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### 1. Introduction

Safeguarding is the action we take to promote the welfare of children and to protect children from harm. It covers caring for children appropriately and protecting them from risks, dangers and things which are not in their best interests as such, it includes health and safety, child protection and pastoral care. Connected to safeguarding is the phrase 'Duty of Care', all adults who work with children as professionals or volunteers have a legal responsibility/duty to keep children safe and to look out for the child's best interests. Children depend on adults for their safety and well-being and all children must know that if they go to an adult for help they will be trusted, believed and assisted.

LLEG acknowledges the statutory duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and regulatory requirements. The policy recognises that the welfare and interests of ALL children are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socioeconomic background, all people are equally regarded.

### 2. Application of this Policy

This policy and procedures are widely promoted and are mandatory for everyone involved in LLEG: for LLEG staff, homestay hosts and their families, LLE Guardianship pupils and their parents and anyone else who comes into contact with an LLE Guardianship pupil. It details what LLEG thinks about safeguarding, and what we do to keep children safe.

**LLEG is committed to safeguarding the welfare of every Guardianship pupil in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after under 18s safely.**

**It is essential that the LLEG Safeguarding Policy and Guidance is known to all adults in the homestay host's household, so homestay hosts must take time to share this with all members of their household aged 16+.**

Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal and exclusion from the organisation.

### 3. Policy Aims

- To provide protection for the children and young people who receive LLEG services, including the children of our homestay hosts via the pupil code of conduct.
- To provide LLEG staff, homestay hosts and their families with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of, harm.

### 4. LLEG Safeguarding Principles

**We will seek to safeguard children and young people by:**

- Valuing, listening to and respecting them;
- Adopting child protection guidelines through procedures and a code of conduct for staff, homestay hosts and their families;
- Promoting and prioritising the safety and wellbeing of children and young people;
- Recruiting staff and homestay hosts safely, ensuring all necessary checks are made, preventing the employment/deployment of unsuitable individuals;
- Sharing information about child protection and good practice with LLE Guardianship pupils, parents, staff, homestay hosts and their families;
- Sharing information about concerns with agencies who need to know, and involving parents and children appropriately;
- Providing effective management for LLEG staff and homestay hosts through supervision, support and training;
- Providing a safe and secure environment for all pupils;
- Ensuring all children are safe and secure and protected from harm;
- Ensuring that all LLE Guardianship pupils know who to turn to for help, advice or support, and have access to 24 hour support;
- Appointing a Designated Safeguarding Lead who has overall responsibility for the safeguarding and welfare of all LLE Guardianship pupils;
- Ensuring that everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people;
- Ensuring that all staff and homestay hosts follow LLEG policies and procedures relating to safeguarding and welfare and are aware of who in LLEG is responsible for safeguarding;
- Ensuring that the relevant persons are aware of the special needs or particular vulnerabilities of individual LLE Guardianship pupils;
- Ensuring appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern;
- Ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

### 5. LLEG staff roles and responsibilities

Within LLEG, there are two levels of responsibility for safeguarding:

i) The Designated Safeguarding Lead, who has overall responsibility for safeguarding and will be involve with any major decisions relating to safeguarding and child protection along with the Principal, Kate Hargreaves. The Designated Safeguarding Leads have received specialist training, which is renewed externally every two years.

**The Designated Safeguarding Lead (DSL) is Emma Langton: +44 (0) 117 9269413 or 07425137794**

**The Deputy Designated Safeguarding Lead is Kate Hargreaves: +44 (0) 117 9269410 or 07766798679**

ii) The Guardianship Managers who look after day to day welfare and pastoral matters, placement of LLE Guardianship pupils with homestay hosts, induction and recording systems. All Guardianship Managers are trained in Safeguarding and Child Protection to the highest standard, currently Level 3 which is renewed externally every two years.

### 6. Implementing the LLEG Safeguarding Policy

#### Training and awareness

- LLEG staff – All LLEG Guardianship Managers are trained to Level 3 and receive ongoing internal training overseen by the DSL.
- LLEG homestay hosts – All hosts must complete online Safeguarding training at Level 1 on an annual basis; face-to-face discussions on safeguarding are carried out at the initial and repeat home visits; Safeguarding webinars carried out by the DSL on a regular basis; safeguarding updates via newsletters, conferences and online events. Training is continually offered as necessary to update.

#### Induction

- New LLEG staff and homestay hosts have safeguarding procedures and their responsibilities included in their induction before they start to have contact with children.

#### Monitoring and supervision

- LLEG actively monitors the use and application of the procedures. LLEG homestay hosts are also asked about safeguarding issues and awareness when discussing their progress and reviewing their work.

### **Recording and information sharing**

- Accurate records are kept within the guidelines of our procedures and current legislation. All records are kept confidentially and securely with limited access. Only the DSL and her deputy can access the records.

## 7. Monitoring and Review

The policy will be reviewed a year after development and then every year, or in the following circumstances:

- Changes in legislation and/or government guidance.
- As required by the Local Safeguarding partners.
- as a result of any other significant change or event.

## 8. LLEG Safeguarding Policy (SP)

### **SP1 – Code of Conduct for Homestay Hosts**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

It is important to build trust between children and adults and to create a safe homestay environment through being positive and using praise. LLEG homestay hosts are expected to promote positive behaviour in all LLE Guardianship pupils and to be fair and transparent in dealing with under 18s. They must ensure that their conduct does not pose any risk or harm to the safeguarding or welfare of pupils, their behaviour would be acceptable to the LLEG Head Office or parents and they should ensure all adults who come into contact with LLE Guardianship pupils are excellent role models.

LLEG's code of conduct for homestay hosts is designed to protect both adults and under 18s from any behaviour/actions which might be misconstrued and it reflects the child-centred principles of the school.

The following code of conduct is extracted from the LLEG Homestay Host Service Agreement signed by all homestay hosts accepting LLE Guardianship pupils.

### Schedule 1: Code of conduct for homestay hosts

#### **Introduction**

1. Allegations of unprofessional conduct or improper contact or words can arise at any time. You are reminded that professionalism and vigilance are required, to ensure the safety of children in your care, and to reduce the risk of an allegation of impropriety against you or a member of staff.
  
2. You need to take particular care and inform LLEG when dealing with a pupil who:
  - 2.1 Appears to be emotionally distressed, or generally vulnerable and/or who is seeking expressions of affection or approval.
  - 2.2 Appears to hold a grudge or becomes angry/frustrated/upset by your actions
  - 2.3 Acts in a sexually provocative way, or who is inclined to make exaggerated claims about himself or herself and others, or to fantasise, or one whose manner with adults is over-familiar.
  - 2.4 If you accidentally harm or hurt a child in any way

**Note: You must immediately inform the LLE Guardianship Manager if any pupil's behaviour is unusual or causes concern.** Some of these behaviours may be indications that a child has been, or is currently being harmed/abused or are at risk of harm and should therefore be reported to the Designated Safeguarding Lead under LLEG's Child Protection Procedures.

3. Always act within the spirit of these guidelines and in the best interest of the child.

### **One-to-one contact with LLE Guardianship Pupils**

4. When accommodating an LLE Guardianship pupil, you should take particular care in the following ways:
  - 4.1 Avoid sitting or standing in close proximity to the pupil;
  - 4.2 Avoid idle discussion;
  - 4.3 Avoid all physical contact and apologise straight away if there is accidental physical contact;
  - 4.4 Avoid carrying out personal tasks which the pupil can do for themselves, e.g. applying sunscreen;
  - 4.5 Avoid any conduct that could be misconstrued or taken as a sexual advance;
  - 4.6 Avoid words or expressions that have any unnecessary sexual innuendo; avoid displays of affection either personally or in writing even in jest;
  - 4.7 Avoid any form of aggression or anger. Threatening words, holding, pushing, pulling or hitting, is never acceptable;
  - 4.8 Avoid any words or actions that are over-familiar;
  - 4.9 Do not swear, blaspheme or use any sort of offensive language in front of pupils;
  - 4.10 Always follow the LLE behavioural policy;
  - 4.11 If you are at all concerned about anything which has occurred during the pupil's stay, inform the Designated Safeguarding Lead without delay, and make a written record (signed and dated).

### **5. Physical contact**

Appropriate physical contact when a pupil is in distress is deemed acceptable, for example, hugging a young child who is homesick. In these situations you should always use your own professional judgement and seek permission from the child first. Always ensure the presence of another adult and explain what you are doing. Please be aware that there may be particular circumstances where physical contact may be unwanted, for example, a child who has been abused may find physical contact particularly difficult.

### **The Law: Abuse of the Position of Trust**

6. All teachers, homestay hosts and their families are in a position of trust. It is a criminal offence under the Sexual Offences Act 2003 for an adult (aged 18 years and over) who is in a position of trust to engage in sexual activity with any child aged under 18 years old even if both parties consent. The offence is punishable by up to five-years imprisonment and/or an unlimited fine.
7. The Sexual Offences Act 2003 also introduced the offence of "meeting a child following sexual grooming". This applies where an adult arranges to meet a child aged under 16 in any part of the world, if he has met or communicated with that child on at least two earlier occasions and intends to commit a sexual offence against that child. The law is clearly intended to apply where adults contact children through the internet or by texting. However, the prior meetings or communications need not have an explicitly sexual content.
8. Sexual activity involving a person under the age of 16 (male or female) is illegal. This is so, even when the younger person is alleged to have provoked or encouraged the activity.
9. Every complaint and allegation by a pupil must be taken seriously by all members of LLE and action must be taken by the Designated Safeguarding Lead. The DSL will involve social services and the police if there are grounds for thinking that a criminal offence has been committed and/or a child has suffered significant harm

### **Professionalism**

10. **LLEG expects the highest standards of professional conduct at all times:**
  - 10.1 Dress appropriately to reflect your professional status and the fact that you are teaching and living with young people. In particular, avoid wearing nightwear in the pupil's company.
  - 10.2 Ensure that the pupil's privacy is protected at all times including in their bedroom and when using the bathroom. There must always be a lock on the bathroom door.
  - 10.3 Always be mindful of the responsibility you have regarding alcohol and smoking whilst living and working with under 18s; avoid smoking and minimise alcohol consumption in the pupil's company.
  - 10.4 Comply with UK laws regarding alcohol, drugs and smoking.



### **Physical constraint**

- 11. If restraint is absolutely necessary to stop a child from taking a particular course of action then in law it must be seen as being appropriate and reasonable.**
- 11.1 Homestay hosts must always try non-physical approaches first, such as talking, shouting instructions or standing in a student's way.
- 11.2 If restraint is absolutely necessary, for example, a child is about to walk out in front of a car then it is best to stop the child by putting your hands on their arm or shoulder where your actions cannot be misconstrued. In this example your actions would be seen as being appropriate and reasonable.
- 11.3 All incidences of physical constraint must be reported to the Designated Safeguarding Lead.

### **Communication with pupils and parents**

- 12. To reduce the chances of miscommunication all communication to pupils/parents and agents must be made through head office.**
- 12.1 All forms of communication must go through the L.L.E.G Head office
- 12.2 All communication and language must be gauged to the pupils age and take into account their level of English.
- 12.3 Homestay hosts are not permitted to give our personal email address.
- 12.4 Homestay hosts must not take photographs of guardianship pupils using personal phones or cameras unless consent has been obtained from parents via Living Learning English Guardianship.

### **Cultural differences**

13. Homestay Hosts are asked to remember that there are cultural differences in all behaviour including behaviour expectations, food preferences, toilet & bathroom habits, greetings, body language etc. and to bear this in mind when interacting and working with children and students from different cultural backgrounds.
- 13.1 Homestay Hosts must always be sensitive to cultural differences and beliefs.
- 13.2 Where possible students should be guided to the appropriate course of action or guided to give the appropriate response, for example; "remember that in England, we always say "please" when we ask for things or to make a request".
- 13.3 Homestay hosts should always dress conservatively to show respect to different cultures and religions even if this contradicts their own personal values and beliefs.
- 13.4 Homestay Hosts must act professionally at all times.

### **Transporting Students**

- 14 Extra care should always be taken when transporting other peoples children.
- 14.1 Homestay hosts must have their vehicle insured for Business use and a clean licence.
- 14.2 Homestay hosts are not permitted to transport Guardianship pupils without prior written permission from L.L.E.G.
- 14.3 Homestay hosts must ask all Guardianship pupils to sit in the back of their vehicle when transporting students alone and always ask pupils to wear their seatbelts.
- 14.4 Homestay hosts must ensure car seats are used for children aged under 12 years old or if the student's height is below 135cm.

### **Gifts and Rewards**

- 15. Homestay hosts are not permitted to accept gifts from Guardianship pupils without informing L.L.E.G head office.
- 15.1 Where gifts are in value of over £30 then the gift should be returned to the pupil politely with an that you are not allowed to accept gifts of significant value. All gifts must be declared.
- 15.2 Homestay hosts must not give gifts and rewards to Guardianship pupils, all members of staff are reminded that this could be misinterpreted as grooming behaviour.
- 15.3 In specific circumstances such as birthdays or when a child is in hospital or has suffered a traumatic event then small gifts maybe given, however the price of these gifts must not exceed the value of £25 and all gifts must be declared to the L.L.E.G office to be recorded.

### LLEG Safeguarding Policy (SP)

## **SP2 – Code of Conduct for LLE Guardianship Pupils**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

LLE promotes a safe, respectful and cooperative environment for all members of its community. As such, LLE Guardianship Pupils are expected to abide by its code of conduct.

Positive behaviour is expected of all LLE Guardianship Pupils in the homestay host's home. This is encouraged through homestay guidelines and rules for LLE Guardianship Pupils, adults setting the right examples and having clear systems for responding to situations.

### **LLE Guardianship Pupils should:**

- Treat their homestay host, their families and other pupils courteously and with respect at all times.
- Treat all resources and facilities in the homestay host's home with care.
- Follow appropriate instructions given by their homestay hosts or LLEG staff.
- Be honest.
- Avoid the use of offensive language.
- Dress appropriately for the homestay environment and on any excursions, visits and activities.

## The home

### **LLE Guardianship Pupils should:**

- Follow all rules set by their homestay host in addition to behaving in a courteous, respectful and cooperative manner at all times.
- Leave their bedroom and any facilities used in the home clean and tidy after use.
- Be respectful of the family by being quiet during the night when people are sleeping.
- Respect the privacy of the homestay host and family and not enter any private areas of the house without their permission.
- If given parental permission to go out unaccompanied, give an approximate time they will be home, and always obey the LLEG curfew times as detailed in their induction.
- Remain contactable by mobile phone at all times.

### Health and safety in the home

**LLE Guardianship Pupils should:**

- Tell LLEG about their medical conditions and provide details in English to LLEG of any medication they are taking and/or have with them in the homestay host's home.
- Use equipment in the home safely and in accordance with safety instructions given to them by their homestay host.
- Tell their homestay host about any accidents or safety-related incidents.
- Tell their homestay host if they are injured or feeling unwell.
- Follow all fire and other home safety advice given to them by their homestay host, in their LLE Guardianship Pupil Handbook and in the Home File.

### Excursions and visits (see also the LLEG Excursions Policy and Procedure. SP 11.)

**LLE Guardianship Pupils should:**

- Pay attention to and follow welfare, health and safety instructions given by their homestay hosts.
- Always carry a fully charged mobile phone which is switched on.
- Always carry their mobile phone with the LLEG emergency contact numbers stored in the phone.
- Behave in an appropriate manner.

### Discrimination

Discrimination in any form will not be tolerated at LLEG.

LLE Guardianship Pupils should behave in a way that has a positive effect on others and not discriminatory on any grounds, including age, gender, race, nationality, culture, religion, pregnancy and maternity, sexuality, disability, health, ability, status and appearance.

### Bullying and harassment (see also SP.8 LLEG Bullying Policy and Procedure)

Bullying (including cyberbullying), and harassment in any form will not be tolerated.

### Use of the Internet and mobile electronic devices (see also SP.9 LLEG E-Safety Policy and Procedure)

LLE Guardianship Pupils under 18 years will be informed that network and internet use on a homestay host's computer will be monitored.

#### **LLE Guardianship Pupils should:**

- Follow the guidance in the LLEG E-safety policy.
- Be vigilant about their safety when using the internet and, specifically, not provide personal details, contact information or images to, or arrange to meet, people unknown to them.
- Not photograph or video fellow LLE Guardianship Pupils or LLEG homestay hosts and their families without consent.
- Not post images of LLE Guardianship Pupils or LLEG homestay hosts and their families on the internet without permission.
- Not access illegal material.
- Not download any file to the homestay host's computer without permission.
- Not change the settings on the homestay host's computer without permission.

### Alcohol and illegal substances

#### **LLE Guardianship Pupils should not:**

- Store, consume or be under the influence of alcohol in the homestay host's home if they are under the age of 18 years old.
- Purchase or consume alcohol in a public place or in licensed premises if under the age of 18 years.
- Purchase alcohol for anyone else.
- Store, solicit, purchase or use illegal substances (drugs) at any time.

### Smoking

#### **LLE Guardianship Pupils should not:**

- Smoke anywhere in the homestay host's home unless explicitly permitted to do so and over the age of 18 years old.
- Purchase tobacco products if under the age of 18 years old.

### Criminal Activity

Criminal activity in any form will not be tolerated at LLEG. UK Laws and Legislation will be covered in each guardianship pupils induction. Guardianship pupils must be made aware that UK Laws will differ from the laws in their own countries.

### Intimidation, aggression and violence

Intimidation, aggression and violence in any form will not be tolerated at LLEG.

**Any pupils breaking British law, or persisting in serious anti-social behaviour, will be subject to LLEG'S disciplinary procedures and reported to the police if necessary. In serious cases, LLE Guardianship Pupils may be asked to leave the LLE Guardianship Scheme.**

LLEG Safeguarding Policy (SP)

## **SP3 – LLEG Policy on Dealing with Unacceptable Behaviour in LLE Guardianship Pupils**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

### Breaches of the code of conduct for LLE Guardianship Pupils

It is the responsibility of LLEG to ensure that all LLE Guardianship Pupils are informed of the LLE code of conduct and confirm with them that they have seen, understood and agreed to follow it. LLE Guardianship Pupils must also be made aware of the consequences if they breach the code.

Behavioural misconduct is defined as any breach of LLEG rules as described in the LLEG Code of Conduct for LLE Guardianship Pupils. In addition, a breach of any rules that have been clearly and explicitly set out by homestay hosts will be considered behavioural misconduct.

LLEG has clear procedures to help and support homestay hosts managing behavioural misconduct from LLE Guardianship Pupils within the home.

**Any pupils breaking British law, or persisting in serious anti-social behaviour, will be reported to the police. Serious cases of gross misconduct will be referred immediately to the Senior Guardianship Manager and Principal. Pupils may be sent home at their own expense, with no refund of fees and the LLE Guardianship Services cancelled.**

**Recording behavioural incidents:** all incidents should be recorded on the LLEG Incident Report Form and sent to the Guardianship Manager. These forms will be stored confidentially in the pupil record or if necessary in their secure safeguarding file.

**Managing behavioural incidents:** early disciplinary procedures will be managed by the homestay host, depending on the nature of the incident. Later stage procedures will be managed by more senior members of LLEG staff, using the procedures below.

*SP3 – LLEG Policy on Dealing with Unacceptable Behaviour in Young Learners*

Type of incident	Initial Procedure	Managed By	Subsequent Actions
Isolated case of minor behavioural incident	<p><b>May be managed informally with pupil at the time of the behavioural incident.</b></p> <p>If an LLE Guardianship Pupil breaches the LLE code of behaviour, the most appropriate sanction for a minor or first-time breach will be to remind them about the code of conduct, and to ask them to comply with it. LLE Guardianship Pupils will be given the opportunity to reflect, enabling them to plan a positive response, with support from their homestay host.</p>	<b>Homestay Host</b>	Monitor for further issues
1st behavioural incident	<p><b>Stage 1: Verbal Warning</b></p> <p>If, having followed the above step, the guardianship pupil continues to exhibit inappropriate or unacceptable behaviour, they should be referred to a Guardianship Manager who will give them a formal, verbal warning. Supportive interventions may need to be identified at this stage. The action shall also be recorded in the pupils file and parents/carers informed.</p>	<p><b>Teacher</b></p> <p><b>Guardianship Manager</b></p>	Move through stages 2-3 if unresolved
2nd behavioural incident	<p><b>Stage 2: Written warning</b></p> <p>Any further persistent inappropriate or unacceptable behaviour will result in a more serious sanction being imposed (eg restrictions from activities) and a written warning from LLE. Again, supportive interventions may need to be identified at this stage. This action should also be recorded on the pupils file and parents/ carers informed.</p>	<p><b>Safeguarding Lead</b></p> <p><b>Principal informed</b></p>	Move to stage 3 if unresolved
3rd behavioural incident	<p><b>Stage 3: Expulsion</b></p> <p>If these interventions are still not effective in helping the Guardianship Pupil to change their behaviour, further sanctions will be necessary. It will be at this point that LLE will discuss with the guardianship pupil and their family removal from our services.</p>	<p><b>Safeguarding Lead</b></p> <p><b>Principal</b></p>	Request to leave the course



### *SP3 – LLEG Policy on Dealing with Unacceptable Behaviour in Young Learners*

The procedures outlined below should be followed sequentially but may not be initiated at Stage 1, as outlined above. If procedural stages are bypassed, an LLE Guardianship Pupil should be made aware of the reason for this by the Guardianship Manager (GM).

## Stage 1: Verbal Warning

### **The homestay host should:**

- Inform one of the Guardianship Managers straight away , Guardianship Manager (GM). will issue the pupil with a formal verbal warning over the telephone.
- If the matter is resolved, complete and return the behavioural incident report form to the GM at LLEG.
- If the matter is not resolved, inform update the behavioural incident report form with the details to date and send to the GM at LLEG who will inform the pupil's parent(s)/carers(s) and representative agent (if applicable) of the details of the incident, and move the procedure to Stage 2: Written Warning.

## Stage 2: Written Warning

Behavioural incidents not resolved by a Stage 1: Verbal Warning, second cases of behavioural incident (the incident may be the same as or different to the first incident), and more serious behavioural incidents should be managed using a formal written warning.

### **The homestay host should:**

- Inform one of the Guardianship Managers straight away who will take further action and liaise with the Safeguarding Lead .
- Complete and return the behavioural incident report form to the GM at LLEG.
- Talk with the pupil to give the pupil the opportunity to explain their behaviour ask the pupil how they plan to improve and whether they require help to do so.
- Secure written commitment from the pupil that they plan to improve and follow any supportive measures and/or restrictions which are put in place.
- Inform the pupil that LLEG has informed their parent(s)/carer(s) and representative agent, if applicable, about the incident and the action taken to date
- Warn the pupil in writing that the consequences of not meeting the requirements of the Written warning will be to move them to the final stage of the disciplinary procedures , where they may be expelled form our guardianship services.

### Stage 3: Expulsion

**The Principal and Safeguarding Lead will:**

- Review the previous Behavioural Incidents and take one or more of the following immediate actions, depending on the nature of the incident(s):
- Request further investigation into the incident where more robust evidence is required to substantiate an allegation or where anyone involved may have acted subjectively, inappropriately or in a biased manner.
- Report the pupil's activities to the police where cases of misconduct involve criminal activity, or where criminal activity is suspected and police investigation is required to substantiate an allegation.
- Remove the pupil from the homestay with immediate effect if they feel that the pupil's continued presence puts their own welfare or safety at risk or that of other pupils, the homestay host and/or members of the homestay host's family.
- Write to the pupils parent(s)/carer(s) and representative agent informing them that the child has been expelled from our services and no fees will be refunded.

**All actions will be meticulously recorded.**

## LLEG Safeguarding Policy (SP)

### **SP4 – LLEG Child Protection Policy and Procedure**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

## Introduction

Living Learning English Guardianship is committed to safeguarding the welfare of LLE Guardianship pupils and has developed this Child Protection Policy and Procedure to support homestay hosts and staff members in putting into practice this commitment.

This policy establishes the roles and responsibilities of everyone who works for or with Living Learning English in relation to the protection of children and young people with whom their work brings them into contact. In the context of child protection, children and young persons refers to anyone under 18 years of age. It is the responsibility of everyone at LLEG to promote the protection of children and young people. In following this policy, staff are always expected to maintain a sense of proportion, apply common sense to situations and protect the child's welfare as priority.

This policy is based on, and reflects, the principles of both UK legislation and guidance and other relevant Living Learning English policies and procedures. The approach has been developed in such a way as to be consistent with 'Best Practice' within the field of child protection.

The welfare of the child or young person is the paramount consideration and is everyone's responsibility. All children and young people, regardless of age, disability, gender, racial or ethnic origin, nationality, religious belief and sexual identity have a right to protection from harm or abuse.

It is not intended that the policy should restrict staff from normal ways of working, but Homestay Hosts and Members of Staff always need to consider how their actions and behaviour may be perceived as opposed to how it is intended. In the event that an allegation is made, both homestay hosts, teachers and staff can not rely on their reputation or "good name" to protect them.

For the guidance of this policy any reference to child/children will also apply to adults at risk aged over 18 years.

### Principles of Good Practice

#### LLEG undertakes to:

- Treat children and young people with care, dignity, respect and always act within the child's best interest.
- Recognise that those working for LLEG will be perceived by children and young people as trusted adults.
- Ensure communication with children and young people is open, honest and clear.
- Assess the risks to children for all activities and operations.

### Living Learning English Guardianship Responsibilities

Emma Langton is the Designated Safeguarding Lead (DSL) and has responsibility for implementing the Living Learning English Child Protection Policy and ensuring appropriate training has been undertaken. The DSL is responsible for formally reporting any allegations of child abuse that occur to the relevant Statutory body (Local Safeguarding partners) and will ensure that accurate records are kept safely and securely.

### Aims

- All staff must understand the responsibility placed on LLEG for child protection
- All staff and adults in the homestay household have a duty of care to protect children and young people from abuse, and this is part of our safeguarding children procedure.
- All staff and adults in the homestay household must understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the DSL.
- Not all concerns about children or young people relate to abuse, however all information and concerns no matter how trivial they may seem must always be passed on to the DSL.
- If you are worried or concerned about a child, it is not your responsibility to investigate and decide if it is abuse. It is your responsibility to act on your concerns and to pass all information to the DSL.

### Definition of Abuse

The definitions of abuse detailed below are as detailed in the statutory guidance for schools and colleges: Keeping Children Safe in Education 2021

- **Physical Abuse** - a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

### Historical Abuse

There may be occasions when a child will disclose abuse which occurred in the past. This information needs to be treated in exactly the same way as a disclosure of current child abuse.

### Confidentiality and Appropriate Disclosure of Information

Confidentiality and trust is crucial to all our relationships, but the welfare of the child is paramount. The law does not allow anyone to keep concerns relating to children aged under 18 years old to themselves. All concerns from any member of staff, homestay family, teacher, teacher's family or volunteer must be passed on to the Designated Safeguarding Lead.

All information that has been collected on any child will be kept locked, secure and/or password protected and access will be limited to the Designated Safeguarding Leads and the appropriate authorities, for example, the Local authority/children's services and the police (Local Safeguarding partners).

All disclosure information will be kept confidential and on a need to know basis. Whilst parents/carers have the right to see any records kept on their child, this might not always be appropriate, and should not put the child at risk.

It is very important that only those who need to know (the Designated Safeguarding Lead at LLEG and the DSL at the child's school), actually know and pass on information to the Local Authority/children's services and/or the police (Local Safeguarding Partnership), this is to avoid confusion, misinformation, rumour, speculation and gossip that could affect the child, their parent/carer or the member of staff or volunteer involved.

In the event of a criminal investigation it is essential that no information on child protection concerns relating to a child are disclosed inappropriately. Any such leaks could have serious consequences for both the child concerned and any police investigation.

### The Seven Golden Rules to Sharing Information

As detailed in the HM Government's guidance: Information Sharing advice for practitioners providing safeguarding services to children, young people, parents and carers. 2018

1. Remember the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom the information will, or could be shared and seek their agreement unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement there is lawful basis to do so, such as where safety may be at risk. You will need to base your judgements on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose of which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion and is shared securely.
7. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purposes.

### Recognising Abuse

Recognising abuse is one of the first steps in protecting children and young people. There could be signs or behaviour that make you feel concerned. All Homestay Hosts and Members of Staff should be alert to the following types of behaviour in the children:

- A change in personality or behaviour
- Becoming aggressive, withdrawn or clingy
- Seeming preoccupied or to be keeping a secret
- Becoming insecure and/or constantly seeking reassurance
- Unexplained injuries or inconsistent explanations of bruising, injuries or burns
- Drug and/or Alcohol misuse
- A drop in school performance
- Becoming over-emotional or over-reacting to a reasonable request
- An unreasonable fear of certain people or places
- Acting in an inappropriate way perhaps with adults, other children, toys or objects
- Sexually explicit language and behaviour
- Participating in risky behaviour or activities
- Changing in eating and/or sleeping habits
- Having unexplained amounts of money and expensive clothing
- Begins to bully other children or adults
- Is in a relationship with an older and/or controlling person
- Pregnancy symptoms
- Obsessive internet use
- A disclosure of abuse
- Drawing inappropriate pictures or writing about explicit abuse in stories or written work.

### Child Sexual Exploitation (CSE)

CSE is a form of sexual abuse where children are sexually exploited for something in return for example, money, food, shelter, power, status or perceived love. It can involve violent, humiliating and degrading sexual assaults or in some cases, young people are persuaded or encouraged into exchanging sexual activity for drugs, gifts, affection or status without the use of violence.



Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online, for example, by sending sexual photographs to the perpetrator. Another example of child exploitation, is older peers encouraging younger peers to become sexually active. A significant number of children who are victims of sexual exploitation go missing from home, care and education.

**Some of the following signs may be indicators of sexual exploitation:**

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or don't take part in education.

### Child Criminal Exploitation (CCE)

CCE is a form of abuse and includes children and young people being forced and/or manipulated by criminal gangs or individuals into transporting drugs, illegal goods or money through county lines in the UK, working in illegal cannabis or other drug factories, shoplifting or pickpocketing. Children could also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to both adults and children.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as guns and knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of child sexual exploitation.

### Human Trafficking

Both children and adults can be trafficked into the United Kingdom for different forms of exploitation, examples of this range from forced prostitution, forced labour, forced criminality such as county lines, benefit fraud, forced marriage, forced servitude and potentially forced organ removal. Trafficking however does not need to take place across international borders, simply bringing a human into an exploitative situation constitutes trafficking.

Many children who are trafficked from overseas come from Eastern Europe, South-East Asia and Africa. Often children are forced to work in agriculture, the sex industry, in nail bars, car washes, restaurants or cannabis farms. Children can also be exploited to carry drugs and fire arms across borders for criminal gangs.

Traffickers may groom the child parents to gain their trust, promising the parents a better life and future for their child. Often the traffickers will ask parents for large sums of money upfront in return for travel documents, visas, education and transport. Traffickers will also make a profit on what the child “earns” through exploitation, crime and forced labour. Children will often be told that they need to pay off a debt for their family.

There has been a number of cases since 2015 of traffickers, trafficking students from Vietnam to UK boarding schools/colleges. Children are granted their visa, attend for the first term and then go missing from their education.

Staff should pay particular attention if they receive a course or guardianship enquiry for a student of any age from **Vietnam, Albania and Romania** and this information should be passed onto the Designated Safeguarding Lead or their deputy at the time of the enquiry.

All staff and volunteers need to be aware of human trafficking and suspected cases should be dealt with as any other safeguarding issue. All suspected cases of human trafficking or modern slavery, will be reported to the [Modern Slavery Helpline](#) on 08000 121 700 or the police on 101.

### Female Genital Mutilation (FGM)

FGM is a form of child abuse and as such is dealt with under Living Learning English's Child Protection policy. FGM is a grave violation of the human rights of girls and women. 'Female Genital Mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons' – definition supplied by the World Health Organisation (2018).

Suspicious should be raised after a child has had a prolonged absence from school together with noticeable behaviour change. This could be after a return from a holiday or you may notice a child is spending long periods of time away from school. In conversation, a child may talk about and express anxiety about a special ceremony or they may be worried about returning to their home country after their English course or when their school term has finished.

A child is at risk of FGM if they come from a community that is known to practice FGM. Countries where FGM is most commonly practiced include **Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria and Eritrea**. However, girls from non-African communities that are also at risk include those from **Yemen, Indonesia, Pakistan and Kurdish nationals**.

A child who has undergone or who is at risk of FGM should be seen as a child protection issue and advice should be sought from the Designated Safeguarding Lead who will make a referral to Social Services/local safeguarding partners and the Police.

### Sexual Violence, Sexual Harassment and Sexual Harm

Sexual Violence refers to the sexual offences under the Sexual Offences Act 2003 and includes rape, assault by penetration and sexual assault.

Sexual harassment is defined as any behaviour in a sexual context which is unwanted and can include sexual exploitation, unwanted sexual remarks on social media, groping, flicking bras, sexual comments, making up sexual stories, making sexual remarks about clothing, deliberately touching another person or brushing against them, drawing sexual pictures, requesting sexual favours or making sexual jokes.

Sexual violence and harassment is never acceptable and should never be treated as a joke or "just banter" between adults, children & children or children and adults of any age.

Any report of sexual violence or sexual harassment will be taken seriously, staff should be aware it is more likely that females will be the victims of sexual violence and sexual harassment, But it is essential that all victims regardless of their gender are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Downplaying behaviours related to sexual abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Any incidences will be dealt with in accordance with this policy by the DSL, a risk assessment will be carried out and any information regarding the above will be passed on to the police and children's services.

### Peer on Peer Abuse

Children can abuse other children. We acknowledge that Peer on peer abuse can occur at any age and other Safeguarding issues can also manifest themselves via peer on peer abuse. LLEG make it clear that any kind of abuse will not be tolerated and peer on peer abuse will not be dismissed as "banter" or seen as an inevitable part of growing up. Peer on Peer abuse is no different to any other form of abuse and must be dealt with as any other safeguarding issue.

Peer on peer abuse could happen within our organisation and may include but is not restricted to the following:

- Bullying (including cyberbullying); Please see SP 8. Bullying policy and Procedure.
- Physical abuse e.g. hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Emotional abuse
- Sexual violence, sexual harassment: or the encouragement of sexual activity. Please see above;
- Forced drug taking or encouragement to take part in County Lines activity;
- Sexting (also known as youth produced sexual imagery). Please see below;
- Upskirting. Please see below.
- Initiation/hazing type violence and rituals. Please see below.

### Consensual and non-consensual sharing of nude images.

'Sexting' is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet. Young people may also call it: "Cybersex" or "sending a nudie", or "dick pic".

Sending consensual nude images is often seen as flirting by children and young people who feel that it is part of normal life. It may be common but sending nude images is illegal. By sending an explicit nude image of themselves, a young person is producing and distributing child abuse images and risks being prosecuted by the police, even if the picture is taken and shared with their permission and consent.

When images are stored or shared online they become public. They can be deleted on social media or may only last a few seconds on apps like Snapchat, but images can still be saved or copied by others. These images may never be completely removed and could be found in the future, for example when applying for jobs or university.

Young people may think sending a nude image is harmless but it can leave them vulnerable to:

**Blackmail** - An adult or another child may threaten to share the pictures with the child's family and friends unless the child sends money or more images. An ex-partner may also threaten to share images with third parties for "revenge".

**Bullying** - If images are shared with their peers or in school, the child may be bullied or exploited.

**Unwanted attention and abuse** - Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images.

**Emotional distress** - Children can feel embarrassed and humiliated. If they are very distressed this could lead to suicide, self-harm or mental health issues.

LLEG is committed to helping young people to use privacy settings, to block and report inappropriate people, remove content they have shared online and to report offensive and inappropriate content other people have posted to get it removed.

All incidences of consensual and non-consensual sharing of nude images should be reported to the Designated Safeguarding Lead who will act accordingly as per any other safeguarding issue.

### Initiation/hazing violence and rituals

LLEG staff may have their suspicions raised if a child discloses an incident which has happened to them or a friend.

It may have happened to them in their home country or in the UK. There have been reported cases of initiation activities taking place in boarding houses and sports teams recently within the UK.

Situations may include but are limited to, pupils being asked to complete dares, pretending to capture or kidnap other pupils, removing items of clothing, being branded, forced consumption/ingestion of spicy foods, alcohol, drugs or other harmful substances etc., whipping, hitting or burning, public nudity, mistreatment of animals, forced sexual activity, self-harm and shaving parts of the body.

Disclosures of Initiation/hazing violence and rituals should be dealt with the same as any other disclosure of abuse and passed on to the Designated Safeguarding Lead.

### Upskirting

Upskirting became an offence in April 2019. Upskirting is defined as “taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm” (DfE, 2019a).

### Mental Health

LLEG recognises that mental health problems can sometimes be an indicator that a child has suffered or is at risk of suffering abuse or exploitation. Whilst staff including homestay hosts are not medically trained to make a diagnosis they are well placed to observe behaviour and suggest that a child maybe suffering with or developing a mental health problem. All observations should be passed on to the DSL.

LLEG also recognises the increase in children and young people experiencing mental health difficulties and is committed to supporting and promoting children’s and students well-being. Should a child or LLE student experience mental health difficulties whilst staying with their teacher or homestay host then the DSL will be available to offer support and guidance. LLEG has designated teachers and homestay hosts who have received mental health training.

### Responding to a Disclosure of Abuse

It is often likely that a child will disclose an incident or abuse to an adult who they know they can trust. Often children will make several attempts to tell a trusted adult before they disclose any information. Children will usually wait until the adult is alone, it maybe at the end of a lesson or an activity or the child may wait until they are due to leave to go home or back to school. Adults must be ready to deal with disclosures of abuse and must follow steps to make sure that they do not interrupt or interrogate the child. All disclosures must be recorded verbatim and passed onto the Designated Safeguarding Lead or their deputy immediately.

**Designated Safeguarding Lead:** Emma Langton

**Email:** emma@livingenglish.com

**Direct Dial:** 0117 926 9413

**LLE Emergency mobile:** 07425 137 794 (24 hours a day, 7 days a week)

**Deputy Designated Safeguarding Lead:** Kate Hargreaves

**Email:** kate@livingenglish.com

**Direct Dial:** 0117 926 9410

**Mobile:** 07766 798 679

**LLE Emergency mobile:** 07425 137 794 (24 hours a day, 7 days a week)

Please follow the steps outlined on the next page.

### Steps to take if a child makes a disclosure of abuse

1. **Stay calm** and be aware of your own emotions, reactions and non-verbal messages.
2. **Listen** carefully to what the child/young person is saying. NEVER interrupt the child until they have finished their disclosure.
3. Follow **TED Rules** to clarify any information that is unclear at the end of the disclosure.
  - o **Tell Me**
  - o **Explain to me**
  - o **Describe to me**

NEVER ask leading or closed- ended questions, for example, do not ask: what did they do next?

4. **Reassure** the child and acknowledge their courage in telling you.
5. Suggested **responses**: “ What you are telling me is important “
  - “ I am glad you were able to tell me, you have taken the right action “
  - “ This is so important that I need to ask somebody else for help “

Do not promise the child that this can be kept secret, as subsequent disclosure could then lead to the child feeling betrayed. Explain that you are **legally obliged** to inform other people who have been trained to help. Reassure the child that the Safeguarding Lead will be informed and will be looking to help to protect them.

6. Record the disclosure verbatim as soon as possible and use the **actual words** used by the child. Make your notes as detailed as possible, including when and where the conversations took place. Draw a simple diagram, if appropriate, to show the position of any bruises or marks the child or young person shows you, trying to indicate the size, shape and colour
7. Keep all records **factual**. Do not make an assumptions or judgements. All children who come to adults for help must be believed and the information disclosed must be passed on to the Designated Safeguarding Lead . It is not your responsibility to make any judgements about whether or not the information is true. Remember to store all records securely.
8. **Do not interrogate** the child, or push for more information. Do not ask the child/young person to repeat what they have they told you, for another person. Record accurately.



9. Pass on the disclosure to the Designated Safeguarding Lead **IMMEDIATELY** or in their absence the Deputy Designated Safeguarding Lead:

**Designated Safeguarding Lead:** Emma Langton

**Email:** emma@livingenglish.com

**Direct Dial:** 0117 926 9413

**LLE Emergency mobile:** 07425 137 794 (24 hours a day, 7 days a week)

**Deputy Designated Safeguarding Lead:** Kate Hargreaves

**Email:** kate@livingenglish.com

**Direct Dial:** 0117 926 9410

**Mobile:** 07766 798 679

**LLE Emergency mobile:** 07425 137 794 (24 hours a day, 7 days a week)

10. The Designated Safeguarding Lead will review and assess all of the information and advise on what action will be taken. If the child has suffered significant harm or is at risk, the DSL will make referrals to the appropriate statutory body either Children's Social Services and/or the police. The person to whom the disclosure was made should ensure that the child is informed about what will happen next, so they can be reassured about what to expect.

### Informing Parents, Agents and Partner Schools

LLEG works in partnership with parents and will inform parents about incidents regarding their child. This will sometimes be through a partner agency if the parents do not speak English at the discretion of the DSL. LLEG will always seek consent for information to be shared with third parties. There are times however when the Designated Safeguarding Lead may view it is not in the child's best interest to share information with parents especially if the child is viewed to be at risk of significant harm in doing so or the allegation is against the child's parents. The DSL will also liaise with the Designated Safeguarding Lead at the child's school regarding any safeguarding concerns that they have.

### Allegations against another child aged under 18s

**Children under the age of 18 years old** facing an accusation of child abuse will need additional support, especially as their parents will be overseas. The **Designated Safeguarding Lead** will carry out a risk assessment and put an action plan in place for any child under 18 who has faced an allegation.

### Allegations against a member of staff or volunteer

The Designated Safeguarding Lead or their deputy must pass on the allegation/ concerns about an a member of staff or a volunteer's conduct if they have harmed or are at risk of harming children to the LADO (Local authority designated officer) of the county where the allegation took place. This must be undertaken within **24 hours** of receiving the disclosure and take priority over any other work.

### Low level concerns regarding a member of staff, volunteer, contractor or external partner

LLEG has a policy for addressing low level concerns regarding a member of staff or volunteer. A low level concern could be when a member of staff steps outside of the staff code of conduct but their behaviour does not meet the threshold for external investigation or a referral to the LADO.

#### **Some of the following behaviour could constitute to a low level concern:**

- Being over friendly with children;
- Having favourite students who they pay more attention to;
- Using inappropriate language in front of children;
- Discussing topics of an offensive nature with children;
- Unprofessional behaviour;
- Contacting a student without informing or having permission from LLEG.

It is crucial that any concerns regarding a member of staff or volunteer, however trivial they may seem are passed on to the DSL or their deputy to be recorded. Staff, teachers and homestay hosts should also pass on any low level concerns to the DSL which they may have about a contractor or a person from an external partner or stakeholder.

#### **The DSL may address a low level of concern by:**

- Ensuring staff, volunteers, contractors and external partners are clear about what appropriate behaviour is when working with children.
- Additional training.
- Helping staff identify inappropriate behaviour and empowering staff to share any low level concerns.
- Addressing inappropriate behaviour at an early stage and ensuring staff put appropriate boundaries in place with the children in their care.
- Providing a robust, responsive, and sensitive handling of any concerns when they are raised.
- Helping to identify areas in LLEG'S safeguarding systems which may need to be improved on.

Records will be reviewed regularly by the DSL, to ensure potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the DSL and their deputy will take further action, either through LLEG's disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, it will be referred to the LADO.

### Safeguarding Referrals

Each county in the UK has different procedures for child protection. You will find contact details for your local Children's Social Care Referral and Assessment Team online. The details will be on your Local Council website or if you are unsure please go to [www.gov.uk/report-child-abuse-to-local-council](http://www.gov.uk/report-child-abuse-to-local-council) and enter your postcode. You will then be given the appropriate contact details. Alternatively, contact the Designated Safeguarding Lead who will provide you with relevant contact details for your local authority.

The procedures and important telephone numbers for **Bristol** are outlined below

**First Response: 0117 903 6444**

Contact this number for an urgent referral, if a child is in immediate risk of significant harm.

If a child is not in immediate risk of significant harm then report your concerns online at:

[www2.bristol.gov.uk/form](http://www2.bristol.gov.uk/form)

**Emergency Duty Team** (out of hours): **01454 615 165**

**LADO** (If allegations against a member of staff or volunteer): Nicola Laird: Tel: **0117 903 7795**

**Prevent concerns:** Tel: **0117 945 5536** Email: [channelsw@avonandsomerset.pnn.police.uk](mailto:channelsw@avonandsomerset.pnn.police.uk)

If you are not happy or satisfied with the response from LLEG or the Designated Safeguarding Lead you are able to contact your local authority or the NSPCC directly to pass on your concerns.

You can also contact your local authority directly if a child discloses information or you have concerns about the Designated Safeguarding Leads or a member of staff.

### NSPCC

The **NSPCC** whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by a school or college. Staff can call **0800 028 0285** – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

For further information on LLEG Whistleblowing Procedures please refer to SP 6: LLEG Whistleblowing Policy.

In 2021, the Department for Education commissioned the NSPCC to launch a new helpline called **Report Abuse in Education**. The helpline comes after anonymised testimonials of sexual harassment and abuse in schools were shared to the **Everyone's Invited website**.

Young people and adults can contact Report Abuse in Education including historic abuse on **0800 136 663** or email **help@nspcc.org.uk**

### What to do if Abuse is Suspected

- The Homestay Host or Member of Staff should keep monitoring the child's behaviour, making a note of any particular concerns (when, where and what happened) and passing the information on to the DSL.
- Continue to discuss all concerns and further disclosures with the Designated Safeguarding Lead or deputy in their absence.
- You should remember that if abuse is taking place, it is usually by someone who is known to the child, often not the parents but other family members or friends. Parents are sometimes the last to know.
- It is important to remember that by reporting all concerns however small to the DSL, you are protecting the welfare of the child.
- It may be appropriate to inform parents/carers that you have concerns. This might not always be possible and should not put the child or yourself at risk. Always discuss with the DSL first.
- If your Local Children's Social Care Referral and Assessment Team (Social Services) has been contacted, they should let the person who has referred know that they are responding to what you have told them. It is unlikely that you will be told exactly what action has been taken and the outcome unless it has implications. If you have not heard from the Referral and Assessment Team, it is appropriate to contact them to ensure that the details you gave them have been taken into consideration and acted upon.
- Remember to always escalate concerns which have not been acted on both internally and externally.

### Abuse of Position of Trust

If it appears that a teacher, homestay host/member of homestay host household or a member of LLEG Staff has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved in an inappropriate way towards a child which may indicate that he or she is unsuitable to work with children.

### **Then the following procedures must be followed:**

- Record your concerns the same as a disclosure and pass on immediately to the Designated Safeguarding Lead (DSL).
- The DSL will take steps to ensure that particular person is not left in sole charge of any child.
- The DSL will contact the Local Authority Designated Officer (LADO) to ask for advice and how to proceed and to give details of the concern.
- LLEG will then follow the LADO's advice on how to deal with allegations against staff.

### Support to Homestay hosts and Staff

LLEG will fully support all Homestay Hosts and Members of Staff in following this procedure. Following an allegation or investigation, Homestay Hosts and Members of Staff are able to talk to the Designated Safeguarding Leads and any of the appropriate agencies detailed in this Policy.

### Recruitment of Homestay hosts and Staff

We acknowledge that people who pose a threat to children may be attracted to employment that allows them access to children and young people. As part of the LLEG Safeguarding Policy, we will ensure that people working with the children are safe to do so. Our safe recruitment procedures are detailed in SP5 – Safer Recruitment Policy and Procedure.

### Obligation to Report

LLEG must refer details to the Disclosure and Barring Service (DBS) when an alleged person has resigned or they have been dismissed because they have harmed or could harm children or vulnerable adults. The information must be referred to the DBS as soon as it becomes known.

### Implementation and Monitoring

- LLEG will appoint a person with responsibility for child protection and safeguarding known as the Designated Safeguarding Lead (DSL).
- This person will receive reports from teachers, homestay hosts and/or staff of any occasions when there are concerns or issues of Child Protection. These reports will be filed and kept securely by the Designated Safeguarding Lead (DSL). Only the DSL and their deputy will have access to these records.
- LLEG will review this policy annually to ensure it is being implemented. Appropriate action will be taken if deemed necessary, through consultation with the agencies referred to below.

### YOUR SAFEGUARDING / CHILD PROTECTION CONTACTS

#### LLE Designated Safeguarding Lead

The LLEG person responsible for child protection is:

**Name:** Emma Langton

**Position:** Designated Safeguarding Lead

**Tel:** 0117 9269413

**LLE Emergency mobile:** 07425 137 794

**Name:** Kate Hargreaves

**Position:** Deputy Safeguarding Lead

**Tel:** 0117 9269410

**LLE Emergency mobile:** 07425 137 794

**You should call the Designated Safeguarding Lead FIRST to report an issue, if they are absent then please ask for the Deputy Safeguarding Lead.**

If you think a child is in **immediate danger**: contact the police by calling **999**

Otherwise, **call 101** & ask for the **Safeguarding Coordination Unit**.

### Support and advice

NSPCC 24 hour Helpline: **0800 800 5000** (free from a landline)

NSPCC Text helpline: **88858** (service is free and anonymous)

NSPCC Whistleblowing Helpline: **0800 028 0285**

CHILDLINE (provides help and advice for children and young people). Tel: **0800 1111**

### Further Information

For information about all aspects of Child Protection, including more advice on what to do if you are worried about a child, visit: [www.nspcc.org.uk](http://www.nspcc.org.uk) (National Association for the Prevention of Cruelty to Children). They provide a free 24 hour helpline where you can discuss your concerns with a counsellor. You can call the NSPCC on 0808 800 5000 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**The South West Safeguarding and Child Protection Group** also provide detailed online information on all aspects of child protection in the South West of England.

## LLEG Safeguarding Policy (SP)

### **SP5 – Safer Recruitment Policy and Procedures for Homestay Hosts**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

LLEG is committed to recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children; this is an essential part of safeguarding. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to children in order to harm them. To this end, LLEG seeks the understanding and cooperation from homestay hosts and their families new to LLEG in the recruitment process and compliance with on-going requests for information and home visits.

#### DBS (Disclosure and Barring Service)

The work of LLEG is classified by the government as regulated activity. This is the term most commonly used to describe roles where a suitability/criminal records check is required – roles involving responsibility for or substantial access to under 18s. In very broad terms, regulated activity is any position that has direct contact with children over a specified period of time. Any person that is engaged in ‘regulated activity’ as defined by the Safeguarding Vulnerable Group Act 2006 (England & Wales) and parallel laws in Scotland and Northern Ireland requires an enhanced disclosure check.

- LLEG will ensure that every permanent member of the household aged 16 and over will have a current, clear and valid **Enhanced** DBS check with children’s barred list check if appropriate.
- LLEG will ensure we have received a self-declaration from the applicant.
- LLEG homestay hosts are required to register annually for the DBS Update Service.

Any criminal records (including spent convictions) will be considered with reference to the Rehabilitation of Offenders Act 1974 and Exceptions to the Act.

### Recruitment

Recruitment materials (homestay host information) include reference to LLEG's commitment to safeguarding the welfare of every pupil in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after our pupils safely, especially under 18s.

At least two references are requested for every homestay host, a professional reference and a character reference. References will be followed up and referees will be asked whether there is any reason not to engage the applicant where they have substantial access to under 18s. Follow up phone calls are made to verify the references (recorded on a spreadsheet and in the homestay host record on the LLEG database).

- LLEG will seek a full employment history for prospective homestay hosts and reserves the right to approach any previous employer. All gaps in CVs must be explained satisfactorily.
- Proof of identity is required (All original documents will be checked on the initial home visit).
- Interview questions will explore candidates attitudes to working with children aged under 18 years old and their knowledge of safeguarding children.
- The interview panel will always include a staff member who has completed the DfE Safer recruitment in education e-learning module: [www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course](http://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course)
- If the candidate is hosting and/or teaching under 18s then DBS checks will be carried out for all permanent residents of the household aged 16+.
- The homestay host position is exempt from the Rehabilitation of Offenders Act 1974 and therefore all convictions, cautions, written warnings, bind overs, including those regarded as 'spent' must be declared. All adults will be required to sign a criminal record self-declaration.
- Further checks will be carried out if the homestay hosts have lived or worked abroad in the last five years or if they have been out of the UK for a significant period of time.
- Interview questions about a candidates health and mental well-being will be asked in order to establish whether there may be any physical or mental obstacles to homestay hosts fulfilling their specific role that cannot be overcome.
- Homestay Hosts are obliged to inform LLEG of any change of circumstance within the home which may affect child protection, e.g. addition of household members aged over the age of 16.
- A single central register of all checks made during recruitment is kept at the LLEG Head Office.



### Induction

LLEG is responsible for ensuring that their homestay hosts and families understand their safeguarding responsibilities for LLE Guardianship Pupils under 18 and are skilled and confident in managing the homestay and in looking after children.

#### **The LLEG Induction Process**

**A homestay/welfare/safeguarding induction** is carried out by an LLE Guardianship Manager.

- All homestay hosts will have access to detailed policies and guidance on their responsibilities, institutional policies, procedures and expectations of professional conduct and ethical behaviour relating to under 18s.
- On-line Safeguarding training at Level 1 is mandatory if you are hosting and/or teaching children aged under 18 and must be carried out annually. Prevent training is also mandatory.
- Electronic copies of the completed welfare induction form will be stored in the homestay host's records, along with the Level 1 Safeguarding certificate.
- LLE Guardianship Managers are available in office hours to respond to queries from homestay hosts.
- Out of hours, a 24 hour emergency phone number is available staffed by LLEG at all times.

#### **Updates to policies**

Updates to policies are sent by email to all registered LLEG homestay hosts.

#### **Ongoing training**

LLEG holds regular conferences, seminars, webinars and in-house training events for homestay hosts including topics such as safeguarding and promoting the welfare of international students.

All homestay hosts and their families should be fully aware of systems within LLEG which support safeguarding and these are explained to homestay hosts as part of the induction process. This includes: LLEG's safeguarding policy; the code of conduct; and the designated safeguarding lead; child protection training and e-safety.

**All adults in contact with under 18s need to demonstrate appropriate knowledge of this policy, their responsibilities and the procedures for reporting any incident of harm or abuse.**

### Recruitment of ex-offenders

LLEG will not unfairly discriminate against any applicant on the basis of conviction or other details revealed. LLEG makes recruitment decisions on the basis of merit and ability, if an applicant has a criminal record this will not automatically bar him/her from working with LLEG this will however depend upon the nature of the offence and LLEG will always act in the best interests of the children in their care. In view of the fact that all positions within LLEG will amount to “regulated positions” within the meaning of the Protection of Children Act 1999 (as amended by the Criminal Justice and Courts Services Act 2000), they are exempt from the Rehabilitation of Offenders Act 1974.

All convictions, cautions, reprimands or final warnings as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) must be declared when applying for a position at LLE. Failure to disclose a previous conviction will lead to an application being rejected or, if the failure is discovered after a homestay host starts working with us, will lead to termination of contract on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence under the relevant legislation, it is unlawful for LLEG to work with anyone who is included on the barred lists maintained by the DBS of individuals who are considered unsuitable to work with children or vulnerable adults.

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within LLEG. LLEG will report the matter to the Police and the DBS if:

- LLEG receives an application from a disqualified person
- LLEG is provided with false information in, or in support of an application
- LLEG has serious concerns about an applicant’s suitability to work with children

### Retention of records

If an applicant is appointed, LLEG will retain any relevant information provided on their application form (together with any attachments) and the pre-employment check data on their personnel file. If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.

## LLEG Safeguarding Policy (SP)

### SP5a – Safer Recruitment Policy and Procedures for LLEG Staff

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

## Introduction

LLEG is committed to recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children; this is an essential part of safeguarding. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to children in order to harm them.

## DBS (Disclosure and Barring Service)

The work of LLEG is classified by the government as regulated activity. This is the term most commonly used to describe roles where a suitability/criminal records check is required – roles involving responsibility for or substantial access to under 18s. In very broad terms, regulated activity is any position that has direct contact with children over a specified period of time. Any person that is engaged in ‘regulated activity’ as defined by the Safeguarding Vulnerable Group Act 2006 (England & Wales) and parallel laws in Scotland and Northern Ireland requires an enhanced disclosure check.

LLEG ensures that every person working within LLEG and who has access to children and information about children have a current, clear and valid **Enhanced** DBS check, with children’s barred list check, registering annually for the update service.

## Recruitment

- Job descriptions include reference to LLEG’s commitment to safeguarding the welfare of every pupil in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after our pupils safely, especially under 18s.
- At least two references are requested, one professional reference from the candidate’s current or most recent employer and secondly a character reference. References are followed up and referees will be asked whether there is any reason not to engage the applicant where they have substantial access to under 18s. Follow up phone calls are made to verify the references.

- LLEG will seek a full employment history for prospective staff and reserves the right to approach any previous employer. All gaps in CVs must be explained satisfactorily.
- Proof of identity and qualifications are required (original documents will be checked at interview).
- Enhanced DBS check and right to work in the UK checks carried out.
- Interview questions will explore a candidate's attitude to working with under 18s and to safeguarding children.
- The interview panel will always include a staff member who has completed the Safer recruitment in education e-learning module: [www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course](http://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course)

### Induction

- LLEG is responsible for ensuring that all staff understand their safeguarding responsibilities and are skilled and confident in managing these responsibilities.
- Staff induction includes a detailed description of our policies, procedures, practices and provisions in relation to the safeguarding and welfare of our pupils.
- Staff are familiarised with relevant reporting lines and communication channels within LLEG to enable them to effectively raise concerns or issues.
- Staff are informed about and expectations for their own conduct.
- Evidence that all induction procedures have been conducted is retained in staff files.
- Safeguarding training at Level 1 and Prevent Training is mandatory for all office staff as part of the initial training.

### Safeguarding training

- The Designated Safeguarding Leads and the Guardianship Managers are trained to Level 3, have completed safer recruitment training and will keep other staff regularly updated and refreshed with safeguarding information.

### Recruitment of ex-offenders

LLEG will not unfairly discriminate against any applicant on the basis of conviction or other details revealed. LLEG makes recruitment decisions on the basis of merit and ability, if an applicant has a criminal record this will not automatically bar him/her from working with LLEG this will however depend upon the nature of the offence and LLEG will always act in the best interests of the children in their care. In view of the fact that all positions within LLEG will amount to “regulated positions” within the meaning of the Protection of Children Act 1999 (as amended by the Criminal Justice and Courts Services Act 2000), they are exempt from the Rehabilitation of Offenders Act 1974.

All convictions, cautions, reprimands or final warnings as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) must be declared when applying for a position at LLEG. Failure to disclose a previous conviction will lead to an application being rejected or, if the failure to disclose is discovered after a candidate starts working will lead to termination of contract on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence under the relevant legislation, it is unlawful for LLEG to work with anyone who is included on the barred lists maintained by the DBS of individuals who are considered unsuitable to work with children or vulnerable adults.

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within LLEG. LLEG will report the matter to the Police and the DBS if:

- LLEG receives an application from a disqualified person.
- LLEG is provided with false information in, or in support of an application .
- LLEG has serious concerns about an applicant’s suitability to work with children.

## LLEG Safeguarding Policy (SP)

### **SP6 – LLEG Whistleblowing Policy**

*Date of policy: 24 May 2016*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

## Introduction

You're a whistleblower if you're an employee or agency worker and you report certain types of wrongdoing. This will usually be something you've seen at work - though not always. The wrongdoing you disclose must be in the public interest. This means it must affect others, e.g. the general public, children or other staff members. As a whistleblower you are protected by law and you shouldn't be treated unfairly or lose your job because you 'blow the whistle'. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

You're protected by law if you report any of the following: a criminal offence, e.g. fraud, someone's health, safety or welfare is in danger, risk or actual damage to the environment, a miscarriage of justice, the company is breaking the law, e.g. doesn't have the right insurance, you believe someone is covering up wrongdoing.

Personal grievances (e.g. bullying, harassment, discrimination) are not covered by whistleblowing law, unless your particular case is in the public interest or you are whistleblowing about another individual. These should be taken up with your HR department.

## Who to tell and what to expect

You can report your concern to the Principal at LLEG if you feel there is any wrongdoing within the company. There are other options if you don't want to report your concern to LLEG, e.g. you can get legal advice from a lawyer, or tell a prescribed body such as AEGIS. If your concern is regarding the treatment of a child or child protection failures you can contact the NSPCC on their whistleblowing helpline; 0800 028 0285 between 8am and 8pm Monday to Friday or you can email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### Making your claim anonymously or confidentially

You can tell LLEG or a prescribed body anonymously but they may not be able to take the claim further if you haven't provided all the information they need. You can give your name but request confidentiality - the person or body you tell should make every effort to protect your identity. If you report your concern to the media, in most cases you'll lose your whistleblowing law rights.

### What LLEG or a prescribed body will do

LLEG or the prescribed body will listen to your concern and decide if any action is needed. You may be asked for further information. You must say straight away if you don't want anyone else to know it was you who raised the concern. You won't have a say in how your concern is dealt with. LLEG or the prescribed body can keep you informed about the action they've taken, but they can't give you much detail if they have chosen to keep the confidence of other people.

Not satisfied with how your concern was dealt with? Contact **ACAS** or **Public Concern at Work**

### LLEG Safeguarding Policy (SP)

#### **SP7 – LLEG Safe Placement Policy**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

#### Placements of LLE Guardianship Pupils

- At the recruitment stage, all Homestay Hosts will be required to inform LLEG about any persons aged 16 years old and above who are normally resident in their homes and those persons will be subject to DBS procedures.
- When booking an LLE Guardianship Pupil to a new homestay host for the first time, the Guardianship Manager (GM) will check that DBS checks have been completed or will be completed before that pupil's arrival.
- The GM will carry out a safeguarding induction prior to the arrival of their first pupil, to ensure that the homestay host receiving the pupil and other household members have read, understood and comply with LLEG's safeguarding policy. Any concerns about non-compliance at any stage of the process will be immediately flagged up and appropriate steps taken.
- Existing homestay hosts are made aware that they must keep LLEG up-to-date with any changes to their household: LLEG hosts must inform us of and any adults who might be staying as guests during their Guardianship pupil bookings. Any guest staying between the hours of 2am and 6am will require an enhanced DBS certificate. The Guardianship managers will regularly check for changes when contacting homestay hosts to reaffirm availability, discuss bookings, etc.

#### Placements of two Guardianship pupils in same household

- Guardian pupils placed together in the same house should not normally have an age difference of more than two years.
- Pupils aged over 18 years must not be placed in the same household as pupils aged under 18.
- If, in exceptional circumstances, a pupil over 18 is placed with a pupil under 18, the age difference should be no more than one year, risks will be assessed, agreement will be secured beforehand from the 17 year old pupil's parents and a letter of good conduct should be sought.



### Statement on Private Fostering

If LLEG places a Guardianship pupils aged under the age of 16 years old (under 18 if the student has a disability) with a teacher/homestay host for more than 28 consecutive days (27 nights) then the stay will constitute to a private fostering arrangement under UK law, and the local authority must be informed.

On rare occasions, where a student may stay in the UK for the summer holidays or if the UK is placed into lockdown by the government due to a pandemic then a guardianship pupils homestay may constitute to a private Fostering Arrangement. When this happens LLEG will notify and gain consent from the Guardianship pupils parents, their school, the Homestay Host and the local authority of where the private fostering arrangement falls to ensure the arrangement can go ahead.

Where possible LLEG aims to notify the local authority of a private fostering arrangement at least six weeks before the placement takes place, however where this is not possible the local authority will be informed immediately and as soon as the Private Fostering Arrangement is known.

The Designated Safeguarding lead will liaise directly with the teacher and Homestay Host to inform them about the regular monitoring visits and the additional checks and precautions which the local authority will take. Teachers and homestay hosts should be aware, however that each county and local authority have different processes and procedures when it comes to monitoring Private Fostering Arrangements.

All details of the Private Fostering Arrangements, including records of meetings and outcomes will be stored securely by the Designated Safeguarding Lead as per any other safeguarding issue.

Whilst a private fostering arrangement is in place, the guardianship managers will stay in regular contact with the Guardianship pupil to monitor their welfare and to ensure they understand the process.

## LLEG Safeguarding Policy (SP)

### **SP8 – Bullying Policy and Procedure**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

### About Bullying

Bullying can occur in any group of people whatever its type or size or the age of its members. There are many different forms of bullying; from teasing and name-calling to serious assault or harassment. Verbal and psychological bullying can be just as harmful and hurtful as physical violence. Sexual and racial harassment are particularly serious forms of bullying. Many children, and adults, are bullied because they are seen to be 'different' – because of their race, religion or culture, sexuality, their gender, or because of any special educational needs or disabilities they may have.

### Signs of Bullying

Some of the ways in which children and young people have described bullying include:

- being called names or being teased either online or in person
- being pushed, hit, kicked, poked or physically hurt in some way
- having money or personal possessions taken or damaged
- having rumours spread or being ignored or left out/ostracised
- being threatened or made to feel frightened or intimidated
- being stalked

### Cyberbullying

Our definition of Cyber bullying includes but is not limited to the following behaviours, abusive or threatening emails or messages, posting abusive comments on social media sites, sharing humiliating videos or photos of someone else, stealing someone's online identity, spreading rumours online, trolling – sending menacing or upsetting messages through social networks, messenger apps, chatrooms or games, developing hate sites about another person, prank calls or messages, group bullying or exclusion online, anonymous messaging, encouraging a young person to self-harm on-line and/or pressuring children into sending inappropriate material.

We acknowledge that bullying online can differ from offline bullying in that it can be inescapable, anonymous, widely shared and can be stored permanently. People may bully online as a form of entertainment, for revenge or to protect a friend. In all cases this behaviour is unacceptable.

It is important through our day-to-day work that we educate children about the harm online and offline bullying can do. Any child who experiences bullying should feel supported, believed and that they can share their concerns with any member of staff, teacher or homestay host. All concerns and disclosures must be passed on to the Designated Safeguarding Lead following the normal procedures.

### Effects of Bullying

The effects of bullying can lead to children and young people to:

- becoming depressed and/or suicidal
- experiencing low self esteem
- becoming shy and withdrawn
- self-harm
- becoming self-conscious
- experiencing physical complaints, like constant stomach aches and headaches, which are brought on by stress
- feeling anxious
- becoming aggressive
- to start to bully other children or adults

**LLEG does not tolerate the bullying of other people in any form whatsoever and all incidents of bullying reported to LLEG will be fully investigated.**

#### **LLE Guardianship pupils will:**

- respect other people, their space and their belongings
- be kind to others, even if they are not our friends
- not walk away if we see someone being bullied
- try to get help and tell a responsible adult
- ask for help if we are being bullied

**LLE Guardianship pupils are given the following advice about bullying:**

- Talk to or contact someone you trust, such as your homestay host, parent, friend or your Agency / ETO (Educational Tour Operator).
- Be persistent. If the first person you talk to doesn't help, don't give up. Speak to someone else.
- If you can, write down everything that has been said or done to hurt you. Try to write down how you feel. When you have found someone you can trust, discuss what you have written.
- If you find it difficult to talk to an adult ask someone to talk to an adult on your behalf.
- Telephone the LLEG emergency number: +44 (0) 7425 137 794
- Telephone the Guardianship Manager in the LLE Office: +44 (0) 117 926 9410
- Telephone ChildLine (Freephone 0800 1111). Their helpers provide a confidential helpline for young people.
- Most importantly, do something. Sometimes bullying stops quickly, but doing nothing means it may continue until someone is seriously upset or hurt.

## LLEG Safeguarding Policy (SP)

### **SP9 – E-Safety Policy**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

This policy applies to all members of the LLEG community (including staff, pupils, parents/carers, visitors and guests in the homestay). It is a statement of the aims, principles, strategies and procedures for e-safety throughout LLEG. The E-Safety Policy should be read in conjunction with our Data Protection and Information Sharing Policy and Safeguarding Policy.

**You have a responsibility to the Guardianship pupils in your care to know what they are doing online during their stay with you.**

### What is E-Safety?

E-Safety refers to child protection and safeguarding of both children and adults in the digital world. It is about learning to understand and use technologies in a safe, positive way, also about supporting children and adults to develop safe online behaviours.

#### **Risks to pupils who use the internet include:**

- exposure to inappropriate materials, for example, pornographic pictures and videos
- physical danger and sexual abuse, for example, through 'grooming'
- cyberbullying – persistent bullying through the digital medium
- losing control over pictures and videos
- obsessive use of the internet and ICT, for example, addiction to video games
- damage to online reputation
- inappropriate or illegal behaviour, for example, exposure to hate mail or offensive images
- viruses, hacking and security
- cyber crime
- exposure to extremist material and the possibility of radicalisation
- copyright infringement, for example, the illegal sharing of music, pictures, video or documents

E-Safety is largely concerned with internet communications. The internet is accessible from computers, laptops, tablets, mobile phones, games consoles and other devices such as internet connected TV. Other communication technologies such as texting, messaging, and phone calls are also covered by the term 'E-Safety'.

### Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material.

The breadth of issues classified within online safety can be categorised into four areas of risk for children, also known as the 4 c's:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group: [apwg.org](http://apwg.org)

### Use of Mobile phones

LLEG are aware that many of our students including children aged under 18 years old will have unlimited and unrestricted access to the internet via their mobile phone networks (i.e. 3G, 4G and 5G).

**LLEG teachers and homestay hosts are expected to monitor guardianship pupils mobile phone and internet use.**

Teachers and homestay hosts should also be aware that students are able to use their mobile phones as a "hot spot" where they are then able to access the internet from other internet enabled devices. This access means some children, whilst at school and despite the school having restricted access to the internet can still sexually harass their peers via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

LLEG is also aware that this could happen in the teachers/homestay hosts home, despite the teacher/homestay host having parental controls on the internet. Any incidences or suspicions should be reported to the Designated Safeguarding Lead immediately as per any other safeguarding issue.

### Why provide internet access?

The internet is an essential element in 21st century life for education, business and social interaction. LLEG encourages the provision of quality internet access to enable Guardianship pupils to communicate with home and as a necessary tool for school work.

### Access to internet

**LLEG homestay hosts are expected to install appropriate parental control software on their WIFI routers.**

Parental controls however cannot block all inappropriate content on-line. A young person who is actively seeking inappropriate content online might be good at disabling or getting around blocking filters and hiding their search history.

We recommend turning off access to the internet during the night where student's internet usage cannot be monitored

Homestay hosts should be aware of the content of the computer games students are playing, e.g. violence, gambling, sex, drugs, swearing. Please refer to the PEGI rating. If in doubt please check with the Guardianship Managers.

Children can be exposed to biased and extreme opinions on-line for example, eating disorder websites which glorify Anorexia, self-harm sites etc. We need to teach the children in our care how to evaluate what they read and see online and empower children to make safe and informed decisions. Children should be reminded that not everything they read on-line represents the truth.

### Internet

- LLE Guardianship pupils aged 10-16 must have adult supervision whilst using the internet.
- LLE Guardianship pupils will be encouraged to tell their homestay host immediately if they encounter any material that makes them feel uncomfortable.
- Internet access will be filtered appropriate to the age of the pupils.
- Access to the internet should be restricted at night time either by removing devices or by turning off the Wi-Fi.

### Email

- All emails sent from teachers and Homestay Hosts must be professional in tone and content.
- LLE Guardianship pupils must immediately tell an adult if they receive offensive email.
- LLE Guardianship pupils must not reveal personal details of themselves or others in email communication (such as address or telephone number). LLE Guardianship pupils must not arrange to meet anyone without specific permission.
- LLE Guardianship pupils should be made aware that the writer of an email (or the author of a web page) may not be the person claimed.

### Social Networking

- All staff, teachers and homestay hosts must not accept friend requests from pupils or parents on social media accounts or interact with any pupils or parents via any form of social media.
- Staff, teachers and homestay hosts must not post photos of guardianship pupils aged under 18 on their personal social media accounts.

#### **LLEG homestay hosts shall:**

- Behave responsibly and professionally at all times in connection with the use of social networking sites and keep up to date with privacy policies of the sites they use.
- Use their professional judgment and, where no specific guidance exists, take the most prudent action possible and consult with the Principal of LLEG if they are unsure.
- Co-operate with LLEG in ensuring the implementation of this policy

### Chatrooms and Instant Messaging

- LLE Guardianship pupils are not permitted to use these facilities on a homestay host's computer

### LLE Guardianship Pupils:

- Must hand mobile phones, tablets, portable electronic games and media players brought to the homestay to the homestay host at night-time, if requested by the homestay host, LLEG or the child's school or parents.
- Are forbidden from sending abusive or inappropriate text messages.
- May have their internet activity checked.



### LLEG Homestay Hosts:

- Are allowed to take digital photographs and video images of LLE Guardianship Pupils if consent has been given by the child's parents, but must follow guidance in the LLEG Photography Policy concerning the taking, sharing, distribution and publication of those images.

### LLEG Website:

- The point of contact on the website will be the Guardianship Organisation address, email and telephone number. Homestay host or pupil personal information will not be published.
- Website photographs that include LLE Guardianship Pupils will be selected carefully and will only be published with parental permission.
- LLE Guardianship Pupils' full names will not be used anywhere on the website, particularly in association with photographs.

### Cyberbullying

Cyberbullying is the use of the internet and related technologies to harm other people, in a deliberate, repeated, and hostile manner. When children are the target of bullying via mobile phones, gaming or the internet, they can often feel very alone and, a once previously safe and enjoyable environment, can become threatening, harmful and a source of anxiety. Cyberbullying (along with all forms of bullying) will not be tolerated. All incidents reported will be recorded and investigated. Please refer to SP8: LLEG Bullying Policy and Procedure.

### Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet.

Keeping Children Safe in Education 2021 defines cyber crime as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

#### **Cyber-dependent crimes include:**

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may accidentally or deliberately stray into cyber-dependent crime. Any incidences or suspected incidences of cyber crime should be reported straight away to the Designated Safeguarding Lead (DSL), who would liaise with the Guardianship pupils school immediately and take the appropriate further action with the police.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will also consider referring the child into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

### LLEG Homestay Host Data Security

- LLEG homestay hosts must not share their user account details and must not leave their computers unlocked and accessible to pupils.
- In line with the General Data Protection Regulations 2018 (GDPR). LLEG Homestay hosts must ensure that any sensitive data that LLEG makes available to them, for example, on the student/ pupil booking letter, transfer confirmation or any other document is stored securely (e.g in a folder with a password on an encrypted device) and deleted after the homestay. This data must not be passed on to a third party.

### LLE Guardianship Pupils

- All LLE Guardianship Pupils must sign the Code of Conduct and Pupil Agreement for Guardianship Pupils.
- E-Safety rules will be given to Guardianship Pupils in their pupil handbook.
- Any breaches of the Code of Conduct with reference to ICT will be referred directly to LLEG and Internet access will be denied.
- LLE Guardianship Pupils will be informed that network and internet use on a homestay host’s computer will be restricted and/or monitored.

### Parental Support

- Parents' attention will be drawn to LLEG's E-Safety Policy in the parent handbook.
- Parents will be asked to read through the LLE Guardianship Pupil Code of Conduct with their child and for the pupil to sign the agreement.

### Policy Implementation

All new LLEG homestay hosts receive e-safety advice and guidance as part of their induction programme to ensure they understand their responsibilities, as detailed in this policy.

### Further Information

If you would like free independent advice and support about keeping children safe online than you can call the free **O2 NSPCC Online Safety Helpline: 0808 800 5002**. Please note you do not have to be an O2 customer to access this advice.

### Parental Controls

If you are having difficulty setting up parental controls or privacy settings on any portable device then you can make a face-to-face appointment with an O2 guru in any O2 store. Again you do not have to be a O2 customer to receive this support.

For further details on setting parental controls on your home WI-FI connections then please contact your internet provider as different providers have different ways to set up parental and privacy controls, for example, you may need to download an App to your phone.

### Social Media Sites

Further information on Social Media sites can also be found at [www.net-aware.org.uk](http://www.net-aware.org.uk). Net aware has up-to-date information on the most popular social networks, apps and games that children and teenagers are currently using.

## LLEG Safeguarding Policy (SP)

### **SP10 – Photography Policy and Procedure**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

#### Using images of children: photographs, videos, websites and social media

We live in an age in which digital technology has vastly increased the use, and potential misuse of photography and video. Photographs for LLEG, pupil and homestay host uses and those that appear in the press and LLEG social media, are a source of pleasure and pride.

Providing reasonable steps are taken to ensure an appropriate photograph, and to protect the full name and contact details, photography of LLE Guardianship Pupils by homestay hosts, staff and the media is allowed, within safe practice guidelines.

#### Issues of Consent

The Data Protection Act 2018 affects our use of photography. This is because an image of a child is personal data for the purpose of the Act, and it is a requirement that consent is obtained from the parent of a young person under the age of 18 years for any photographs or video recordings which includes CCTV footage in or outside the homestay families home. It is also important to ascertain the views of the child.

Consent is sought from parents on the Guardianship Pupil Application form for images to be taken and used by LLEG.

Homestay hosts and their families may not use images of LLE Guardianship pupils online without the express consent, in writing of LLEG.

Parents and the child retain the right to withdraw consent at any stage, but they need to do so in writing. Homestay Hosts who have CCTV in their home must make LLEG aware in writing. ICO has a Code of Practice in relation to the use of CCTVs inside and outside properties, this must be adhered to by Homestay Hosts using CCTV. Homestay Hosts are expected to remain up-to-date with any changes to this code of practice.

[ico.org.uk/media/1542/cctv-code-of-practice.pdf](https://ico.org.uk/media/1542/cctv-code-of-practice.pdf)

LLEG will:

- Never use a pupil's full name online to accompany a photograph.
- Use the minimum information necessary to accompany a photograph.
- Only use images of children in suitable dress (not swimming costumes, for example).
- Store photographs securely for authorised LLEG use only.
- Only use images of under 18s where permission has been granted by the child and their parents.

## LLEG Safeguarding Policy (SP)

### **SP11 – Excursions Policy and Procedure**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

Excursions and activities are an important part of each child's stay in the UK, and must be organised and planned with great care and attention. It is important to remember international pupils will probably be in unfamiliar surroundings, in a different culture, with varying degrees of confidence in spoken English.

Please implement the guidelines below at every opportunity in order to establish good practice.

- Plan your trip well in advance: times, maps, details of meeting points and local hospitals, and always check the weather.
- Brief your student about where you are going and what you will be seeing in a pre-excursion lesson/meeting.
- A written risk assessment must always be carried out for each activity/excursion, and control measures should be put in place depending on the students ages, maturity, confidence and level of English.
- Risk Assessment templates and additional information can be found on the Teachers portal and should be kept in the teachers/Homestay Hosts home file. Further information on Risk assessments can be found here: [www.hse.gov.uk/services/education/example-risk-assessments.htm](http://www.hse.gov.uk/services/education/example-risk-assessments.htm).
- Safety briefings should be given to all students including adults upon their arrival in you home, and before every excursion or trip out of the house.
- Guardianship pupils should have their mobile phones fully charged, switched on at all times, with sufficient credit for emergencies and have emergency numbers to call (homestay host and LLEG emergency phone number) stored in their phones.
- Homestay hosts should always have the mobile numbers of all pupils.
- Homestay hosts should establish a meeting point and times with their pupils, and these should be marked on maps. Guardianship pupils should also be shown to the meeting point at the beginning of the excursion, should they become lost, loose their map or should internet and telephone communications fail.

- Under 18s, depending on their age and if they have parental permission may be able to be given some free time to explore by themselves but must always tell their homestay host where they are going and what time they will return.
- Homestay hosts and pupils will need to agree a clear procedure in the event of a pupil becoming lost on an excursion, e.g. establish regular meeting points, wait as long as possible at the agreed meeting point, and contact LLEG and/or the police if they are lost
- Pupils should be advised to take particular care when crossing the roads, please remind pupils to look the right way!
- No activity or excursion is to be undertaken that falls outside the pupil's insurance cover. Please always check with the LLEG head office if you are unsure.
- All activities carrying a high risk level e.g. horse-riding, need explicit permission from LLEG and must be undertaken at a designated centre which carries appropriate insurance. Risk Assessments must be completed and approved by LLEG at least 1 week in advance. LLEG has a duty of care to ensure that the centre has the appropriate qualifications, insurances and accreditations, before permitting an activity or excursion to take place.
- Extra Parental permission is required for pupils to take part in high risk activities, e.g. climbing, sailing, skiing and this must be requested through the LLE Guardianship office.
- All Activities which require an external instructor for example, swimming lessons, climbing centre workshops, canoeing etc. Must also be approved by LLEG.
- LLE Guardianship pupils who are aged 16+ should be made aware of the risks in picking up a taxi on the street and should be advised to pre-book taxis at all times through LLEG with our vetted drivers.

### Local area

Our Guardianship pupils do not always read the many culture-based signals that we are constantly, often subconsciously, interpreting to help us stay safe in our local areas; they will need guidance and help.

It is recommended that students who are old enough to go out alone and have permission are initially introduced to the local area by the homestay host in carrying out a walking tour. Homestay hosts must provide pupils with some specific and clear guidelines about areas to avoid, using taxis safely, which bus routes to use etc. Please add this information to your Home File.

### Free Time and Curfews

Guardianship pupils aged 13 years and under must always be accompanied by their teacher/homestay host.

Pupils aged 14-15 years maybe given free time with their parents permission. They are able to go out for short periods of time with their friends but they must always be back in the homestay by 20:00.

Pupils aged 16 maybe given free time with their parents permission. They are able to go out with their friends but they must always be back in the homestay by 21:00 or earlier depending on what the teacher/homestay host agrees to.

Pupils aged 17+ are able to go out and meet friends but must be back at a time agreed by the teacher/homestay host but no later than 23:00.

### Emergencies and Critical Incidents whilst on Excursion

LLEG has an Emergency and critical incident plan should any of our students or guardianship pupils be involved or injured in a critical incident for example, a Terrorist or weapon attack. Teacher's and homestay hosts are reminded that any increase in Terror Threat level should be detailed in their Activity and Excursion Risk Assessments and control measures should be in place.

It is the teachers and host's responsibility to brief all students regardless of their age on current safety procedures and to contact the LLE emergency number straight away should a critical incident occur. LLEG will then launch the Emergency and critical incident plan and advise you on the next steps. All staff at LLEG are fully trained to launch the Emergency and Critical incident plan at any time of day.

- Safety briefings regarding critical incidents should be given to all students including adults, so EVERYONE is aware of the risks and know how to act.
- Students should always carry the LLE emergency telephone number, student card and ensure their mobile phone is fully charged.
- In the event of a Terrorist attack students should be informed and briefed to **RUN, HIDE AND TELL.**
- Children (Under 18's) should be reminded to find a safe place should they become separated from you or lost, and not be able or old enough to return to your home on their own, for example, a hotel or a school.
- If travelling to unfamiliar areas with a student, teachers and homestay hosts should be aware of where the nearest hospital and police station is.



- In the event of a critical incident teachers and homestay hosts should never contact agents or parents directly. All communication needs to go through LLEG head office. If contacted directly, teachers and homestay hosts should not give any details of an incident but advise to call LLE on the Emergency number.
- All media enquiries must be dealt with by the LLEG head office.
- If you are unable to contact LLEG or the Emergency number due to a telephone or internet communication failure, then if possible and safe to do so, please keep a log of events including exact timings, occurrences and any actions taken.
- In the event of a terrorist attack, teachers, homestay hosts and students should not talk to the media until LLE have been informed and have given the okay. LLEG will have pre-prepared media statements.

It is important that students are prepared and advised of safety precautions but in a way which is suitable for their age, personality, and English language level. A change in terror threat level may alarm some students and parents, should you feel that a student is particularly concerned please notify us as soon as possible.

## LLEG Safeguarding Policy (SP)

### **SP12 – Travel Policy and Procedure**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

## Pupil travel

**LLEG is committed to safeguarding the welfare of every pupil in its care and this includes making safe arrangements for arrival, departure and travel within the UK.**

### **Under 18s**

- All pupils under 18 travelling without an adult should book a LLEG transfer or be met by a local representative of LLEG.
- Travel arrangements are arranged through the Guardianship Manager at LLEG Head Office and not directly with the homestay host.
- In no circumstances will under 16s be allowed to travel alone or by public transport. It is a condition of enrolment on the guardianship scheme that suitable transfer arrangements for pupils are in place.
- If a pupil aged 16 and over is given permission to travel by public transport to the homestay host, school or airport, then full travel details must be forwarded to the LLE Guardianship Manager. Parents must sign a disclaimer absolving LLEG of all responsibility for the journey as LLEG cannot be responsible for children travelling independently.
- Full transfer booking information is provided by LLEG to the pupil including the meet and greet service, driver telephone number, LLEG emergency telephone number, the destination address and contact details and emergency procedures. The travel information includes the departure airports, flight and times, and any connecting flight details, as well as the arrival data.
- Pupils are given travel advice to accompany their transfer confirmation telling them what documents they need to bring with them and emergency procedures. This is detailed in the pupil handbook and during the online Guardianship induction.
- Pupils are informed that they could be delayed at four points once they have landed: immigration; a possible medical check; waiting for luggage; or at customs control checking what passengers are bringing into the country.
- Pupils are informed that they may be asked detailed questions about why they are coming to the UK, the school, their Homestay Host and family and who is meeting them at the airport. They will never be asked to pay fees or fines,
- Pupils are advised to carry in their hand luggage any essential medication.

### Booking Flights

#### **Parents/partners will:**

- Book flights in good time to ensure suitable daytime flights are available on the required dates of travel.
- Book flights which arrive/depart between 9am and 9pm. Earlier or later flight times are extremely difficult to manage as they are not acceptable times to arrive or depart as a guest in a homestay host's home and are not compliant with most school policies.
- Complete detailed travel information for the arrival of the child no less than four weeks before the child departs. Last-minute arrangements are not acceptable, as messages could go astray and children could arrive without anyone to meet them.
- Book an Unaccompanied Minor Service for any child travelling alone under 14 directly with the airline and inform LLEG that the child is travelling as a UM so appropriate arrangements for this can be made and the child is handed over to the named LLEG representative.
- Buy an inexpensive mobile for their child if they don't already have one before they leave their home country, ensure this is suitable for use in the UK with international roaming, is fully charged and with sufficient credit for an emergency call. The mobile must be switched on as soon as immigration has been passed and LLEG must be provided with the mobile number when sending the travel information.

### Safe Travel

- A 24 hour emergency number is available and LLEG appointed drivers or homestay hosts will call the person on duty if there are any problems whatsoever with the travel arrangements, such as delays or flight cancellations.
- Drivers and homestay hosts providing the meet and greet service will stand in a prominent position in the arrivals hall using the LLEG welcome sign with the pupil's name on it.
- LLEG has clear comprehensive lists of arriving and departing pupils, showing the name, sex, age, flight and connection details, airport terminal numbers and mobile numbers available to the weekend duty person. An IPAD is provided with mobile Wi-Fi so duty staff can check airport information and log onto the LLEG database to check information, access pupil data and check what parental permission has been given on the LLEG Safeguarding Form.
- Taxi companies that LLEG work with have enhanced DBS checks for all their drivers and have signed a service agreement with LLEG to ensure a high quality service.

### Shared Transfers

Where shared transfers are booked, one-and-a-half hours' waiting time with the LLEG representative/driver is the maximum waiting time between flights (except in unplanned events eg: airline delays).

### Travel within the Homestay

- Homestay hosts are advised to sit under 18s in the rear of the car when transporting pupils. This reduces the likelihood of any false accusations of inappropriate behaviour.
- Homestay hosts and their families who transport LLEG pupils are required to have their car insured for business use and to comply with the law regarding child restraints and car seats.

## LLEG Safeguarding Policy (SP)

### **SP13 – LLE Health, Safety and Welfare Policy**

*Date of policy: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 19 March 2021, 12 January 2022*

*Next review date: January 2023*

## Health and safety

- LLEG recognises its responsibility under the Health & Safety at Work, etc. Act 1974 to provide for the health, safety and welfare of their employees, pupils, members of the public and any others who may be affected by LLEG's activities.
- To this end LLEG will, so far as is reasonably practicable, fully comply with the requirements of the said Act, and such of its attendant Regulations as may apply, by making suitable and sufficient arrangements.
- LLEG will comply with matters of Health and Safety in accordance with guidance provided by the Health and Safety Executive.

## Within the LLEG Office

### **LLEG will:**

- Develop and maintain safe systems of work.
- Give sufficient information, instruction, training and supervision to ensure the health, safety and welfare of all its staff, pupils and others working within LLEG premises, and during activities and excursions.
- Protect the health, safety and welfare of visitors to LLEG.
- Provide equipment that is fit for purpose and maintained in accordance with the necessary requirements.
- Maintain a safe and healthy place of work, with safe access to that place of work.
- Provide induction training which will include but not be limited to the Health & Safety Policy, First Aid arrangements, accident book and Fire Precautions/Procedures.
- Positively consider the environmental impact of all LLE activities; and, formally consult with employees on all matters having effect on their health, safety and welfare at work.
- Update staff on latest developments in health and safety.

Further, detailed information is provided in the LLEG Staff Handbook.

### Guidance for Homestay Hosts

#### **LLEG will:**

- Provide competent, professional guidance, training and support as required.
- Where applicable, issue detailed safety policy, instructions and guidelines to homestay hosts relating to their activities, and ensure homestay hosts are conversant with them.
- Conduct an initial home visit in person to each Homestay Host before placing guardianship pupils and carry out an health and safety assessment of the home.
- Carry out subsequent health and safety checks on annual visits.

#### **Homestay Hosts will:**

- Follow all health and safety advice and guidance from LLEG.
- Initiate first aid in the event of an accident, and ensure that the accident is recorded and reported to LLEG.
- Keep their property clean and tidy.
- Carry out a fire risk assessment and an evacuation plan which is shared with each pupil and added to the LLEG Home File.
- Ensure there is at least one smoke alarm fitted on each storey in the home.
- Have an up-to-date gas safe check in place each year from an accredited engineer and send this to LLEG annually.
- Ensure a carbon monoxide alarm is fitted in any room containing a gas, liquid or solid-fuel burning appliance.
- Ensure their electrical system is safe, not overloaded and sockets and fittings are secure.
- Ensure food is stored properly at an appropriate temperature and raw and cooked foods are stored separately.
- If agreed, supervise students when cooking and ensure they know how to safely operate appliances in the kitchen.
- Ensure any alcohol, medications and cleaning products are stored safely, paying particular attention when hosting younger students or students who do not understand instructions in English.
- Carry out a home risk assessment and add this to the LLEG Home File.
- Agree to annual home visits and spot checks as requested by LLEG.

**It is the duty of all members of LLEG staff, homestay hosts and Guardianship pupils to take reasonable care for the health and safety of themselves, and of any others who may be affected by their acts or omissions.**

### Welfare

#### **LLEG contributes to pupils' wider well-being by:**

- Listening to each individual child and providing appropriate support.
- Dealing promptly with safeguarding or health and safety concerns.
- Helping each pupil achieve the best possible educational outcomes.
- Promoting students health, safety and welfare through safe practices.
- Dealing with any form of discrimination and keeping pupils safe.
- Dealing with bullying in accordance with the LLEG's anti-bullying policy.
- Encouraging pupils to behave responsibly by following the behaviour policy.
- Carrying out annual visits and spot checks to teachers and homestay hosts homes.

#### **LLEG has policies to:**

- Prevent unsuitable people working with under 18s.
- Ensure LLEG teachers and homestay hosts homes are safe.
- Promote safe practice and challenge poor and unsafe practices.
- Identify instances where there are grounds for concern about a child's health, safety and welfare.
- Take appropriate action to keep children safe and away from harm.
- Deal with complaints.
- Promote welfare and good outcomes for children by providing a child-centred service.

## LLEG Safeguarding Policy (SP)

### **SP14 – LLE Missing Child Policy**

*Date of policy: 20 May 2015*

*Last reviewed: 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2021*

*Next review date: January 2023*

Living Learning Guardianship is committed to safeguarding and promoting the health and welfare of its guardianship pupils. The missing child policy forms part of the organisations Safeguarding Policy and Guidance for this policy has been taking from DfE: Keeping Children Safe in Education 2021, Working together to Safeguard Children 2018 and DfE: Children Missing in Education, September 2016.

Living Learning Guardianship will take immediate action when they are notified that a child is lost or has gone missing. LLEG could be contacted by Schools, homestay families, taxi companies or a member of its staff. In all circumstances LLEG will take action to ensure the child is found whilst taking into consideration that children who have gone missing are at much greater risk of:

- Physical and emotional harm
- Neglect
- Sexual exploitation
- Becoming involved in crime
- Demonstrating anti-social behaviour
- Abusing drugs and alcohol
- Being illegally employed
- Forced marriages
- Honour based violence
- Radicalisation
- Modern day slavery/child trafficking
- Female genital mutilation

Living Learning Guardianship has identified situations where Guardianship pupils could go missing these include but are not limited to the following situations.

#### **Airport**

- On the way to and from the airport.
- After not being able to find their driver at the airport.
- Deliberately absconding from the airport.
- Being abducted.



### Homestay

- Not arriving at the homestay for their stay.
- Going missing from the homestay home.
- Not returning to the homestay at their curfew time.
- Getting purposefully lost on an activity or excursion with the teacher/homestay host.
- Deliberately running away.
- Being abducted.

### School

- Not returning to school after an Exeat weekend or school holiday.
- Not returning to school at their curfew time.
- Going missing on a school trip, activity or sporting event.
- Deliberately absconding from school
- Not meeting their transfer to/from school.
- Unauthorised absence from day pupils.
- Being abducted

### Missing from School

If a child is missing from school during term-time then the school will be responsible for taking the lead in investigations and will be responsible for liaising with LLEG and the pupils parents.

### Missing at the airport or from the homestay

If a child goes missing at the airport or during any time they are staying with an LLEG Homestay Host or teacher LLEG will be responsible and the following procedures will be followed.

If a pupil is missing or there is a concern that a child's safety or well-being is at risk, it is essential that action is taken without delay.

If a child is not home within 30 minutes of their curfew time then please contact the Emergency telephone. If the call is out of office hours (09:00 - 17:00) then the DSL and her deputies should be contacted via the Emergency phone on **07425 137 794**

**Emma Langton – Designated Safeguarding Lead: 0117 926 9413**

**Kate Hargreaves – Deputy Safeguarding Lead: 0117 926 9410**

LLEG has an **Emergency response policy** to deal with Emergency situations. Where there is a concern about a child's immediate welfare and safety this will be referred to the police and the local authority.

Following advice from the Designated Safeguarding Lead, Homestay Hosts maybe instructed to contact the police and to file a missing child report. It is important that homestay hosts have the following information ready:

- A brief physical description of the child.
- The child's full name and nationality.
- Whether the child currently taking any medication.
- Notes about what the child was wearing.
- Details about where the child was last seen and who they were with.
- Any other information that may be related to the incident for example, if a pupil had an argument with a parent on the telephone that morning.

### LLEG will:

Notify the Pupils parents immediately and ask them to try and make contact with their child. Homestay hosts must not contact the pupils parents.

Notify the pupil's school and gain information about where or who the child may be with.

Liaise with the Homestay Host and the child's parents to keep them updated.

Liaise with the police and local authority until the child is found.

### If the pupil is found, or the incident is otherwise resolved:

- The Principal and Designated Safeguarding Lead must be directly informed by the homestay host.
- The Police will be informed if they have been involved.
- The Principal and Designated Safeguarding Lead will initiate a full inquiry, and provide a written report.
- This report and the incident log will be kept securely in the LLE Head Office.

### After the incident:

- The homestay host or Guardianship manager will sensitively discuss the incident with the pupil.
- The Principal will sensitively discuss the incident with the parents/guardian.
- A conclusion is drawn as to how the incident happened and, if appropriate, procedures (including risk assessments and training) may be updated.

## LLEG Safeguarding Policy (SP)

### **SP15 – LLE Prevent Policy**

*Date of policy: 24 May 2016*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

## Statement

LLEG is committed to tackling, preventing against extremism and radicalisation of its pupils, staff members, teachers and homestay hosts. Extremism is holding any extreme political, religious, homophobic, racist views or opinions and being intolerant to other peoples point of view. Radicalisation can involve the exploitation of vulnerable people, including children and vulnerable adults, to hold extreme views, including views justifying political, religious, gender-based, homophobic or racist violence, or steering people into a rigid and narrow ideology that is intolerant of any diversity in society. Protecting against extremism and radicalisation is the same as any other safeguarding concern.

## Risk Assessment and Procedures

LLEG understands its responsibilities under the Counter Terrorism & Security Act 2015, DfE: Keeping Children Safe in Education, 2021, and Working together to Safeguard Children 2018 to prevent and safeguard people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways shown below.

- LLEG accepts pupils aged 10 to 20 all year from around the world and seeks to identify and safeguard any pupil who may hold extreme views and/or maybe drawn into terrorism.
- LLEG will seek to challenge and identify any pupil, staff member or Homestay Host holding extreme views or who may have been radicalised or drawn into terrorism.
- LLEG promotes a multi-cultural environment where respect for and tolerance of other beliefs is required. LLEG's head office is located in the centre of the multi-cultural city, Bristol and places Guardianship pupils with homestay hosts in cities, towns and villages all over the UK.
- LLEG will train all staff and homestay families in the Prevent Strategy. All will complete online training from the Home Office.
- A risk assessment has been produced by the LLEG Lead Contact for the Prevent Strategy and held in the LLEG Head Office; it will be reviewed and updated annually.
- LLEG will make and maintain contact with the local police/local authority Prevent coordinator in all areas where we have pupils to understand their role, the support available, (e.g. via the Channel process) and a list of contacts for referrals.

### Prevent Lead

Responsibility for ensuring Prevent Duty is met lies with the Designated Safeguarding Lead and the Principal, who are the Lead Contacts for the Prevent Strategy.

**The Designated Safeguarding Lead (DSL) is Emma Langton: +44 (0) 117 926 9413 or 07425 137 794**

**The Deputy Designated Safeguarding Lead is Kate Hargreaves, Principal: +44 (0) 117 926 9410 or 07766 798 679**

### Prevent Training

The Prevent Leads and Guardianship Managers have completed training in Prevent awareness , making Prevent referrals and in the Channel programme. All homestay hosts and teachers will complete Prevent awareness training which will be renewed every two years.

### Notice, Check and Share

There are a number of behaviours which may indicate that a child or adult is at risk of being radicalised or are being exposed to extreme views and each need to be considered in terms of context and time- period. Below are some examples.

- Possession of materials or symbols associated with an extremist cause.
- Seeking to communicate with other extremists.
- Using insulting or derogatory names to describe a group of people.
- Accessing violent extremist websites.
- Justifying the use of violence to solve issues or problems either personal issues or issues in society.
- Experiencing social isolation, for example, arguments with friends and family members.
- Having an identity crisis, feeling like they don't fit in or not having any friends at school.
- Spending increasing time in the company or the same location as other suspected extremists.
- Changing their style of dress or personal appearance to fit in with a group.
- A change in behaviour to becoming increasingly centred on an extremist ideology.
- Loss of interest in other friends and activities not associated with the ideology, group or interest.
- May attempt to recruit others to the new group.

If anyone has concerns regarding the above, then advice should be sought from the Designated Safeguarding Lead (DSL) who will act as the first point of contact. The DSL will consider the context and ensure any action is proportionate. The DSL will then consider if a referral is needed to the Channel Programme and will make an accurate and fact-based referral.

### Prevent Referrals

Tel: **0117 945 5536** Email: **channelsw@avonandsomerset.pnn.police.uk**

### Channel Programme

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism to make referrals if professionals are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Children aged under 18 years old must have consent from parents to partake in the programme and will not be disadvantaged for taking up the opportunity.

### LLEG will counteract risks of extremism by:

- Promoting a safe and supportive international environment via clear expectations of accepted behaviours.
- Promoting the core British values:
  - (i) democracy
  - (ii) the rule of law
  - (iii) individual liberty
  - (iv) respectful tolerance of different faiths or beliefs.
- Through documents given to pupils (pupil handbook), via information on arrival on British culture and traditions and via homestay placements. The approach is to educate that this is how things are in UK, although it may be different to your country.
- Where possible, developing critical awareness and thought to counter accepting extremism without question, especially of online material.
- Challenging radical or extremist views in any context (formal or informal) via stated procedures. In most situations this would require an immediate response re the tolerance expected then reporting concerns.
- Being ready to react when world or local events (e.g. Paris attacks) cause upset and the likelihood of conflicting feelings being expressed. Prevent lead to take initiative in these situations.

- Asking homestay hosts to have strong filters on the Internet and clear rules on accessing extremist/terrorist websites/uses of social networks to exchange extremist/terrorist views.
- Homestay hosts getting to know pupils and their circumstances making it easier to spot changes in behaviour.
- LLEG staff and homestay hosts being observant and vigilant in noticing any signs of radical or extremist behaviour.
- LLEG staff and homestay hosts supporting any pupils identified as vulnerable.
- LLEG staff and homestay hosts themselves not supporting or funding and extremist organisations.
- LLEG staff and homestay hosts exemplifying the core British values.

### Understanding the risk of extremism

Staff, pupils and homestay hosts may come into contact with LLEG already holding extremist views. Or, whilst in a homestay, they may be influenced by a range of factors: global events peer pressure, media family views, extremist materials (hardcopy or online), inspirational speakers, friends or relatives being harmed, social networks, and more.

People who are vulnerable are more likely to be influenced.

Their vulnerability could stem from a range of causes including: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crises, victim of hate crime or discrimination and bereavement.

### Understanding terminology

**Radicalisation:** act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of mind.

**Extremism:** holding extreme political or religious views which may deny right to any group or individual. Can be expressed in vocal or active opposition to Core British values and can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as any religious extremism.

### LLEG Safeguarding Policy (SP)

#### **SP16 – LLEG Complaints Policy**

*Date of policy: 24 May 2016*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 19 March 2021, 12 January 2022*

*Next review date: January 2023*

Living Learning English Guardianship (LLEG) is committed to providing a high quality Educational Guardianship Service including accommodation, welfare and support services to its pupils.

We hope that everyone who comes into contact with our services will be completely satisfied with our support, operations, work and policies however, in the event of someone wishing to make a complaint, LLEG have outlined the procedures below.

A complaint could be on any matter about which a stakeholder is unhappy and seeks action from LLEG to resolve a problem or issue. LLEG takes all complaints extremely seriously and strives to make every effort to deal with complaints informally, at an early stage, and with the view of maintaining continued partnership with their stakeholders.

#### **LLEG aims to:**

- Resolve complaints in a timely manner and within the timescales set-out in this policy.
- Act in good faith when a complaint is made and ensure no one is at disadvantage if they make a complaint.
- Resolve all complaints openly and honestly with all parties.
- Review all complaints each year and make reasonable adjustments to improve services.

### For Parents, Students, Agents and Schools

#### **Stage 1 – Informal Stage**

The person is advised to firstly speak to one of the Guardianship Managers, who will listen to the complaint and try to find a solution. They are advised to telephone the office on: **+44 (0) 117 926 9410** or to email [guardians@livingenglish.com](mailto:guardians@livingenglish.com). LLEG aims to respond to the initial complaint within two working days.

If the complaint is regarding a safeguarding concern or a member of staff's misconduct then it will be referred immediately to the Designated Safeguarding Lead or their deputy and dealt with under the LLEG Safeguarding Policy.

### Stage 2 – Informal Stage

If the complaint cannot be resolved satisfactorily and the person is still not satisfied, then the person will be referred or asked to contact the Senior Manager and Designated Safeguarding Lead, Emma Langton by email: [emma@livingenglish.com](mailto:emma@livingenglish.com) or telephone **+44 (0) 117 926 9410**. Emma will investigate the complaint and try to find a solution. Emma will respond within two working days. In the event that a full investigation is needed, then Emma will advise the person on a suitable and agreed time-frame.

### Stage 3 – Written Formal Stage

If the complaint has been unable to be resolved in Stage 1 and Stage 2, then a formal written complaint should be made to our Principal, Kate Hargreaves by sending an email to [kate@livingenglish.com](mailto:kate@livingenglish.com) or a letter to our head office: Living Learning English, 27 Portland Square, Bristol, BS2 8SA. Kate will respond to the complaint within two working days. In the event that if a full investigation is needed then Kate will advise the person on a suitable and agreed time-frame.

### Stage 4 – Written Formal Complaint to AEGIS

If we have been unable to resolve your complaint then you can also complain in writing to our accreditation body AEGIS (Association for Education & Guardianship of International Pupils):

AEGIS

The Wheelhouse

Bond's Mill Estate

Bristol Road

Stonehouse

Gloucestershire

GL10 3RF

Tel: +44 (0) 1453 821293

[info@aegisuk.net](mailto:info@aegisuk.net)

AEGIS will listen to your complaint and advise you on the next possible course of action, which may include mediation.



### Storing and recording complaints

A clear and comprehensive summary of the complaint and details of how the complaint was followed-up including the outcome will be stored on our database. All complaints will be logged, recorded and kept on file in accordance to LLEG's information retention schedule. This also refers to complaints which are found to be unsubstantiated, malicious, false or unfounded.

Where the complaint is regarding a member of staff, teacher or homestay hosts misconduct which does not need to be dealt with under the LLEG Safeguarding policy, the complaint will be kept in the person's file and dealt with under LLEG's disciplinary procedure.

Where complaints are found to be malicious then the complaint will not be stored in the person's file but will be stored by the Principal securely in case another malicious complaint is made by the same individual.

### Complaints from Staff, Teachers or Homestay Hosts

Complaints from staff, teachers or homestay hosts should be dealt with informally by the Senior Guardianship Manager in the first instance and then raised formally with the Principal in writing if the matter cannot be resolved. Please also refer to the LLEG Whistleblowing procedure for guidance on reporting wrongdoing within the company.

## 9. LLEG Safeguarding Policy Check List

*Date of check list: 20 May 2015*

*Last reviewed: 2 January 2018, 14 December 2018, 4 December 2019, 11 December 2020, 12 January 2022*

*Next review date: January 2023*

### A child protection policy states the organisation's commitment to safeguard children

The organisation has a child protection policy.

- The policy is written in a clear and easily understood format for staff, pupils, homestay hosts and their families.
- The policy is publicised, promoted and distributed to relevant audiences.
- The policy is approved and endorsed by the management team.
- The policy is mandatory for LLEG staff and homestay hosts.
- The policy is reviewed every year or whenever there is a major change in the organisation or in relevant legislation or guidance.

### Child Protection procedures: what to do if there are concerns about a child's welfare

There are clear procedures which provide step-by-step guidance on what action to take if there are concerns about a child's safety or welfare.

- The child protection procedures are available to all (including pupils and their parents) and actively promoted on joining the organisation. Consideration is given to language, difference ways of communicating and ease of use.
- There is a designated person with a defined role and responsibilities in relation to Safeguarding.
- There is a process for recording incidents, concerns and referrals and storing these securely in compliance with relevant legislation.
- There is a process for dealing with complaints by parents and pupils about unacceptable behaviour towards children.
- There is guidance on information sharing which clearly states the welfare of children is the most important consideration.

### Prevention: safe recruitment of staff and volunteers

There are rigorous policies and procedures for recruiting staff and homestay hosts who have contact with children.

- All those who have significant contact with children are subject to safeguarding safer recruitment checks as required by statutory guidance and all checks are properly recorded on a central register.
- There are well publicised ways in which staff, homestay hosts and their families, parents and pupils can raise concerns about unacceptable behaviour by anyone within the organisation. These include external contacts such as NSPCC and Childline.
- An assessment of risk of any activities and the environment in which they take place is made prior to commencement and action taken to minimise risk.
- A risk assessment is in place for transporting children and for excursions. Operating standards are set out to ensure children are adequately supervised at all times.

### Codes of practice and behaviour

There are well-publicised codes of behaviour for which all staff and homestay hosts comply.

- The organisation provides guidance on expected standards of behaviour by adults towards children and young people.
- There is guidance on expected behaviour by children towards other children.
- There are processes for dealing with behaviour that is not acceptable.
- All disciplinary measures/sanctions are non aggressive and do not involve humiliating children and young people.
- Codes of practice and behaviour.
- Managers and senior staff promote a culture that ensures children are listened to and respected as individuals.
- The consequences of breaching the code are clear and linked to disciplinary and grievance procedures.

### Equality and inclusion

The safeguarding policy makes it clear that all children have equal rights to protection.

- The safeguarding procedures, guidance and training help staff and homestay hosts to recognise the additional vulnerability of some children and the extra barriers they face to getting help, because of their race, gender, age, religion, sexual orientation, social background and culture.
- Codes of conduct/behaviour make it clear that discriminatory, offensive and violent behaviour is unacceptable and that all complaints will be acted on.

### Communication

Information about the organisation's commitment to safeguard children and young people is openly displayed and available to all.

- Information for young people and for parents is made available about where to go for help in relation to child abuse.
- Information is provided in a format and language that can be easily understood by all service users.
- Everyone in the organisation knows who the designated person for child protection and safeguarding is and how to contact them.
- Contact details for children's social care, police and emergency medical help and child help lines are readily available.

### Education and Training

- There is an induction process for all LLEG staff and homestay hosts that includes familiarisation with the LLEG safeguarding policy and procedures.
- All staff and homestay hosts are provided with opportunities to learn about how to recognise and respond to concerns about child abuse.
- Staff with special responsibilities in relation to safeguarding have training to enable them to develop the necessary skills and knowledge and have regular opportunities to update their knowledge and understanding.
- Training and written guidance on safe recruitment is provided for those responsible for recruiting and selecting staff and homestay hosts.

### Advice and Support

- Designated safeguarding leads have access to specialist advice, training, support and information.
- Pupils are provided with information on where to go for help and advice in relation to abuse, harassment and bullying, or significant difficulties in the homestay or their own homes.
- There are arrangements for providing regular supervision and support to staff and homestay hosts and particularly during and following an incident or allegation of abuse or a complaint.

### Evaluation

Plans are in place to evaluate the effectiveness of the safeguarding measures.

- Arrangements are in place to monitor and evaluate the child protection procedures and the safe recruitment procedures.
- The resources essential for implementing the plan are made available. Practices are reviewed at stated intervals, at least every year.
- All incidents, allegations of abuse and complaints are recorded and monitored.

## 10. LLEG Travel Risk Assessment

What are the hazards	Who might be harmed and how	What we are already doing	Do we need to do anything else to manage this risk?	Action by who?	Action by when?	Complete
Traffic accident	Pupils and Homestay Hosts	<p>For taxi transfers plenty of time is allowed between pick up and airport check-in so drivers do not need to rush.</p> <p>If we receive reports of poor or dangerous driving we will refuse to use the same driver again. If this happens more than once we will no longer use that taxi company.</p> <p>All homestay hosts are advised to leave plenty of time to arrive at the airport to avoid rushing.</p> <p>Homestay hosts are not obliged to provide transfers if they do not feel confident in driving to major airports.</p> <p>We provide a 24 hour assistance number to all pupils, homestay hosts and taxis in case of an emergency.</p> <p>All drivers are DBS checked, fully licensed and insured.</p> <p>Information on how to contact the emergency services in the UK is provided to pupils before they travel.</p>				
Wrong child being collected  Child getting into wrong taxi	Pupils under 18	<p>A welcome sign is provided to all drivers (taxi and homestay hosts) bearing the pupil's name and the LLEG logo so pupils can identify their driver.</p> <p>All pupils are sent a copy of the welcome sign so they know what to look for.</p> <p>All pupils are sent a detailed transfer confirmation with the full details of the person/company meeting them.</p> <p>Taxi companies have signed a service agreement to confirm they will use the LLEG welcome sign when collecting pupils.</p> <p>Pupils are issued with a Travel Safe document containing information on how to stay safe when travelling alone.</p> <p>We provide a 24 hour assistance number to all pupils, homestay hosts and taxis in case of an emergency.</p>				

### 10. LLEG Travel Risk Assessment

What are the hazards	Who might be harmed and how	What we are already doing	Do we need to do anything else to manage this risk?	Action by who?	Action by when?	Complete
Lost documents	All pupils	<p>All pupils are advised to keep their documents in a safe place when travelling.</p> <p>LLEG has contact numbers for airports to try to trace any lost documents.</p> <p>We provide a 24 hour assistance number to all pupils, homestay hosts and taxis in case of an emergency.</p> <p>Pupils are issued with a Travel Safe document containing information on what to do if they lose their documents/bank card.</p>				
Lost luggage	All pupils	<p>LLEG has contact numbers for airports to try to trace any lost luggage.</p> <p>We provide a 24 hour assistance number to all pupils, homestay hosts and taxis in case of an emergency.</p> <p>Pupils are advised to carry in their hand luggage any essential medication.</p>				
Adverse weather conditions	All pupils	<p>We provide a 24 hour assistance number to all pupils, homestay hosts and taxis in case of an emergency.</p> <p>We have a network of homestay hosts throughout the UK available to host pupils if they are stranded due to poor weather.</p>				
Delay or issues at Immigration	All pupils	<p>We provide all pupils with the necessary documentation for immigration purposes.</p> <p>We provide pupils with clear travel instructions including a list of documents they must bring with them on arrival.</p> <p>We have a copy of these documents easily accessible on file by the duty person should immigration need a copy.</p> <p>An LLEG representative (homestay host or driver) will be waiting in arrivals for pupils under 18.</p>				

### 10. LLEG Travel Risk Assessment

What are the hazards	Who might be harmed and how	What we are already doing	Do we need to do anything else to manage this risk?	Action by who?	Action by when?	Complete
Risk of exposing pupil to danger from unknown adults	Pupils under 18	<p>All homestay hosts and taxi drivers are required to have a full DBS check.</p> <p>We provide a 24 hour assistance number to all pupils, homestay hosts and taxis in case of an emergency.</p> <p>We recommend that students under 16 book an airline Unaccompanied Minor Service where possible.</p>				
Missing Pupil	All pupils	Emergency contact numbers for parents and agents so can check if travel plans have changed.				
Pupil refusing instructions from Guardianship Mangers/ Teacher/ homestay host	Pupils aged under 18 years old	<p>All children aged under 16 years old are only permitted to travel with either the homestay host, LLEG's taxi service or the school's transfer service unless their parents are in the country.</p> <p>Guardianship Mangers to monitor pupils conduct at school and in the homestay. Any pupils who can not stick to curfews or whose behaviour is not exemplary are not allowed to travel alone.</p> <p>Guardianship Managers to follow the LLEG behaviour policy.</p> <p>If a child is in immediate danger then the police will be called</p>				

### 10a. LLEG Travel Risk Assessment for Pupils travelling independently

What are the hazards	Who might be harmed and how	What we are already doing	Do we need to do anything else to manage this risk?
Risk of any of the above incidents occurring with no LLEG assistance at the airport/port/train or bus station	Pupils under 18	We provide a 24 hour assistance number to all pupils in case of an emergency. However, LLEG assistance will be limited if travel arrangements have been made privately. Pupils will be liable for any expenses incurred by LLEG assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LLEG's Travel Policy - all under 17s should book an LLEG or school transfer
Missing the booked bus / train	Pupils under 18	We provide a 24 hour assistance number to all pupils in case of an emergency. However, LLEG assistance will be limited if travel arrangements have been made privately. Pupils will be liable for any expenses incurred by LLEG assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LLEG's Travel Policy - all under 17s should book an LLEG or school transfer
Arrival flight is re-routed to a different UK airport (usually due to weather)	Pupils under 18	We provide a 24 hour assistance number to all pupils in case of an emergency. However, LLEG assistance will be limited if travel arrangements have been made privately. Pupils will be liable for any expenses incurred by LLEG assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LLEG's Travel Policy - all under 17s should book an LLEG or school transfer
No credit / battery on mobile phones to make calls in an emergency	Pupils under 18	Advising pupils to always travel with a fully charged mobile phone and with sufficient credit to be able to make calls in an emergency.	Follow LLEG's Travel Policy - all under 17s should book an LLEG or school transfer
Pupil having insufficient English to cope with an incident whilst travelling	Pupils under 18	Any pupil whose English is not of a standard to be able to deal with any incident whilst travelling alone must book an LLEG transfer.	Follow LLEG's Travel Policy - all under 17s should book an LLEG or school transfer
Pupil having insufficient money or a credit card to cover any unforeseen incidents.	Pupils under 18	We provide a 24 hour assistance number to all pupils in case of an emergency. However, LLEG assistance will be limited if travel arrangements have been made privately. Pupils will be liable for any expenses incurred by LLEG assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LLEG's Travel Policy - all under 17s should book an LLEG or school transfer
Bus / Train is delayed or cancelled— engineering works, strikes, unforeseen incidents	Pupils under 18	We provide a 24 hour assistance number to all pupils in case of an emergency. However, LLEG assistance will be limited if travel arrangements have been made privately. Pupils will be liable for any expenses incurred by LLEG assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LLEG's Travel Policy - all under 17s should book an LLEG or school transfer
Getting on the wrong bus / train	Pupils under 18	We provide a 24 hour assistance number to all pupils in case of an emergency. However, LLEG assistance will be limited if travel arrangements have been made privately. Pupils will be liable for any expenses incurred by LLEG assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LLEG's Travel Policy - all under 17s should book an LLEG or school transfer



## 11. LLEG Glossary of Terms used throughout this policy

**Agent** – Agent refers to an Educational agency either an individual or organisation that offer advisory services to students and their parents usually in their native language, on educational matters and services, for example, school placements in the UK. This is in exchange for a fee paid by the family and/or commission paid by the educational institute they represent.

**CCTV** – Closed Circuit Television (A self-contained surveillance system comprising cameras, recorders and displays for monitoring activities).

**County Lines** – is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The '**County Line**' is the mobile phone **line** used to take the orders of drugs or the railway line in which drugs are transported.

**Designated Safeguarding Lead (DSL)** – The role of the Designated Safeguarding Person is specified in the Children Act 2004 and ensures that every organisation has a “named person” for safeguarding children and young people.

**DBS Check** – Disclosure and Barring Service check. This is a background and police record check carried out on an individual person aged over 16 years old by an organisation. This helps employers make safer recruitment decisions and helps to prevent unsuitable people from working or volunteering with vulnerable groups, especially children. DBS checks result in a certificate being issued which will flag previous criminal records and any potential safeguarding issues recorded, depending on the level of check requested.

**Educational Guardian** – Living Learning English. We act with delegated parental responsibility and have pastoral and academic responsibility for the safeguarding, care and welfare of our guardianship pupils whilst they attend boarding school, college or University in the UK. Responsibilities may include being authorised to make certain decisions regarding emergency medical and dental treatment and matters of a disciplinary nature. Please note that an educational guardian is not a legal guardian.

**Exeat Weekend** – A weekend where boarding school pupils must leave the boarding school.

### *11. LLEG Glossary of Terms used throughout this policy*

**Homestay host** – a person approved and appointed by LLE, following a rigorous safer recruitment procedures to provide accommodation for an international pupil whilst they are not attending school for example, exeats weekend, half-term or other school holidays or at the beginning or end of term.

**Information Commissioner’s Office (ICO)** – The UK authority which upholds information rights in the public interest.

**LLE** – Living Learning English

**LLEG** – Living Learning English Guardianship