



Safeguarding policy

Lyons Languages offers language tuition and study holidays to adults (over 18 years) and younger students between the ages of 12 and 18 years. We endeavour to ensure that our programmes of study are appropriate to the age of those students enrolled.

Lyons Languages has a duty of care to all students and recognises that the welfare of children and vulnerable adults is paramount. All students, whatever their age, culture, disability, gender, language, racial origin, religious beliefs, and/or sexual identity, have the right to protection from abuse.

The school's directors and staff are committed to providing a safe environment for any person visiting the school, staying with an approved homestay provider, participating in an organised activity, travelling on arranged and approved transport, or enjoying free time as included in the school's programmes.

Safeguarding is an umbrella term that covers everything related to student welfare. Everyone who works at the school has a legal and professional duty to actively promote the welfare of our students. We believe that the school should provide a caring, positive, safe, and stimulating environment in which all students should feel comfortable and be protected from potential risk.

The purpose of this policy is:

- to provide protection for the children and young people who receive Lyons Languages' services;
- to provide staff with guidance on procedures they should follow if they suspect a child or young person may be experiencing, or at risk of, harm.

This policy applies to all staff, teachers, host families, students and anyone working on behalf of Lyons Languages. The full policy is available on our website at www.lyonslanguages.com and a simplified version is included in staff and student handbooks, and homestay hosts' guidelines.

This policy was compiled with reference to the NSPCC advice, and current government legislation. Links to relevant statutory information are included in text where appropriate.

The policy will be reviewed annually.

Parental Consent and Supervision

Whenever a child is accepted on a programme of study, a Parental Consent Form is sent to their parent(s) or legal guardian(s). This document and Lyons Languages Supervision Policy explain the level of care that will be provided to their child in this area.



Policy terms

This policy uses some terms frequently; for the avoidance of doubt, the following definitions apply:

Safeguarding or Child Protection

Safeguarding is a broader term than child protection. It encompasses everything we do to look after our students, providing them with the best possible care and the safest possible circumstances. Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or likely to suffer, significant harm.

Child / Children

The Children Act 1989 states that the legal definition of a child is “a person under the age of 18”.

Vulnerable Adult

The school believes that any foreign language student, regardless of age, could be considered vulnerable to abuse as a consequence of their ability to communicate or understand being inhibited by their language level and as a result of living in a foreign country. A vulnerable adult is therefore defined as any foreign language student aged 18 or over.

Adult

An adult is legally defined as any person who is aged 18 or over; for the purposes of this policy, it is assumed that this person has substantial or unsupervised access to children and vulnerable adults.

Abuse

The Department for Education defines abuse as:

“A form of maltreatment of a child. Somebody may abuse or neglect a child by inciting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.”

Although referring to children, for the purposes of this policy, this definition also covers vulnerable adults.

Principles

This policy is based on the following principles:

- all people should be treated with respect and dignity;
- all children and vulnerable adults have the right to safeguarding from potential abuse;
- all adults have a role in ensuring a safe and comfortable environment at all times;
- all adults have a responsibility to report any concerns about children or vulnerable adults.



We will seek to safeguard children and young people by:

- valuing them, listening to and respecting them;
- adopting child protection guidelines through procedures and a code of practice for staff;
- ensuring all necessary checks are made when recruiting staff in all roles;
- sharing information about child protection and good practice with children, parents, agents, and staff;
- sharing information about concerns with agencies who need to know, and involving parents, group leaders, agents and children as appropriate;
- providing effective supervision, support and training for staff

Responsibilities

Designated Safeguarding Lead

Lyons Languages will ensure it has a designated safeguarding lead (DSL) who has undertaken, as a minimum, Level 3 (Advanced) Safeguarding training course with regular refresher training. The DSL is responsible for recording and reporting any allegations of abuse to the Local Authority Designated Officer.

The Director in charge of welfare, Rosalind Lyons, is the Designated Safeguarding Lead and is responsible for:

- arranging relevant safeguarding training for all staff;
- carrying out DBS or police record checks for all teaching staff, supplementary staff and homestay hosts;
- reporting any allegations or concerns to the Local Authority Designated Officer and any other relevant agencies;
- keeping records of any allegations and concerns;
- overseeing the implementation of this policy and reviewing it annually.

Staff training

All staff at Lyons Languages are required to complete Level 1 Safeguarding awareness training as a minimum. Host families are provided with a copy of our full Safeguarding Policy and will be encouraged to complete Level 1 Safeguarding awareness training.

Adults' safeguarding responsibilities

Staff Code of Conduct

All adults associated with under-18s have safeguarding responsibilities. All staff are required to agree to the school's Code of Conduct (also included in Staff Handbook) before starting work. The following sections relate directly to safeguarding:



The role of staff and volunteers

In your role at Lyons Languages you are acting in a position of authority and have a duty of care towards the children and young people we work with. You are in a position of trust, and this is of critical importance particularly regarding relationships with individual students. Under the Sexual Offences Act 2003, any person in a 'position of trust' engaged in sexual activity with students under the age of 18 is breaking the law. For further details about this law, see <https://www.legislation.gov.uk/ukpga/2003/42/contents>.

Responsibility

You are responsible for:

- prioritising the welfare of children and young people;
- providing a safe environment for children and young people;
- ensuring equipment is used safely and for its intended purpose;
- having good awareness of issues to do with safeguarding and child protection and
- taking action when appropriate;
- following our principles, policies and procedures, including our policies and procedures for child protection/safeguarding and whistleblowing;
- staying within the law at all times;
- modelling good behaviour for children and young people to follow;
- challenging all unacceptable behaviour and reporting any breaches of the behaviour code to Rosalind Lyons (Director in charge of welfare);
- reporting all concerns about abusive behaviour, following our safeguarding and child protection procedures. This includes behaviour being displayed by an adult or child and directed at anybody of any age.

Rights

You should:

- treat children and young people fairly and without prejudice or discrimination
- understand that children and young people are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the group/organisation
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

Relationships

You should:

- promote relationships that are based on openness, honesty, trust and respect;
- avoid favouritism;
- be patient with others;



- exercise caution when you are discussing sensitive issues with children or young people;
- ensure your contact with children and young people is appropriate and relevant to the work of the project in which you are involved;
- ensure that whenever possible, there is more than one adult present during activities with children and young people. If a situation arises where you are alone with a child or young person, ensure that you are within sight or hearing of other adults. If a child specifically asks for or needs some individual time with you, ensure other staff or volunteers know where you and the child are;
- only provide personal care in an emergency and make sure there is more than one adult present if possible, unless it has been agreed that the provision of personal care is part of your role and you have been trained to do this safely.

Respect

You should:

- listen to and respect children at all times;
- value and take children's contributions seriously, actively involving them in planning activities wherever possible;
- respect a young person's right to personal privacy as far as possible. If you need to break confidentiality in order to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity.

Unacceptable behaviour

When working with children and young people, you must not:

- allow concerns or allegations to go unreported;
- take unnecessary risks;
- smoke, consume alcohol or use illegal substances;
- develop inappropriate relationships with children and young people;
- make inappropriate promises to children and young people;
- engage in behaviour that is in any way abusive, including having any form of sexual contact with a child or young person;
- let children and young people have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account;
- act in a way that can be perceived as threatening or intrusive;
- patronise or belittle children and young people;
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people.



Reporting concerns

If you become aware of any breaches of this code, you must report them promptly to Rosalind Lyons. If necessary you should follow our whistleblowing procedure and safeguarding and child protection procedures.

If for any reason you feel you need to report a problem through an external agency, the [NSPCC's *what you can do to report abuse* dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

Accommodation

All host families are visited and screened by the Directors prior to receiving students and then visited at least once every two years. An enhanced DBS check is carried out on all adults in families hosting under 18s. Information and guidelines regarding safeguarding are provided to hosts in the Homestay Guidelines.

Child protection

Child abuse constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Recognising symptoms of abuse

It is important that we are able to recognise the symptoms of abuse. Some signs may vary with the age of the child, and not every child will exhibit every symptom. There are four main categories of abuse and these are listed below.

Sexual Abuse:

- acting in an inappropriate sexual way with objects or peers;
- sleeping problems;
- becoming withdrawn or clingy;
- personality changes, seeming insecure;
- unaccountable fear /dread of particular places or people;
- changes in eating habits;
- physical signs such as unexplained soreness around genitals, sexually transmitted diseases;
- secretive behaviour.



Physical abuse

Signs of physical abuse could be if a child:

- has unexplained bruises, burns etc.;
- is wearing clothes to cover injuries, even in hot weather;
- refuses to undress for sports, or join swimming sessions;
- shows signs of general neglect;
- is often hungry, may beg or steal food;
- is badly dressed in clothes that need washing;
- exhibits poor appearance and personal hygiene such as unwashed hair;
- lacks necessary medical/dental care;
- is often tired;
- may be abusing alcohol or other drugs.

Emotional Abuse

Abuse can be emotional as well as physical. Some signs to watch out for include when a child:

- shows delayed physical or emotional development;
- shows extremes of passivity or aggression;
- develops a sudden speech disorder;
- exhibits overreaction to mistakes, or continual self-deprecation;
- shows neurotic behaviour (rocking, hair twisting, self-mutilation);

Neglect

Recognising signs of neglect

Below are signs frequently found in cases of neglect; their presence is not proof that abuse has occurred, but must be regarded as indicators of the possibility of significant harm, and referred as such:

- a child appears to lack essential physical needs, such as food, clothing, or medical care;
- a child appears to lack essential emotional needs, such as feeling loved, valued, and safe;
- a child appears to be listless, apathetic and unresponsive, with no apparent medical cause;
- a child displays unexplained weight loss;
- a child is frequently absent from school;
- a child is left with inappropriate carers (e.g. too young, complete strangers);
- a child is left with adults who are intoxicated or violent;
- a child is abandoned or left alone for excessive periods;
- a child has very poor dental health.



Child Sexual Exploitation

Child sexual exploitation is a form of sexual abuse in which a young person is manipulated, or forced into taking part in a sexual act. This could be part of a seemingly consensual relationship or in return for attention, affection, money, drugs, alcohol or somewhere to stay.

As professionals, it is important that we familiarise ourselves with the signs that a young person is being exploited and to share this information with colleagues. If you notice any of the signs in a young person, report it to the Designated Safeguarding Lead.

Signs of child sexual exploitation include:

- going missing for periods or time or regularly returning home late;
- regularly missing classes;
- appearing with unexplained gifts or new possessions (particularly mobile phones);
- having older boyfriends/girlfriends;
- suffering from sexually transmitted diseases;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

Female Genital Mutilation

Female genital mutilation (FGM) includes procedures that intentionally alter or injure the female genitals for non-medical reasons. It can also be known as female genital cutting or female circumcision. Female genital mutilation is considered to be a violation of human rights and is illegal in the UK.

Possible indicators that FGM is about to happen:

- a child talking about getting ready for a special ceremony;
- a family arranging a long break abroad;
- a child's family being from the "at risk" communities for FGM (Nigerian, Indonesian, Kenyan, Somali, Eritrean, Sudanese, Sierra Leone, Yemeni, Afghani, Kurdish, Pakistani or Egyptian);
- Knowledge that an older sibling has undergone FGM;
- A young person talks of going abroad to be "cut" or to get ready for marriage.

Possible indicators that FGM has already happened:

- Prolonged absence from school;
- Behaviour change after returning from a holiday;
- Bladder/menstrual problems;
- Difficulty in sitting still and looking uncomfortable;
- Complaining of pain between their legs;
- Mentioning that someone did something to them that they cannot talk about;
- Secretive behaviour;
- Reluctance to take part in any physical activity.



How to respond to concerns

All staff have a duty to respond to concerns. Staff who report concerns will not be penalised and their report will remain confidential.

It is essential to act quickly and effectively if an allegation is made, or if there is a suspicion or concern about a staff member's relationship with a child, particularly if they have:

- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates she/he is unsuitable to work with children.

If an allegation is made, or a concern arises, the DSL should be informed immediately. She will then contact the Local Authority Designated Officer (LADO).

LADO contact details:

Email: LADO@cambridgeshire.gov.uk

Telephone: 01223 727 967 (Monday to Friday during office opening hours)

Telephone: 01733 234 724 (Emergency Duty Team - out of hours queries)

The LADO is available to provide support and guidance in any allegations process, including advising whether or not the person concerned should be immediately suspended.

Responding to a disclosure from a child:

If a child tells you that they, or someone they know, is being abused:

- Listen; believe what the child is saying and take it seriously;
- Be attentive, calm, reassuring and non-judgmental;
- Avoid condemning the alleged abuser;
- Don't make assumptions about the child's feelings;
- Never promise confidentiality;
- Never attempt to investigate the allegations;
- Report the disclosure to the DSL immediately;
- Record what was said or observed – record facts not opinions, report what was said to you in the child's own language.

Keeping records

Lyons Languages will:

- keep clear, detailed, accurate written records of concerns (noting the date, event and action taken);
- ensure all records are kept securely, separate from the main student file;



- ensure the member of staff is treated fairly and honestly, helped to understand the concerns expressed and the process being followed and possible outcomes;
- senior staff should seek advice from the LADO and / or police before informing the person who is subject to an allegation.

If an adult is accused:

- the DSL should be informed immediately;
- the adult will be suspended pending investigation;
- the DSL will contact the LADO;
- the details of the investigation will be kept confidential until fully resolved to protect all parties involved.

If a child is accused:

- the DSL should be informed immediately;
- The child will be suspended pending investigation but supported by members of the school's safeguarding team;
- the DSL will contact the LADO;
- the details of the investigation will be kept confidential until fully resolved to protect all parties involved.

Safer Recruitment

The recruitment process and procedures aim to identify and deter applicants who may not be suitable to work with children. To achieve this, Lyons Languages will ensure all recruitment materials (advertisements, job descriptions and application forms) contain the following statement:

Lyons Languages is committed to safeguarding and promoting the welfare of children and young people. We expect all staff and volunteers to share this commitment. We do not appoint without interview and require a minimum of two references plus proof of identity and qualifications. Reference requests will ask specifically whether there is any reason why an applicant should not work with children. All gaps in employment must be explained satisfactorily. Enhanced DBS or Police checks will be required. We require all staff to comply with our Staff Code of Conduct.

- obtain a minimum of 2 professional and character references that provide information on a candidate's suitability to work with children;
- assess candidates' attitudes to working with children during interview;
- verify the identity and qualifications of successful applicants;
- carry out suitability checks on all successful applicants before employment;
- ensure all staff have read this policy and are aware of procedures for reporting concerns;
- provide Level 1 Safeguarding training for all new staff as part of the induction process.



Suitability checks

An enhanced DBS check will be carried for all new staff prior to employment.

If a prospective member of staff has been living outside of the UK for more than a year, a police certificate of good conduct from the country of most recent residence will be requested in addition to the DBS check. If it is not possible to obtain an overseas record check, references will be checked by phone and the prospective member of staff will be asked to complete a self-declaration form.

If the DBS check shows an applicant has a criminal record, the Directors will make a judgment on their suitability to work with children, taking into account the seriousness and nature of the offence, the age of the offence and whether it was concealed during application.

Safeguarding for Homestay Hosts

Our homestay hosts

Lyons Languages takes all reasonable steps to ensure our hosts are carefully selected and approved, by:

- following safer recruitment procedures for all hosts;
- inspecting all potential hosts in advance and revisiting all active hosts regularly;
- establishing and maintaining an open and positive dialogue with all hosts;
- giving hosts clear guidelines on appropriate behaviour and reporting requirements;
- ensuring that all hosts have read and agree to uphold our policies, procedures, and principles.
- providing all hosts with a copy of our safeguarding policy and encouraging them to take an online Level 1 Safeguarding Awareness course.

Our students

We take all reasonable steps to ensure our students are informed, instructed, and aware, by:

- giving students clear guidelines on acceptable behaviour in advance of arrival;
- informing students of their host, and the travel arrangements to/from school, in advance;
- encouraging students and their parents to contact the host in advance;
- insisting on mobile phone numbers for every student in advance of arrival.

Our placements

We take all reasonable steps to ensure a safe and comfortable home environment, by:

- allowing students and their parents to give us information about the type of host preferred;
- endeavouring to match a student with a suitable host;
- avoiding a situation where a child student is placed in the same host as an adult student;
- obtaining regular feedback from students with regard to their home environment;
- reacting swiftly to deal with any problems or dissatisfaction.



Our responsibilities

We take all reasonable steps to meet our legal safeguarding responsibilities, by:

- remaining aware and respectful of our private fostering responsibilities;
- requiring our hosts and staff to report any incident, allegation, evidence, or suspicion of abuse;
- referring any such incident to statutory authorities as required by law;
- implementing this policy, and all supporting documents, and reviewing everything regularly.

Prevent

‘Prevent’ is part of the Government’s counter-terrorism strategy and aims to prevent people from becoming involved in terrorism or supporting terrorism. The aim of Prevent is to raise awareness regarding who may be vulnerable to radicalisation and potentially terrorism, why some people are able to influence or manipulate others to commit crimes and to recognise when a vulnerable individual may be in need of help. Our international students are with us for only a limited period, but it is important to be aware of this issue.

There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. Their vulnerabilities or susceptibilities can then be exploited towards crime or terrorism by people with a specific agenda.

Signs of radicalisation will often resemble common adolescent behaviour such as:

- Angry, mood swings, newfound arrogance, perceived sense of injustice, sense that other people are “wrong”;
- Expressing opinions that are at odds with generally shared values, language, phrases and ways of speaking/writing not previously seen/known;
- Appearance (e.g., tattoos), change in routine, dress, new obsessions and pre-occupations.

Contact the Safeguarding DSL if you have any concerns in this area.

We aim to educate students to accept and tolerate a range of views even if they are not their own. Lyons Languages will provide Prevent awareness training to all staff. We encourage all homestay hosts to undergo some online training in this area.

Rosalind and Siobhan Lyons

Directors

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