



# ELC Safeguarding and Child Protection Policy

**Definitions:**

For the purposes of this policy:

“English Language Centre schools” or “school” or “schools” refer to English Language Centre Brighton, English Language Centre Chester and English Language Centre, Eastbourne.

“children” refers to any students, staff (including apprentices), visitors or volunteers under the age of 18 for whom the school has primary responsibility.

This policy was written using guidance written by Accreditation UK and with reference to key government publications on safeguarding, including Keeping Children Safe in Education (Sept 2023) and Working Together to Safeguard Children (Dec 2023 – edited Feb 2024. Update June 2024).

Policy Reviewed: February 2025 by Senior Management Team

Next Review due: February 2026 by Senior Management Team

**Reviewed by:** Phil Hopkins, CEO ELC; Simon Dooley Centre Manager, ELC Brighton; John Veale, Centre Manager, ELC Eastbourne; Rachel Connabeer, Centre Manager, ELC Chester

The following policies and procedures contain sections which are directly relevant to safeguarding in the school:

- Staff Recruitment Policy
- Staff Training Policy
- Data Protection Policy
- Attendance and Lateness Policy
- Disciplinary Policy
- Abusive Behaviour Policy

- Diversity, Equality and Inclusion Policy
- ICT Policy and Procedures
- Health and Safety Policy
- Pastoral Care Policy
- Privacy Policy

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# Safeguarding and Child Protection Policy

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## 1. Introduction

- 1.1 English Language Centre (ELC) schools have a responsibility to provide a safe & healthy learning environment for all students and staff but especially for students under the age of 18 and vulnerable adults.
- 1.2 ELC will help keep children and young people safe by contributing to:
  - providing a safe environment for children and young people to learn.
  - protecting children from maltreatment, inside or outside the home, including online
  - identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe as soon as problems emerge
- 1.3 ELC is committed to ensuring and promoting the safeguarding of learners who are involved in courses or activities which come under the responsibility of the school.
- 1.4 This Child Welfare & Protection policy deals with the welfare and protection of children, which the Children Act 1989 defines as a person under 18 years of age.
- 1.5 Our policy applies to all staff working in the school setting, and to all people who have unsupervised access to children in the home setting. ELC aims to ensure that all students aged under 18 & vulnerable adults are protected from potential abuse or harm from hosts, staff, other suppliers or fellow students and that they are safe in all aspects of their interactions with the school.
- 1.6 This policy will be made known to all adults in contact with under 18s through their role with ELC schools (including employees, homestays, group leaders and sub-contracted workers such as drivers doing airport transfers and excursions). It is expected that all these adults will understand and apply this policy as appropriate to their area of activity, and in particular will report any child protection or concerns immediately to the school's designated safeguarding officer as set out in the procedures below.

## 2. Context

- 2.1 The courses at ELC Schools are primarily aimed at adults aged 18 and over but we also welcome students under the age of 18.
- 2.2 The minimum age on most brochure courses is 16 and ELC makes clear to parents and guardians through the publicity on its website that these under-18s will be studying in an adult environment.
- 2.3 On General English, Summer Vacation and Examination courses, we reserve the right to accept students who are 15 where they come as part of a group with a leader who will take responsibility for their welfare outside of class times and during activities. In such cases we will take additional safeguarding measures. Applications from students outside the published age limit are treated on a case by case basis. Please see the Policy on Under 16 Students.
- 2.4 On occasion, ELC Brighton, ELC Chester and ELC Eastbourne accept closed groups of students aged from 12 to 16. These groups are accompanied by group leaders. ELC Chester offers a Summer Course for Teenagers (ages 13-16) at a different site in Chester. Additional safeguarding measures are also applied for these courses as detailed in the Policy on Under 16 Students.
- 2.5 At ELC, tuition is usually face to face, at school, in classrooms with a teacher. On occasion courses are delivered online for specific courses and one to one skype lessons. All aspects

of the safeguarding policy and code of conduct apply to staff and students involved in online tuition.

### **3. General Principles**

- 3.1 We believe that all our students including young people and adults should be safe and protected in the school and that their welfare and well-being is of paramount importance. In delivering our duty of care, the school will endeavour to act in the best interests of the child.
- 3.2 We aim to create an environment where students and staff feel safe and protected where they are listened to and their views respected.
- 3.3 All staff at the school have a responsibility in relation to safeguarding and promoting the welfare of all students but especially children, and for ensuring that they are protected from harm and to follow the school's policies and procedures.
- 3.4 We will respect the decisions made by young people about their own safety and well-being unless this is in conflict with our statutory duties
- 3.5 Our safeguarding policies will take into account the specific needs of international students in the United Kingdom and the local environments of Brighton, Chester and Eastbourne.
- 3.6 There are three main elements to our policy:
  - ensuring we practise safe recruitment in checking the suitability of staff and homestay providers to work with children
  - establishing a safe environment in which children can learn and develop
  - developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse and inappropriate behaviour.

### **4. Recruitment**

- 4.1 ELC will ensure safe recruitment practices are always followed.
- 4.2 With regard to employment of administration and teaching staff, these measures will include requesting a DBS disclosure for all staff, requiring written references (with follow up phone calls as required) and requiring an annual declaration of suitability to work with under 18s in accordance with our staff recruitment and training policies
- 4.3 With regard to homestay accommodation providers who host under 18s, these measures will normally include requiring:
  - a valid DBS disclosure within the last 3 years covering the household,
  - requiring an annual declaration of suitability to work or come into contact with under 18s signed by the main carer covering all members of the family aged 18+
  - an initial inspection and subsequent annual inspections of homestay providers' facilities and the gathering of regular feedback from students.
  - homestay hosts who accept under 18s have initial safeguarding training with ELC Accommodation & Welfare Staff at recruitment and complete annual training refreshers during their annual revisit.
- 4.4 With regard to service providers (e.g. tour providers, taxi/coach companies), these measures will include requiring an annual declaration and written evidence that their staff have undergone satisfactory DBS disclosure within the last 3 years
- 4.5 The school will require ETOs/schools or group leaders accompanying groups with students under the age of 18 to provide confirmation or evidence that the group leaders have current police good conduct certificates or similar from their country of origin.

### **5. Establishing a safe environment**

5.1 We recognise that because of the day to day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- ensure children know that there are adults in the school who they can approach if they are worried
- ensure we have designated staff at each school who will have delegated responsibility for general issues to do with the welfare of students under the age of 18 and a Designated Safeguarding Lead and Person at each centre who is at senior level and will act as the point of contact and information for any child protection issue.
- ensure staff, Welfare Officers and Designated Safeguarding Leads and Persons receive appropriate training and support for their roles.
- ensure every member of staff with significant contact with children (including temporary staff and volunteers) knows the name of the designated persons responsible for child protection and welfare and undergoes (Basic) Level 1 Child Protection training as part of induction procedures and then annual refresher training
- ensure all staff and volunteers with significant contact with children understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated person responsible for child protection.

5.2 ELC has responsibility to provide a safe learning environment for all students and staff but especially for students under the age of 18 and vulnerable adults. The school will therefore:

- ensure that the Health & Safety Policy and risk assessments for social activities, both on and off site will pay particular attention to the welfare of students under the age of 18 where appropriate.
- establish clear rules, obligations, advice and guidelines for under 18s (e.g. curfew times for returning to homestay, advice on places to avoid, information on the law with regard to, for example, alcohol)
- ensure that all students but especially those who are under 18 are informed and aware of the school's rules, regulations, guidelines and obligations (e.g. through pre-course information, first-day briefing, ongoing advice)
- check that all students aged under 18 are in lessons within 15 minutes of the start time and follow up in the case of absence.
- ensure that all students who are under the age of 18 are accommodated with homestay providers who comply with our requirements above, unless alternative accommodation provision has been made by the student's parents (e.g. with a relative, close friend)
- the lead homestay in each household will be required to sign a statement confirming that they understand and accept the school's code of conduct for working with students under the age of 18 and other vulnerable learners.
- ensure that students under the age of 18 are accommodated in single rooms unless:
  - specifically requested otherwise e.g. in the case that 2 friends of a similar age request twin room accommodation
  - in summer in Eastbourne, unless otherwise requested, and subject to availability, we will normally place a student aged under 18 in a twin room with another student of the same gender and a similar age but different first language

- Students under 16 or on the Summer Course for Teenagers in Chester or in Closed Groups would normally be placed in a shared homestay address and travel together to school on public transport, or on foot or a lift from the homestay. If such a student is placed in a single homestay room, he/she will be placed close to other students who can travel back together.
- ensure that in the case that students aged 16 and 17 are accommodated in homestays with other guests aged 18 and over, it is done so on a case by case risk-assessed basis taking into account, for example, differences in ages, background and sex
- match students to homestays that take account of their needs (e.g. allergies, sex, diet, cultural background, length of stay) and considering factors such as distance from school, proximity to other students, bus routes, well-lit roads, local area (pubs in area etc.), as appropriate
- provide clear and accurate information to potential students, agents and parents prior to enrolment about the nature of the courses, learning environment and accommodation provision so that they make an informed choice about their suitability
- ensure the premises are secure through secured and entry systems at the front and rear to discourage access by people who should not be on the premises. At Brighton and Eastbourne, these entry points and common areas will be monitored and recorded by CCTV
- use separate areas of the school premises for groups of younger learners, In Chester, there are separate rooms in the rear wing of the school. In Brighton and Eastbourne, a separate floor or building can be used.
- ensure that firewall settings and group policies for the PC and Wi-Fi network will prevent access to websites of an unsuitable nature (e.g. violence / hate / racism / radicalism / extremism, adult / mature content, drugs / alcohol abuse).

5.3 ELC has a responsibility to provide a safe environment for staff also. In addition to ensuring the school environment is safe and secure, ELC has a responsibility to ensure staff are aware of measures to safeguard themselves when outside the school premises:

- All staff attending or leading excursions with students sign to confirm they have received, read and understood the risk assessment for the activity they are leading,
- All staff visiting homestay hosts are requested to:
  - arrange visits in daylight where possible
  - leave a record of who they have arranged to meet, when and where
  - inform the host that the appointment is in the school diary
  - carefully observe and assess the premises before entering
  - take a mobile phone
  - not to go upstairs in front of the host
  - inform the host that they are expected later at school afterwards
- All staff are advised to seek immediate support from their line manager if they believe there is any risk to personal safety while performing school duties

5.4 ELC's responsibility to provide a safe learning environment extends to courses where tuition takes place online on a video conferencing platform. The online environment poses additional risks such as:

- Online grooming
- Online radicalisation
- More access to inappropriate and harmful content
- Online bullying and peer to peer abuse

While we also need to maintain a supportive and friendly learning environment, we need to take care that normal professional standards are maintained. ELC staff should maintain the safe school culture established at our premises in the online environment as there may be an element of informality that can build up due to the different setting.

- All appointments of staff involved in online lessons undergo the same safe recruitment procedures and safeguarding training as others.
- Teachers who offer online lessons receive additional guidance and training on safeguarding online
- Students aged under 18 and their parents receive guidance and support for their online safety.
- Classes with students aged under 18 are appropriately monitored and supervised by the teacher
- Staff and students know how to report any concerns of abuse.

5.5 In cases where ELC places a student with an alternative school or course provider, ELC will continue to be responsible for the safeguarding of that pupil for the duration of their stay.

- ELC will liaise with the alternative provider with regards safeguarding policy.
- ELC will provide a risk assessment for each placement
- ELC staff will conduct regular welfare checks with the student for the duration of the placement

## 6. Procedures

6.1 It is not unusual to have concerns about students for all sorts of reasons. Staff should as a matter of course discuss their concerns with a line manager to clarify their understanding of the situation.

6.2 The line manager will then make an assessment of the situation and involve the Welfare Officers or Designated Safeguarding Lead as appropriate.

6.3 In the case that the Designated Safeguarding Lead is involved, he/she will liaise with the Chief Executive and make a decision as to whether the matter should be taken further. This will be usually be done where it is believed:

- there is a risk of significant harm to the student or
- harm to others or
- a criminal act has taken place or
- the student is at immediate risk or danger

6.4 Where the Designated Safeguarding Lead decides that further action is necessary, this may be to:

- seek further advice from Social Services
- make a referral to Social Services
- report the incident to a designated Social Worker
- report the matter to the Police if a crime is suspected

### **Brighton:**

#### **Local Area Designated Officer**

Kay Whitcroft

To make a referral you must complete the Allegations referral form

[ladoenquiries@brighton-hove.gov.uk](mailto:ladoenquiries@brighton-hove.gov.uk)

**Brighton & Hove Local Safeguarding Children Partnership**

Tel: 01273 292379 (office hours)

**Multi Agency Safeguarding Hub**

Tel: 01273 290400

**Out of Office Hours Emergency**

Tel: 01273 335905 / 06

01273 292379

**Chester:**

**Allegations Management (LADO)**

The Local Authority Designated Officer (LADO) is the person to be notified when it has been alleged that a professional or volunteer who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

To make a referral you must complete the Allegations referral form  
[safeguardinglado@cheshirewestandchester.gov.uk](mailto:safeguardinglado@cheshirewestandchester.gov.uk)

To report an initial concern about a child:

**Integrated Access and Referral Team (I-ART)** Tel: 0300 123 7047

The team can be contacted 8.30am to 5pm from Monday to Thursday and 8.30am to 4.30pm on Friday.

**Out of Office hours Emergency**

Tel: 01244 977 277

Email: [EDT2@cheshirewestandchester.gov.uk](mailto:EDT2@cheshirewestandchester.gov.uk)

**Cheshire Police:** 0845 458 0000/ 01244 350000 (999 in an emergency).

**Eastbourne:**

**Local Area Designated Officer**

Donna Davis [lado@eastsussex.gov.uk](mailto:lado@eastsussex.gov.uk)

**East Sussex Safeguarding Children Partnership**

- Single Point of Advice (SPoA) at East Sussex County Council on 01323 464222
- email [0-19.SPOA@eastsussex.gov.uk](mailto:0-19.SPOA@eastsussex.gov.uk)

To report an initial concern about a child:

**East Sussex Police:** 01273 470 101 (999 in an emergency).

**7. Designated Members of Staff for Child Protection, Safeguarding and Welfare**

7.1 The Chief Executive has overall responsibility for child welfare, protection and safeguarding at senior management level which will be delegated on a day-to-day basis

- 7.2 The designated members of staff with day-to-day responsibility for welfare will normally be the Accommodation & Welfare Officers or Student Services Team in each school
- 7.3 The Designated Safeguarding Leads (DSL) in Brighton, Chester and Eastbourne are the Centre Managers. All are separate from the Welfare Officers/Student Services team. The DSLs will cover each other in case of their absence.
- 7.4 The Designated Safeguarding Lead will make reasonably regular contact with the local LSCB to make themselves known and to ensure the school has current contact information

### **ELC staff**

All staff at the school have a responsibility in relation to safeguarding and promoting the welfare of all students but especially those under 18. ELC follows safe recruitment practices and require that all members of staff undergo a DBS check before taking up employment, and thereafter at 3-yearly intervals, and sign an annual declaration of suitability to work with under 18s. We provide all staff who work with under 18s with basic awareness training in safeguarding, child welfare and prevent.

We employ full time Accommodation & Welfare Officers/Student Services Team who have delegated responsibility in particular for the day-to-day welfare of under 18s, and we have a Designated Safeguarding Lead in each centre.

Key personnel and responsibilities:

### **ELC Brighton**

**Designated Safeguarding Lead:** Simon Dooley (Centre Manager) – trained to safeguarding Specialist (level 3)

#### **Trained staff who can deal with day-to-day issues of welfare and safeguarding**

Karen Hoyle (Head of Accommodation & Welfare, Brighton - safeguarding Specialist (level 3) DSP  
Mita Ghelani (Accommodation & Welfare Officer, Brighton) – safeguarding Advanced (level 2)

### **ELC Chester**

#### **Designated Safeguarding Lead,**

Rachel Connabeer (Centre Manager) – trained to safeguarding Specialist (level 3)

#### **Trained staff who can deal with day-to-day issues of welfare and safeguarding**

Courtney Greene (Accommodation and Welfare Officer) - trained to safeguarding Specialist (level 3)  
DSP

#### **Other staff trained to safeguarding Advanced (level 2)**

Kat Mickleson, SCT Centre Manager  
Lucy Swinnerton, Administrative Assistant

### **ELC Eastbourne**

#### **Designated Safeguarding Lead,**

John Veale (Centre Manager) – trained to safeguarding Specialist (level 3)

#### **Trained staff who can deal with day-to-day issues of welfare and safeguarding**

Alfredo Mezzela (Accommodation & Welfare Officer) – trained to safeguarding Advanced (level 2) DSP

Members of the safeguarding team above are also responsible for meeting under 18s on arrival and holding regular welfare meetings for under18s staying longer than four weeks.

## **8. Record-keeping**

8.1 It is essential that clear and accurate records are kept regarding all welfare issues.

8.2 Any disclosure of abuse from a student or another member of staff must be recorded in writing. This will cover:

- student and staff details
- reason for the concern
- any apparent physical signs of abuse
- an account given to the member of staff of abuse by the child concerned, as accurately as they are able to record it.
- dates and times of incidents
- dates and time of when notes were made.
- Information on any response taken

8.3 The report should be factual and should not include opinions or personal interpretations of the facts presented as it may form part of a criminal investigation.

8.4 The report should be signed, dated and passed, at the latest within 24 hours, to the Designated Safeguarding Lead, who will keep a copy stored in a secure place.

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# Care of Under 18s Safeguarding Procedure

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## Introduction

The English Language Centre's courses are primarily aimed at adults aged over 18 but we welcome students aged 16 and 17 on summer courses, in closed groups and in smaller numbers on standard courses year-round. We also welcome students aged under 16 (please see the Policy on Students Under 16). ELC has a responsibility to provide a safe & healthy learning environment for all our students and staff but especially for students under the age of 18 and vulnerable adults. This document describes how we care for students aged under 18 but it should be noted that:

- ELC does not provide 24-hour supervision
- students aged 16 and 17 on brochure courses will study in classes with adults
- students will travel between homestay and school unsupervised
- students will be unsupervised outside lesson times and the time spent at homestay

## Parental Agreement

Before arrival at ELC, we require the parents/guardian and students aged under 18 to complete a web form "Parental Agreement" and send to ELC to confirm that they understand the systems and rules that we have in place for the welfare of under 18s and the level of supervision that we provide for under 18s. ELC will initially speak to the student about minor breaking of the rules. ELC will inform the parents in the case that the student is regularly not abiding by the agreed terms of the Parental Agreement, or immediately in the case of a serious breaking of the rules.

If any student under 18 receives a written warning about their behaviour, their parent/guardian will be informed. If a student under 18 is required to leave the school, the school will make appropriate arrangements for their safe return to their country (at their parents' expense).

## Arrival/Departure from/to airport to/from accommodation

We strongly advise all parents/guardians of students under 18 to arrange a taxi transfer from/to the airport on arrival and departure.

All students must travel with a completed Parental Consent to Travel form signed by their parents/guardians.

ELC arranges all taxi transfers with a local taxi driver/company who provide an annual declaration that the drivers they use have had a satisfactory DBS check and the vehicles they use all comply with legal requirements.

## Accommodation

In the case of students under 18, we normally require that they stay in half board homestay accommodation. Any student under 16 is required to have full board accommodation.

Alternative arrangements where the student will have adult supervision, such as staying with a family friend, will be accepted provided we have written confirmation of the arrangements from the parents at the time of the enrolment. We would not expect individual students aged under 18 to stay unsupervised in a hotel or guest house.

ELC will normally only place a student under 18 in a homestay following an initial inspection by our Accommodation & Welfare Officer and a satisfactory DBS (Disclosure and Barring Service) check on the household, who is also required to sign an annual declaration covering all adult members of the family. ELC also requires that other any students in the homestay will be of a similar age.

When recruited, homestays who host under 18s will undergo initial ELC safeguarding and prevent training from the Accommodation & Welfare staff who will also check understanding of key points of ELC policy and procedure. ELC provides an online course designed to provide Basic (level 1) safeguarding for hosts. They will also be visited by a member of the Accommodation and Welfare Department annually. During the revisit, the school will check any change in circumstances for the host and also offer refresher training on safeguarding and prevent.

Homestays provide breakfast and dinner every day. Lunch is not provided except for students under 16 and ELC does not have a canteen. Students normally buy lunch at one of the many shops, restaurants or supermarkets within 5 minutes' walk of school. Parents should ensure that their child has sufficient money for lunch.

- Students will be placed in a single room, unless travelling with a friend of the same sex and similar age in which case twin room accommodation may be possible. In summer in Eastbourne, unless otherwise requested, and subject to availability, we will normally place a student aged under 18 in a twin room with another student of the same gender and a similar age but different first language.
- Students under 16 are normally placed in a twin room with another student of the same gender and a similar age but different first language.
- The student is treated as part of the host's family and they eat together in the evening
- There will always be a responsible adult at home overnight.
  
- Student curfews are risk assessed according to local factors, time of year and supervision. Normally, a student who is 16 or 17 will be required to return home by 23.00 each evening. Students under the age of 16 are normally required to be home by 20.00. If any students are accepted under the age of 13, they are not normally allowed to stay out unsupervised after school. Our homestays have been asked to contact the school if this rule is broken.
- The student must provide written permission from their parents 1 week beforehand should they wish to stay out overnight or go on an overnight trip. A specific form is required, signed by the parents which includes the contact details of where they will be staying. Any overnight stay away from homestay or day trip away from the town/city must be approved by the school's safeguarding team in writing.

### **Reporting Concerns**

All ELC staff, homestay hosts and suppliers have a legal responsibility to report suspected cases of abuse or allegations of abuse. For ELC staff concerns should be reported as described in the section 'ELC Staff' below. It is not staff's role to investigate or assess whether or not abuse or radicalisation has occurred. ELC staff have a responsibility to pass on concerns to those who can investigate them, so that action to protect the student and others can be taken if necessary.

Abuse is defined as anything that causes significant harm to children and vulnerable adults physically or emotionally. It can be deliberate or unintentional and can take many forms, the list below is not exhaustive:

- Neglect
- Physical
- Sexual
- Psychological i.e. repeatedly being made to feel humiliated, afraid or devalued by others
- Financial or material – i.e. stealing or denying access to money or possessions

Abuse rarely exists as a standalone event that is easily covered by one category. Sexual abuse, for example, is always also emotional abuse as there is always a power imbalance. In most abuse cases, multiple issues will overlap with one another. Secondary forms of abuse can include:

- Peer-on-peer abuse (under 18s, particularly teenagers can abuse their peers, gender based violence, bullying, cyber-bullying, sexual harassment and violence are examples.
- Teenage relationship abuse if one partner starts to dominate and manipulate their partner
- Child Sexual Exploitation when under 18s receive 'something' (attention, gifts, money, alcohol, drugs) by an exploiter. Young people could potentially be trafficked into the UK for purposes other than learning English
- 'Honour Based' Violence (HBV) to protect the honour of a family and/or community.
- Female Genital Mutilation (FGM), the non-medical, partial or total removal of external female genital organs. This is illegal if done in UK, or if a UK resident is taken overseas to have it done. If you receive a disclosure concerning FGM from a student under 18, it is a legal obligation to report to the police. Staff must report to the Designated Safeguarding Lead.
- There are many Harmful Sexual Behaviours prevalent with teenagers such as Sharing Nudes or Semi-nudes or 'youth-produced sexual imagery'. Guidance identifies that, in most cases, this is a safeguarding issue rather than a criminal one.
  - Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18. An image covers photographs, videos and streaming
  - Indecent is not succinctly defined in law, but would probably include the following:
    - naked young person / a topless girl / an image displaying genitals
    - sex acts including masturbation / overtly sexual images even if wearing underwearSharing sexual images between under 18s is illegal and risky, but often the result of teenage curiosity. Young people need education and safeguarding support rather than criminalisation. Adults sharing sexual imagery of under 18s is child abuse and must be reported to the police

Abuse can manifest itself in a number of noticeable ways. This may be more difficult to discern in the context of cultural differences. However, here are some possible signs of abuse that may cause concern:

- Signs of physical injury with no satisfactory reason for its cause
- Changes in style of dress attempting to cover up any signs of physical injury
- Changes in behaviour, e.g. being or becoming isolated, eating disorders, poor hygiene, homesickness, not wanting to return to the country of origin, becoming needy or clinging to members of staff or other students
- Fall in standard of work, poor attendance, inattentiveness or disengagement from others both in and outside class
- Asking questions about certain topics (e.g. connected to abuse)
- Drawings or posters showing abuse
- Students voicing concerns about anyone

If a student discloses an alleged incident of abuse to a member of staff, they should follow the 5 R's:

- **Receive** – Do not guarantee confidentiality. Listen rather than question directly. Do not interrupt
- **Reassure** - Offer reassurance without making promises, and take what is said seriously. Alleviate feelings of guilt and isolation, while passing no judgement
- **React** Do not overreact. Advise that you will try to offer support, but that you must pass the information on. Explain what you have to do and who you have to tell
- **Record** - Record the discussion accurately, as soon as possible afterwards

- **Remember** - Use the child's words or explanations

It is not unusual to have concerns about children for all sorts of reasons. Staff should therefore discuss any concerns they have with their line manager or the school's DSL to clarify their understanding of the child's circumstances.

### **Low Level Concerns**

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a “nagging doubt” – that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct.

The term ‘low-level’ does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm. Some examples are being over friendly, having favourites, taking photos of children on their phone, engaging with a child in a secluded area or behind a closed door.

Any concerns no matter how small should be discussed with the line manager. The Line Manager will then make a decision on how to proceed and may consult Accommodation and Welfare staff. Administrative staff with a safeguarding concern should report to their Centre Manager/DSL. Academic staff should report concerns to their line manager (Academic Manager at ELC Brighton, ELC Chester and ELC Eastbourne). The Academic Manager will confer with their DSL or the DSL from the sister school in case of absence. Accommodation and Welfare trained staff are also available for advice/support on safeguarding matters locally.

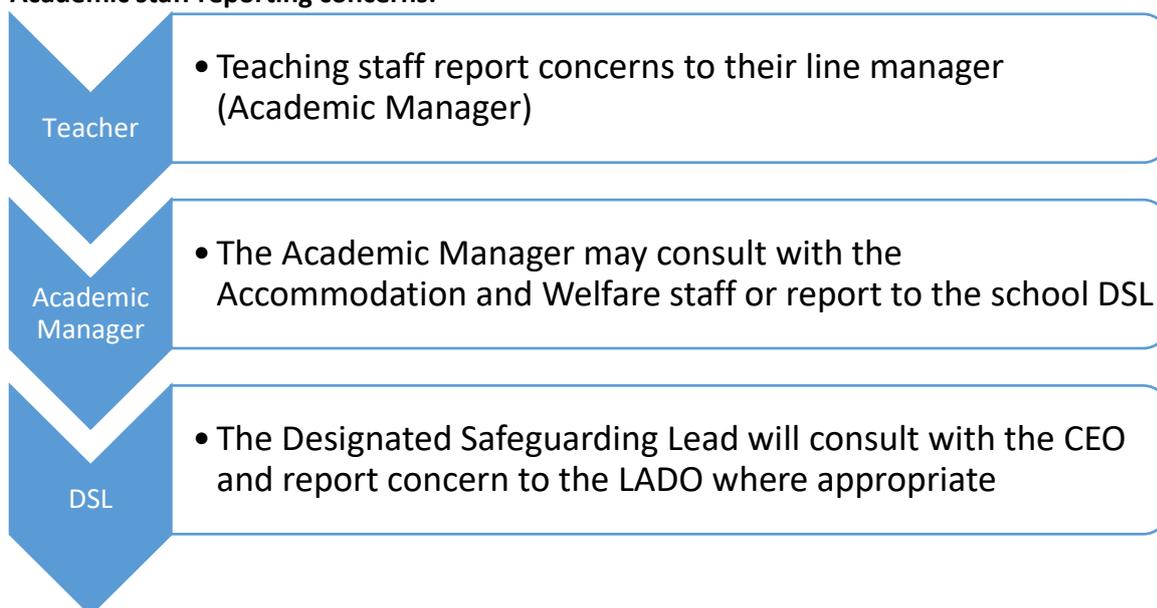
If there are still unresolved concerns or specific allegations that may be of a child protection nature, discussions should then take place - without identifying the child in question if necessary - with the front line staff in Children's Social Care or the Safeguarding Unit. Whatever discussions take place, DSL or DSP will:

- never delay emergency action to protect a child from harm, ensuring that they take any necessary action on the same working day
- always record in writing concerns or discussions whether or not further action is then taken

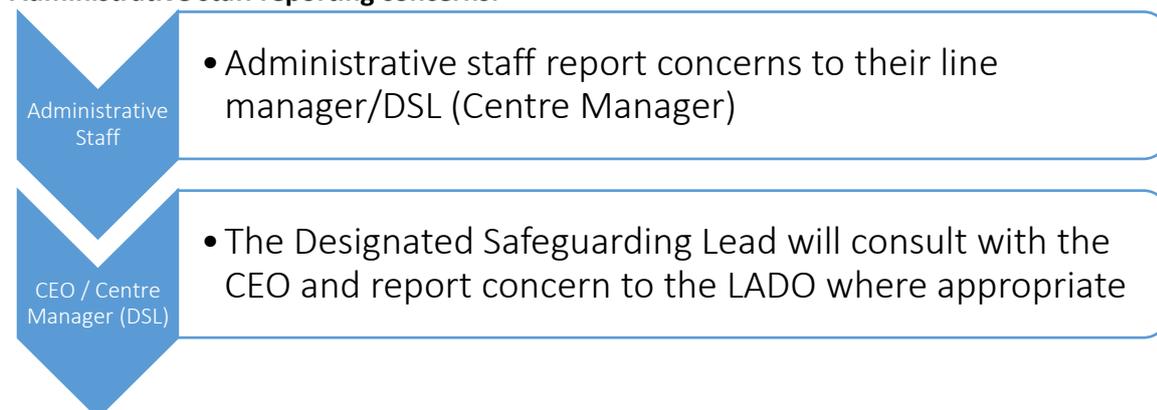
At the close of discussions, there should always be a clear and explicit recorded agreement about who will be taking what action, or that no further action will be taken.

The DSP will keep written records of concerns about children even where there is no need to refer the matter immediately. The DSL will ensure all records are kept securely, separate from the main student files, and in a locked location. These are accessible only to the DSL, the Centre Manager and if necessary an official outside agency. These records are kept for at least 3 years.

### Academic staff reporting concerns:



### Administrative staff reporting concerns:



### Day One at ELC

ELC provides a full induction for new students that includes a tour of the building, Health & Safety Information and introduces key staff (e.g. Accommodation & Welfare, social organiser). Under 18s specifically:

- are made aware who they should talk to if they have a problem or need help
- are given an ELC student card which includes the school's emergency number, and/or given this number separately, which we ask they immediately add to their mobile phone
- are given an advice and emergency details information sheet (see below) which includes a reminder of curfew times
- complete an Emergency Contact form to check that we have up-to-date contact details for parents/guardians

### Ongoing support for under-18s during the course

The school's emergency number will be made known to all students under 18, and the parents or legal guardians of students under the age of 18. The school will obtain a 24-hour emergency number for the parent or legal guardian of any student under the age of 18. These numbers are added to the

secure Under 18 / Next of Kin list which is sent weekly to the emergency phone holder and the leaders of the School's Emergency Team (e.g. academic managers, social organisers, weekend duty person). All registers include the ages of students so that teachers can be aware of students aged under 18 in their class and provide necessary support as required. All students under the age of 18 are indicated on group lists in red or with a U. Other at risk adults (for example a student with special educational needs or a disability) will be identified to staff on a need to know basis when the information comes to the school's attention.

All students under 18 have an initial induction, are informed of ELC policies and procedures and are introduced to Accommodation & Welfare staff as their contact if they need support. Those students under 18 who are staying for more than 4 weeks will have a monthly welfare meeting with an Accommodation & Welfare Officer. Inductions will include guidance on online safety which is also available in classrooms

If a student under 18 is ill or requires medical treatment, the school will arrange for an appropriate person to accompany the student to the doctor or other medical professional (as appropriate).

### **Attendance and lateness**

If a student under the age of 18 does not come to school when expected for class, or for an activity, or at their homestay by the agreed time, the school or homestay will follow up immediately until they are satisfied the student is safe. If this happens outside of normal school hours, the person discovering this will call the school emergency phone for advice if required.

We keep a register of attendance for all students and mark lateness. Every day by 09.15 (09.45 in Chester) an academic manager checks that all students aged under 18 are in class. If not, they inform an Accommodation & Welfare Officer who will check with the homestay and follow up until we are sure that the student is safe (eg either in class or sick at home). In both cases we keep a record in the student's file. If an under 18 arrives late to class, teachers should not ask the student to return to the class after the break and should accept the student into the class so they are supervised during class times. In cases where ELC cannot locate the student and cannot be sure of their safety, the DSL will contact the police and register the student as missing until they can be located.

### **Internet access and Wi-Fi**

ELC provides all our students with free access to the internet via PC or Wi-Fi so that they can stay in contact with friends and family.

Our servers are set to block content that is not suitable for under 18s.

### **Online lessons**

Staff, students under 18 and their parents are made aware of ELC policies on abusive or inappropriate behaviour and who to speak to if they have any concerns of abuse or inappropriate behaviour. Any platform or medium used for online lessons is secure and protects the privacy of students and their data, all lessons are by invite only and password protected.

All course materials and content is appropriate for the ages of the students. Teachers control screen sharing rights. All student interaction including chats, break out or waiting rooms with other students are monitored appropriately by the teacher. If lessons are delivered from home, tutors choose neutral locations for lessons and maintain the professional environment of the school.

As in normal lessons, non-attendance is followed up after 15 minutes or earlier. The Academic Manager or other relevant staff regularly visit online classes. Parents are informed of the content and timetable of the online lessons. For one to one courses, parents are encouraged to visit classes on occasion.

## **Social Programme**

We provide a full programme of afternoon and evening activities Monday to Friday, and full-day guided excursions at weekends. Although the programme is not specifically designed for students aged under 18, we do aim to offer a number of activities every week that are suitable for under 18s. We publish the social programme every week on our website here:

Brighton: <https://www.elc-schools.com/uk/brighton/social-programme/>

Chester: <https://www.elc-schools.com/uk/chester/social-programme/>

Eastbourne: <https://www.elc-schools.com/uk/chester/social-programme/>

Activities are clearly marked:

- \* - a member of ELC will be present for this activity
- 18+ - you must be 18 or over to attend this event and will need to provide identification
- AF - no alcohol available at this event

For activities where the meeting point is not given as ELC, students will need to make their own way to the event unsupervised. After all activities, students will make their own way home unsupervised. For evening activities, particularly when it is dark, we strongly advise all students under 18 to travel back to their homestay with a friend living nearby.

ELC organises one-day guided excursions at weekends to destinations such as London, Oxford, Cambridge, Bath & Stonehenge and Canterbury for Sussex and North Wales, Liverpool, Manchester for Chester. These are supervised by ELC staff but there will normally be some time (2-3 hours) where the students will be unsupervised, for example to go shopping. We require that all students provide the tour leader with their mobile phone number and take particular care to ensure that under 18s have the mobile phone number of the tour leader in case of emergency.

ELC also sells tickets for excursions run by local companies (Discovery Tours in Sussex, Busybus in Chester) which organise full day and weekend excursions for students from other local language schools. These companies have carried out their own risk assessments and say they follow best practice in particular with regard to students aged 16 and 17, and have carried out DBS checks of drivers. However, these students are treated as adults. As with excursions organised by ELC, one-day excursions organised by these companies are guided but there will normally be some time (2-3 hours) where the students will be unsupervised, for example to go shopping. These companies also organise excursions that involve 1 or 2 nights away (e.g. to Scotland, to Manchester & Liverpool).

## **Supervision on social events and excursions**

Prior to booking the course, such students (and their parents) are made aware of the level of supervision and the extent of ELC's responsibility. On arrival students are given guidelines appropriate to their age, level, course type etc, regarding what they may do outside of scheduled class or activity time and without supervision. (e.g. ELC's Under 18s Policy and Procedure, Student Welcome Packs, Induction and Parental Consent, weekly social programme).

Appropriate adult staffing supervision ratios are considered and set according to the activity type and the age, gender, interests and needs of the students, and set out in risk assessments. As a general rule where activities involve under students aged 16 and 17 attending an adult programme, the ratio is 1:15-20 under-18s and special provision is made for those students under-18 as required.

## **For closed groups under 16 and on the Teens Vacation Course in Chester**

ON -SITE (In school + regular local facilities)

Supervision ratios at any one time 1: 15

OFF -SITE EXCURSIONS

Supervision ratios at any one time from 1: 10 to 1: 15

**For groups of students under the age of 14 in closed groups**

ON - SITE (In school + regular local facilities)

Supervision ratios 1: 15

OFF –SITE EXCURSIONS Supervision ratios at any one time 1: 8 to 1: 15

Students aged 12-14 1:10 to 1:15

Students under 12, 1:8

Provision will be made for these minimum supervision ratios to be exceeded as appropriate in order to ensure the safety and welfare of the students. Risk assessments for adult excursions including students under the age of 18 will address any supervision concerns.

We also accept 16 and 17 year olds in closed groups accompanied by group leaders. In such cases, depending on the activity, the ratio is 1:15-20 with group leaders forming part of the supervision ratio (Group leaders are not to be responsible for students other than those in their group).

At least two supervisory adults (including where appropriate group leader supervising his or her own students) will participate on any off-site school-organised activity

For groups with students from different categories the requirements of the youngest age category will normally be applied to the supervision ratio for the group as a whole.

Group leaders are fully briefed on arrival and made clear of their responsibilities. Clear systems of communication are established between group leaders, ELC management and Social activities organisers, with the leaders receiving regular support throughout their stay from management and social activities organisers. Where a group makes its own arrangements for activities outside of the school, the school will be made fully aware of the plans and will assess them from a safeguarding perspective

**Specialist Qualifications**

The Social Activities Organiser has first aid training but no other specialist qualifications. Activities requiring specialist qualifications or training (e.g. kayaking, horse-riding, etc) are out-sourced to external providers who have suitably qualified staff and meet all legal requirements in terms of risk assessments, premises, etc.

**Child Trafficking and Sexual Exploitation**

Young people under 18 entering the UK might be at risk of trafficking and possible sexual exploitation.

There are a number of precautionary measures that school staff will undertake to assist in preventing this:

- The school will be wary of any unusual circumstances in the application process which raises suspicions that a child might be being trafficked into the UK.
- When a child is met at the airport, the school will not allow the child to be met by anyone else unless this has been fully agreed and vetted in advance. If a young person under 18 does not appear for their transfer on arrival, or does not turn at their homestay unexpectedly, the school will fully investigate and, if necessary, inform the police.

- If any staff or homestay are suspicious that a young person (especially under the age of 18) is being inappropriately approached during their stay in the school, the police will be notified immediately.

### **Personal data and safeguarding**

The principle set out in Keeping Children Safe in Education is helpful:

*“Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.”*

Further information about how the school manages personal information, and special measures for data held about students under the age of 18, can be found in the school’s Privacy Policy.

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# Disclosure & Barring Service Policy

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## 1. Introduction

- 1.1 The English Language Centre Ltd (ELC) has responsibility to provide a safe learning environment for all students and staff but especially for students under the age of 18 and vulnerable adults.
- 1.2 ELC will use DBS Disclosure as part of a range of options for assessing the suitability of those who have contact with students under the age of 18 and vulnerable adults as part of ELC activities.
- 1.3 ELC makes and obtains decisions based on information provided on DBS disclosures in accordance with the Data Protection Act, the DBS Code of Practice and the Independent Safeguarding Authority advice.

## 2. General Principles

- 2.1 All people who work for or on behalf of the school and who are likely to have unsupervised access to under-18s or vulnerable adults as part of ELC activities should be subject to checks as to their suitability for this type of access.
- 2.2 The school recognises that DBS and police checks are not the only safeguarding measure that organisations should apply at the point of selecting an individual to work closely with children. Therefore, for new appointments to staff and homestay roles, the school always takes up references and, for employees or volunteers checks an individual's employment history and any gaps in an applicant's CV. References for any person likely to have contact with under 18 year olds will include a question about their suitability to work with young people under the age of 18. There is also a robust set of procedures for following up any concerns, as set out in the school's Child Protection Policy.
- 2.3 ELC obtains an enhanced DBS disclosure and prohibited list disclosure for all types of roles that involve 'regulated activity' of a 'specific nature' (e.g. teaching, training, care, supervision, advice, treatment or transport) or in a 'specified place' (e.g. school) of under 18 year olds and vulnerable adults.
- 2.4 ELC encourages all of its staff to subscribe to the DBS update service, and will pay the annual fee on production of a receipt. Where staff are subscribed to the update service, a check will be made at least annually that the DBS status remains satisfactory.
- 2.5 For staff or volunteers working in a non-regulated role in the school, the DSL will carry out a risk assessment to determine whether a DBS check should be carried out.
- 2.6 Any person who is working in a role as outlined in 2.3 above on behalf of the school for whom a safeguarding concern is raised that leads to further action will be reported to the Independent Safeguarding Authority as required by law.
- 2.7 These checks will cover all ELC staff, all homestay providers of accommodation for under-18 year olds (covering the household) and service providers (e.g. taxi companies, coach/bus companies, tour providers).
- 2.8 ELC will ensure DBS checks are obtained prior to appointments being confirmed. ELC will not accept previous DBS checks for staff carried out by another organisation unless a safeguarding risk assessment is carried out by the line manager which includes either:
  - the prospective employee has signed up to the update service and the check is clear.
  - the prospective employee or homestay host has a DBS from another organisation dated within the last 3 months and the applicant will perform the same role. In this case, the line manager will provide a safeguarding risk assessment and request a Barred and Prohibited List check where relevant.

- 2.9 In the case where ELC has applied for a new check on a prospective employee and is still awaiting its return by the time the prospective employee is due to start, a safeguarding risk assessment will be carried out by the line manager. The risk assessment can take into account: previous DBS from other organisations, references, results from Barred & Prohibited List checks, the nature of their work and previous work records with ELC if any. The risk assessment will address how supervised contact with under18s will be managed. The safeguarding risk assessment must be authorised by the DSL or ADSL before any appointment is made.
- 2.10 Where an employee has previously worked overseas, they must provide an overseas police check from the last country they worked in, the first time they are appointed and every subsequent three years. Where seasonal staff return to ELC after working overseas, a reference from their most recent employer must be provided. If the applicant worked in the EEA state sector, an EEA prohibited list check will be requested.
- 2.11 If an ex-employee returns to work after a period of 12 weeks or less, references and a declaration covering this period will be requested. No enhanced DBS check will be requested if the ex-employee's most recent DBS check date was within the last 3 years.
- 2.12 When running DBS checks for homestay providers, ELC will ensure the check is based on a home based role so police can check information on other adult residents at the same address. ELC will always ensure a DBS check is in place before placing an under 18 with a host. As the role is home-based, guidance will be provided to host on recommended conduct at home including recommendations for online safety at home.
- 2.13 A responsible adult, known to the school and who has undergone a satisfactory DBS check as above will always be present overnight and will normally be present when students under 16 are home.

### **3. Validity of DBS Disclosures**

- 3.1 There is no period of validity for a DBS disclosure. Technically, it is out-of-date on the day that it is issued as a new or further criminal conviction, caution, etc. may be recorded against the individual at any time after the issue date.
- 3.2 ELC normally requires a DBS disclosure every 3 years from the initial DBS at recruitment.
- 3.3 In addition, ELC requires all staff and homestay providers to make an annual declaration of their suitability to work with under-18 year olds, and service providers to provide written evidence that their staff have undergone satisfactory DBS disclosure within the last 3 years.

### **4. Usage and Storage of DBS disclosure information**

- 4.1 ELC complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of DBS disclosures and disclosure information.
- 4.2 DBS disclosure information is passed only to those who are authorised to receive it in the course of their duties, i.e. those whose jobs deem it essential.
- 4.3 Information disclosed as part of a DBS check will be treated as confidential. It is an offence for information in a Disclosure to be passed to anyone who does not need it in the course of his/her duties.
- 4.4 If an enhanced disclosure is not clear, the CEO, Centre Manager or DSL will meet confidentially with the person (in the case of homestays with the Student Services Manager or Deputy) to review the disclosure and make a written risk assessment as to their suitability for the role. The CEO, Centre Manager or DSL will request to see the original certificate listing the convictions, no photocopied certificates will be accepted. They will then complete a safeguarding risk assessment which takes into account the seriousness and natures of the offence, as well as the age and frequency of any offence. The safeguarding risk assessment must be authorised by the DSL or DSP before any appointment is made.

- 4.5 ELC maintains a record of those to whom disclosures or disclosure information has been revealed.
- 4.6 The photocopying of any DBS Disclosure is strictly forbidden by the DBS.
- 4.7 ELC does not keep disclosure information for any longer than is necessary, generally up to 6 months.
- 4.8 ELC will keep a record of the date of issue of a disclosure, the name of the subject, the type requested, the reason for which it has been requested, the unique reference number and the details of the recruitment decision taken. All employee data will be kept securely on a Single Central Register

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# Prevent Policy

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## Introduction

The English Language Centre has responsibility to provide a safe & healthy learning environment for all students and staff but especially for students under the age of 18 and vulnerable adults. As part of this broader context, ELC recognises its responsibilities under the Counter Terrorism and Security Act 2015 to help prevent people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways expressed in this policy document and within the contexts in which we operate.

## Contexts

ELC is a multicultural and international community that actively promotes inter-cultural understanding and encourages an appreciation of the different ways we all live, think and learn. We will endeavour to educate students about acceptance and tolerance of a range of views, that people think differently and believe different things, all of which are acceptable as long as these views and beliefs are reasonable and do not extend to hurting or denigrating those with different beliefs.

Courses at English Language Centre schools are aimed at people from overseas who have a need to develop their competence in the English language, whether that is for work, future study at a UK university, travel or personal advancement. Our students are primarily adults aged over 18 but we do welcome students aged 16 and 17 and under 16. ELC Chester offers a Summer Course for Teenagers (ages 13-16) at a different site within Queens School grounds.

Our students come from a wide range of ages, cultures, religions and backgrounds. Our students may study with us for 2 weeks up to 44 weeks. ELC exists to give all our students the best teaching and learning facilities we can. We are committed to providing students with excellent courses in a warm, friendly and professional environment, as well as caring for every aspect of their stay.

## Definition of Terms

**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 the mind.

**Extremism \*:** holding extreme political or religious views which may deny rights to any group or individual. Can be expressed in vocal or active opposition to

**Core British values:** including

- (i) democracy
- (ii) the rule of law
- (iii) individual liberty
- (iv) respectful tolerance of different faiths or beliefs.

\* NB: **extremism** can refer to a range of views, e.g. racism, homophobia, white supremacism, right-wing ideology, as well as any religious extremism such as islamophobia.

## General principles

The main elements to our policy are:

- strong leadership to ensure that our Prevent Duty is met and that all stakeholders are aware of their obligations
- appointing sufficient and suitably-trained staff to provide support and guidance to stakeholders
- assessment of risks and drawing up an action plan at least on an annual basis
- working with local partners

- education and training for staff, students and other stakeholders
- having clear procedures for reporting and recording concerns about vulnerable individuals, and making referrals

### **Designated Members of staff for Prevent**

The CEO has overall responsibility for ensuring ELC's Prevent Duty is met and as such has responsibility for reviewing and delivering the prevent risk assessment/action plan, policy and procedures.

Key personnel and responsibilities:

#### **Senior manager with overall responsibility for Prevent:**

Phil Hopkins (CEO)

#### **Designated Lead Person for Prevent**

Simon Dooley (Centre Manager) in Brighton  
 Rachel Connabeer (Centre Manager) in Chester  
 John Veale (Centre Manager) in Eastbourne

The Designated Leads cover for each other

#### **In Brighton:**

In the absence of the above, the following person can substitute  
 Karen Hoyle (Head of Accommodation & Welfare) – trained to Safeguarding Specialist (level 3)

#### **Staff who can deal with day-to-day issues welfare and safeguarding (including Prevent duty)**

Mita Ghelani (Accommodation & Welfare Officer, Brighton) – safeguarding Advanced (level 2)

#### **In Chester:**

In the absence of the above, the following person can substitute  
 Courtney Greene (Accommodation & Welfare Officer) - trained to Safeguarding Specialist (level 3)

#### **Staff who can deal with day-to-day issues welfare and safeguarding (including Prevent duty)**

Kat Mickleson (teacher and Centre Manager Summer Course for Teenagers course)  
 Lucy Swinnerton, Administrative Assistant

#### **In Eastbourne:**

In the absence of the above, the following person can substitute:  
 Simon Dooley (Centre Manager ELC Brighton) - trained to Safeguarding Specialist (level 3)  
 Should both the Centre Managers be absent at the same time, Chris Robinson, Academic Manager, will cover.

#### **Staff who can deal with day-to-day issues welfare and safeguarding (including Prevent duty)**

Alfredo Mezzela ( Accommodation & Welfare Officer) – trained to safeguarding Advanced (level 2)  
 DSP

### **Risk Assessment and Management**

In order to have an effective policy it is important that all staff including homestays understand the ways in which risks may arise, how warning signs may manifest themselves and how to react when they do.

**Risk assessment** - The designated Prevent lead has produced a risk assessment/action plan showing what is already being done and what still needs to be done. This is reviewed and updated at least annually.

### **Understanding risk of extremism**

Staff, students & other adults (group leaders, homestays etc) may arrive at school already holding extremist views. Or, whilst part of the school, they may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials via hardcopy or online, inspirational speakers, friends or relatives being harmed, social networks.

People who are vulnerable are more likely to be influenced. Their vulnerability could stem from a range of causes: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime or discrimination, bereavement

### **Ways to counteract risks**

ELC will promote a safe and supportive international environment with clear expectations of accepted behaviours and those, including radicalisation and extremism that will not be tolerated.

ELC will promote inter-cultural understanding and encourage an appreciation of the different ways we all live, think and learn, and core British values of democracy, rule of law, individual liberty and respectful tolerance of different faiths or beliefs through documents given to students, notices around school, behaviour towards each other via classes on British culture and via curriculum. Our approach is to educate students about acceptance and tolerance of a range of views, that people think differently and believe different things, all of which are acceptable as long as these views and beliefs are reasonable and do not extend to hurting or denigrating those with different beliefs. Where appropriate, lessons will develop critical awareness and thought to counter accepting extremism without question, especially of online material.

We expect staff and homestays to challenge radical or extremist views in any context (formal or informal). In most situations this would require an immediate response, referring to the international environment of school, and tolerance expected, then reporting concerns to designated members of ELC staff.

ELC firewalls and group policies for internet and WiFi access are set to prevent access to extremist / terrorist websites and use of social networks to exchange extremist/terrorist views.

Any guest speakers invited to present to staff and/or students are carefully vetted and usually are invited to present in furtherance of the charity's objects or work in achieving those objects. All notices and material from external people must be approved by the CEO before they can be distributed. Any outside organisations wishing to rent rooms outside school hours must personally meet ELC staff before any agreement is reached and must provide 2 references which will be followed up.

Staff and homestays will be encouraged to get to know their students, their home circumstances and friendship groups. Through knowing students well, it is easier to spot changes in behaviour. Staff and homestays will be to be observant and vigilant in noticing any signs of radical or extremist behaviour.

Accommodation & Welfare staff and all staff and homestays will work hard to support any students identified as vulnerable.

## Training

ELC recognises the importance of training in enabling staff and homestays to perform their Prevent duty. For staff, this training will consist of documents, online and face-to-face training to ensure that all staff:

- understand context and expectations of Prevent
- their duty to implement the policy
- understand terminology and risks associated with radicalisation and extremism
- how to identify and support vulnerable students
- ways the school will counteract the risks
- signs to notice that may cause concern
- know the lead Prevent person and procedures for communicating concerns
- know the importance of their own behaviour and professionalism in (a) being exemplars of British values and (b) not discussing inflammatory subjects with students (Code of Conduct).

Training materials will be tailored to ensure that homestay hosts understand the sections of the policy they need to be aware of.

Students and group leaders will be made aware of key parts of the policy:

- understanding terminology
- importance of maintaining a supportive and tolerant society within school
- what core British values are and why they are considered important
- that they must report any concerns/incidents, and procedure for that.

## Signs that may cause concern

Students talking about exposure to extremist materials or views outside school. This information must be passed on and reported to the relevant local authority.

- Changes in behaviour, e.g. becoming isolated
- Fall in standard of work, poor attendance, disengagement
- Changes in attitude, e.g. intolerant of differences /having closed mind
- Asking questions about certain topics (e.g. connected to extremism)
- Offering opinions that appear to have come from extremist ideologies
- Attempts to impose own views/beliefs on others
- Use of extremist vocabulary to exclude others or incite violence
- Accessing extremist material online or via social network sites
- Overt new religious practices
- Drawings or posters (e.g. in accommodation) showing extremist ideology/views/ symbols
- Students voicing concerns about anyone

NB: Any concerns relating to a **person under 18** are **safeguarding** issues and should be dealt with by safeguarding staff (if different from Prevent staff) and, where necessary, the LSCB contacted.

## Working with local partners

The designated Prevent lead has established, and will maintain, contact with the local police and local authorities.

**ELC Brighton:**

**Prevent Officer for Brighton and Hove**

Tom Morvan-Toone [thomas.morvantoone@sussex.pnn.police.uk](mailto:thomas.morvantoone@sussex.pnn.police.uk) mobile 07786114158

**ELC Chester:**

**Prevent Team**

For informal discussion telephone 01606 362121

Andrew McIntyre – Prevent Coordinator, Cheshire Police. HQ Office Line: 01606 362147.

Email: [McIntyre@cheshire.pnn.police.uk](mailto:McIntyre@cheshire.pnn.police.uk).

**Prevent Contact in Chester**

[CTPNW.Merseyside@Merseyside.pnn.police.uk](mailto:CTPNW.Merseyside@Merseyside.pnn.police.uk) landlines Cheshire 01606 365 986 or

Merseyside 0151 777 8125

**ELC Eastbourne:**

**Prevent Officer for East Sussex**

Naomi Watkinson [naomi.watkinson@sussex.pnn.police.uk](mailto:naomi.watkinson@sussex.pnn.police.uk) mobile 07788566585

**The East Sussex local authority Prevent Lead**

Louisa Havers [louisa.havers@eastsussex.gov.uk](mailto:louisa.havers@eastsussex.gov.uk) landline 01273 482117

**National Police Prevent Advice 0800 011 3764**

**How and when to react to concerns**

It is essential that any concern or incident, however small, be reported to a line manager who will follow the appropriate course of action. In all cases these will be dealt with sensitively and carefully with confidentiality assured for the person reporting a concern.

The line manager will then make an assessment of the situation and involve the Accommodation & Welfare or Prevent Lead as appropriate.

In the case that the Prevent Lead is involved, a decision will be made as to whether the matter should be taken further. This will be usually be done where it is believed there is a risk of exploitation by extremists.

Where the Prevent Lead decides that further action is necessary, this may be to seek further advice from the local Prevent team.

In all cases a record should be written up and kept in the confidential file

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# Code of Conduct for Staff

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## Introduction

Our students come from a wide range of ages, cultures, religions and backgrounds. ELC exists to give all our students the best teaching and learning facilities we can. We are committed to providing students with excellent courses in a warm, friendly and professional environment, as well as caring for every aspect of their stay. We understand the importance of our staff in creating such a professional environment and we are committed to their care, training and support. ELC also recognises that it has a responsibility to provide a safe & healthy learning environment for all students and staff but especially for students under the age of 18 and vulnerable adults.

## Purpose, Scope and Principles

The aims of this Code of Conduct are:

- to both support and protect students and staff
- to set boundaries and give clear guidelines on what is expected of ELC staff in order to help create the warm, friendly and professional environment we aspire to, both in general and with specific reference to under-18s and vulnerable adults

This Code of Conduct applies to all staff who are employed by the organisation including volunteers and work experience staff. All staff have a key role to play in defining how we are as an organisation and how we are perceived by our colleagues, students, clients and all other stakeholders. In addition to our academic and care commitments to students and staff, we aim

- to actively promote inter-cultural understanding
- to encourage appreciation of the different ways we all live, think and learn
- to treat everyone with respect and dignity

As such, whilst maintaining the identity we wish to have and complying with our statutory and legal obligations, we should be sensitive to different cultural backgrounds and expected behaviours. All students are clients of ELC and should be treated with respect and professionalism. In day to day life at school, staff can become privy to sensitive, private or confidential information regarding a student. ELC expects all staff to exercise great care with any personal information and to divulge only to relevant staff or to their line manager if they have any concerns for the student.

Even if it were desirable, it would be impossible to write up an exhaustive list of rules prescribing staff behaviour. We trust staff to make professional and common sense decisions. As a general guideline we would expect students to be treated in the way that we would wish our own friends, colleagues and family members to be treated in a foreign environment in which they are likely to be more vulnerable and lacking in awareness of the surrounding environment, language and cultural norms. If you have any questions or doubts about points in this Code of Conduct, or matters not covered here, please speak to your line manager for guidance.

## Under 18s (and vulnerable adults)

Separate Safeguarding & Child Protection policies and procedures have been developed and are available on our website, from line managers and provided as part of training. In considering the vulnerability of adults, age is not necessarily the determining factor. It could be said that anyone of any age with a limited level of English in the UK for the first time is vulnerable so some of the following may equally be relevant to 18+

This section of the code of conduct is written to give clear and formalised guidance to school staff on creating a safe school culture for under 18s. This includes protecting both adults and students

under 18 from behaviours or actions that might be misconstrued, and to ensure that staff do everything reasonable in their power to ensure the safety and well-being of under 18s studying at the school.

In all we do, the yardstick we will use is that of adopting behaviour that we would expect a responsible parent to adopt, and treating students under the age of 18 in the way we would wish our own family members under the age of 18 to be treated in a foreign environment. Young people may well look up to staff and look to them for clues about how to behave in a new environment: hence it is important that staff consider this in their behaviour and provide an appropriate role model for them where appropriate. This might include how they talk to others, which subjects are appropriate to talk (or joke) about, and how they dress and the way this might be read by younger students.

### **Child protection**

We have a legal and moral duty to protect our students from the risk of sexual, physical, financial and emotional abuse, and neglect.

School staff are in a position of trust as defined in the Sexual Offences Act 2003. Staff engaged in any form of sexual contact (e.g. kissing, touching) with students under the age of 18 are breaking the law even though the legal age of consent is 16. This applies to all adults working or volunteering with under 18s.

If staff or other stakeholders are concerned that a colleague or other person working with under 18s is not acting within the letter or spirit of this code of conduct, there is a legal obligation to report this to school management.

### **Interaction with under 18s**

The school expects staff to behave with common sense to ensure the safety and well-being of young people under the age of 18. Students under 18 will be clearly identified on class lists where they are participating in adult courses. They will also be identified in out of school activities. For the purposes of this code of conduct, here are a few particular areas to consider:

1. Staff should avoid situations where they are left alone. If a confidential meeting is necessary, it should be undertaken with a door open close to other staff or adults.
2. Staff should be as positive and even-handed with under 18s as possible, using praise where appropriate and ensuring that all of the students are treated equally and fairly.
3. Staff should as far as possible avoid any physical contact with students under the age of 18, particularly contact which might be misconstrued by the under 18 or by someone else witnessing it. Clearly physical chastisement is illegal and any incidence of a member of staff using physical chastisement would result in dismissal and the police being informed.
4. Staff should be especially careful in any dealings with under 18s they might have in a social setting outside of the school, particularly when alone. These might easily be misconstrued by the under 18 year old(s) or by others.
5. Staff should neither explicitly nor implicitly condone the breaking of the law, particularly in regard to drinking alcohol, taking drugs, smoking, sexual activity or extremist views/behaviour. Any concerns in this area should be reported immediately to the school's CEO.
6. Any sexual relationship between an adult who has a position of care and responsibility in the school (including temporary summer staff) and an under 18 year old is illegal.
7. On excursions and activities organised by the school, due regard should be given to the risk assessment document and in particular to any special measures adopted for under 18s on that trip. In general, it should always be ensured that under 18s are with at least 2 other people at all times, and, if necessary, with the member of staff leading the trip.

8. Staff should wear their lanyard at all times when working in or for the school. This is so that all students, but particularly under 18s, can identify members of staff

### **IT, the internet, social networks and other technology**

While access to the internet and phones are wonderful ways for young people to stay in touch with their friends and family, they also provide opportunities for abuse and inappropriate behaviour. In particular, there are risks to young people through cyber bullying (possibly by their peers), exposure to radical/extremist views, grooming by adult sexual predators, and downloading of illegal or copyrighted materials and possibly computer viruses. The school has therefore established the following guidelines:

1. Staff should not as a matter of course give out their personal mobile number, email address, Facebook contact details to students, especially those under 18. The exceptions to this may be if a member of staff is carrying out ELC business – for example, taking a group of students out of school and for safety concerns they give all students their number. ELC can provide official email addresses for staff, to receive homework for example. If Facebook is used for ELC business, for example a 'closed group' for an exam course, then set up a separate account and advise your line manager.
2. Inappropriate access to websites should be reported to the CEO. Inappropriate websites include pornographic sites, excessively violent videos and games, websites promoting extremist/terrorist views and some age-inappropriate social networks and chat rooms. Most inappropriate sites are blocked on the school network, but may be accessed by students in a home setting or possibly by bypassing safeguards. Therefore, all staff are asked to be vigilant regarding use of the internet by under 18 year olds, and if there are concerns about content, excessive use or possible grooming or abuse, they should be reported and/or action taken to remove access.
3. Where possible, in a homestay access to Wi-Fi should be restricted, particularly after bedtime, to ensure that young students are not distracted and get enough sleep.
4. All students are made aware of the school's IT policies at induction and these are displayed prominently in the school and in particular in the computer rooms. Groups of younger learners, for example teens, will have a special session as part of their induction on e-safety.
5. Staff should not take photos of any students on their own personal devices unless they have been specifically asked to do so for ELC social media use. If this is the case, these photos should be deleted as soon as they have been forwarded to the person dealing with social media in the school. Staff can have their photo taken with students on the students' own devices if requested or on devices belonging to the school for social media purposes.

### **Accommodation specific issues**

Please note: all students under the age of 18 are required to stay with a homestay recruited and inspected by the school, or with a close relative or private fosterer arranged by the parents or guardian of the child.

In addition to the above guidelines, homestay providers should be aware of the following areas:

- 1) Respect the privacy of the individual in their room (including from other children and pets who may live in the household), and in particular always knock and attempt to gain permission to enter the room before entering a bedroom or bathroom.
- 2) Do not allow adults to be alone in a bedroom or bathroom with a child unless the door is open and other adults are present in the house.

## Transport and other contractors

- 1) All contractors working for the school to transport children and contractors who regularly do work in the school will provide annual written evidence that their staff have been properly DBS checked. If a contractor working in the school is not able to provide this evidence, they will either be supervised or will not be allowed into areas where they might encounter students under the age of 18. 4.4
- 2) If for any reason a member of staff is required to transport a child in your car or the school minibus:
  - Ensure seatbelts are used, and that children under 16 sit in the back if possible.
  - If you are dropping off children after an event, try to keep a pair of students at the same address as your last drop off: avoid being alone in a car with a child as far as possible.
  - Ensure you have appropriate insurance cover.

## Staff Dress Code

All staff are expected to be of clean appearance, and smartly dressed in a way that is appropriate for the situation in which they are working and that they present a professional image and one that reflects sensitivity to customer perceptions. Shorts and beach sandals/flip flops would not normally be appropriate. Jeans and trainers should be smart. Clothes should not be frayed, ripped or have holes in them. Thin strapped vest tops, off the shoulder and strapless tops would not be appropriate.

## Personal Relationships

We understand that personal relationships may develop at work: with colleagues, clients, students or people that you may meet whilst on ELC business. Such relationships need to be handled sensitively. Particular issues can arise when the two parties are of different seniority levels or working within the same area. Resentments can arise if it is felt that an individual is being treated differently, and if a relationship should end it can be difficult for the two parties to continue working with each other.

It is essential that there is a harmonious and professional atmosphere amongst the staff at all times. You are expected to ensure that any personal relationships do not interfere with this. Personal relationships between members of staff are, in the end, a private matter, however in order to avoid misunderstandings and potential problems, it would be a courtesy to inform your line manager and you are encouraged to do so.

In the same way, you are expected to behave positively and with professionalism in your dealings with colleagues even if you do not get on with them personally.

Personal relations with students and clients are particularly sensitive. Although most people studying here are adults, you must at all times remember that you may not be regarded as having equal status even if that is your perception. This will apply with particular force if you are a teacher and the individual concerned is in your class. While normal social friendliness is certainly encouraged, more intimate relationships are often inappropriate and if you perceive that one is developing you are urged to discuss this with your manager or with another senior member of staff. Please also remember that all staff are in a position of authority from the perspective of students of all ages. Relations with students should be professional and respectful at all times.

**Under no circumstances would an intimate relationship between an adult member of staff and a student, co-worker or volunteer in the school under the age of 18 be appropriate or legal. If it**

**becomes apparent that one has developed, it would be seen as a serious breach of the school's policy in this area and will lead to immediate dismissal and a report about the individual adult being made to the relevant authorities.**

### **Publicity and digital content**

In addition to our websites, brochures and promotional materials, digital media has a much greater impact on how the organisation is perceived and can have a significant impact on how a potential client or current stakeholders (e.g. parents, sponsors) regard us. Although we actively encourage digital content (YouTube, Facebook, twitter, Instagram), it is essential that these serve only to enhance the school's reputation with high standards of content and presentation. We also request that any such content that represents the school, should be approved by a line manager and use official ELC channels.

### **Socialising with students and clients outside work**

It is part of the nature of our industry that staff, and particularly teaching staff, social organisers and guides, may socialise with students and clients outside of the school setting. In some cases, this may be an organised ELC activity. In other cases, it may be an informal gathering of, say, a teacher and their main class, or lunch/dinner with a client as part of a marketing event. In all cases, these will be perceived as an ELC event and as such staff should represent ELC in a professional manner and neither explicitly nor implicitly condone the breaking of the law, particularly in regard to drinking alcohol, taking drugs, smoking, sexual activity or extremist views/behaviour. Please see above for guidance with regards to interaction with under-18s.

### **Misuse of drugs and alcohol**

It would be considered a disciplinary offence for staff or students to be on ELC premises and/or, in the case of staff, carrying out official duties when under the influence of alcohol or non-medically prescribed drugs.

If you have good reason to suspect a student of taking/dealing in drugs whether on ELC premises or outside, please advise your line manager who will follow it up through the appropriate channels.

### **Harassment and bullying**

In order to achieve a safe, warm, friendly and professional environment for students and members of staff ELC is committed to ensuring that everyone is able to work and to participate in the life of the school without fear of harassment, bullying or intimidation. Everyone at ELC has a part to play by ensuring that their own behaviour, whether intentional or unintentional, does not constitute harassment. ELC will take action against inappropriate behaviour which shows lack of respect for others or which leads people to feel threatened (see Policy on Abusive Behaviour).

### **Radicalisation and extremism**

ELC is a multicultural and international community that actively promotes inter-cultural understanding and encourages an appreciation of the different ways we all live, think and learn. We will endeavour to educate students about acceptance and tolerance of a range of views, that people think differently and believe different things, all of which are acceptable as long as these views and beliefs are reasonable and do not extend to hurting or denigrating those with different beliefs.

While this is unlikely at ELC, if anyone in the school suspects that someone is expressing views that might hurt or denigrate those with different beliefs, this should be brought to the Centre Manager's attention so that any action can be considered. This is particularly important if it

appears that this person is attempting to radicalise other students with these views. In extreme cases, the Police may need to be notified.

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# Policy on Under 16 Students

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## Introduction

Our courses and teaching are designed to provide effective training for students who need English for their work, study or travel. We endeavour to treat everyone equally and with respect, understanding that everyone is unique with different needs and different goals.

## Principles

On General English, Summer Vacation and Examination courses, we reserve the right to accept students who are 15 where they come as part of a group with a leader who will take responsibility for their welfare outside of class times and during activities. Applications from students outside the published age limit are treated on a case-by-case basis. ELC will accept these bookings for the following reasons:

- These students will already know other members of the group and will already have studied with them at school in their own country. It would therefore be discriminatory to bar such students from studying with their classmates in the UK.
- If the no U16 rule were applied rigidly on the General English, Summer Vacation, Examination courses, there could potentially be U16 students who would arrive in the UK with the rest of the group who would then be barred from attending the course. This would raise obvious welfare issues. It is easier to monitor the welfare of these students within the school environment.
- ELC practises safer recruitment. All staff are DBS checked and interview and reference requests explore the organisation's and staff member's responsibilities to younger learners
- We also accept students aged 12 to 16 in closed groups. In cases where there are students aged under 16, we will take additional safeguarding measures. It is accepted that it is difficult to apply different rules to groups containing members from different age groups. Groups containing members who are both under 16 and over 16 will be judged on a case-by-case basis, but in all cases the DSL should be satisfied that all arrangements in place do not compromise the safety of any students under 18.

## Private fostering

Local authorities in Brighton, Cheshire and East Sussex require notification if any person under the age of 16 is placed with a local family for more than 27 nights, and for the homestay family to be registered as a private fosterer. The school has a policy of not providing accommodation for any student under the age of 16 for more than 27 nights. The school does not offer courses to under 16 year olds that require stays of more than 27 nights.

## Procedure for under 16s

The booking will only be accepted if the group is accompanied by a Group Leader.

## At school

- It is explained to Group Leaders pre-arrival and during their induction that relevant Group Leader(s) must monitor, and be responsible for, any U16 student in their group during breaks and lunch times and after lessons finish. NB Common areas of the school are regularly patrolled by Academic Management during these times.
- Key staff receive a full (password-protected) list of all U18 students, with ages specified, on a weekly basis.

- As part of their induction on the first morning all U18 students receive additional information about their welfare and ensuring their safety. They are introduced to an Accommodation & Welfare Officer and given advice about who to speak to if they have concerns.
- Closed groups of U16 students are required to use the school's transfer service which ensures they are assisted with safe arrival and departure, unless it can be demonstrated to the satisfaction of the DSL (and documented) that appropriate alternative safe arrangements are in place. Induction/welcome are talks tailored to their group. They may also have separate social activities.
- Groups of students under the age of 16 normally follow a slightly different timetable to main school students so that break times do not overlap with the adult students who are in the school at the same time.
- Students on the Summer Course for Teenagers at the University of Chester are supervised at all times on campus. In break times, this supervision is done by Activity leaders employed by the school.
- All students and staff on the Summer Course for Teenagers at the University of Chester wear lanyards so they can be readily identified at all times.
- It is illegal for young people under 16 to smoke in public, and this will be enforced in the school.

#### **In class**

- When placing new students into class, the academic managers will take age as well as level into account.
- Where possible closed classes with under 16s will be placed separate from adult students, in a different building or on a different floor.
- Teachers are made aware of any student who is under 16 (U18 students are clearly marked on class registers).
- Teachers ensure that all class activities, and materials used, are age-appropriate for all class members. Materials refers to course books, supplementary materials, videos, online materials, and any realia brought in by the teacher or other students in the class. The aim is to make sure that U18 students are not exposed to inappropriate materials and where there are 18+ students, they do not feel that they are not studying in an adult class. Unsuitable materials may include, but are not limited to, materials which:
  - contain overly sexual references
  - contain violence
  - include the use of language which may cause offence
- With pair and group work, teachers will take account of the ages and maturity of students working together, matching students appropriately and ensuring all students are comfortable with their pair/group partners.
- All students are expected to attend all classes while studying at ELC. Attendance is monitored and a record kept of lateness and absence. In addition, academic managers check all classes with U18 students within 15 minutes of the start of class. Any absences are followed up immediately by Academic Managers or Accommodation & Welfare Officers, either directly or via their homestay (students under the age of 18 must stay with a host family; they may not take a place in one of the Residences or Student Houses).
- Classes with students under the age of 16 are not allowed to go on class activities out of the school.

#### **After school**

- A responsible adult who has been vetted through the school's DBS procedures will always be present overnight in a homestay accommodating a student aged 16 or under. The school will ensure that students aged 16 and under are not accommodated with other students aged 18 or over.
- Students under 16 can go out unsupervised on Saturdays and Sundays during the day
- Students under 16 cannot go out with friends after dinner unless supervised by a group leader
- Students under 16 can participate in evening activities organised by the School (these normally finish at 9.30-10.00pm) or by group leaders. Students must be accompanied home by a group leader or by taxi. Arrangements are in place for ensuring the safe travel of any students aged 16 and under when returning to their homestay after an evening event. They will return either by taxi, homestay, or by being escorted to the bus station by school staff.
- A student under the age of 16 who is unwell will not be left unsupervised: if the homestay is unable to care for the student, the student will be looked after in school.
- Students under 16 or on the Summer Course for Teenagers in Chester would normally be placed in a shared homestay address and travel together to school on public transport, or on foot or a lift from the homestay. If such a student is placed in a single homestay room, he/she will be placed close to other students who can travel back together.
- For students under the age of 16, or any student studying on the Summer Course for Teenagers, the cost of any excursion programme offered will be included in the overall course fee.

**Additional provisions in place for students under 13 (or for groups containing students under 13)**

- The school would only accept these groups in exceptional circumstances agreed by the Centre Manager and Chief Executive. Special supervision arrangements are made for students under the age of 13 during break times: usually the group leader will be expected to monitor and be present with these students outside of class time and in particular if they wish to go into the city centre.
- Any students under 13 are only accepted in the school if it is agreed that they will be escorted to and from the homestay by minibus, taxi or by the homestay. The cost of this will be passed on as part of the course fee.

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# Whistleblowing Policy

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## "WHISTLEBLOWING" POLICY (Making a Disclosure in the Public Interest)

### Aims

- encourage and enable you to feel confident in raising concerns and to question and act upon any concerns;
- provide avenues for you to raise concerns;
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied with the action taken;
- reassure members of staff that they will be protected from repercussions when raising genuine concerns;
- ensure that all those working for, or on behalf of, the School are aware that they must not treat individual(s) detrimentally because they have made a "qualifying disclosure" under the Act.

### Last Update

- February 2024

### Introduction

ELC is committed to the highest standards of openness, probity and accountability and has systems and procedures in place to ensure this. As an educational charity we have particular obligations to comply with Charity Commission guidelines which include audited annual accounts.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of ELC to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. ELC has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by ELC nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside ELC.

## **Under 18s**

### **Allegations against Staff**

- There may be occasions where a child or young person will accuse a member of staff of physically or sexually abusing them. This may be false or unfounded. However, in some cases the allegations may be true.
- In the event that any member of staff suspects any other member of staff of abusing a student, it is their responsibility to bring these concerns to their line manager or the Chief Executive.
- If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with under ELC disciplinary procedures

### **Scope of Policy**

This policy is designed to enable employees of ELC to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these
- Safeguarding and welfare of all students particularly those under 18

### **Safeguards**

#### **i. Protection**

This policy is designed to offer protection to those employees of ELC who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

#### **ii. Confidentiality**

ELC will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

#### **iii. Anonymous Allegations**

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of ELC.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

#### **iv. Untrue Allegations**

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

#### **Procedures for Making a Disclosure**

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice should be reported to your line manager, Centre Manager or Chief Executive Officer. Complaints of malpractice will be investigated by the Chief Executive Officer unless the complaint is against the Chief Executive Officer or is in any way related to the actions of the Chief Executive Officer. In such cases, the complaint should be passed to the Chair of Governors for referral. Their contact details are available from Sam Woods, Group Finance Manager, ELC Brighton 01273 721771.
- The complainant has the right to bypass the line management structure and take their complaint directly to the Chair of Governors. The Chair of Governors has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.
- The complainant can however directly contact an external organisation such as English UK (see below) or your Local Authority's Designated Officer if the concern is regarding Safeguarding. The NSPCC Whistleblowing Helpline is 0800 028 0285.
- The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. If you would like independent advice at any stage, you can contact the independent charity Public Concern at Work [www.whistleblowing.org.uk](http://www.whistleblowing.org.uk) on 020 7404 6609. They should be able to give you free and confidential advice about how to raise a concern about serious malpractice at work.

If you are still unhappy after contacting the investigating officer, you may also contact our national association, English UK, who can look at your disclosure independently. Their contact details are:

English UK  
 219 St John Street,  
 London EC1V 4LY  
 Tel: +44 (0)20 7608 7960  
 Fax: +44 (0)20 7608 7961

Email: [enquiries@englishuk.com](mailto:enquiries@englishuk.com)      Web: [www.englishuk.com](http://www.englishuk.com)

If there is evidence of criminal activity then the investigating officer should inform the police. ELC will ensure that any internal investigation does not hinder a formal police investigation.

**Timescales**

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

**Investigating Procedure**

The investigating officer will follow the steps as set out in the ELC Disciplinary Procedure.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Chair of Governors

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, ELC recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the industry Ombudsman), or, where justified, elsewhere.