SAFEGUARDING PROCEDURES

INTRODUCTION

The University aims to adopt the highest possible standards and to take all reasonable measures to ensure the risks of harm to the welfare of children, young people and vulnerable adults are minimised. The English Language Centre (ELC) takes its responsibilities to protect and safeguard the welfare of children, young people and vulnerable adults very seriously, whilst recognising that ultimate responsibility rests with parents and guardians (where nominated). The adoption of the ELC’s Safeguarding Procedures aims to facilitate the management of the risk associated with the duty to protect such individuals.

The ELC does not consider its courses appropriate for people under 17 years of age. In view of the adult academic nature of the courses we provide, we consider an ideal enrolment age to be 18 years or above. However, the ELC permits students under the age of 18 to:

- enrol as an individual applicant on its Activate English or Pre-sessional courses;
- enrol as part of a commercial (closed) group of students;
- take the IELTS test at the University of Liverpool IELTS Centre based in the ELC.

We do not accept under 17s on our courses, unless as part of a specially arranged group.

The ELC Safeguarding policy does not pertain to students under the age of 18 participating in in-sessional English (ISE) classes and who are registered on a University of Liverpool academic programme. The care of this group is governed by the University of Liverpool’s Safeguarding Policy as applied by academic departments. www.liverpool.ac.uk/media/livacuk/legal/documents/Policy.on.the.Safeguarding.Of,Children,2014,FINAL,updated,June,2016,Revised,September,2016.pdf

Nevertheless, the ELC Staff Code of Conduct applies at all times.

Emma Bentley, Director, English Language Centre
10th January 2016*

STANDARDS

Students who are under the age of 18 on application to an ELC course or IELTS test must provide a parental consent form when requested at application stage.

Students who are under 18 when they start their programme with the English Language Centre are required to have a UK-based guardian. This should be either a responsible adult who is resident in the UK or someone appointed through a professional UK guardianship agency. If a student chooses to use a professional UK guardianship agency it is the parent’s responsibility to ensure they are happy with the standard of care offered by the guardianship agency. The Association for Education and Guardianship of International Students (AEGIS http://www.aegisuk.net/) accredits guardianship agencies and monitors standards; the ELC recommends that parents use an agency approved by AEGIS.

In the case of students under the age of 18 coming to the ELC as part of a commercial (closed) group, the group must have a named accompanying group leader. All accompanying group leaders must provide a current DBS certificate or equivalent overseas suitability check.

*This document is reviewed annually.
The Social and Welfare Officer, Course Coordinator or member of the ELC Management Team will meet and brief the guardian/the group leader in the first week of study and have at least one follow-up meeting per Stage.

The University is unable to take responsibility for the standard of care provided by external guardianship agencies or group leaders. Parents must satisfy themselves that the services provided by the agency or group leader(s) will meet their child’s needs. If the parent chooses to appoint a responsible adult as a UK guardian, the University will call them to confirm their understanding of the role of guardian. The University may withdraw the offer of a place if we are not satisfied that guardianship arrangements provide a sufficient level of care for the individual.

The English Language Centre requires all applicants who will be under 18 years of age on enrolment to their course to either make arrangements to live with a UK-based guardian, or provide evidence that they have enrolled with a British Council registered accommodation agency. This is checked as part of the student application. The British Council registers accommodation agencies and monitors standards; the ELC recommends that parents use agencies registered by the British Council. An example of such an organisation is Hosts International [http://www.hosts-international.com/](http://www.hosts-international.com/).

If a student chooses to use a British Council registered accommodation agency, it is the parents’ responsibility to ensure they are happy with the standard of care offered by the accommodation agency and must satisfy themselves that the services provided by the agency will meet their child’s needs. The University is unable to take responsibility for the standard of care provided by external accommodation agencies. The University reserves the right to withdraw the offer of a place if we are not satisfied that accommodation arrangements are sufficient for the individual.

In the case of closed groups which include one or more students under the age of 18, accommodation arrangements will necessarily differ from group to group, whilst still providing a safe environment. Closed groups will be required to provide an accompanying residential group leader. All accompanying group leaders must provide a current DBS certificate or equivalent overseas suitability check. Parents will receive detailed information about accommodation arrangements prior to booking.

Under 18s who are registered on a course of study at the English Language Centre are provided with weekly 1-2-1 meetings with the Social and Welfare Officer. In addition, under 18s are given additional advice/guidance on the suitability of particular trips and social activities on offer. As a general rule, any activities provided for the ELC by the Guild of Students require the guardian or other nominated responsible adult to attend also. These students are given an information booklet called ‘Being under 18 at the English Language Centre’ upon their arrival, which includes this guidance as well as practical information about keeping safe and laws in the UK.

Once enrolled on an ELC course, any absence of a student who is under 18 will be followed up immediately by the Social and Welfare Officer.

All permanent members of English Language Centre staff who have regular student contact are required to undergo a DBS (Disclosure and Barring Service) check. This is stated in the job particulars at the point of advert. All permanent staff are also required to attend the University’s safeguarding awareness training once every five years.

In addition, all staff (permanent, fixed term, temporary, IELTS examiners and IELTS test day employees) and student volunteers must adhere to the [ELC Staff Code of Conduct](http://www.hosts-international.com/) and sign a declaration agreeing to do so.

Where U18s are among the student body, they will be placed in classes with ELC tutors who have undergone a DBS check. Where a substitute tutor (i.e. cover) is required for a class attended by an U18, a tutor with a DBS
check will be provided wherever possible. If this not operationally possible, the ELC Staff Code of Conduct ensures standards of care are upheld.

In the case of commercial closed groups with one or more students under the age of 18, all accompanying course leaders will need to provide a current DBS certificate or equivalent overseas suitability check. In the event that the majority of the group are under 18, all ELC colleagues involved in the course will undergo a DBS check (including fixed term and temporary staff). When a fixed term or temporary appointment is made and the applicant’s CV indicates a period of 12 months or more working overseas in the last three years, the appropriate suitability check will be made. Where a substitute tutor (i.e. cover) is required for such a group, any tutor providing cover will hold a DBS check.

All members of ELC staff are reminded on an annual basis of the University’s ‘Code of Practice Regarding Children, Young people and Vulnerable Adults’. The Social and Welfare Officer briefs all tutors as part of tutor induction on a given course.

In the case of IELTS speaking tests, any candidate under the age of 18 is allocated to an Examiner who has been DBS checked. All staff present on IELTS test days must adhere to the ELC Staff Code of Conduct at all times.

**SUMMARY OF ACTIONS**

**Risk assessment**

On registration day, the Social and Welfare Officer conducts a risk assessment at her first meeting with any student who is under 18. In the case of closed groups of under 18s, this is a group risk assessment.

**Dealing with suspicions or allegations of abuse**

Any allegations or suspicions of abuse or concerns about the welfare of a child, young person or vulnerable adult are reported following the guidelines in Appendix Two of the University of Liverpool’s ‘Policy on the Safeguarding of Children, Young People and Vulnerable Adults’ [https://www.liv.ac.uk/legal/policies/](https://www.liv.ac.uk/legal/policies/).

If any member of staff, or student, is concerned about the safety or welfare of a child or young person they should discuss these concerns with the Designated Safeguarding Contact for the ELC (ELC Director). The individual should record their concerns on the University’s Safeguarding Reporting Form (Appendix Three of the ‘Policy on the Safeguarding of Children, Young People and Vulnerable Adults’). A copy of this form should be sent to the Designated Safeguarding Contact (ELC Director) and the University Safeguarding Co-ordinator as soon as possible after the disclosure takes place. The ELC’s Safeguarding Contact is responsible for referring cases to the Safeguarding Co-ordinator.

If the ELC’s Safeguarding Contact and/or the Safeguarding Coordinator is unavailable, for example during an IELTS test or a weekend Social Programme trip, and there is an urgent safeguarding concern, the staff member should contact the University’s emergency Security telephone number (0151 794 2222) and request to speak to Paula Harrison Woods regarding a safeguarding issue. If Paula is not on call on that day, they should contact Careline on 0151 233 3700.

**Dealing with concerns about Radicalisation**

The English Language Centre follows the University’s protocol for dealing with concerns about radicalisation as detailed in the University of Liverpool’s ‘Policy on the Safeguarding of Children, Young People and Vulnerable Adults’ Section 11: [https://www.liv.ac.uk/legal/policies/](https://www.liv.ac.uk/legal/policies/). These guidelines are circulated to all ELC members of staff annually and are referred to as part of staff induction for temporary staff.
ROLES AND RESPONSIBILITIES

The English Language Centre Director, Emma Bentley (ELC Safeguarding Contact) is responsible for:

- Ensuring the University Safeguarding policy is implemented within the English Language Centre.
- Ensuring the ELC Staff Code of Conduct is adhered to at all times in relation to any ELC-affiliated teaching.

The Social and Welfare Officer, Rebecca Gee is responsible for:

- Following up immediately on any absence of a student who is under 18 and is enrolled on a course at the English Language Centre.
- Pastoral care relating to all under 18s who are enrolled on a course at the English Language Centre.
- Briefing parental and nominated guardians on their responsibilities on arrival.

ELC and IELTS Manager, Mark Ingarfield is responsible for:

- Ensuring that the University Safeguarding policy is implemented on IELTS test days.

University Safeguarding Officers

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<thead>
<tr>
<th>Role</th>
<th>Contact</th>
<th>Name</th>
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<tbody>
<tr>
<td>Lead Safeguarding Officer</td>
<td>The Director of Legal, Risk and Compliance</td>
<td>Kevan Ryan</td>
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<tr>
<td>Safeguarding Co-ordinator</td>
<td>The Deputy Director, Student Administration</td>
<td>Dr Paula Harrison Woods</td>
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<td></td>
<td>and Support Division</td>
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<tr>
<td>Deputy Safeguarding Co-</td>
<td>The Head of Counselling and Mental Health</td>
<td>Karen Sheehan</td>
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<td>ordinator</td>
<td>Advisory Services</td>
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Ultimate responsibility for safeguarding lies with the University’s Lead Safeguarding Officer, The Director of Legal, Risk and Compliance Kevan Ryan.
STAFF TRAINING, CHECKING AND AWARENESS-RAISING

Staff training
The following members of staff undergo certified safeguarding awareness training:

- Social and Welfare Officer, Level Two
- Director, Level One (target Level Two)
- Pre-sessional / Activate English Director, Level One
- Activate Co-ordinator, Level One
- Commercial & Quality Director, Level One

Policy awareness raising
The policy is brought to the attention new (and returning) ELC colleagues as part of their induction. The University’s policy and local ELC procedure are also considered at an all staff ELC team meeting on an annual basis. All permanent ELC staff are also required to attend the University’s safe-guarding awareness training and Prevent awareness training.

The policy is brought to the attention of all IELTS test day staff on an annual basis and the document forms an integral part of the induction and training of new staff.

Checking of ELC Staff
All permanent ELC tutors are DBS checked. Under-18 year olds in a given class are highlighted to the respective tutors by the Social and Welfare officer and are indicated on the class register.

Summer staff recruitment
In the summer, given (1) the fact that the vast majority of summer students are over 18 (historically 2 or 3 from a cohort of 550 to 600) are under 18, (2) the large number of tutors recruited, (3) the short term of employment, it is not practical to engage in DBS checking. All tutors, however, must adhere to the ELC Staff Code of Conduct and are briefed on their safe-guarding and Prevent duties as part of their induction. The ELC ensures that under-18 year olds on the Pre-sessional are allocated to DBS checked tutors. The presence of U18s in a class is highlighted to the group tutor by the Social and Welfare Officer and also indicated on the class register. Cover arrangements during the summer period follow the procedure set out earlier in this document.