



## The London School of English (LSE) Safeguarding Policy

### 1. Policy Statement

#### 1.1 Context

The Under 18s sections in this policy apply to our Summer Programme based in central London and covers all locations where LSE staff and students are present.

The course age range is 15-18 years. Students must be 18 at both the start and finish of the course (those who would turn 19 during the course duration cannot enrol).

The Student Residence is a 10 minute-walk away from the classroom venue.

#### 1.2 Terminology

As part of our training, we make sure that everyone at LSE has a clear understanding of the policy and procedures we have in place to keep under 18s safe. The following terminology is used throughout this policy to ensure that staff are familiar with the terms used.

**Under 18s (U18s)** – any student or visitor who is or is under the age of 18 is deemed to be a minor or child in safeguarding ‘Duty of Care’ law. U18 students are required to always wear an ID lanyard when they are in the school or on a school associated trip so that they are easily identifiable to staff. (While 18-year-old students are technically and legally adults, in safeguarding legislation they are covered by the same statutory obligations as under-18s while enrolled on educational programmes).

**Duty of Care** – all staff members at LSE have a duty of care towards students regardless of age. This is an obligation to look after the wellbeing of all students but particularly those under 18 to keep them safe and as a caring and responsible UK parent would.

**Safeguarding** – this is an umbrella term which covers health and safety, welfare and child protection. It refers to the steps we take to ensure the safety and wellbeing of all our students but particularly those aged under 18.

**Child Protection** – This is part of safeguarding and focuses on protecting U18s from abuse or harm. This includes child protection procedures which detail how to respond to concerns about an U18.

**Designated Safeguarding Lead (DSL)** – A named person with overall responsibility for safeguarding at LSE and ensuring that LSE has updated safeguarding policies and vigilant practices.

**Assistant Designated Safeguarding Lead (ADSL)** – at LSE, we have several members of staff who have been trained to DSL standard and who are able to step in with confidence in the DSL’s absence. This way, we can ensure that someone trained to DSL level is available at all times during the U18s courses.

**Designated Safeguarding Person (DSP)** – The DSP supports the DSL and ensures that the designated policies and practices are carried out on a daily basis.

**Local Safeguarding Children’s Partnership (LSCP)** – each area has access to a dedicated team of professionals who work together to strengthen child protection and safeguarding systems in the local area.

**Local Authority Designated Officer (LADO)** – this is the designated person at the LSCP that we will contact if we have any child protection concerns with an U18, particularly involving an adult.

**Adults at Risk** – an adult at risk is defined as a ‘person aged 18 or over who may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation’. Although it is extremely rare that we would have a student who can be officially defined as ‘an adult at risk’, we apply an extra duty of care to those whose personal circumstances may make them more vulnerable than others. This includes a physical disability, special educational needs, low level of English, unfamiliarity with the local area or customs. It cannot be assumed that someone who is not considered at risk on-site would not become at risk off-site.

### **1.3 Statement of policy & procedure review**

Our overall focus is to make LSE’s Young Adults Summer Programme a warm, safe and welcoming place for all students with a clear focus safeguarding all U18s. Our staff are all aware of their duty of care and we have updated policies and procedures to support them and ensure the swift reporting of any concerns around safeguarding issues. We will always take action when we believe an U18 is at risk or has been harmed. At all times, we will act in the best interests of the student.

All students and visitors to LSE who are either U18 or fall into the category of Adults at Risk are entitled to be protected under this policy regardless of their race, nationality, age, gender, gender identity, sexual orientation or religious belief.

This policy has been drawn up by the safeguarding team with the assistance of an independent safeguarding consultant. This policy is reviewed annually as a minimum but also when there is a change in legislation, a change of named safeguarding staff or amendment to procedures following an incident, by the safeguarding team alongside the related safeguarding policies and procedures. This policy was last reviewed and updated by **Shirley Norton** in **February 2026**.

The safeguarding team meets on a weekly basis with the Young Adults management Team while the courses are running to discuss any safeguarding concerns or issues. Further meetings are held once the summer programme is complete and in the 6 months running up to the start of the next summer. Updates and changes are made to reflect the recommendations made in the meetings.

### **1.4 Safeguarding staff and responsibilities**

The overarching principle is that all staff have the responsibility to safeguard students. Within that, we have a designated staff structure to support that ethos and ensure the utmost attention is paid to the safety and security of our students. All staff are trained to safeguarding level 1 (Basic Awareness), the DSP team are trained to level 2 (Advanced), the DSL and ADSLs are trained to level 3 (Specialist).

Designated Safeguarding Team

Designated Safeguarding Lead (DSL)

Assistant Designated Safeguarding Lead (ADSL)

Designated Safeguarding Person (DSP)

Role	Staff Member	Job title	Email	Responsibility
DSL	Shirley Norton	Director of Operations	Shirley.norton@londonschool.com	Overall responsibility for

				safeguarding policies and procedures
DSL	Natasha Bradbury	Welfare Manager (Young Adults)	Natasha.bradbury@londonschool.com	Safeguarding policies and procedures during programme
ADSL	Ben Butler	Head of Courses	Ben.butler@londonschool.com	
ADSL	Julia Stofast	Client Experience Manager Welfare Officer	Julia.stofast@londonschool.com	
ADSL	Hauke Tallon	CEO	Hauke.tallon@londonschool.com	
DSP	Christina Kiernan	Reception Manager Welfare Officer	reception@londonschool.com	

In the absence of the DSL, an ADSL will be appointed to take over the responsibilities. A notice will be put up in the Trainers' room and an all-staff email will be sent to notify which ADSL is standing in for the DSL. Students will be informed who is standing in for the DSL by a notice in each classroom.

### **Outside Contacts**

The following contact information can be used to report a concern about an U18.

**Local Authority Designated Officer (LADO)** – Jacqueline Fearson.

Email: [Jacqueline.fearson@camden.gov.uk](mailto:Jacqueline.fearson@camden.gov.uk).

**MASH team in the LSCP** – website: [Camden Council - Are you worried about a child?](#)

Email: [LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk)

Office hours: 020 7974 3317

Out of office hours (after 5pm, weekends and bank holidays): 020 7974 4444

**NSPCC** phone: 0808 800 5000

**Local Police Station** phone: 101

### **1.5 Legal framework**

This policy is informed by the following legislation with support from an independent safeguarding consultant:

The Children Act 2004

Local Government Act 2000

The Sexual Offences Act 2003

Children Act 2004

Protection of Freedoms Act 2012

Counter-Terrorism and Security Act 2015

Children & Social Work Act 2017

Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges, Sept 2023

Working Together to Safeguard Children (2018)

When to call the Police (National Police Chief's Council 2020)

It is also informed by guidance from The British Council Accreditation Scheme which outlines best practice and government guidelines.

### **1.6 Policy availability**

The safeguarding policy is provided along with the staff handbook. An updated copy is emailed to all staff if changes have been made with a cover email explaining what the changes are and where they can be found in the handbook.

The full version and the condensed version of this policy are available to the public on our website.

The condensed version is sent to all Educational Tour Operators (ETOs) and Parents/Guardians of under 18s with their course confirmation information.

## **2. Code of Conduct**

### **2.1 Statement of Intent**

The aims of this code of conduct are to both support and protect staff and students. It is written to set clear boundaries, standards and guidelines on what is expected of LSE staff at all times in order to ensure a safe, warm and welcoming environment. This code of conduct applies to all staff employed or contracted by LSE.

U18s are required to wear ID lanyards while on the school premises and on school trips so that they are easily identifiable to staff and other students.

### **2.2 Guidelines for all London School of English staff members**

As a general rule, we expect all staff to treat students, especially those under 18, the same way they would expect their own family members to be treated if in a foreign environment in which they are likely to be more vulnerable and lacking in local language and cultural norms. All staff must be committed to:

- professional conduct at all times
- treating everyone but particularly U18s and adults at risk with respect and dignity
- always taking time to listen to what a student is saying
- recognising and valuing the unique contribution each individual can make
- encouraging and praising students

### **2.3 Child Protection – Position of Trust**

All permanent and freelance staff at LSE are in a Position of Trust. **Any sexual activity between an adult who has a position of care or responsibility and an under 18 is illegal even though the legal age of consent is 16 (Sexual offences Act 2003).**

### **2.4 Leading by Example**

U18 students are likely to look at the staff for an example of appropriate behaviour so all staff need to be mindful of setting a good example. It is not possible to write an exhaustive list as staff are expected to apply their common sense, but some examples would be:

- provide an example that you would wish others to follow
- use appropriate language with U18s and challenge inappropriate language you hear U18s using. Please remember that English is not their 1<sup>st</sup> language, and they may be unaware of the impact of inappropriate language
- use neutral language in interactions to limit misunderstandings of intent or possible accusations of misconduct

- do not make light of smoking, drug taking or alcohol consumption
- dress appropriately at all times during working hours or when in the company of LSE students
- respect a young person's right to privacy
- arrive punctually for all lessons and activities

## **2.5 Prohibited actions**

The following prohibited actions refer to interactions with U18s unless the age is explicitly mentioned. Staff should:

- not condone the breaking of the law, particularly in regard to drinking alcohol, taking drugs, smoking, vaping, sexual activity or extremist views/behaviours;
- not drink alcohol in front of students;
- not drink or be under the influence of any alcohol if responsible for U18s on a social programme or school visit;
- avoid being alone with an U18 wherever possible unless it is an individual tuition lesson. Make sure that they can be easily viewed by passers by outside of the room if that is the case (see point 2.7).
- not initiate any form of physical contact with an U18. Inappropriate physical contact can be hard to define in a multicultural environment. Staff are therefore prohibited from initiating any form of physical contact with students in order to avoid misunderstandings or accusations of inappropriate conduct. This is especially important in a situation where the staff member is in a 1-1 situation with an U18.
- not meet a student under the age of 18 outside school on a one-to-one basis unless the meeting is work related and has been approved by a member of the safeguarding team (e.g. to accompany an U18 to a medical visit);
- be aware of any action that could be construed as favouritism towards a particular student;
- not have any contact on social media platforms with students or provide or exchange details which could lead to staff and students identifying each other on social media. Please refer to LSE's Communication Policy for further details. All email contact with any LSE student must go through an LSE email account.

## **2.6 U18s in the classroom**

All students are expected to attend classes and arrive on time every day. There must be no leeway given with under 18s and any absence or lateness needs to be immediately reported to the Courses Manager to follow up. In the case of absence from class, the trainer is required to notify the Courses Manager immediately by phone from the classroom rather than wait for the next break. The Courses Manager will then follow up as appropriate.

As part of our safeguarding ethos, trainers need to ensure U18s are comfortable and integrating well. Part of this will rely on the material and subjects chosen by the trainer for class delivery. It is the trainer's responsibility to make sure that material chosen – especially authentic material – is appropriate for all the ages and nationalities in the class.

## **2.7 One-to-one contact with U18s**

All staff members should avoid a situation where they are left alone in an enclosed space with an U18. If a confidential meeting is necessary, it should be conducted in a room with an open door, close to other staff members. If appropriate, another staff member should be brought into the meeting.

If an U18 is scheduled for individual tuition or a tutorial, the trainer must teach in a classroom, preferably close to other occupied rooms, e.g., not in a room on an empty floor where they are clearly visible to anyone passing the room and the door must be left ajar.

If an U18 student needs to be given first aid treatment in an enclosed space, there must be two staff members present. The staff member must explain what they are going to do to administer first aid and ask permission first.

## **2.8 U18s General welfare**

We are interested in the general welfare of all our students but there are some areas where we need to pay closer attention to U18s for safeguarding considerations These include the following:

- Appropriate dress. All students should be dressed appropriately for class and when on a school social programme or class visit and should not wear clothes that could offend anyone. Examples of this would be clothes that are too revealing or clothes with offensive slogans or images. If a staff member sees anyone dressed inappropriately, they should talk to them or ask another member of staff to talk to them and explain what is appropriate.
- While bullying is clearly prohibited throughout the school, we need to be extra vigilant with U18s. Staff must ensure that students are treated with respect by us and each other. Behaviour that is contrary to this must be challenged and cannot be allowed to pass, even if they say it is a joke or they don't really mean it.
- Keeping an eye on who U18s are socialising with. Are they spending a lot of time with one particular person? Do they appear to be uncomfortable or overly friendly with anyone?

## **2.9 Social Media and Technology**

While technology and phones are a part of our lives and provide many benefits, they also provide opportunities for abuse and inappropriate behaviour. In particular, there are risks to young people through cyberbullying, exposure to radical/extremist views, grooming by sexual predators and downloading of illegal or copyrighted material. LSE has therefore established the following guidelines:

- Staff should not give out their personal phone number, email address or social media contacts to U18s. All staff members have an LSE email address and any correspondence with U18s must go through that channel.
- If a staff member is on a social programme involving U18s, they must take a school phone with them and make sure that the U18s have that number in their phones. The staff member should have a list of everyone's phone number as part of the risk assessment.
- Inappropriate access to websites should be reported to [helpdesk@londonschool.com](mailto:helpdesk@londonschool.com) . Inappropriate websites include pornographic sites, excessively violent video games, websites promoting extremist views, and some age-inappropriate social networks and forums. A student may access them by bypassing safeguards, so all staff are asked to be vigilant. If there are any concerns about content, excessive use or possible grooming or abuse, they should be immediately reported to a member of the safeguarding team so that appropriate action can be taken.
- All students are made aware of the school's IT policy on induction, and it is clearly displayed on noticeboards around the school.
- Staff should never use their own devices, including mobile phones, to take pictures of U18s. If they plan to film or take photos of any U18s on school equipment, they need to first check that the student is happy for them to do so and check to see that their parents have given their consent. Any images that are taken should be deleted immediately after use.
- Staff should be aware of the signs of cyberbullying and be vigilant in reporting it to a member of the safeguarding team if they have concerns.

## **2.10 Harassment and Bullying**

In order to achieve a safe, comfortable environment for staff and students, LSE is committed to ensuring everyone is able to work and participate in life at the school without fear of harassment, bullying or intimidation. Everyone at LSE has a part to play in ensuring their own behaviour, whether intentional or unintentional, does not constitute bullying or harassment. As part of our safeguarding responsibility, it is everyone's responsibility to report any concerns of harassment or bullying to the safeguarding team to follow up.

## **2.11 U18s Social programme and external visits**

On excursions and activities organised by LSE, due regard should be given to the risk assessment document and any special measures adopted for U18s on that trip. It should always be ensured that U18s are with at least 2 other people at all times. The member of staff leading the trip must know the whereabouts of any U18s at all times and have a contact phone number for them as per the risk assessment policy for offsite activities. Other students, even those over 18, can never have responsibility for a student under 18; that responsibility lies with staff.

## **2.12 School Accommodation**

Residence rules and expectations apply for all our students but with U18s, particular care must be taken around the following aspects:

- Respecting the privacy of the individual in their room including from other children. In particular, following the protocol of knock and gain permission before entering. U18s must be told they are not allowed to enter any other bedroom under any circumstances.
- Not allowing adults to be alone in a bedroom or bathroom with an U18 unless the door is open and other adults are present on the corridor of the residence. Adults should meet with U18s in communal areas wherever possible.
- Staff must dress appropriately, especially when they go to or from their bedroom. They must insist that U18s do the same.

## **2.13 Transporting Students by Car**

All contractors working for LSE to transport U18s will provide annual written confirmation that their staff have the appropriate DBS check. If a staff member needs to transport an U18 in their car, then they must:

- inform a senior member of staff that they are doing this and report to them when the student has been safely delivered to their destination;
- ensure that seatbelts are always used;
- avoid being alone in the car with an U18 but if this is unavoidable, the U18 must sit in the back.

## **2.14 Low-Level Concerns relating to Staff and Whistleblowing**

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease of a “nagging doubt” – that an adult working in or on behalf of the school 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.

Staff are informed about what is appropriate behaviour and should be able to distinguish expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

Any concerns are reported to the DSL. The aim is to

- address unprofessional behaviour and support the individual to correct it at an early stage;

- provide for a responsive, sensitive and proportionate handling of such concerns when they are raised;
- help identify any weakness in the safeguarding system.

Examples of low-level concerns

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

Staff are required to report to their line manager if they have any concerns about a colleague not following this code of conduct or if they have any concerns at all about the safeguarding and welfare of an U18. Staff can remain safe in the knowledge that they will not be penalised as a result and that their report will remain confidential.

The school has a Whistleblowing policy which can be found in the employee handbook.

The NSPCC Whistleblowing helpline number is 0800 028 0285.

### **3. Child Protection**

#### **3.1 Introduction**

Child Protection forms part of the duty of care we have to our U18s and refers to the need to protect them from direct harmful behaviour such as emotional, sexual or physical abuse or neglect. It should be noted here that this abuse can come from another child and not just an adult.

All staff must undergo Basic Awareness training (Level 1) as a minimum and it is each staff member's line manager that is responsible for making sure this is done. Records of the training are centrally located on SharePoint so that the DSL can track training requirements.

LSE staff accept and recognise our responsibilities to develop awareness of issues which cause children harm. We undertake to safeguard U18s and adults at risk by:

- following strict procedures for recruitment and selection of staff including enhanced DBS checks and overseas police checks where necessary;
- providing effective management for staff through training and support;
- ensuring all staff are aware and fully engaged with their responsibilities;
- having a strong safeguarding team whose members are known to staff and accommodation providers;
- having a designated member of the safeguarding team that can be contacted 24/7;
- making sure all staff and accommodation providers know how to respond when they suspect abuse or an U18 tells them about abuse;
- sharing information about child protection and good practice with children, parents and staff;
- sharing information with agencies that need to know and involving parents and children appropriately.

#### **3.2 LSE Safeguarding team**

The DSL takes the lead responsibility for safeguarding and child protection.

The role responsibilities include:

- receiving information about events that are planned at LSE that may involve young people or adults at risk (England and Wales) and plans that indicate how safeguarding will be covered;

- raising awareness to ensure that LSE's safeguarding policies are known, understood and used appropriately;
- receiving information from any team member, volunteers, U18s, parents or guardians who have safeguarding concerns and recording it;
- assessing the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate;
- consulting initially with a statutory safeguarding agency to test out any doubts or uncertainty;
- managing referrals to a statutory safeguarding agency or the police;
- recording statements from any member of the team who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.

The DSL/ADSL roles are specified in the individual's job description.

Full contact details for the safeguarding team and who to contact in what instance are available to all staff and are displayed in the trainers' rooms.

### **3.3 Procedure for reporting allegations or suspicions of abuse**

**All adults need to respond to a suspicion or allegation of abuse without delay.** It should be noted that all adults includes any adult working in the school including volunteers, visiting speakers and agency staff. It is not for staff to decide whether a suspicion or allegation is true. All suspicions or allegations must be taken seriously and reported to a member of the safeguarding team immediately so that appropriate action can be taken to protect the child if necessary. We have a legal duty of care to our U18s that must be taken extremely seriously by everyone.

This includes information which indicates an adult or another U18 may have:

- behaved in a way that has/may have harmed an U18;
- possibly committed a criminal offence against or related to an U18;
- behaved towards an U18 in such a way that indicates s/he would pose a risk of harm towards children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Depending on the nature of the concern, the safeguarding team will handle the matter internally. If the concern is a serious incident or if it is an allegation of abuse or a disclosure, the safeguarding team must immediately report it to the LADO and follow their advice for the next step. If a crime has, or may have, been committed they may report it to the police.

The safety and welfare of the child must be the primary consideration in deciding whether to share information and this always overrides confidentiality.

### **Vulnerable students**

Vulnerable students are any U18s and Adults at Risk. An adult at risk is defined as a 'person aged 18 or over who may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation'.

Although it is extremely rare that we would have a student who can be officially defined as 'an adult at risk', we apply an extra duty of care to those whose personal circumstances may make them more vulnerable than others. This includes a physical disability, special educational needs, low level of English, unfamiliarity with the local area or customs. It cannot be assumed that someone who is not considered at risk on-site would not become at risk off-site.

Vulnerable students are more susceptible to grooming and abuse, so everyone needs to be more alert once a vulnerable student has been identified. Where possible, LSE will identify any students with SEN and/or disabilities and ensure that there are appropriate support measures in place. This may be indicated at the time of booking or is most likely to be when the student arrives or is referred to the school's safeguarding team. There must be an awareness that behaviour, mood and injury may relate to possible abuse and not necessarily be as a result of the specific SEN or disability that has been identified. It should also be noted that these students are of a higher risk of peer group isolation and may have additional challenges with communication.

Any staff with concerns regarding a student whom they believe fall into this category must contact the DSL who will consider what, if any, additional pastoral care should be put in place.

### **The difference between a Concern and an allegation/serious incident**

We take the safety of our students very seriously and it is important that staff understand the difference between a Concern and an Allegation or Serious Incident.

**A Concern** is a low-level safeguarding or welfare thing which staff notice and need to report, however small they seem, to safeguarding/welfare staff to allow them to address the concern. A staff observation may be part of a larger picture which safeguarding team need to know. Concerns will be recorded, investigated and some information may be shared with staff.

**An Allegation / serious incident** is anything which could be connected to child protection, i.e. abuse. All these, even if only suspicions, must also be reported and remain confidential. Response from safeguarding team will follow set procedure, may involve outside agencies and information will usually not be shared as it is confidential.

### **3.4 Recognising symptoms of abuse**

While abuse of U18s at LSE may seem to be extremely unlikely, we should not assume that it could never happen. Staff in particular need to be able to recognise symptoms of abuse. There are several types of abuse and often common related signs to look out for. Signs of abuse may vary with age and not every child or adult at risk will exhibit every symptom. We have to be cautious if someone is displaying signs because it does not automatically follow that they are being abused. As well as displaying symptoms, U18s or adults at risk may tell you of abuse. In that case, always listen and follow the procedures for responding to a disclosure (see 3.5 Disclosure from an U18 – what you should do).

#### **Sexual Abuse**

Sexual abuse is any sexual activity with an U18. Many children and young people who are victims of sexual abuse do not recognise themselves as such. Sexual abuse can have a long-term impact on mental health. Victims of sexual abuse can be male or female.

**Physical signs:** over-familiarity, explicit sexual drawings, pain, soreness or itching in the genital or anal area or mouth, recurrent genital or urinary infections, pregnancy.

**Behavioural signs:** Sleep problems, anorexia, bulimia, self-harm or excessive 'comfort' eating, fear of a specific person, alcohol or the use of drugs, unexplained gifts, money, having 'secrets' particularly around internet use or overtly sexual display.

#### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of an U18. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on an U18's emotional development.

**Physical signs:** speech disorders, depression, eating disorders, evidence of self-harm and voicing of suicidal thoughts.

**Behavioural signs:** over-reaction to mistakes, continual self-deprecation, excessive fear of new situations, excessive behaviours e.g rocking, head banging, pulling own hair out. Stealing, excessively sad, depressed, withdrawn, low self-esteem, unable to form friendships with other students.

### **Physical Abuse**

Physical abuse is deliberately physically hurting an U18. It may take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating an U18.

**Physical signs:** injuries not adequately explained including fractures, bruises, burns, bite marks, slap marks, grip marks, symmetrical bruising or bruising in unusual places.

**Behavioural signs:** appears scared of others, avoids communication with authority, mood swings, can be both passive and aggressive, frozen watchfulness, could appear overly happy and eager to please, anti-social and even criminal behaviour.

### **Neglect**

Neglect is a pattern of failing to provide for an U18's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of an U18's health or development. Children who are neglected often suffer from other types of abuse.

**Physical signs:** looks excessively thin or ill, unexplained weight loss, complains of hunger, lack of energy, untreated conditions/injuries, repeated accidents – especially burns, repeatedly unwashed, smelly or dressed inappropriately for the weather.

**Behavioural signs:** poor level of concentration, constantly hungry, not keeping doctor or hospital appointments, frequently not at school or persistent lateness.

### **Specific Areas**

In addition to the types of abuse mentioned above, four other specific types of abuse that staff must be aware of are Child Sexual exploitation (CSE), Female genital Mutilation (FGM), Peer-on-Peer Abuse and Honour-based Abuse (HBA)

#### **Honour-Based Abuse (HBA)**

This is coercion or violence used against a person in the belief that family or tribal honour requires action. A person can be seriously injured or even killed in extreme cases. Signs to look out for include:

- the student being withdrawn, anxious or frightened
- a decline in behaviour or performance
- a family member keeping a close eye on the student

#### **Female genital Mutilation (FGM)**

One aspect of HBA is FGM. This is a practice that can cause severe and long-lasting damage to physical and mental health. It is carried out for religious, social or cultural reasons, however, there are no medical reasons for carrying it out. It is a criminal offence if done in the UK. Staff should be aware that a person who has suffered FGM may ask for help without being explicit about the problem due to embarrassment or fear. Any causes for concern are to be reported to the DSL. Any suspected case of FGM must be reported to the police.

## **Child sexual exploitation**

This is a form of sexual abuse where U18s are exploited to engage in sexual activity in return for money, gifts, drugs, affection or status. CSE does not always involve physical contact as it can happen online or involve pressure from peers or cyber bullying.

Signs to look for in U18s include:

- having a much older boyfriend or girlfriend
- appearing with unexplained gifts or new possessions
- associating with others involved with exploitation
- misusing drugs or alcohol
- being absent from school
- going missing or regularly coming back late to accommodation

## **Child Criminal Exploitation (CCE) and County Lines**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity. Violence, coercion and intimidation is common.

Signs might include: students missing education, unexplained gifts, misuse of drugs and alcohol, changes in emotional well-being.

## **County Lines**

Exploitation is an integral part of the county lines offending model with children and adults at risk exploited to move (and store) drugs and money.

## **Child-on-Child abuse**

It should be remembered that abuse does not only come from adults but can come from other U18s. Child-on-child abuse can include bullying (including cyberbullying), harmful sexual behaviours HSB including sexual violence and sexual harassment.

## **Bullying**

Bullying between students can be in many forms. This can include face to face and/or online.

**Cyberbullying** or online bullying takes place over digital devices such as mobile phone, computer and tablets. It can occur through texts, apps, social media, forums or gaming where people can view, participate in or share content. Cyberbullying includes sending, posting or sharing negative, harmful, false or mean content about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour. The most common places where cyberbully occurs are:

- social media, such as TikTok, Instagram, Snapchat, and Twitter/X
- SMS (Short Message Service) also known as Text Message sent through devices
- Instant Message (via devices, email provider services, apps, and social media messaging features)
- email

Signs to look out for in under-18s include:

- appearing nervous when receiving a text, instant message or email
- unwillingness to share information about online activity
- unexplained anger or depression, especially after going online
- abruptly shutting off or walking away from computer or mobile device mid-use

## **Harmful Sexual Behaviours (HSB) including sexual violence and sexual harassment**

Harmful Sexual Behaviours (HSB) is an umbrella term for many types of behaviours. It includes:

- contact and non-contact behaviours
- online and off-line behaviours
- group/gang and peer influenced behaviours

Examples include:

- sexual/sexist name calling
- rumours about students' sexual activity
- sharing naked imagery
- sexual harassment

Some people might try to excuse mild transgressions as a “joke” or “teenage fun”. However, all forms of sexual violence are unacceptable. It should also be noted that both perpetrators and victims can be either male or female.

### Upskirting

Upskirting typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks. This has been illegal in the UK since 2019.

### **3.5 Disclosure from an U18 – what you should do**

All staff must be prepared to listen to a disclosure from an U18 as they are likely to choose the person they feel most comfortable with and this will not necessarily be part of the safeguarding team. If an U18 chooses to disclose an allegation of abuse to you, you must follow these key steps.

Receive	<ul style="list-style-type: none"> <li>• Listen calmly to what is being said without displaying shock or disbelief. Accept what is being said without judgement.</li> <li>• Allow the child to speak without interruption.</li> <li>• Take it seriously.</li> <li>• Be calm.</li> </ul>
Reassure	<ul style="list-style-type: none"> <li>• Reassure but only so far as is honest and reliable. Don't make promises that you can't be sure you can keep e.g. 'everything will be alright now'.</li> <li>• Don't promise confidentiality, you have a duty to report your concerns. Tell the child that you will need to tell some people but only the ones whose job it is to protect children.</li> <li>• Acknowledge how difficult it must have been to talk.</li> <li>• Never agree to keep secrets – be honest.</li> <li>• Reassure the child that he/she is right to tell.</li> <li>• Alleviate feelings of guilt and isolation while passing no judgement</li> </ul>
React	<ul style="list-style-type: none"> <li>• Listen quietly, carefully &amp; patiently.</li> <li>• Do not investigate, interrogate or decide if the child is telling the truth.</li> <li>• Do not ask leading questions.</li> <li>• Ask open questions like 'is there anything else you want to tell me?'</li> <li>• Do not ask the child to repeat what they have told you to another person.</li> <li>• Explain what you have to do next and who you need to talk to</li> </ul>
Record	<ul style="list-style-type: none"> <li>• Make brief notes at the time and write them up in detail as soon as possible. Record the date, time, place, words used by the child and how the child appeared to you.</li> <li>• Do not destroy your original notes in case they are required for a police investigation.</li> <li>• Record statements and observable things</li> <li>• Do not assume anything. Don't speculate or jump to conclusions</li> </ul>

Remember	<ul style="list-style-type: none"> <li>• If an U18 discloses abuse to you, take it seriously.</li> <li>• Seek advice from the dedicated members of staff</li> </ul>
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Dealing with a disclosure can be stressful but there are some DON'Ts that you must remember:  
Don't:

- refuse to listen or say that you will talk to them later;
- over-react;
- be in a room on your own with the student with the door shut;
- show worry or concern;
- put words in their mouths;
- make comments;
- ask leading questions;
- promise confidentiality;
- leave the student alone after they have disclosed. If you need to leave the office, ask another member of staff to sit with them as a reassuring presence.
- tell any of your colleagues other than members of the safeguarding team.

Once a statement has been collected from a student, further questioning should be avoided apart from important clarification of factual detail.

The CEO and the DSL will meet as soon as possible to consider an appropriate course of action in response to the information disclosed by the student and will consider any other relevant information. The DSL will decide if it is appropriate to involve other staff members and also whether to inform the student's parents. There may be no need to take further action in which case, this should be recorded in writing.

Further action may include the immediate removal of any imminent threat of danger, seeking advice from the Local Authority Designated Officer and contacting the police.

### **3.6 Importance of Record keeping**

Accurate record keeping is essential in safeguarding and child protection. If accurate records are not kept, then it can affect the police's chances of prosecuting a perpetrator.

If someone discloses to you, you must:

- make some brief notes at the time of the disclosure;
- write your notes up in detail as soon as possible using a Concerns & Disclosure form;
- not destroy your original notes in case they are needed as part of a police investigation;
- record the time, date, place, words used by the child and how the child appeared to you;
- record statements and observable things – do not add opinions;
- not assume anything – don't speculate or jump to conclusions.

Completed Concerns & Disclosure forms must be given to a member of the safeguarding team and kept securely online (password protected) with access only for the safeguarding leader(s).

#### **Confidentiality**

Confidentiality must be maintained throughout the process. You must not talk to anyone apart from the safeguarding team about the incident. Gossip or leaks can be extremely damaging to the accused who has not yet been proved guilty, and to any ongoing investigation.

Never leave sensitive documents lying around. Never leave your computer screen unlocked with sensitive documents displayed.

All safeguarding records are kept securely on SharePoint, password protected according to our Data Protection Policy and only accessible to the safeguarding leader(s). There is an area for:

- safeguarding training

- all safeguarding contact details including the LSCP and the LADO
- safeguarding Concerns
- allegations
- safeguarding Reports
- safeguarding Audits

### **3.7 Annual Safeguarding report & Audit**

In September each year, LSE prepares an annual safeguarding report which is an overview of what has happened in safeguarding during the previous 12 months. It does not list individual names or identifying details. The report includes the following:

- the number of concerns raised and dealt with
- if any patterns have emerged
- how effective safeguarding strategies have been.
- if any major safeguarding issues have come up
- records of training carried out and any changes made to training procedures.
- any changes to the safeguarding team or structure
- any feedback from staff/students regarding safeguarding awareness
- any areas of weakness noted
- if any new initiatives should be considered or implemented over the coming year

An independent Safeguarding consultant will then audit the report and check it against available evidence and in discussion with LSE's safeguarding team. Once it has been passed as accurate, a strategy meeting is held with the safeguarding team to discuss the report and ways to make improvements.

### **3.8 If an adult is accused**

It is the duty of LSE staff to disclose cases of abuse or allegations of abuse to the safeguarding team without delay. It is not for the staff to decide whether a suspicion or an allegation is true. All suspicions and allegations of abuse must be taken seriously.

It is important to ensure that the child is away from all possible harm. That may require changing the accused adult's work duties if they are a member of staff, even requiring them to leave the school while the investigation takes place. At all times the CEO will be kept informed of events and the DSL will decide whether it is appropriate to involve the LADO. At all times, confidentiality will be kept, and the ongoing investigation will not be discussed outside the safeguarding team.

If an accusation is made against the DSL, the matter must be reported to the CEO or in his absence, a director immediately. If none of the directors are on site, it should be reported to a member of the safeguarding team to ensure that the procedure outlined above is followed.

If an accusation is made against a member of the Senior Management Team, the DSL will follow the same procedure, but keeping at least one other member of the Senior Management Team informed.

### **3.9 Process following a reported allegation or serious incident.**

Immediate action needs to be taken by the safeguarding team to ensure the safety of the child. Medical assistance needs to be sought if required. A member of the safeguarding team is assigned to personally support the child and decide when it is safe and appropriate for the child to return to his/her normal routine.

Once a Concern is reported to a member of the safeguarding team, s/he will liaise with other members of the safeguarding team before immediately seeking guidance from the LADO. This is called **the initial discussion**. If a member of the safeguarding team is named in the allegation, they must be excluded from the safeguarding discussions.

If the DSL contacts the LADO, their advice may include the following:

- further action to protect the child
- contacting the police immediately
- when and what parents/guardians should be told
- what should be said to the person facing the allegation.
- making a referral to the DBS depending on the severity of the accusation
- suspending the accused. This is not automatic and should only be considered when children are at risk of serious harm, or the concern is so serious it could result in immediate dismissal. If the person is suspended, the reason must be communicated to him/her within 1 day.

Possible Outcomes from Initial discussion	What to tell/do with the accused person – this must always be agreed with the LADO
1. Strategy meeting – usually held within 3 days	Tell the accused person about the allegation using minimum detail. Inform him/her of the possible/likely courses of actions. LSE will appoint a named person to support the accused and will advise the accused to get professional advice.
2. Referrals to the police or social care for investigation	As above.
3. No further action	School decides what internal action to take, possibly disciplinary action and certainly an investigation by a senior manager.

#### Terminology for possible outcomes to the investigation

Definition	Meaning
Substantiated	There is sufficient evidence to prove the allegation.
False	There is sufficient evidence to disprove the allegation.
Malicious	There is clear evidence to prove there was a deliberate act to deceive and the allegation is false.
Unfounded	There is no evidence which supports the allegation. It could be that the person making the allegation misinterpreted the incident or did not know all the circumstances.
Unsubstantiated	There is insufficient evidence to prove or disprove the allegation (it is not the same as 'false'). Accused could be guilty or innocent.

Resolution of allegation	Action by LSE
Allegation substantiated, leading to prosecution and dismissal	Inform DBS, record kept on file.
Allegation substantiated, leading to disciplinary action or dismissal	May need to inform DBS, record kept on file.
Allegation unsubstantiated	Summary report kept in staff file for future clarification and reduce need for reinvestigation. Copy given to the accused.
Allegation unfounded or malicious	Report removed from file. Disciplinary action required against perpetrators of malicious story.

LSE has a duty of care to its employees and will provide adequate support for anyone facing an allegation. The school must maintain confidentiality regarding the accused. Until any investigation, either internal or external, has been completed, the identity of the accused must not be released. If

the allegation is unsubstantiated, unfounded or malicious, LSE will support the member of staff on their return to work, especially if they have been suspended.

### **3.10 If an U18 or another student is accused**

It must be recognised that abuse can come from children as well as adults and it is possible that a student under the age of 18 may be accused of abuse against another child. In such circumstances, it is important that the accused is recognised as being under 18 and must be given all the required support by a member of the Designated Safeguarding Team

## **4. Training**

The DSL has overall responsibility for ensuring that all adults in the organisation have training to the appropriate level. Training must take place before any U18 comes into the care of an adult. The level of training provided for our staff is as follows:

<b>Role</b>	<b>Level of Training</b>	<b>Refreshed</b>
DSL	Level 3 Specialist Safeguarding	Every 2 years externally
ADSL	Level 3 Specialist Safeguarding	Every 2 years externally
DSP	Level 2 Advanced Safeguarding	Every 2 years internally
All staff	Level 1 Basic Awareness training. This is done through the British Council online and then in a face-to-face LSE context specific training with a member of the safeguarding team trained to Level 3.	Annually on-line and face to face internally

The face-to-face training for Level 1 Basic Awareness ensures that all staff understand what safeguarding requirements and procedures are in place in LSE and include:

- reiterating the duty of care that every adult has, regardless of their role or position in the school
- awareness that the duty of care includes being mindful of their own and other staff members' behaviour towards U18s and adults at risk and to report any concerns.
- making sure that everyone knows who the members of the safeguarding team are and how to contact them
- understanding the systems for reporting concerns and what the stages of the procedures are
- information on signs of abuse to be aware of
- information on how to respond if an allegation is made
- reminder of the Code of Conduct that everyone is expected to always follow.
- Prevent Training

During the online Basic Awareness training, understanding is tested throughout with multiple choice questions. In the Face-to-Face Basic Awareness training, understanding and learning is checked verbally during the session and a short-written test is taken by all participants.

### **4.1 Induction**

As part of induction, the following will be undertaken:

- making known to all staff the policies and procedures in place that promote the safety and welfare of children and adults at risk.
- all staff will meet with the DSL/ADSL on their first day (where possible) for a safeguarding induction. This will include confirming understanding regarding the difference between a concern (something that seems not to be right but is of no immediate danger to the U18)

and a serious issue (where the U18 could be in danger of harm/abuse and an urgent response is required)

Records of all training for staff are kept on SharePoint by the DSL

## **5. Safer Recruitment**

### **5.1 Safer Recruitment Overview**

LSE is committed to safer recruitment for all staff posts, permanent and freelance for any staff that may have unsupervised contact with an U18. This includes school staff, activity leaders and other providers such as transport companies. The Safer Recruitment guidelines are applied clearly and purposefully at every stage of the process:

- advertisement of the role
- application information pack
- job description
- invitation to interview email
- during the interview
- through all suitability checks

All staff that may have unsupervised contact with U18s are DBS checked by LSE. This will also apply when U18s are placed in the care of subcontractors without direct supervision by LSE staff, for example in the case of airport transfers. Where there is no direct supervision by LSE staff, the subcontractor must confirm in writing on an annual basis that these staff members are DBS checked and that the check is up to date and clear. Should new staff be recruited in the year, the company's recruitment policy must require that all staff have the appropriate DBS check completed before they can be allocated to work involving U18 students.

In addition to DBS checks, all applicants for a role must provide 2 recent references and have a checkable employment history with no unexplained gaps. References for any person who may have contact with U18s must include a question about their suitability to work with U18s and whether they have been subject to any disciplinary action. A prohibited list check will be undertaken for anyone who has worked in a state school in the UK and for anyone who has worked in a state school outside the UK to confirm that they have not been sanctioned against working in education. This could be confirmed by a letter of professional conduct from the local authority or other measures that LSE can request, such as additional references.

Interviews for all posts include questions that ask about a candidate's attitude to and expectations of working with U18s and what safeguarding involves.

LSE will also require that Group Leaders or anyone accompanying groups of U18 students provide confirmation or evidence that the Group Leaders have current police good conduct certificates or similar from their country of origin.

### **5.2 Overseas Police Checks**

If an applicant has been working or living overseas, then a local police check from the country or countries they have been in for at least six months in the last three years is required. If the certificate is delayed, LSE will apply additional scrutiny to the other checks and request a third reference from someone who has experience working with them, preferably in an U18 environment.

### **5.3 Applicants awaiting a DBS or where criminal checks are not possible**

If an applicant has been working overseas before applying to LSE and a police check cannot be obtained for whatever reason, LSE will request an enhanced DBS check for their UK records and will take additional care with other recruitment checks including:

- identity
- qualifications
- work history
- references (minimum 3)

On occasion, new staff are taken on and need to start work before their DBS or police check is returned. If that is the case, then the DSL ensure that:

- a Barred List check has been carried out;
- a self-declaration form has been signed, completed and filed;
- a detailed risk assessment by the DSL and the prospective line manager has been completed, signed and filed;
- other staff members are aware that the DBS or police check is outstanding, and that this person cannot be alone with U18s under any circumstances.

The staff member will be prohibited from being alone with an U18 until a cleared DBS or police check can be verified. In the case of trainers, they will not be scheduled for individual tuition with an U18 and all contact with U18s must be closely monitored. Steps to do this must be clearly set out in the risk assessment done prior to the role commencing.

### **5.4 Information for Applicants**

Applicants are always informed of the following:

- LSE always takes up references and checks an individual's employment history
- reference checks will include questions that are specifically related to suitability to work with U18s
- any gaps in an application form must be explained to our satisfaction
- LSE is committed to safeguarding and is only interested in recruiting candidates with the same mindset and values
- enhanced DBS checks will be carried out for all staff before appointment including the Prohibited List
- applicants from overseas will be expected to provide a current police check from the relevant country
- on appointment, staff are required to undertake the online basic awareness safeguarding training and the face-to-face training to understand the policies and procedures of our context
- enhanced DBS checks will be carried out for all staff before appointment
- where relevant, Prohibited List checks will be done

Employment of ex-offenders is possible at LSE provided that the seriousness, nature and frequency of the offence, as well as the age of the conviction, do not make the candidate unsuitable for the post they are applying for. Candidates will be signposted to a source of independent advice on what is required to be disclosed. At least two members of staff involved in the recruitment process will assess the candidate's suitability to work in the position they have applied for. Please also see LSE's Recruitment of Ex-Offenders Policy

## **5.5 Staff Records**

All staff HR records are held on SharePoint. The individual's department head is responsible for keeping the HR file up to date.

In addition to that, a central record of staff is kept to maintain a record of all pre-appointment checks, which is updated and maintained by the Head of Young Adults courses. The central record acts as a check list for the following information:

- identity – name, address, DOB
- start date
- role in organisation
- qualifications
- DBS certificate
- Barred check list
- Overseas Police check – required (Y/N), received (Y/N)
- right to work in the UK
- Prohibited check list (for trainers)
- 2 references (+ an extra one for those with a delayed DBS check)

## **5.6 Referrals to the Disclosure & Barring Service (DBS)**

A referral must be made to the DBS if LSE withdraws permission for an individual to engage in work with U18s or would have done so had the individual not resigned, retired, been made redundant or been transferred to a position which does not involve contact with U18s because they think that the individual has:

- engaged in *relevant conduct*, i.e., action or inaction that has caused: neglect, emotional/psychological, sexual or physical harm;
- satisfies one or more of the harm tests; to harm or cause harm, to put an U18 at risk, to attempt to harm or incite others to harm or to behave in a way that indicates they may not be suitable to work with children;
- received a caution or conviction for a *relevant offence*.

If these conditions have been met, the information must be referred to the DBS. The referral should be made to the DBS when LSE has gathered sufficient evidence as part of their investigation to support their reasons for withdrawing permission to engage in work with U18s and, in following good practice, consulted with their LADO if appropriate.

# **6. Welfare for U18s**

## **6.1 Risk Assessments**

To ensure the safety of our staff and students, a comprehensive range of risk assessments are carried out. All risk assessments are reviewed annually and where relevant (e.g., social programme activities), they are reviewed before each event to make sure they are still relevant. Please see our risk Assessment Policy for further details.

Specific areas for analysis of risk include:

- travelling to and from the UK
- travelling to their accommodation from point of entry into the UK
- travelling between their accommodation and school
- in the school building and grounds

- in their accommodation
- educational activities
- off-site activities
- the social programme
- free time
- unsupervised time

Before engaging in any activity with students, trainers and social programme leaders must read the relevant risk assessment, adapt it to any specific need for this particular group and then sign it to say they have read and understood it. The risk assessment must then be signed by a manager and filed appropriately.

The fact that an activity has been risk assessed does not mean that there are no risks to students. However, potential risks can be significantly reduced by following the safety provisions outlined in the risk assessment.

### **6.2 Unsupervised time**

While every attempt is made to engage the U18s in school led activities, it is recognised that there may be time when the U18s will be unsupervised. All the U18s in LSE are aged 15-17, there are no students younger than that to consider. The following provisions are in place to help keep the U18s safe during unsupervised or free time:

- U18s must participate in all class trips that are during class time.
- If an U18 is late for class (at the beginning of the day or after a break), then the trainer must immediately notify the courses manager to follow up.
- Accommodation staff must immediately contact the school's emergency number if an U18 misses their curfew.
- All students are issued with a card with the school's emergency number. On day one of an U18's course, they are asked to programme the number into the phone and call it to check the number is correct.

### **6.3 Missing Students**

Procedures for what to do in the event of a missing student are outlined in:

- Procedure for dealing with missing students.
- Social programme – guidelines for group and activity leaders
- Airport arrivals procedures and policy

The procedures cover what to do in the event of a missing student in any eventuality including airport arrival, accommodation, school and social activities.

All U18 students are required to give us their emergency contact details before they arrive in the UK for their course to start. They need to provide the following information:

- Name of emergency contact
- Telephone number and email address of emergency contact
- Relationship to the student
- Approximate level of English of the emergency contact
- Spoken language(s) of the emergency contact.

### **6.4 Welfare provision**

The LSE welfare team is advertised on the student noticeboard and is pointed out as part of the induction on day one of the course. There is always a member of the safeguarding team and the

welfare team on site during U18 courses. Our teams are made up of men and women so a student can choose the person they feel most comfortable talking to.

In order to prepare U18s for life in the school & London during their stay and to have the best experience possible, the following procedures are in place:

- a copy of the U18s Handbook is available on the website and is sent with the booking confirmation.
- a day one orientation for U18s is organised and led by a member of the safeguarding team. The orientation covers all aspects of their stay and the areas that are specific to U18s.
- U18s wear easily identifiable lanyards so that other students and staff members are aware who they are at all times.
- a safeguarding poster is on the noticeboard in every classroom and in the staff areas to remind everyone of their responsibilities in Duty of Care
- all staff are aware of who the welfare and safeguarding team are and know to refer any concerns, however small, to them to take over. The welfare team member will then feedback to the person who brought up the worry so that everyone can be reassured that it is being dealt with

### **6.5 First aid provision**

LSE has a comprehensive First Aid Policy in place and ensures that at least 3 appropriately trained physical or medical first aiders are available with at least one of each gender. First aid training is updated regularly, and the training schedule is kept up to date by the Facilities Manager. The names and photos of the trained first aiders are on the student noticeboard which is pointed out as part of the induction.

A member of LSE staff will accompany all U18s to medical appointments and to the pharmacy to pick up medication.

The DSL and at least one of the ADSL's are trained in Mental Health First Aid.

All staff should be aware that mental health problems can, in some cases be an indicator that a child has suffered or is a risk of suffering abuse, neglect or exploitation.

It is important to recognise whilst providing support that unless trained appropriately, staff are not mental health experts and should not be diagnosing conditions. The mental health first aid role is to provide information for staff and students to feel comfortable in asking for help or providing an environment where the suggestion of help may be made through a considered and guided approach such as with mental health first aiders.

Staff are well placed to observe students' day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, following procedures and speaking to the DSL.

### **6.6 Code of Conduct for U18s**

For everyone to be very clear on acceptable standards of behaviour a student code of conduct is included in the U18 Handbook and covered in the day 1 inductions. This includes information on alcohol and tobacco laws in the UK and makes it clear that:

- the legal age to buy alcohol and tobacco products in the UK is 18
- students under the age of 18 are not permitted to smoke or vape while under the care of the school.
- students under the age of 18 are not permitted to drink alcohol at any time.

- students under the age of 18 are not permitted to join a social activity which has not been deemed age appropriate. A student turning 18 whilst on the course will adhere to the rules as if they were still U18.

### **6.7 Radicalisation & Extremism**

LSE is a multicultural and international community in which we aim to foster an acceptance and tolerance of a range of views. We encourage our students to express their views as long as they respect the core British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those of different faiths and beliefs in accordance with the Government's prevent strategy.

We are aware that some students may have been exposed to extremist influences or views before their arrival in the UK or may be exposed to them after coming here. At times, students themselves may reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. Any of these behaviours that are witnessed by staff must be challenged and reported to the DSL. These will then be dealt with in line with the relevant policies governing staff and student conduct.

Staff should be aware that U18s and Adults at Risk may be more susceptible to, or could be targeted by, extremists. Students who have not made friends, appear lonely or are excessively homesick may be particularly vulnerable. As part of a wider safeguarding responsibility, staff need to be alert and have a duty to report the following to the DSL:

- disclosures by students of their exposure to extremist views, actions or material both inside and outside of the school
- graffiti symbols, writing or artwork promoting extremist messages
- students accessing extremist material online
- any reports of changes in behaviour, friendships, actions or requests for assistance
- students voicing opinions drawn from extremist ideologies or narratives
- use of extremist or 'hate' terms to exclude others or incite violence
- intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on but not exclusive to gender, gender identity, disability, sexuality, race, colour or culture
- attempts to impose extremist views or practices on others
- anti-western or Anti-British views.

In order to help prevent such occurrences, the school is committed to raising staff and student awareness of radicalisation and extremism through training and incorporating these themes sensitively and appropriately into lessons. We maintain robust IT measures to prevent access to extremist materials and other inappropriate websites. In a situation where concerns have been raised, the DSL will share them with local agencies as appropriate for guidance.

### **GDPR and U18s**

U18s need particular protection when collecting and processing their personal data because they may be less aware of the risks involved. U18s have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased. An individual's right to erasure is particularly relevant if they gave their consent to processing when they were a child.

All our student data (adult and U18) is processed and stored under strict GDPR guidelines. In addition to the consent of the U18, parental consent is required.

## **Contextual Safeguarding**

We have strict protocols in place to ensure the safety of our U18s in school accommodation and on school premises and activities. We also recognise that we have a duty of care to our students when they are unsupervised and ensure we have risk assessments conducted for, and advice for all U18s on areas such as:

- U18s keeping safe in unsupervised time
- travelling to and from school each day
- who to contact if you have an emergency
- keeping safe at events in London e.g., London Marathon

## **7. Safeguarding U18s and Adults at Risk on the social programme**

Events on social programmes can take place during the afternoon, the evening or at weekends. To safeguard all our students but particularly those U18 or Adults at Risk, the following procedures and guidelines must be followed:

- A relevant risk assessment must be completed by the activity leader and signed off as complete by a manager. Each activity will need a tailored risk assessment, so it is not appropriate to cut and paste from another document. However, many social programme activities fall into similar categories and so a template can be used as a starting point
- The social programme organiser needs to be sure that the ratio of staff to students is adhered to, especially if an U18 student is joining at any stage. The ratios are 1:15 as a minimum for social programme activities unless otherwise agreed with the DSL.
- For any on-site activities, make sure that the room is fit for purpose and any obstacles have been removed.
- Sports activity leaders should ensure that students are playing the respective sports in a safe manner and should immediately calm students down or stop play altogether if too much aggression is shown on the sports field.
- For all social programme activities, the leader must have a complete list of all names and phone numbers for everyone joining the activity. A copy of this list must be left with the risk assessment in the school office and another copy must go with the activity leader.
- Activity leaders must be able to identify all U18s by sight and know all their names. U18s must wear their ID lanyard so that they can be clearly identified.
- The activity leader must take a school phone with them and make sure that every student has a note of the number in case they get separated from the group.
- On excursions where students have time to themselves, no U18 can be left alone. Students must always stay in groups of at least 3. The activity leader must ensure that the U18 student has their number and the school emergency number before leaving the school and that the student's phone has sufficient charge on it in case of emergencies.
- When using public transport, the activity leader must make sure that all students stay together and that none are left behind.
- It is the responsibility of the activity leader to check the environment they are taking the group to as part of the risk assessment process. They should consider potential changes including heavy traffic, sporting events or public holidays etc.
- Ensure that all students know where the meeting point is and what time they are due to be there after their free time is over
- Activity leaders are encouraged to take photos on excursions. Particular attention needs to be taken to safeguarding if there are U18s on the trip. While all students need to give their consent to their image being taken and used for publicity, photos of U18s can only be used

with their consent AND their parent/guardian's consent. The Activity leader should have this information as part of the risk assessment preparation

## **8. Safeguarding U18s and Adults at Risk in School Accommodation**

All U18s are given a code of conduct which includes rules and expectations for the school accommodation. This is also included in their day 1 induction and include the following:

- There is a 24-hour staffed reception
- There is security access to the accommodation where a pass must be used to gain entry.
- LSE students are in ensuite rooms on corridors with an LSE staff member nearby.
- LSE staff will be in the communal areas of the accommodation when students are present.
- There will be an LSE member of staff available 24 hours a day.

## **9. Safeguarding U18s and Adults at Risk during airport transfers**

We strongly recommend that all U18s use our airport or Eurostar transfers in order to travel from their point of entry into the UK and their accommodation. If a parent wishes to organise their own travel arrangements, the school must conduct a risk assessment and inform the parent of their findings. The parent can then complete an informed parental consent form with clear information on who the U18 should contact if they get into any difficulties.

All drivers in the companies we use to transfer U18s are DBS checked and we have annual confirmation of this in writing on file. No company has permission to use a substitute driver for an U18 transfer.

Transfer documents that involve an U18 are clearly marked to say that the passenger is U18, and drivers are under strict instructions to never leave the airport/pick up point without their U18 passenger. In the event of a no-show, the driver must contact the emergency number of the school and receive confirmation that their passenger has not left their country of origin before leaving the pick-up point. When an U18 is delivered to the accommodation, the driver must ensure that the U18 passenger is met by an adult and has access to the accommodation before leaving.

## **10. Parental Consent**

A Parental/Guardian agreement for students U18 to study with LSE is emailed at the time of booking and must be completed before the course starts. This explains what the rules of the course are regarding airport transfers, unsupervised time, etc. No U18 can join a course without a signed parental consent form.

Parental consent and areas that consent have not been given for will be stored on the U18s student account and information distributed to the safeguarding team as appropriate.