

Guide to assist ELT Organisations Writing and Updating a Safeguarding Policy

Recent 2018 updates are shaded in blue and also shown in italics (for those without colour copies).

Wording has been revised since the last issue of this document (September 2017); therefore, it is advisable to check the full document.

NB: This document refers the terminology, government documents and official safeguarding procedures of England. Terminology, documents and official procedures in Scotland, Northern Ireland and Wales will sometimes differ! Your policy must reflect that.

Why do ELT organisations need a safeguarding policy?

* There is a legal 'Duty of Care' for any organisation looking after students under 18

** The government document 'Working Together to Safeguard Children' states that private organisations 'need to have appropriate arrangements in place to safeguard and protect children from harm'. (July 2018)*

* The policy, along with other documents, is evidence of how the organisation delivers safeguarding

* It is the first inspection criteria in the 'Safeguarding under 18s' section of the AccreditationUK Scheme (British Council inspection) S1

Does the policy have to follow this format?

* No, safeguarding policy documents come in a wide range of formats, styles and levels of content; there is not one 'correct' way.

* What is important is that the policy meets the safeguarding needs of the children in the organisation, which means it must be

(a) accurate in reflecting what happens in the organisation and relevant to the situation [\(see A2\)](#)

(b) appropriate to the age of students (if there is wide age range, there may be different procedures for different ages)

(c) clear and effectively communicated to stakeholders; staff, homestays, group leaders, students, etc (S2, AccreditationUK Scheme inspection criteria)

(d) has procedures in case anything does go wrong; risk assessments are often used for this

(e) recognises that international students need extra support/guidance because they don't know UK norms or have local knowledge

* Most ELT organisations have their full policy available on the website

* The full policy needs to be supplemented with condensed versions, usually in simpler language, sharing the key relevant points to various stakeholders

Who is covered by safeguarding?

* Safeguarding applies to international students of any age.

* Some ELT organisations, particularly those with students aged 16+ have a safeguarding policy covering all their students with certain sections applying only to their under 18 students. This document has been prepared with under 18 students in mind.

* For students under 18 there is a legal expectation that adequate safeguarding is happening

* Particularly important aspects of safeguarding under 18s are:

- building and not compromising relationships of trust between U18s and adults (see section B, Code of Conduct)

- that adults working with under 18s act as a 'caring and responsible UK parent, protecting children from that which is not in their best interests'. UK is added because UK norms apply to international students whilst they are in UK

How does this guide work?

- * There are six suggested sections with **headings in bold**. Content areas are numbered in each section.
- * Each content area has two columns to the right: (i) associated questions and (ii) any notes. By responding to these questions and checking the notes, you can produce policy content that is appropriate for your organisation. The format of the policy should match that of your organisation's other policy documents.

Do we have to complete every section listed in this guide?

- * The sections and content of this guide cover what is expected from the key government publications on safeguarding, *(i) 'Keeping Children Safe in Education' (Sep 2018) and (ii) 'Working Together to Safeguard Children' (July 2018) – (See A10)*
- * ELT organisations inspected by OFSTED or ISI have a statutory obligation to follow requirements in 'Keeping Children Safe in Education' and their policy should reflect this. *Those writing/updating the policy must read the new September 2018 document which has an appendix of the 2018 updates.*
- * ELT organisations inspected by the British Council may not need to cover all content as thoroughly, but most is good practice. *Further guidance is available from the Accreditation Unit document, 'Inspection criteria, requirements and additional guidance'* or from this webpage <https://www.britishcouncil.org/education/accreditation/information-centres/inspection-support>

Policy area	Questions to ask	Notes
A) Policy statement		This section includes necessary administrative information and underlying principles guiding the policy. Include date policy produced and who produced it.
A1 Context	What factual information helps people understand why your organisation has the safeguarding provision that it does?	Name or organisation, location(s), ages of student, type of courses (e.g. mostly adults with some 16/17s, occasional closed group teens, etc) type of accommodation offered, etc.
A2 Context: multi-centre organisation	<i>If a multi-centre organisation, how do you provide specific safeguarding information relating to the different locations / courses / student ages?</i>	<i>Multi centre ELT organisations may have an overarching company safeguarding policy and procedures; however, the policy must also show how things differ in each centre according to variables such buildings/campus, location, type of course, age of students, and any other relevant local safeguarding information</i>
A3 Terminology	How will you ensure that everyone who reads this policy (including international group leaders) will understand the terms used? Identify and briefly explain key terms and also key roles (give more detail in A9)	Imagine you are coming to safeguarding for the first time; what words / phrases / acronyms would need explanation? Clarify what certain words/phrases mean in context of the policy, e.g. 'all adults' have a responsibility for safeguarding. Who, in your organisation, is covered by 'all adults'? Helpful to clarify from outset the difference between safeguarding (umbrella term meaning 'looking after') and child protection (protecting children from abuse).
A4 Statement	How will you summarise your organisation's commitment to and the paramount	<i>Should include phrase 'always acting in the best interests of the child' – or similar.</i> Add further appropriate phrases (that are true!), e.g. aiming to promote a culture of vigilance / has

	importance of safeguarding children?	safeguarding as top priority in every area of organisation's operation
A5 U18's entitlement	Which children are included in this policy and what are their rights?	Must state that policy is for all, whatever race, gender etc and that they have an entitlement to be protected.
A6 Adult's responsibilities	What are your expectations of the adults who will read this policy?	All adults associated with U18s have legal 'duty of care' and responsibilities to safeguard the U18s e.g. (i) following the policy (ii) sharing the organisation's commitment to safeguarding (iii) undertaking training (see section D) (iv) being ready to report any concerns, even small ones, or allegations (v) knowing who to contact within the organisation and also outside.
A7 Structure, Roles and responsibilities	What is the safeguarding structure of the organisation? Who has key responsibilities and for delivering the policy (which may be different people for different parts of the policy)? How do you contact them?	Show structure for designated safeguarding team with clear leadership, enough named people to cover absence & locations, especially for multi-centres. Identify safeguarding team members, their role title with brief descriptions / responsibilities of role, how to contact the team, maybe also level of training required for each role. A safeguarding organogram often helpful to convey information on structure. Exact titles of roles can be whatever organisation prefers; but very important that everyone knows the titles and what each role does. Typically ELT organisations have: (i) main lead person plus cover (who must be trained to similar level) (ii) supported by as many designated safeguarding team members as required for situation. <i>Main lead safeguarding person (i) must not be same person as company owner/boss and (ii) must be sufficiently independent and strong to contact outside authorities / access outside safeguarding guidance (e.g. from EUK) if there is a safeguarding conflict of interest or if child's best interests require it.</i> <i>Designated safeguarding team; role and responsibilities must be included in staff member's job description (last two points both S1 requirements)</i>
A8 Designated team way of working.	How does the designated safeguarding team operate?	State how designated safeguarding team operates, e.g. when and how regular meetings or communication are scheduled (this may vary according to time of year), where minutes are kept, circumstances that would lead to additional meetings etc Include 'attending & contributing to meetings' in safeguarding team job descriptions
A9 Local authority contacts and standards	<i>Which local authority does organisation work with? How and who to contact over various safeguarding matters.</i>	<i>As well as following national guidance, each ELT organisation must follow the standards and procedures set by their local authority in e.g. child protection arrangements (see section C) and in private fostering (see section F).</i> <i>In this opening section of the policy state which local authorities are involved and (i) which department to contact for different issues and (ii) how to contact them, with names if available.</i> <i>Multi-centre organisations usually need to make contact with the local authority in each area they have a centre, but head office need to clarify that with their local authority. Making and maintaining contact with the local authority is important (although sometimes challenging)</i>

A10 Documents/ legal framework	Which documents and/or statutory guidance were used to help writing policy?	Refer to past legal acts and more recent official documents used to help produce the policy. Ensure references show most recent updated versions.
A11 Associated policies	What policies are associated with/share some common ground with this one?	All key safeguarding information should be in one policy, not spread amongst many. Therefore, either (i) attach associated policies as appendices to the main safeguarding policy or (ii) include key information from an associated policy, maybe in shortened form, directing reader to where more complete information is available.
A12 U18's involvement	(i) In what way and at what stage are you involving U18s in producing the policy? (ii) Which elements of the policy are u18s expected to know?	(i) It is considered best practice to involve U18s in producing some relevant parts of the policy, although this may be hard in ELT context. Some schools have set u18 students tasks, e.g. produce materials about staying safe in the local area for students arriving later – and had unexpectedly good results. (ii) U18s need to be taught their responsibilities, e.g. knowing what safeguarding is, knowing when they may be at risk and how to get help when needed , looking out for each other and raising concerns with adults if necessary, behaving appropriately with peers and adults (bearing in mind students come from different cultures and probably don't know UK norms / expectations)
A13 Policy review	When and how often will the policy be reviewed and which senior staff will sign it off? Will the review involve feedback and from whom?	As a minimum, need to review policy annually and also when there are (a) any official updates or (b) any major incidents - to look again at procedures. Expertise and experience of all staff, not just safeguarding team, should be used in reviewing policy; e.g. as minimum ask staff / other stakeholders for feedback on policy (clarity, content, procedures etc) and respond to it. When revised policy is re-issued, (i) ensure training for stakeholders in the changes and (ii) clearly reference the updates made
A14 Policy availability & formats	Where is this policy available? Is it available in different formats (e.g. simplified/core elements)?	(i) Full policy should be available on organisation's website. (ii) Policy to be self-contained document and not depend on other documents to understand it (e.g. referencing other policies) so may have many appendices (A11). (iii) Simplified, pared down versions would normally be sent to specific stakeholders, e.g. homestays/group leaders/site visitors, presented so they could easily understand.
B) Codes of conduct	The headings in this section are fairly typical for Codes of Conduct, but not a definitive list. Make this section practical and relevant; it applies to all adults , not just staff, i.e. group leaders, homestays, and any others.	Codes of Conduct are very important in safeguarding. They help adults (e.g.; staff, homestays, group leaders) and U18s behave appropriately with each other. They are especially necessary for ELT organisations as they involve adults and U18s from many different cultures who probably won't know what is considered appropriate (and for adults – professional) behaviour in UK. They need guidance.
Before beginning	Decide different types of Code of Conduct best suit your organisation.	a) Adults working with U18s need clear guidance on acceptable behaviours and what isn't OK. b) U18s also need clear guidance on same for their interaction with peers and with adults Will the ELT organisation achieve this via one Code of Conduct that covers everyone in the

		<i>organisation? Or will there be two separate but linked Codes of Conduct, one for adults and one for U18s. (Some organisations will feel that student rules cover many Code of Conduct points).</i>
B1 Overview & principles	How are the need for and benefits of Codes of Conduct explained to staff and students?	Present a positive approach based on building trust between U18s and adults and creating a safe school culture. Include the need to protect both adults and U18s from any behaviour/actions which might be misconstrued. This is particularly important for staff who may inadvertently act in a way that could lay them open to allegations of inappropriate behaviour and the potential for their career being put at risk.
B2 Position of trust	Do staff realise they are breaking the law if they have sexual activity with a 16/17 year old student?	Policy must have specific reference to the Sexual Offences Act 2003 which states that any person in a Position of Trust engaged in sexual activity of any sort (kissing, touching etc) with students under the age of 18 is breaking the law (even though legal age of consent is 16). This applies to all adults working or volunteering with U18s.
B3 Setting standards	What is expected of: (i) of adults working with your U18 students? (ii) U18s behaviour with U18s & with adults?	Short lists of briefly worded key points will be most effective, e.g. (i) informing staff that they must be excellent role models (ii) informing students that tolerance and respect for other students and adults is expected at all times
B4 Adult - U18 interaction	What boundaries and guidance will be provided about behaviour between adults and U18s and also U18s with each other to ensure nobody gets into a situation which could be inappropriate and/or misunderstood?	This section is very important: specific instructions are needed for better understanding; vague or generalised instructions can be easily misinterpreted. Provide guidance on a range of situations/behaviours/ actions, e.g. be positive and use praise, be fair in dealings with all students, use appropriate and acceptable language, physical contact in a range of settings, avoid being alone with U18s behind closed doors, socialising with U18s outside school. Students also need to understand why these limits exist.
B5 Appropriate appearance	(i) How should adults look and dress with U18s? (ii) What expectations exist for students' appearance, particularly in class?	(i) Adults might not be aware of the effect their appearance can have on students and how hard it is for some students to respect them/their role if they do not present appropriately; e.g. in class, on activities, in accommodation, especially at night time? (ii) Students also need guidance on what is acceptable; cultural sensitivity is important.
B6 Alcohol, drugs and smoking	(i) What is expected of adults regarding alcohol, drugs and smoking when working with U18s? (ii) Students need to know UK laws and the ELT organisation's rules around these.	(i) Guidance needed on expectations of adults using drugs, alcohol and smoking when in contact with U18s, and also consequences if guidance not followed. Also give guidance on adults' attitudes if talking to U18s about drugs, alcohol and smoking, i.e. better to education about addictive substances, not to make light or joke about them. (ii) Explain how U18s are informed of UK laws (adult students also need to know as they might unwittingly break law, e.g. buying alcohol for U18s) and the school rules around drugs, alcohol and smoking, plus consequences for breaking either. Remember that school rules can be stricter than UK law.
B7 IT & social networks	(Similar to B4 but in the world of IT and the Internet.) What will the U18s, and the adults working with them, be told about	Adults and U18s need clear rules about using the Internet, technology and social networks, especially communication between individual adults or U18s, e.g. using school mobile phones not staff personal mobiles during excursions. New GDPR regulations must be taken into account.

	appropriate online behaviour?	Online 'Safe User Agreement' will provide detail; but should also be mentioned as part of Code of Conduct as it is so important
B8 Accommodation	What guidance is provided for hosts, residential staff, group leaders about how they should behave around U18s in the more informal setting of accommodation, especially re: bedrooms and showers/bathrooms?	Appropriate behaviour between adults and under 18s is even more important because of the less formal setting of accommodation. Give clear guidelines on what is and isn't OK and highlight the need for privacy in bathrooms and bedrooms, e.g. knock and ask permission to enter or announce you will knock again and open door in 10 seconds; adults cover up when walking to/from bathroom
B9 Transport	(i) What requirements exist for taxi and/or coach companies transporting U18s? (ii) If staff use own cars, what guidelines exist for them?	(i) When using taxi/coach companies, school gets written confirmation that all drivers used for school work will have full DBS checks. Could also get confirmation that all vehicles used will have current roadworthiness certificates. (ii) If staff have to use own vehicles to transport U18s, the U18 should sit in the back (unless 3 in which case one sits in front and is first to get out)
B10 Favouritism & Gifts	What guidance is given to staff about importance of treating all students equally and accepting – or otherwise - gifts from students?	If staff have 'favourite' students, the others feel left out and staff lay themselves open to accusations of favouritism. In some cultures, giving gifts to teachers is normal; however this can lead to accusations of bribery. Students as well as staff need to know school's policy on gifts to avoid embarrassment to both. Some schools set limit on value of gifts staff can accept and/or need to inform management of all gifts received.
B11 Whistleblowing	Do staff understand their responsibilities to inform management if they have concerns about a colleague's inappropriate behaviour? Students also need to feel comfortable about reporting inappropriate adult behaviour.	Organisation to clarify staff's legal obligation to inform management of any concerns about colleagues not following Code of Conduct. Staff who report this (or any other problems) will (a) not be penalised and (b) their report will remain confidential. Provide NSPCC Whistleblowing Helpline 0800 028 0285 as an outside contact. Tell students (i) pathway for reporting inappropriate adult behaviour and (ii) that they must do it if have any concerns (iii) reassure they won't get into trouble for doing so.
C) Child protection		
C1 Overview and Structure	Briefly, how does your school meet its child protection responsibilities?	Outline child protection responsibility for all adults associated with U18s and show structure of designated team, with their additional responsibilities for responding to child protection incidents.
C2 Nominated/designated persons	Who are the nominated person(s), what are their titles, how do you contact them, and who covers if they are not available?	Must have leads (often called DSL, Designated Safeguarding Lead) – but can be called whatever the school prefers. Lead persons have responsibility for effective child protection procedures including dealing with any incidents, supported by a team of designated staff. There needs to be 24x7 cover for both lead and support roles. (see section D for training requirements for each role)
C3 Situations when adults	What different scenarios may cause an adult to have child protection concerns, and what	Adults have responsibility to respond (i) if noting something themselves, (ii) if being told about something by another person (adult or under 18) and (iii) following a specific procedure if an U18

need to respond	should the adult do in that event?	disclosed to them (C5)
C4 Identifying main forms of abuse, recognising symptoms	What information is provided for adults about the 4 main forms of abuse and recognising possible symptoms?	The 4 main areas of abuse are physical, sexual, emotional and neglect. Sometimes bullying is included as a 5 th main form of abuse, or can be included as a secondary form (see C7). There are various signs to look for; one that usually denotes something is not right is 'change in behaviour'
C5 A child telling an adult (disclosure)	What step-by-step guidance have you provided for adults to respond correctly if an U18 decides to disclose that they are being / have been abused?	A child may choose any adult to talk to; therefore all adults need to know the right way to respond. Whilst many people working with adults are now familiar with how to respond, homestays and group leaders may be less familiar with the Listen – Reassure – Report – Record approach, plus don't ask questions etc etc.
C6 Confidentiality	Do adults understand the importance of maintaining confidentiality?	Any adult who becomes aware of child protection information must only share it with the designated team; not with anyone else, including their own family. Confidentiality about both the victim and the accused must be maintained.
C7 Knowing and recognising secondary forms of abuse	How do adults know about abuse that goes beyond the four main types and how to recognise symptoms?	If not already covered, need to provide information on (i) Child Sexual Exploitation (CSE), (ii) Female Genital Mutilation (FGM) – it is illegal in UK and must also be reported to Police as well as designated staff, (iii) peer-on-peer abuse (i.e. abuse is not just adult to child); is a general heading, under which come (iv) and (v) below. Policy to show the school's approach to all forms, how it is minimised (e.g. clear rules / rewarding positive behaviour / supporting victims / responding quickly) and how incidents are handled and reported (iv) Bullying, especially cyber-bullying, is often a sub-section of peer-on-peer abuse (v) Sexual Violence and Sexual Harassment; usually male-to-female, making it clear that even 'low-level' incidents, e.g. skirt raising, up-skirting, touching breasts, etc are not just 'a bit of teenage fun' but unacceptable. (see KCSE p85)
C8 Difference between concern and serious issue	How have you helped adults understand difference between these two and speed of response required for each?	Clarify the difference between a concern (something seems to be not right; however no immediate danger to U18) and a serious issue (U18 could be in danger of harm/abuse and a quick/urgent response is required)
C9 Identifying vulnerable students	What information has been provided about vulnerable students?	Identify what might make a student vulnerable (e.g. SEND, Special Educational Needs and Disability – and other factors) and that any vulnerable students are more susceptible to grooming and abuse. Designated staff, therefore, have responsibility to pay close attention to these students and be careful not to confuse signs of abuse with signs of a SEND condition
C10 Keeping records	What systems exist for keeping records of allegations of abuse, where are they kept, who has access to them and how long are	Secure provision is required for these records, with access only to the designated staff and, if necessary, an official outside agency

	they kept?	
C11 If an adult is accused	What system is in place if an adult has been accused of inappropriate behaviour/abuse?	State the procedure clearly, a flow-chart may be helpful, showing how an allegation is dealt with, by whom - including when outside agencies, e.g. LSCB might be contacted, any time frames, etc.
C12 If the DSL / senior manager is accused	What system is in place if the DSL or most senior manager is accused of inappropriate behaviour/abuse?	Must show how this situation will be dealt with. Important that designated safeguarding staff are ready to handle this situation should it occur. Will be broadly similar to C11 above but with some crucial differences
C13 If a child is accused	What system exists if an U18 student has been accused of inappropriate behaviour/abuse?	As C11, but showing differences, i.e. that the u18 accused also needs to be supported by member of designated team.
D) Training		
D1 Responsibility	Who is responsible for ensuring all adults have training to the appropriate level?	(Ultimate responsibility lies with lead person. A designated staff member may have specific responsibility for training.
D2 Different levels of training.	What levels of training apply to different roles in the organisation?	All adults are expected to have Basic Awareness (Level 1) - includes homestay hosts, group leaders; not just staff Designated Staff to have Advanced Safeguarding (Level 2) Lead Person and their deputies must have Specialist Safeguarding for the DSL and/or multi-agency training (both Level 3).
D3 How delivered and how often?	(i) How will the different types of training be delivered, both initial and refresher? (ii) How often is refresher training required for different roles?	i) Aim is for ELT organisations to become self-sufficient in most safeguarding training, so that only the lead persons go outside for external training. The designated staff and all other adults can be trained within the organisation so that the training becomes organisation-specific and relevant. a) Basic Awareness (Level 1) is available free online with an ELT-specific course https://galleryteachers.com/service/safeguarding-basic-awareness-course/ Online training at this level this must be supported by face-to-face training in house from designated staff. Initial training should be part of induction process. b) Advanced Safeguarding (Level 2) and Specialist training (Level 3) are also available online, but better done face-to-face. English UK offer Advanced (Level 2) and Specialist (Level 3) training specifically for the language industry; other organisations offer training that is more general. ii) (a) Basic Awareness refresher training must happen: at least annually / if there any changes to policy or legislation / if a serious incident occurs (b) Refresher training for Advanced & Specialist at least every 2 years and should be refreshed sooner if there are major changes to legislation
D4 Content	What content is needed at each level?	a) Basic Awareness. Some generic and some organisation specific, similar to contents of a condensed safeguarding policy. For example, sections from this document: A1, A4-6, A14, C1-9,

		<p>key points section B, F13 and other key points from section F (some of F may be covered in handbooks)</p> <p>b) Advanced. Must know more than Basic Awareness level; most importantly how to respond to situations and how to contact local authorities.</p> <p>Specialist: takes full responsibility and lead over any safeguarding incidents, so must know how local authorities work, have good awareness of ELT-related safeguarding.</p>
D5 Ensuring understanding	How will trainers ensure that adults have understood the Basic Awareness training?	Organisations are required to ensure mechanisms for understanding, ensuring that participants have understood the Basic Awareness level training. This can be done via discussion, verbal testing and most reliably through written tests after training.
D6 Recording training	How will you prove to outside bodies that the adults in your organisation have been trained to the right level?	Most outside trainers, including online, will provide certificates as evidence that training has been successfully completed. All training, both initial and refresher, and for all levels of safeguarding must be recorded showing (i) date of training (ii) who completed training (iii) content of training (iv) evidence that it was completed and understood.
E) Safer recruitment	NB: There is specific training for Safer Recruitment, available from EnglishUK. Best practice is that at least one member of an interviewing panel has done this training which covers in detail the points below.	<i>The Accreditation Unit of the British Council issued a document for the new inspection period 2018-19 'Inspection criteria, requirements and additional guidance' This document provides details of how to meet all the inspection scheme criteria. It is available only to accredited schools; contact the Accreditation Unit if you need a copy. Inspection criteria S4 is the main one relating to Safer Recruitment; there are detailed notes to support the information here.</i>
E1 Overview	What is your school's commitment to safer recruitment, and briefly how is it delivered.	Remember that recruitment does not only apply to staff, but also to homestay hosts, volunteers, group leaders, outside agencies etc.
E2 Recruitment materials	How is safeguarding mentioned in your school's recruitment materials?	This can include statements about a commitment to safeguarding as well as expectations that adults associated with the school will be expected to share the school's ethos and actively engage in looking after U18s safely.
E3 Recruitment stages for all	In what ways is safeguarding addressed in your school's recruitment process?	Show how safeguarding is addressed at every stage of recruitment, from job description on, e.g. having interview questions that ask about a candidate's attitude to working with U18s
E4 Applicants informed that	What elements of your school's safeguarding do you tell applicants about?	To deter abusers from applying, applicants need to be told the thoroughness of the process, e.g. that DBS and proof of identity will be required, that gaps in cvs will have to be explained, that references will include a question about suitability to work with u18s and will be followed up, etc.
E5 DBS applications and renewals	What is the process for (i) obtaining criminal record (DBS or overseas) checks for staff, group leaders, volunteers etc (for homestays see E6) including (ii) response to existing checks and (iii) renewing checks	State your organisations process (i) for doing criminal records checks for range of applicants, e.g. UK residents, applicants resident overseas, non-UK nationals / residents and (ii) including response to applicants with existing police checks and policy on (iii) renewals for all relevant situations, e.g. permanent staff, returning summer staff etc. <i>(See S4 in 'Inspection criteria, requirements and additional guidance' document for details on all the above)</i>
E6 Recruitment	What is your school's policy on (i) criminal	Accreditation UK require that (i) all adults aged 18 or over in homestay are checked. This can be

of homestays	checking homestays, including response to existing checks and (iii) renewing checks	done via different routes; what does your organisation do? Include information on (ii) response to applicants with existing checks and (iii) policy on renewing checks (See S4 in 'Inspection criteria, requirements and additional guidance' document for details) KCSE requires all adults hosting under 18s have separate DBS checks, and leaves school to decide about young adults aged 16 & 17 living in homestay.
E7 Applicants awaiting DBS	How will you handle applicants who are due to work with U18s but whose disclosure check has yet to arrive?	Must do Barred List check as a minimum. Breaking the law if anyone starts work with U18s without having had the Barred List check. Also need a risk assessment to decide whether applicant can be sufficiently supervised to ensure safety of U18s. Homestays can never be used if DBS has not yet been received.
E8 Applicants with a criminal record	How will you respond if an applicant's disclosure has a criminal record	Refer to organisation's 'Employment of Ex-Offenders' policy (all UK companies legally required to have one) explaining procedure that will be followed, including taking into consideration the nature and seriousness of the offence, how long ago and how often it happened and the type of post applied for. Decision about employing the applicant must be made by more than one person; recording procedure must be done correctly.
E9 Applicants where criminal check not possible	How will you respond when applicants, e.g. group leaders, cannot get a criminal check? Need some kind of appropriate additional measures	Need stated process for how school responds if overseas criminal check is not possible, e.g. (i) check facts via govt website https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants (ii) if check really not possible, get additional references from country where police check can't be done, preferably from person who saw candidate working with u18s and ensure at least one of additional references has verbal check
E10 Single central record	Ensuring all necessary pre-appointment checks have been done for everyone	Make a grid with required headings and tick or put N/A in every box to ensure that nothing is missed when recruiting staff/homestays/group leaders.
E11 Prohibited list check	Have you checked those who have not broken the law but are deemed unsuitable to work with U18s?	The Prohibited List check is an additional check on staff (mostly teachers but can also be TAs & other school staff) who have been deemed unsuitable to work in the regulated education sector. This check can now be made across European Economic Area as well as UK. This check is not a BC inspection requirement, but is considered best practice. (See S4 in 'Inspection criteria, requirements and additional guidance' document for details)
E12 s128 check for managers	Have you checked if any people in management positions in your school have been deemed unsuitable to be manages in educational settings?	This check is similar to Prohibited List check but applies to any people deemed unsuitable to manage in educational settings. Check can be made on anyone in management positions, e.g. owners, senior managers, directors, governors, trustees and department heads, particularly if they have held similar positions in the regulated education sector. This checks is not a BC inspection requirement, but is considered best practice especially for owners, directors and senior managers.
E13 Childcare act disclosure	Only applies to adults working with students aged under 8.	Organisations need evidence that they have asked adults working with under 8s about situations related to looking after children in UK or overseas that would not appear on police (DBS) or Prohibited List checks, (i) have they ever had a child placed under a Care Order (ii) have they ever had a Childcare Registration cancelled. If answer is yes, school must decide whether to proceed;

		for schools in regulated education sector, an OFSTED waiver is required.
E14 Disqualification by association	<i>Only applies to adults working with students under 8 in domestic setting, i.e. homestays hosting under 8s.</i>	<i>In addition to asking the questions in E13 of the main host, the same questions need to be asked about any other people residing in the home where the hosting is taking place. If answer is yes to anyone, the procedure is as for E13.</i>
F) Welfare / implementing safeguarding		This section should give a picture of the range of ways that your school looks after the U18s and the measures in place to ensure their safety and well-being. The headings are fairly typical, yet should not be seen as a definitive list.
F1 Use of risk assessments	(i) How does your school use risk assessments for safeguarding U18s? (ii) What systems are in place to ensure they are properly delivered?	Risk assessments should be living documents, evidence that thinking about risks has taken place. i) Who has overall/departmental responsibility for risk assessments / what are they used for / how are they produced and managed? ii) how do you ensure adults are using them and very importantly key information is being passed to students?
F2 (i) Supervision and ratios (ii) Safety during unsupervised time	(i) When and how are students supervised and what are the ratios? (ii) What measures are in place to keep students safe during unsupervised time?	(i) State school policy on supervision; when and where it happens, who does it and state the required supervision ratios (how many adults to how many students). (ii) At certain times students may be away from adults, e.g. journey homestay-school, shopping time during excursions, time after lessons finish and before needing to be at homestay for dinner, curfew times, etc) and therefore not directly supervised. What safety measures are in place to reduce risk of harm to under 18s during these times, who has responsibility and checks that students are following safety measures? Most information and procedures for (i) and (ii) should be decided from risk assessments and include awareness of location/situation, age of students etc. Parents need to have full knowledge of the levels of supervision for U18 students before choosing a course (see also F14)
F3 Welfare provision	What provision is made for the welfare of U18s? What systems exist and who is expected to deliver welfare to U18s?	There are many different ways that an ELT organisation will be providing general care for U18s. The exact provision will depend on the situation and will include mention of staff roles and responsibilities linked to welfare as well as the provision made. Much of this information may already exist in a welfare handbook
F4 Dealing with welfare concerns	What systems are in place for dealing with safeguarding / welfare concerns?	Show process of dealing with a concern; who is told, who is expected to deal with it, how do they deal with it, what follow up is there, does anyone else need to know, is feedback provided? Flow- chart may be helpful here to clarify your systems.
F5 Missing students	What guidelines and systems are in place when a student does not appear as expected?	Think about a range of situations; e.g. in class, on activities, during excursions, returning to homestays at curfew time. What procedures are in place in every situation to ensure quick response and which adults need to know the procedures? Who takes responsibility for follow up?
F6 Emergency	How do you ensure you can contact parents	Schools must have reliable and up to date information on contacting the parents of students aged

contact details	of under 18 students in event of an emergency?	under 18. KCSE 2018 requires schools to have at least two emergency contacts. BC covers this in inspection criteria S8 and does not require two.
F7 Accommodation	(i) What accommodation arrangements are acceptable for U18s at the ELT organisation? (ii) What happens if U18 wishes to spend time, e.g. weekend away from accommodation?	(i) Specify which types of accommodation U18s can use and which are not considered suitable; this is usually linked to levels of supervision. Be careful when parents / agents organise private accommodation for U18s; the ELT organisation should always reserve right not to agree to this if location or premises are unsuitable. Overall duty of care for U18s lies with ELT organisation. (ii) When U18s wish to stay away from organised accommodation, school must know where and have contact details and specific parental consent is required (see F14).
F8 First aid & medical	How does the school provide medical care and first aid for U18s?	U18s are dependant on adults for proper medical and first aid provision. How is this delivered (possibly in a range of situations; in school, outside school/on excursions, in homestays) and by whom? This very large area should have input from those experienced in providing medical support for U18s. Organisations must know about all medical / behavioural conditions for under 18s before arrival and must have consent for emergency medical treatment for U18s signed by the parents - not agents/group leaders. (See F14) Control of medication and dispensing records it are also needed
F9 U18 Behaviour & discipline	How do you ensure good behaviour from your U18 students and what disciplinary systems exist?	Examples will include; school rules, adults setting right examples, clear systems for responding to situations, sanctions available etc. and how all these are conveyed and to whom.
F10 Fire safety	What additional provision exists for U18s fire safety?	Fire safety is a legal requirement for all students and will be part of a H&S policy. When caring for U18s, additional consideration is needed, e.g. understanding fire notices, very young students possibly not waking up when fire alarm goes.
F11 Airport transfers	How do you ensure U18s safety on (i) arrival in UK and (ii) on departure?	(i) What systems exist for meeting students aged U18, how/when are students and other adults are informed about the systems, what is school's response when a U18 wants to travel independently from airport to school, how are UMs dealt with (if relevant)? (ii) Also need safe systems in place for departures, covering what happens if flights are cancelled and under 18s returned to the airport terminal; who from ELT provider is there to look after them?
F12 E-safety	How does school help students stay safe when they go online?	Educate students about being safe online; not believing all they read, not sharing personal data or photos with people they don't know, etc. Have some rules about internet use, e.g. Safe Use Agreement. At the same time have a supportive approach that students must tell adults if they receive any unwanted contact online or via text.
F13 Radicalisation & Extremism PREVENT	(i) Are adults and students aware they must show proper tolerance and respect to others and be vigilant and report any who don't? (ii) School needs risk assessment showing how it counteracts dangers of extremism.	(i) State school's expectations about respect for and tolerance of people from different countries, religions, races and with different views – as long as the views are not extreme (i.e. proposing harm to others). Explain four core British values. State school's response if anyone does not show respect and tolerance (ii) Produce risk assessment showing how school counteracts dangers of extremism. More info here https://www.britishcouncil.org/education/accreditation/information-

		centres/inspection-support
F14 Parental Consent	Do you have evidence that parents / student representatives (a) are aware of and (b) agree to how your organisation delivers safeguarding for U18s?	Important. Parents / student representatives need to sign their agreement to many aspects of the organisation's safeguarding, e.g. medical consent, levels of supervision, rules and disciplinary procedures, spending time especially nights away from campus / homestay, any situations where the ELT organisation feels the U18 is at greater risk due to not following the school's usual procedure. More info here https://www.britishcouncil.org/education/accreditation/information-centres/care-children
F15 Private Fostering	Do accommodation staff understand the importance of private fostering arrangements and informing local authorities?	(a) Define private fostering, (b) explain when it happens: student aged under 16 (under 18 if disabled) staying with a family who is not his/her own immediate family for more than 27 nights and (c) that it must be reported to the local authority, usually social care, at least six weeks before arrangement starts. ELT organisations are advised to contact their local authority, usually a Private Fostering section of the LSCB (Local Safeguarding Children Board) to ensure the school is complying with what their local authority expects (not always the same)
F16 Corporal punishment EYFS	Statement that corporal punishment is never used or threatened. For children up to 6 only	Only applicable to organisations taking very young children. An ISI requirement. A clear statement that it is not currently used and never will happen.
F17 GDPR & Safeguarding	<i>Do you have guidance on use of personal data in safeguarding context</i>	<i>Refer to government document, Information Sharing, updated July 2018</i> https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
F18 Contextual Safeguarding	<i>Has school considered safeguarding needs of students beyond the campus/ in the locality?</i>	<i>This will be happening in ELT organisations already through many of the F sections above. Now a requirement of KCSE 2018</i>