- Children, parents and guardians have the right to decide if their images should be taken or shared.
- Children, parents or guardians have the right to know why photographs/videos are being taken and where they are going to be stored and for how long.
- No personal information or any other means of identifying the child should be attached to their image.
- Children, parents and guardians may choose to revoke permission previously given, however it may not be possible to delete images that were previously published on social media/the internet.
- There are potential risks to sharing images of children online.

## PREVENT

Live Language understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalized or drawn into terrorism and seeks to meet its obligations in the ways shown below, after setting the context.

Our school promotes a multi-cultural environment where respect for and tolerance of other beliefs is required.

At Live Language we believe we embody our 3 values:

- Student success is our passion
- We respect all
- We are committed to continuous improvement.

We share these values with our students. We also teach the British Values of Democracy, Freedom of Speech, Rule of Law, and Tolerance. These values are highlighted within lessons, often being brought up naturally during a class exercise, or alternatively students may learn more about these in depth during a free extra-curricular activity, Culture Club. These are also mentioned in our student handbook.

The Code of Conduct also explains how students are expected to behave and interact with one another. Any radical or extremist views brought up within the classroom environment is challenged, usually by referring to the international environment of the school and reinforcing our value of respecting all and the British value of tolerance.

Staff have been trained on PREVENT and know how to identify radical and extremist behaviour. Any staff member concerned about the views or behaviour of a student, no matter how small should report to the Prevent Leader in the school. Refer to PREVENT Policy for more information.

The School IT equipment has had filters implemented to avoid extremist content being viewed and shared. See Telephone, Email, and Internet Policy for further details.

### Provisions for more Vulnerable people

We are using the term special educational needs and disabilities (SEND) to refer to children who have disabilities or additional needs.

Adults who work with children and young people with SEND should be aware of the additional needs children may have that could mean they are more vulnerable to abuse and/or less able to speak out if something isn't right.

Some children may be vulnerable because they:

- have additional communication needs
- they do not understand that what is happening to them is abuse
- need intimate care or are isolated from others
- are dependent on adults for care.

Any child or person with SEND will be alerted to the designated persons stated in this policy. Further reference and advice can be found in the Statutory Guidance on the Education (Additional Support for Learning) Scotland Act 2004.