ELC FRAMEWORK FOR SAFEGUARDING, PREVENT AND CARE OF UNDER 18s:

STUDENT SUMMARY

This summary is provided to help ELC students (and their parents, guardians and sponsors) understand the level of care that the ELC commits to provide as outlined in the ELC FRAMEWORK FOR SAFEGUARDING, PREVENT AND CARE OF UNDER 18s. For more information on any of the sections below, you should refer to the full ELC Framework. Use the Table of Contents to help you find the information you need.

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Last Updated: 13/03/2018
This Framework is reviewed at least once annually or in accordance with changes to national or institutional policy, changes to staffing, or in view of 'lessons learned'.
PURPOSE

The University aims to have the highest possible standards and to do all that it can 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 UK-based guardians (where nominated). The use of the ELC’s Framework for Safeguarding, Prevent and Care of Under 18s aims to help the management of the risk associated with the duty to protect such individuals, regardless of their race, gender, national origin, color, ethnicity, religion, or disability.

SCOPE

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 ELC provide, the ideal enrolment age is considered 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 group of students.

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

Due to the small number of under 18 enrolments at the ELC, the level of risk is considered to be low; as such, the safeguarding measures adopted by the ELC are reasonable and proportionate. The risk lies primarily with the ELC’s Activate provision, when 17-year olds are eligible to be enrolled on a case-by-case basis; commercial courses are generally provided to overseas universities (i.e. students aged 18+) or professionals; Pre-sessional English provision is predominantly at PG level.

Nevertheless, the ELC Staff Code of Conduct (available on request) applies at all times.

Emma Bentley, Director, English Language Centre

TERMINOLOGY

Safeguarding is an umbrella term; it can apply to children, young people or vulnerable adults. The University’s policy considers:

- Children (under the age of 16)
- Young People (aged 16 and 17)
- Vulnerable Adults (adults who have to rely on others for tasks of daily living or may be unable to protect themselves against significant harm or exploitation)

Safeguarding refers to looking after such individuals appropriately, helping them to stay safe.
There is a legal **Duty of Care** on adults working with Under 18s and vulnerable adults to protect them from that which is not in their best interests. This includes sexual activity between a person in a **Position of Trust** and a student under the age of 18 (as stipulated in the Sexual Offences Act 2003).

**Practical safeguarding** can include the following: food and eating; medical needs; pastoral care; supervision and security; smoking, alcohol and substance misuse; online safety; visitors/third parties; preventing radicalisation; child protection.

**Child protection** is the need to protect an Under 18 from direct harmful behaviour, i.e. abuse.

**Prevent Duty** is the duty to protect Under 18s and vulnerable adults from involvement in groups which set out to radicalise individuals. Universities have been identified within the government’s **Prevent Strategy** as potential sites for radicalisation.

**Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

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**ELC SAFEGUARDING STRUCTURE**

**University of Liverpool**

- **Lead Safeguarding Officer**: Director of Student Experience & Enhancement
- **Deputy Safeguarding Officer**: Director of Legal, Risk & Compliance

**University of Liverpool**

- **Safeguarding Co-ordinator**: Director of Student Administration & Support
- **Deputy Safeguarding Coordinator**: Head of Counselling & Mental Health Advisory Services

**English Language Centre**

- **Designated ELC Safeguarding Lead (DSL)**: ELC Director
- **Designated ELC Safeguarding Staff (DSS)**: Social & Welfare Officer (primary); Social & Welfare Assistants (secondary)

**English Language Centre**

- **ELC Staff** (teachers, professional services, support assistants), Halls Experience Teams, Temporary Workers, Group Leaders, Sub-contractors, Visitors - all stakeholders actively involved in safeguarding students and/or with a legal Duty of Care for Under 18s

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**ROLES & RESPONSIBILITIES**

The responsibilities of the staff in the section above are outlined in the [University’s Policy on the Safeguarding of Children, Young People and Vulnerable Adults](#).
The **Designated ELC Safeguarding Lead (ELC Director, Emma Bentley)** is responsible for:

i. Providing support, advice and guidance to ELC staff and students about the University’s Safeguarding Policy, and for ensuring compliance with this and the ELC Framework.
ii. Referring cases of suspected abuse or allegations to the Safeguarding Coordinator.
iii. Liaising with the Safeguarding Co-ordinator to inform them of any issues and ongoing investigations.
iv. Ensuring detailed and accurate written records of referrals/concerns are kept and that they are secure and confidential.
v. Ensuring appropriate levels of training are provided to staff within the ELC.
vi. Assisting in the review of safeguarding policies and procedures.
vii. Informing the Safeguarding Coordinator of any changes to the Designated Safeguarding Lead role holder in the ELC.

As per the University’s overarching policy, an individual with a particular responsibility may devolve the tasks associated with this responsibility to others. On a day-to-day operational basis, the **ELC Social & Welfare Officer (Primary DSS)** is responsible for items i. to iv. above. The overall responsibility remains with the ELC Director.

As **Head of Department, the ELC Director** is also responsible for:

i. Ensuring appropriate risk assessments are carried out for relevant activities.
ii. Identifying staff, students and volunteers who will have frequent contact with children and young people and who may require a DBS check.
iii. Liaising with HR to ensure that appropriate DBS checks take place.
iv. Monitoring the welfare of students who are aged under 18.
v. Ensuring safeguarding concerns are reported to a Designated Safeguarding Staff member (DSS).

The **primary DSS (ELC Social & Welfare Officer, Katie Pearce)** is responsible for:

i. Ensuring the **Parental Consent, Accommodation and Guardianship Arrangements for Under 18s** form is completed as required, and undertaking the necessary due diligence checks.
ii. Briefing parental and nominated guardians on their responsibilities on arrival.
iii. Following up immediately on any absence of a student who is under 18 and is enrolled on a course at the English Language Centre.
iv. Pastoral care relating to all under 18s who are enrolled on a course at the English Language Centre.

**All staff** are responsible for:

i. Reporting any concerns about safeguarding individuals to the ELC Director.

**All staff who intend to, or may be put in the position of, working with children, young people or vulnerable adults** are responsible for:

i. Ensuring that they understand the implications of the University’s Safeguarding Policy and ELC Framework before commencing any course, event, visit or other activity.
STANDARDS: COURSES WHICH HAVE STUDENTS WHO ARE UNDER 18

PRE-ENROLMENT

i. Students who will be under the age of 18 when they enrol onto an ELC course MUST complete the University’s Parental Consent, Accommodation and Guardianship Arrangements for Under 18s form when requested and before an offer can be made. This form also includes transport arrangements between the point of entry to the UK and the University. The form is available on the ELC website.

ii. Students who are under 18 when they start their ELC course 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.

iii. 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.

iv. 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. Parents must satisfy themselves that the services provided by the group leader(s) will meet their child’s needs. All accompanying group leaders must provide a current DBS certificate or equivalent overseas suitability check.

v. The ELC requires all applicants who will be under 18 years of age on enrolment to their course to either live in a University Hall of Residence, or to make arrangements to live with a UK-based guardian. 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.

vi. 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.

DURING THE COURSE

vii. Within the first week (five days) of the course, the ELC Social & Welfare Officer conducts a risk assessment at their first meeting with any student who is under 18. In the case of closed groups of under 18s, this is a group risk assessment. The Risk Assessment form can be found in Appendix 8 of the University’s Policy on the Safeguarding of Children, Young People and Vulnerable Adults.

viii. The Social and Welfare Officer will meet and brief the guardian/the group leader in the first week of the course, and will arrange at least one follow-up meeting per block of study (approx. every 10 weeks) until the student’s 18th birthday.

ix. Under 18s who are registered on a course of study at the English Language Centre (and who are not part of a closed group) are required to attend a Social & Welfare drop-in once a week.
At the initial meeting, Under 18s are given advice/guidance on the suitability of particular trips and social activities on offer. Under 18s are required to let the Social & Welfare team know if they intend to join any social activity so that this can be reflected in the event Risk Assessment.

Under 18s are given an information booklet *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.

Where Under 18s 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 Under 18, 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.

The General English & Short Courses Director and Activate Coordinator act in a supervisory capacity in the event that an Under 18 is taught by a tutor who has not undergone a DBS check.

Any Under 18s in a given class are highlighted to the respective tutors by the Social & Welfare Officer and are indicated on the class register.

In the event of a closed/bespoke group which is exclusively under 18, all teaching staff involved in the course will be required to hold a valid DBS check.

Under 18s are encouraged to wear their purple lanyard (with UoL Student ID card) which helps identify them to ELC staff and other students.

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**SUPERVISION ON TRIPS AND SOCIAL PROGRAMME ACTIVITIES**

The ELC’s Social Programme is open to all students enrolled on ELC courses and we actively encourage all students to engage with the activities and trips on offer. All excursions, both in the social programme and as part of timetabled lessons, must adhere to the ELC Trip Policy (available on request) at all times. The ELC Trip Policy outlines the procedures involved at each stage of delivering a trip or activity, and highlights the responsibilities of the staff involved.

All trips and activities require a Risk Assessment (available on request) to completed and signed off by both the Departmental Safety Coordinator (Off-campus activity) and the ELC Director (or their nominee) in advance. Where an Under 18 signs up to an activity or trip, they are asked to inform the Social & Welfare Officer so that the correct documentation and safeguards can be put in place. Any Under 18s participating in the activity or trip should be noted on the Risk Assessment, and appropriate age-related precautions should be detailed.

On excursions, the designated Trip Coordinator should ensure that they have the emergency contact details of the under 18 student’s UK guardian, in addition to the student’s contact details. Where an Under 18 takes part in an ELC activity or trip, the Staff to Student ratio must not exceed 1:15, and at least one of the accompanying staff members should be DBS checked (usually the Social & Welfare Assistant). Where possible, staff should offer all students the chance to stay with them for the entire excursion, even during free time so that they are able to enjoy the opportunity to practise their conversational English outside of the classroom.

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**EXPECTATIONS OF STUDENTS (STUDENT CODE OF CONDUCT)**
All students are expected to conduct themselves, both on and off the campus, in a manner which demonstrates respect for the University, its staff, fellow students and property, and for other members of the local community in general. The University places great emphasis on the good behaviour of its students and has a formal procedure for dealing with serious cases of misconduct.

As part of a student’s online registration through Liverpool Life, students are required to submit their personal and academic information. By completing this part of the registration, the student agrees to comply with the University’s Statutes, Ordinances, Regulations and Rules.

In addition to the University guidelines outlined above, the ELC has a Student Conduct Agreement (available from the ELC website) which all ELC students are required to sign at enrolment. This agreement sets out the ELC’s expectations of students with regard to their attendance and academic engagement at the University of Liverpool, and their general behaviour. Students must also obey UK legislation with regard to age. It is illegal for someone who is under 18 to buy or attempt to buy alcohol or tobacco. Similarly it is illegal for an adult to buy or attempt to buy alcohol or tobacco for anyone under 18. While under 18s are permitted to enter a pub in the UK provided they do not drink alcohol, they are prohibited from entering nightclubs as these are strictly for over 18s only.

The ELC strives to provide a positive, professional and safe environment with a culture of tolerance and respect. The ELC and the University will take action against anyone who bullies or harasses another person. Students are expected to help to create and maintain an atmosphere where people can learn and an environment which encourages equality of treatment. More information can be found in the ELC Summary: Bullying and Harassment Policy and ELC Summary: Diversity and Equality of Opportunity Policy. Both are available on the ELC website.

### STAFF RECRUITMENT, TRAINING AND AWARENESS-RAISING

### DISCLOSURE AND BARRING SERVICE (DBS) CHECKS

Following the UK Government’s statutory guidance on Regulated Activity (children) — supervision of activity with children which is regulated activity when unsupervised, provision is made for local managers to determine what is reasonable for their circumstances. On the basis of this, and on assessing the risk, the following ELC post-holders are subject to a DBS check every three years:

- ELC Director
- General English & Short Courses Director
- Activate Coordinator
- Resources Coordinator
- Activate Teachers (12-month contract\(^1\) or longer)
- Operations Director
- Social & Welfare Officer
- Social & Welfare Assistants
- Summer Support Assistants (fixed term)

This is considered to be reasonable and proportionate. For all new post-holders, the requirement for a DBS check is stated in the job particulars at the point of advert and at appointment. When a 12-month fixed

\(^1\) It is not practical to engage in DBS-checking for colleagues employed on short-term contracts (typically 10 weeks in duration); however, it is likely that many of these colleagues hold their own DBS certificates. On the summer Pre-sessional the risk is considered minimal (maximum 1-2 students from a cohort of 550).
term or permanent 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 also be made. In the event that a required DBS/suitability check is delayed (i.e. not received before employment commences), the post-holder will not be scheduled to teach or provide advice/guidance to Under 18s until the check is complete. This same provision is made for colleagues on short-term contracts who are not required to undergo a DBS check.

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).

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**TRAINING & AWARENESS RAISING**

All permanent and 12-month fixed-term ELC colleagues are required to undertake Basic Safeguarding Awareness Training (including the Prevent Duty); the online module at [https://galleryteachers.com/service/safeguarding-basic-awareness-course/](https://galleryteachers.com/service/safeguarding-basic-awareness-course/) is used for this purpose. This training must be refreshed at least every three years.

Colleagues on shorter fixed-term or temporary contracts, including Support Assistants and student volunteers, are briefed on this policy and their responsibilities at induction. Colleagues who are primarily involved with the Activate course (academic or social and welfare related) are required to complete the online training referred to above. Face-to-face in-house awareness raising is held at least once annually, or sooner if there are changes to legislation/policy or a serious incident occurs.

In addition, all staff (permanent, fixed-term, temporary (casual), volunteer) must adhere to the [ELC Staff Code of Conduct](#) (available on the ELC website) at all times and sign a declaration agreeing to do so.

The following ELC colleagues have undergone additional certified safeguarding training:

- ELC Director, Specialist Safeguarding Training (formerly Level 3)
- Social & Welfare Officer, Specialist Safeguarding Training (formerly Level 3)
- Social & Welfare Assistant, Advanced Safeguarding Training (formerly Level 2)

Refresher training takes place at least every two years.

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**RECOGNISING ABUSE**

Staff have a responsibility to be aware of groups of students who could be vulnerable, and to help identify individuals. Some vulnerable groups include:

- Babies up to 18 months, and unborn babies
- Students with Special Educational Needs and Disability (SEND)
- Students with existing emotional, behavioural or mental health difficulties
- Students from homes with ongoing domestic violence or alcohol/drug abuse.

Concerns for the safety and wellbeing of children, young persons or vulnerable adults could arise in a variety of ways and in a range of different settings which may not necessarily be linked to the University, for example:

- A child may report or display signs of abuse.
Someone may hint that a child is a risk (this might include the child of an ELC student).
Someone may hint that a colleague or student is an abuser.
An individual may witness or hear about abuse in another organisation.
An individual may be supporting an adult who indicates that other children and young people may be being abused by someone who abused them as a child.

Those who abuse children, young people and vulnerable adults can be of any age (even other children and vulnerable adults), gender, ethnic background or class, and it is important not to allow personal feelings about people to prevent appropriate action taking place.

Four main types of abuse are identified as: physical, emotional, sexual abuse, and neglect. Bullying, including cyber-bullying, is sometimes identified as a fifth main form of abuse. A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Staff are in a good position, seeing students regularly and building strong relationships with them, to notice signs of a safeguarding concern at an early stage.

Staff should also remain vigilant of:
- Honour-based violence
- Female Genital Mutilation – this is illegal in the UK and must also be reported to the Police.

**DEALING WITH SUSPICIONS OR ALLEGATIONS OF ABUSE**

**MAINTAINING CONFIDENTIALITY**

Students who share information with staff should be secure in the knowledge that any information disclosed will be handled in a respectful and appropriate manner; this is often key to encouraging students to seek help and support.

There may be times when a student asks a staff member to keep a conversation they have private. It is important to be clear from the outset that we cannot always guarantee confidentiality, even if it seems that the current presenting problem is not particularly serious. Sometimes students may initially disclose a small personal problem that may be masking, or lead, to a much more serious issue. It is better to be clear that in some exceptional circumstances staff may have to break confidentiality, but that these circumstances are rare and would arise only:

- where there is risk of harm to a staff member or others, including safeguarding issues e.g. child protection or where disclosure is required by law e.g. a court subpoenas records required in court or under prevention of terrorism legislation.
- If we are legally obliged to provide information to outside agencies we will do this in line with the Data Protection Act.

Staff should explain at the beginning of the conversation that if they have serious concerns about the safety of the student or the safety of others, that they will have to pass this information on in order to be able to provide the best support available. Where possible, staff should always discuss this with the student first and encourage them to speak with the Social & Welfare Officer him/herself, or to consent to the sharing of relevant information. Colleagues must be clear that even without consent, some concerns must be passed on to the relevant staff who can help.
PROCEDURE

It is essential to act quickly and professionally in all cases of suspected abuse. If a student accuses another student or member of staff of abuse or inappropriate behaviour, you should report this immediately to the **ELC Director** (the designated ELC Safeguarding Lead).

The course of action taken will depend on the specifics of the situation. The ELC follows the guidance set out in **Section 10** of the *University’s Policy on the Safeguarding of Children, Young People and Vulnerable Adults*. Any allegations or suspicions of abuse or concerns about the welfare of a child, young person or vulnerable adult should be reported using the procedures as shown in the Guidelines in **Appendix 2** of the University policy. Members of staff must discuss concerns, suspicions or allegations with the ELC Designated Safeguarding Lead (ELC Director) or other University Designated Safeguarding Contact (see **Appendix 5** of the Policy). The ELC Director is responsible for referring cases to the Safeguarding Coordinator.

REPORTING AND RECORDING

In all cases it is vital that accurate records are maintained of allegations, concerns, decisions and reasons for actions. The **Reporting Safeguarding Concerns Form** in **Appendix 4** of the University Policy should be used to record initial concerns. Records of subsequent actions should be maintained in a secure file.

It is important that records clearly differentiate between known facts, information reported by the student, and the observations or opinion of the person making the record.

**Records should be dated and written personally as soon after the event as possible**

It should be clear who has made the record and when it was made. Records should be written as soon as possible after the event to ensure that the record is accurate. Records should be written by the individual whose name is on the record. If the record is written on paper you should sign the record. In some instances you may also wish to show the record to the student and ask them to sign a copy. Staff should be mindful that students have the right to access any records held on them under the Data Protection Act 1998. More information on the University’s compliance with data protection laws can be found here: [https://www.liverpool.ac.uk/legal/data_protection/](https://www.liverpool.ac.uk/legal/data_protection/).

PREVENT DUTY

The duty to protect children, young people and vulnerable adults from harm extends to protecting them from involvement in groups which set out to radicalise individuals. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

The Counter Terrorism Act 2015 imposes a duty on ‘specified authorities’, when exercising their functions to have due regard to the need to prevent people from being drawn into terrorism. Universities have been identified within the government’s **Prevent Strategy** as potential sites for radicalisation. Whilst children, young people and vulnerable adults may be most at risk of radicalisation, students and staff who do not fall into these categories may also be at risk.

- Prevent aims to reduce the likelihood of people becoming involved in violent extremism and/or in supporting terrorism.
• Prevent applies to all forms of extremism; racism, far-right ideology, religious, homophobia.
• Prevent involves everyone (staff, students) and applies to everyone, not just Under 18s.

Under the Duty, the University and ELC are required to exemplify core British values, which are defined as:

• democracy
• the rule of law
• individual liberty
• mutual respect and tolerance for those with different faiths and beliefs.

The University has policies in place to promote tolerance and respect, and procedures for dealing with any abusive behaviour by staff or students. It is committed to providing a safe campus environment for students, and to challenging extremist views. Policies to note in this regard are the Dignity at Work and Study Policy and Procedure; Freedom of Speech; Diversity and Equality of Opportunity and the Health & Safety Codes of Practice.

The English Language Centre follows the University’s protocol for dealing with concerns about radicalisation as detailed in Section 11 of the University’s Policy on the Safeguarding of Children, Young People and Vulnerable Adults’.

Staff or students may be concerned about someone due to changes in behaviour or appearance. For example:

• An individual may stop contact with peers and only be interested in contact with members of a particular ideological group.
• An individual may change their habitual style of dress.
• An individual may condone violence in support of their espoused ideology.

There may be many reasons for such changes which is why a safeguarding approach should be adopted as this enables relevant services within and outside the University to identify an individual’s needs and vulnerabilities. Concerns about radicalisation are reported in the same was as suspicions or allegations of abuse (as detailed above).