



BEST PRACTICE IN STUDENT WELFARE, SAFEGUARDING AND CARE OF UNDER 18S

A guide for English UK member centres

Section: welfare

Sub-section: safeguarding under 18s

Safeguarding under 18s (S)

Section standard

Wording	Things for providers to think about to meet the standard.
<p><i>There is appropriate provision for the safeguarding of students under the age of 18 within the organisation and in any leisure activities or accommodation provided.</i></p>	<p>Safeguarding is helping students of all ages to stay safe. Adults working with students aged under 18 have a legal 'Duty of Care' to safeguard them and protect them from that which is not in their best interests.</p> <p>Appropriate provision is how the safeguarding is arranged, managed and delivered. It will vary for each ELT organisation depending on a range of factors, e.g., the students' age, whether students belong to a group with a group leader, the type and length of course, whether under 18s have joined a 16+ adult course, the location/situation of the provider, and more.</p> <p>The most effective safeguarding is when a positive and active approach permeates an organisation: staff, homestays, group leaders, sub-contractors; everyone understands what is expected of them, knows the safeguarding procedures and carries them out diligently and professionally.</p> <p>To ensure that safeguarding provision is appropriate for the age of students, an organisation must have managers/senior staff with good experience who know and understand the needs of their under 18 students. Unless that knowledge exists, an organisation's safeguarding provision can be inadequate due to ignorance rather than deliberate omission.</p> <p>Although safeguarding has to be considered for every aspect of a course with under 18s, leisure activities, accommodation and unsupervised periods require increased attention as students are more vulnerable at those times.</p>

Note: extensive guidelines and advice for this section are available on the British Council Accreditation website www.britishcouncil.org/education/accreditation/information-centres/care-children especially the Safeguarding Under 18s Guidance document (see [Document 20](#) in Practical Help section below)

Criterion S1

Section: Safeguarding Under 18s

Wording	Evidence
<p>S1 There is a safeguarding policy which specifies procedures to ensure the safety and well-being of all students under the age of 18. A named member of staff is responsible for implementing this policy and responding to child protection allegations.</p> <p>Requirements Clear and comprehensive policy in place written in accessible English, appropriate to current students Policy is reviewed annually and updated accordingly. Policy includes:</p> <ul style="list-style-type: none"> ● information on recognising abuse ● child protection response procedures ● names of Designated safeguarding lead (DSL), cover arrangements and how to contact ● guidance on handling delayed suitability checks ● guidance for everyone in organisation on appropriate behaviour and interaction with under 18s. 	<ul style="list-style-type: none"> - Interviews with managers/staff - Talking to activity staff - Talking to group leaders - Talking to homestay hosts - Student focus group(s) - Notices - - Documentation - Job descriptions (13) - Accommodation placement (42) - Information for group leaders (45) - Safeguarding policy (49) - Staff handbooks/notes (52) - Teacher handbook/notes (53)

Background information

- * this criterion refers to a policy and named member of staff; just having them is insufficient, both need to be effective in providing appropriate safeguarding
- * the policy content must be relevant to the provider and their under 18s situation
- * the policy should be a current and working document, updated annually and when related changes occur - this could be when legislation changes, staff change roles or leave the organisation, after a safeguarding incident, or for other related reasons.
- * there must be a staff member available at all times to respond to child protection allegations; therefore there must be other staff with adequate training to cover when the named lead person is absent - or indeed when the lead person is implicated in a safeguarding concern.

Questions to ask	Some helpful information
<p>1 What should the policy cover? Is there a required list of content headings for example?</p>	<p>i) some content must be included:</p> <ul style="list-style-type: none"> - statement; the intention and administrative details of the policy - code of conduct; expectations of adult's behaviour and interaction with under 18s - child protection; abuse (primary and secondary forms), how to recognise it and respond if an under 18 discloses, and identifying those trained to deal with incidents (designated staff) - safer recruitment; procedures for ensuring the right people are hired

		<ul style="list-style-type: none"> - e-safety; strategies for protecting students from illegal and inappropriate materials and helping them stay safe online - training; how / when training is delivered to all stakeholders and who is responsible - Prevent: strategies to protect under 18 students from radicalisation and extremism are also part of safeguarding, (although Prevent affects students of all ages and also staff / other adults). Accreditation UK include this within procedures to promote tolerance and respect. ii) in addition, sections are needed that describe the provider's safeguarding delivery & procedures, e.g. <ul style="list-style-type: none"> - use of risk assessments - general welfare provision - airport transfers - medical provision - supervision arrangements - missing students - travel to and from homestays iii) advice is that all safeguarding material should be in one place, i.e. the policy using appendices and template forms rather than referring to other policy documents. However, as Prevent applies to all ages, there may be a separate policy which is cross-referenced. For more detailed information and guidance on writing a policy, see Document 21 below.
2	We are a large organisation with centres at various locations. We have a company safeguarding policy; is this sufficient to cover every location?	Large organisations with multiple sites can have a 'company policy' with additional site-specific sections or notifications ensuring the relevant persons and procedures are clear for each location / course. A company safeguarding policy is helpful for setting company standards; however, there will be differences in how safeguarding is delivered at each centre due to location, physical layout of campus / building, type of course, age range of students etc. Therefore, there must be allowance for this in the safeguarding policy, maybe with a section for centre-specific information. The four UK countries also have different child protection systems and terminology, which also need to be reflected in the policy (see point 3 below).
3	What is a typical safeguarding structure in an ELT organisation? Who should the named member of staff be?	<ul style="list-style-type: none"> i) all adults associated with the organisation have a responsibility to deliver safeguarding ii) some staff will have designated safeguarding responsibilities to ensure the policy is implemented. There is no set number / ratio for how many designated staff (DS) there should be; it will depend on the organisation's size and facilities (e.g. all in one building, split-site campus, multi-centre). iii) there must be a designated safeguarding lead (DSL) to take overall responsibility and be the named person. Usually this is a senior manager, although to avoid conflict of interest, it should not be the owner / director. iv) as somebody must always be available to respond to a child protection allegation; the DSL must have a deputy(s) who will cover in their absence. (see point 5 below) <p>Beyond the ELT organisation, each of the four UK countries has a safeguarding system delivered via local authorities. ELT providers must familiarise themselves with their local authority safeguarding / child protection contact, system and expectations. Local authorities are responsible for setting standards and coordinating safeguarding provision in their area.</p>
4	Should safeguarding responsibilities be included in staff job descriptions?	i) yes; all staff have safeguarding responsibilities and there should be a safeguarding section in job descriptions that clarifies duties.

		ii) homestay contracts / agreements / handbooks should also include their safeguarding responsibilities, (see S2 below).
5	How should everyone be trained in safeguarding?	i) training is required at all levels; Basic Awareness (old level 1) is connected to S2 below ii) designated staff need 'Advanced for Designated Staff' training (old Level 2) iii) DSLs need Specialist for Designated Lead' training (old Level 3) iv) for detailed information on training, including where to access it see Document 22 below.
6	What are 'child protection allegations'?	Child Protection is one part of safeguarding, the area concerned with abuse. An allegation is when a specific individual(s) have been accused of committing abuse of a child. It is very important that designated staff and DSL know how to respond if child protection allegations are made. There are procedures that must be followed and certain people to be informed. This information is part of training for designated staff and DSLs.
7	What is 'safer recruitment' from the content list?	See S4 below.
8	Whilst the ELT organisation is safeguarding the under 18 students according to its policy, how are the under 18's parents involved? What is their input?	The overall responsibility for the safety of the under 18 lies with the ELT organisation because they have local knowledge and know what the cultural norms are for UK. Having informed the parents how the school's safeguarding policy will affect their child; the organisation must get a signed parental consent form. For more information, see S3 point 5

Practical help

- * link to [Document 20](#) Safeguarding Under 18s: Guidance for ELT providers
- * link to [Document 21](#) Guide to writing a safeguarding policy
- * link to [Document 22](#) Safeguarding training explained

Criterion S2

Section: Safeguarding Under 18s

Wording	Evidence
<p>S2 The provider makes the policy known to all adults in contact with under 18s through their role with the organisation, and provides guidance or training relevant to its effective implementation.</p> <p>Requirements Policy available to all staff. Safeguarding included in induction for all staff. Staff receive safeguarding training relevant to their role:</p> <ul style="list-style-type: none"> ● all staff in contact with under 18s: Basic safeguarding awareness training (formerly level 1) ● named person/DSL: Specialist safeguarding for Designated Lead (formerly level 3) ● guidance provided to all other relevant adults ● updates provided for all staff. 	<ul style="list-style-type: none"> - Interviews with managers/staff - Talking to activity staff - Talking to group leaders - Talking to homestay hosts - Student focus group(s) - Notices <p>Documentation</p> <ul style="list-style-type: none"> - Induction documents (16) - List of CPD (18) - Accommodation placement (42) - Information for group leaders (45) - Safeguarding policy (49) - Staff handbooks/notes (52) - Teacher handbook/notes (53)

Background information

* a policy needs to be communicated to relevant people, and in a way they can understand

* training & guidance are necessary to ensure that people know what they have to do themselves to implement the policy

* safeguarding is most effective when all associated adults know the provider's expectations, procedures and are actively involved

	Questions to ask	Some helpful information
1	The policy is far too long and detailed for group leaders, homestay hosts and others to read.	i) providers need a full-length policy as evidence that all aspects of safeguarding have been addressed and procedures are in place. ii) stakeholders do not need to read the whole policy, but they need to know some of the content and understand their responsibilities. A condensed version that covers key content using simple language works well; it must be supported by guidance and training (see next point) iii) points to include in a condensed version are at the end of Document 21 (see S1)
2	How can I be sure these stakeholders have read the condensed version and understood it? Some group leaders don't have a good level of English.	i) include a page / section for the stakeholder to sign and return saying they have received and read the policy and understand their responsibilities. ii) for homestays, the signed section should state that the homestay host is signing on behalf of all people in the homestay (including visitors) and that host will ensure others follow the policy.

		<ul style="list-style-type: none"> iii) if necessary for group leaders / agents, have translated versions of condensed policy. iv) going through the policy must be part of the face-to-face induction training for all stakeholders to assist them in understanding. v) consider having a short test at the end of induction to check understanding has happened; test paper becomes evidence that it has. (see Document 22)
3	When/how can face-to-face training for homestays and group leaders happen?	<ul style="list-style-type: none"> i) new homestays have safeguarding training as part of the appointment process. Existing homestays can be trained via sessions in the school or visits to the home before refresher training kicks in (see point 6 below). ii) group leaders would normally have face to face safeguarding training as part of the induction on / soon after arrival.
4	What about staff; should they see the full or condensed version and when is their training?	<ul style="list-style-type: none"> i) the full safeguarding policy must be available for staff (and anyone else) to read; it should be on the provider's website. This should be the most recently updated version. ii) staff should be directed to read the sections of the policy that they need to know for their role. iii) staff also require face-to-face training on the policy; this should be part of their induction. (see Document 22).
5	Sub-contractors: there can be so many and with different roles; what can be done for them and for visitors?	<p>Sub-contractors</p> <ul style="list-style-type: none"> i) provide sub-contractors with only the safeguarding information that they need (which will vary according to the sub-contractor) and present it concisely so that they can remember it. ii) sub-contractor safeguarding information might mention (a) appropriate behaviour (b) noticing anything amiss / causing concern and reporting that quickly (c) listening if an under 18 is upset (d) any of the provider's safeguarding procedures relevant to that sub-contractor, (e) who to contact with any concerns / information and contact details. iii) some typical sub-contractors include taxi-drivers, cleaners, airport meeting service, excursion tour operators / bus drivers, etc. Send the sub-contractor company leaflets for distributing to its staff and a covering letter for management to sign and return confirming that all staff working with the provider's students have received and understood the safeguarding requirements. <p>Visitors</p> <ul style="list-style-type: none"> iv) providers should have a notice or leaflets in reception reminding visitors (a) that under 18s are on site and (b) that the visitor has safeguarding responsibilities, e.g. to behave appropriately (including language), to report any concerns to staff immediately, any other points relevant to the provider / campus (c) some providers include acknowledgement that the visitor has received the safeguarding information as part of the signing in process at reception.
6	Do stakeholders need repeat training and if so, how often?	<ul style="list-style-type: none"> i) stakeholders don't need to repeat the same training every year; rather they need to have their safeguarding awareness checked and knowledge refreshed. ii) this 'refresher' training must happen at least annually for staff / homestays and / or; (a) when updates are made to the policy, (b) when any safeguarding incidents occur from

		<p>which lessons can be learnt (c) as ongoing awareness-raising, so that staff / homestays view safeguarding as an integral part of their work.</p> <p>iii) using relevant / actual scenarios for discussion helps staff realise that safeguarding is not just about serious child-protection incidents; it is predominantly about day-to-day situations and supporting students in staying safe and making sensible decisions</p> <p>iv) other stakeholders, e.g. group leaders should be refreshed as required</p> <p>v) designated staff and DSLs must have refresher training every 2 years (see Document 22)</p>
7	How is this refresher training for stakeholders delivered?	<p>i) delivered by the organisation's designated staff / DSLs</p> <p>ii) for staff, should be done via department or whole staff meetings. For homestays via newsletters, meetings in school or as part of an annual home visit</p> <p>iii) designated staff keep a record of when refresher training happens and, if necessary, with additional documentary evidence of materials used (see Document 22)</p>

Practical help

* link to [Document 21](#) Guide to writing a safeguarding policy

* link to [Document 22](#) Safeguarding training explained

Criterion S3

Section: Safeguarding Under 18s

Wording	Evidence
<p>S3 The provider has written parental/guardian consent reflecting the level of care and support given to students under 18, including medical consent.</p> <p>Requirements Where the provider has no direct contact with the parents/guardians, it must be clear in agreements with agents when and where this information is collected and passed to ELT provider.</p>	<ul style="list-style-type: none"> - Interviews with managers/staff/ group leaders <p>Documentation</p> <ul style="list-style-type: none"> - Parental consent (50, 79)

Background information

- * levels of care and support are part of legal 'duty of care' for under 18s
- * levels of care could influence parents' decision making about a course, so information must be available before a booking is made
- * it could be particularly important information for parents of 16/17s, who could join either a junior or adults (16+) course
- * information must be accurate

Questions to ask	Some helpful information
<p>1 How detailed should the information be?</p>	<ul style="list-style-type: none"> i) situation dependent. Parents / agents need enough accurate information to give a realistic picture of the welfare provision on a course. ii) consider; <ul style="list-style-type: none"> - residential or homestay; welfare and supervision elements of each - staff / student ratios - availability of provider's staff 24/7 and how to access them - amount of time during week that students are away from adults (staff / homestays / group leaders) - how those times are managed to safeguard the students - ease of access to medical support (see also S7) - courses with mostly groups and some individuals; how are the individuals supported? - arrangements for airport transfers - if different levels of support for different ages, iii) information often best presented (a) as an overview (easier for the reader) with (b) full details also available. Using point 2 below, an example of the overview might be; 'When students are away from adults they are given limits, guidelines for staying safe and a 24 hour phone number. For more details, click this link.'

2	What are 'levels of care and support' required, especially when under 18s have 'free time' away from adults?	<p>There is a legal 'duty of care' to safeguard under 18s; therefore, time away from adults must be supported in age and situation-appropriate ways, e.g. by providing</p> <ul style="list-style-type: none"> i) limits; i.e. time, distance, areas visited, ii) guidelines for students on staying safe in the provider's local area. These are often similar to information given to UK under 18s, e.g. stay with friends, always tell somebody where you're going, have local map, make sure mobile is charged, go into a shop if you need assistance, etc iii) written (a) 24 hour contact numbers to get help (b) student ID; info on who they are so others can help them and know who to contact <p>It needs to be clear to parents that even though students are away from adults, they have not been abandoned. (see also S6)</p>
3	Why is it particularly important for 16/17s?	<ul style="list-style-type: none"> i) in some countries 16/17s are considered adults and in others they are still children; parents will have different expectations of how much their 16/17 will be cared for / supported. ii) parents do not necessarily know UK life and culture or the provider's local area. <p>Therefore, it is important to give parents information that allows them to choose the most suitable course for their child; a junior or a 16+ adult course.</p>
4	What about airport transfers?	<p>See W6 points 3 & 4 for more information on levels of care and support required for under 18s' airport transfers (both arrival and departure). For S3:</p> <ul style="list-style-type: none"> i) provide overview information with full details available (see point 1 above) ii) how are transfers organised? (groups / individuals, set times, mode of transport, time to centre) iii) who is meeting students? (meeting service staff / provider's staff / taxi driver) iv) backup available if things go wrong (flight delays, airport problems, traffic delays); this is critically important for under 18s.
5	How does a Parental consent form fit into safeguarding the under 18s?	<p>The parental consent form is a necessary part of 'other information made available before enrolment'. It is critically important. Parents must know how the school is going to safeguard their under 18 and give consent that they agree to a list of specific points. In addition the organisation must have certain information for safeguarding reasons, for example having the contact details for the parents in the event of emergencies.</p> <p>Most important is the parents' consent for emergency medical treatment; this cannot be given by an agent; it has to be the parents themselves who sign this.</p> <p>Providers should also acquire consent from the parents (and the child) if they intend to take and use photographs featuring the under 18 student (see Document 24)</p>
6	My agent won't send us all this information; and they tell us that other schools don't require it.	<p>Explain to agents why it is required (i) it is UK law that you have it (ii) the group leader may be seriously injured / dead in the event of a real emergency, so you cannot depend on them (iii) whatever agents tell you, they are not always contactable 24x7, so the school must have it.</p> <p>Make it part of your signed agreement with an agency that they must provide this information; without it the school will not work with them.</p> <p>All schools to strictly follow this policy so agents realise they cannot find a loophole.</p>

Practical help

- * link to [Document 23](#) Parental Consent Form checklist
- * link to [Document 24](#) Photography and Filming Consent

Criterion S4

Section: Safeguarding Under 18s

Wording	Evidence
<p>S4 Recruitment procedures for all roles involving responsibility for or substantial access to under 18s are in line with safer recruitment good practice and the organisation’s safeguarding policy.</p> <p>Requirements Providers must check the suitability of all those working with under 18s, as follows:</p> <ul style="list-style-type: none"> ● Relevant staff members must have two references (if recruited since 1 January 2014) and relevant current criminal record/suitability checks. ● Homestay hosts must have two references (if recruited since 1 January 2016). ● Homestay hosts and all adults normally resident in the home must have relevant current criminal record/suitability checks. ● Reference requests must include enquiry about suitability to work with U18s. <p>Where any of these are contracted by a third party (e.g. accommodation is provided by an agency) the provider must have formal agreements in place to ensure that relevant suitability checks have been done.</p>	<ul style="list-style-type: none"> - Interviews with managers/staff - Talking to activity staff - Talking to group leaders - Talking to homestay hosts <p>Documentation</p> <ul style="list-style-type: none"> - Recruitment documents (15) - Evidence of suitability checks (78)

Background information

- * the aim of safer recruitment is to stop the wrong people (e.g. abusers) gaining easy access to under 18s
- * sexual abusers are known to be devious about gaining access to victims
- * having thorough recruitment procedures and always following them reduces the risk of an abuser joining the provider’s staff / homestays
- * recruitment checks are also required on other stakeholders, e.g. group leaders or anyone with substantial access to students
- * the safeguarding policy needs a safer recruitment section that accurately reflects what is happening

	Questions to ask	Some helpful information
1	Which roles involve 'responsibility for or substantial access to under 18s'?	<p>For most ELT providers with under 18 students, every role has 'responsibility for or substantial access to under 18s'; therefore, safer recruitment best practice will need to be followed for everyone.</p> <p>i) there may be exceptions, e.g. a cleaner who is being recruited to work a very early morning shift, finishing before students arrive, does not have substantial access to under 18s.</p>
2	<p>What is 'safer recruitment best practice'?</p> <p>Is it the same in all four areas of UK?</p>	<p>The provider's safeguarding expectations should appear throughout the recruitment process.</p> <p>i) job description – include safeguarding responsibilities for role</p> <p>ii) advert – state provider's commitment to safeguarding and importance of staff sharing this</p> <p>iii) information sent to applicants – include safeguarding policy, tell staff before applying that recruitment safeguarding procedures will be followed, e.g. checking gaps in CVs, references will ask about person's suitability to work with under 18s and be followed up, suitability checks (see point 4 below) will be made.</p> <p>iv) application form – invite self-disclosure about criminal record, declaration that contents of form are true</p> <p>v) checking completed applications and short-listing – done by two people separately</p> <p>vi) interview – (a) have questions to check applicant's attitude to and knowledge of safeguarding (b) interviews done by at least two people, one of whom has completed 'Safer Recruitment' training</p> <p>vii) job offer – made dependent on acceptable references and pre-appointment checks</p> <p>viii) references – collect relevant references, i.e. from people who know the applicant with under 18s, and ask about any behaviour that might give rise to concern about suitability to work with under 18s. Reference collecting should not be simply a tick box exercise; providers should be striving to check an applicant's suitability to be with under 18s. When collecting verbal references, use template to record findings and ensure all questions are asked.</p> <p>ix) pre-appointment checks – carry out as required (see point 3 below)</p> <p>x) induction – ensure safeguard training happens for everyone</p> <p>xi) probationary period – assess safeguarding awareness / delivery as part of review. This list is standard practice in the maintained education sector (schools, FE, HE etc). Current ELT provider practice is not usually as thorough; it should be. Some safer recruitment facts: (a) known that abusers are deterred when they see an organisation is serious and thorough about safeguarding, (b) using templates, grids, following set procedures and using more than one person to check applications / interview all make it less likely for an unsuitable person to be appointed. English UK offer 'Safer Recruitment' training (see Practical help below)</p> <p>xii) the approach to safer recruitment is the same in all four areas of UK. The aim is to stop inappropriate people gaining access to under 18s. As devolved governments deliver their own safeguarding, terminology and detail are sometimes different (e.g. DBS checks – see point 6 below). Providers need to know about their local systems and be rigorous in using all safety checks available.</p>

3	What about homestays? Do we need to be as thorough?	<p>Homestays pose a higher risk than staff for an abuser gaining access to under 18s, because (a) there is no / minimal direct supervision by the provider's staff and (b) with extended families - and their partners - many unknown, unchecked people visit households. Therefore;</p> <p>i) appointing homestays should follow a similarly rigorous procedure,</p> <p>ii) with some appropriate changes, e.g. to information materials sent, interviews usually happening in the home.</p> <p>iii) better to interview when all / most members of the household are present.</p> <p>iv) references (sometimes called recommendations to sound more appropriate) must be collected; at least two are required. They may not be professional, but should not come from family members; they could be from existing homestays who have introduced them, other people who have known them with under 18s</p> <p>v) do not accommodate an under 18 in a homestay where background checking has not been done or is incomplete. Unlike e.g. teachers, hosts cannot be taken out of regulated activity.</p>
4	What are pre-appointment checks? Are they the same as suitability checks?	<p>i) yes; they are the same; checks that tell you about a person's suitability to work with under 18s and are done before an applicant starts work</p> <p>ii) Some checks are made at interview (see document 26); others are made following an offer of employment. Results of these checks must be known before the applicant has unsupervised access to under 18s.</p> <p>iii) Checks include:</p> <ul style="list-style-type: none"> - identity; name, address, DoB - right to work in UK (if applicable) - qualifications (where applicable) - DBS / equivalent checks (see point 6 below) or Overseas Police checks (see point 7 below) - Barred List check. Part of an Enhanced with Lists DBS. If DBS has not come back, employer must check that applicant is not on the Barred List. The employer is breaking the law if they allow a person to start work – in any capacity – without checking Barred List. Access to the Barred List is restricted and most ELT centres are unlikely to be able to do a standalone check. Please see document 25 for more details - Prohibited List check: covers staff who have not broken the law but who have, in the past, behaved in such a way as to indicate they should not work again with under 18s. ELT organisations can check with the Employer Access Team employer.access@education.gov.uk or call 020 7593 5394. - Disqualification under the Childcare Act declaration: only applicable to staff working with students aged under 8 <p>(for full information on pre-appointment checks see document 25 below)</p> <p>iv) references (see document 27) are suitability checks that are sometimes done before interview but usually after interview and prior to confirming a job offer (see points 2 & 3 above)</p>
5	How do we keep track of so many suitability checks?	<p>Use a Single Central Register (or Record. It is known by both names and as SCR.)</p> <p>i) have an Excel spreadsheet with all staff listed on one side, and all pre-appointment checks (see document 25 below) listed along another side</p>

		<ul style="list-style-type: none"> ii) have two additional checks, (a) person's role in organisation and (b) date started work iii) complete information in all boxes, putting N/A where necessary. Often need to record evidence that original document was seen, so need date and initials / name of person who saw it. iv) depending on numbers involved and access rules, include homestay information on same grid as staff, or on separate grid v) easier to spot any gaps / checks missed using the SCR system
6	DBS checks aren't all the same are they?	<ul style="list-style-type: none"> i) Four types: basic, standard, enhanced, enhanced with list checks. ii) regulated activity (for definition, see document 28 below) requires enhanced DBS; providers should get enhanced with list checks, to save them needing to do Barred List check separately (see point 3 above). iii) DBS can be for the child workforce / adult workforce / child and adult workforce. Providers should apply for child workforce iv) applicants can apply for own DBS Basic certificates; however to conduct an Enhanced List check only an employer can do this and can only apply if they have offered person a job / volunteer position v) for full DBS information, see government website www.gov.uk/disclosure-barring-service-check/overview. DBS applies to England and Wales only vi) In Scotland there is Disclosure Scotland (Protecting Vulnerable Groups - PVG - scheme) www.disclosurescotland.co.uk and in Northern Ireland, Access NI www.nidirect.gov.uk/accessni-criminal-record-checks
7	What happens when applicants, including group leaders, come from overseas?	<ul style="list-style-type: none"> i) overseas applicants need equivalent from country of residence. The government provides guidance: www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants as does the British Council document (also document 29 below), on the page Safeguarding under 18s www.britishcouncil.org/education/accreditation/information-centres/care-children ii) overseas applicants, including UK residents who have lived / worked overseas, need to provide a police check / certificate of good conduct from the country(ies) they have resided. This should come with an authenticated translation, which cannot be done by an agent. An ELT organisation may accept in the original language if they have the means to translate it thoroughly themselves iii) group leaders should produce the original police check. When this is not possible, then as a minimum, the group leader's employer (agency or school) should confirm that they have a clear police record iv) when applicants have lived / worked in several different countries in past 5 or 10 years, ELT organisation needs to set own policy on when checks are needed, e.g. residing in a country for 6 months or more within the last 5 years. v) if applicants cannot get an overseas police check (e.g. not resident in the country for long enough), ELT provider must state procedures on how they will react. Typically they would attempt to be more thorough in reference checking, collect additional verbal references, plus a letter from latest employer confirming good conduct 'to the best of their knowledge'.

		iv) procedures for how the provider will react to these and other recruitment situations (e.g. see point 8 following) to be part of the safer recruitment section of their safeguarding policy.
8	What if the DBS hasn't arrived and the person needs to start work?	<p>i) provider must do a Barred List check; illegal for staff to start work without that</p> <p>ii) if Barred List check clear, provider can allow a staff member to work, but not engage in regulated activity, i.e. they must always be supervised by another staff member who has been DBS checked. They must also sleep away from under 18 students as they cannot be supervised throughout the night; this may mean them sleeping off campus if there is no separate accommodation available on campus.</p> <p>iii) exactly how provider carries out supervision will depend on circumstance; procedures must be included in safeguarding policy</p> <p>iv) homestay adults cannot be supervised by the provider's staff; therefore, no under 18 students should be placed there until DBS check(s) of household adults are in place (see point 9 following).</p>
9	Do we have to check all the adults in a homestay?	<p>Yes, British Council currently accept two options; however providers should check with their LSCBs to see if they accept the second option. Bournemouth, for example, do not.</p> <p>Option 1</p> <p>i) every adult (aged 18 or above*) gets an individual DBS check. (*DBS checks can be done from age 16, but in this context, it is usual to use 18 as the starting age). This will supply a full criminal history of every adult in the household. Each person can keep their DBS current, not needing to renew it (unless something untoward happens) by joining the Update Service (see point 13 below)</p> <p>NB: most local authorities require all adults in the household to have individual DBS checks if there is a private fostering arrangement</p> <p>Option 2</p> <p>ii) the main host applies for a DBS check and indicates that the work happens in the home (known as HBP – Home Based Provision); on hard copy forms this is Box 66. When local police check the application, they will check not just the person, but also the address. If police feel that other household members or associated adults / regular visitors pose a risk to under 18s, the police have the option to disclose information about the person posing a risk. However, this is not the same as a full DBS check on the other members of the household and associated adults, because the police will not disclose all convictions, only convictions or information that police think makes the person a risk to under 18s.</p> <p>Using this approach, the Update Service is not appropriate; the main host's information would be kept current, but not the other adult members of the household. Therefore, repeated DBS applications would need to be made, indicating HBP every time. (for frequency of doing DBS checks, see point 12 below).</p>

10	What happens if there is a criminal conviction on the applicant's DBS check?	<ul style="list-style-type: none"> i) DBS certificate will go to applicant, not employer. Applicant must then show original to employer ii) any convictions must be judged case-by-case, depending on a range of factors, e.g. nature, seriousness and frequency of offence, how long ago it happened, etc. (for further information, see FAQ section of document 21 S1). Providers should also consider the relevance of reprimands and cautions and consider whether they are relevant to working with under 18s.
11	When a new staff member or homestay adult applies, can we accept DBS checks done by another organisation?	<ul style="list-style-type: none"> i) if the applicant is a member of the Update Service and the provider has registered with the Service as an employer; yes (see point 13 below). The original paper certificate needs to be viewed. This is needed to confirm the update service is for that certificate and the appropriate workforce (barred list) was checked. If the applicant cannot locate the paper certificate then a new DBS must be ordered. ii) if the applicant has gone through a DBS check for work with another organisation and the check is less than three months old and is for a similar role in the children's workforce, then according to the British Council then no full DBS check is required. However, a separate Barred List check is still required. Access to the Barred List is restricted and most ELT centres are unlikely to be able to do a standalone check. Please see document 25 for more details <p>If points (i) and (ii) do not apply then, then no.</p>
12	How often does a DBS have to be renewed?	<ul style="list-style-type: none"> i) there is no legal time limit on a DBS; it is only accurate up to the date it was issued. ii) 3 years is a generally accepted time before renewal; this is the current BC requirement. iii) OFSTED advise maintained schools that re-checking full-time staff (who have had no break in service) every 3 years is not the best use of resources. Re-checking should only happen if there is a reason for it, e.g. the staff member has been involved in any incident / crimes. To support this, contracts require staff to inform the employer if they are involved in any incident involving the police / courts iv) part-time / reserve teachers can be kept current by employing them, even for a half-day, every x months/weeks. The time should be stated in the provider's safeguarding policy. An accepted period is every 3 months. v) the answer to all DBS renewal problems is the Update Service (see point 13 below)
13	What is the Update Service?	<p>Update service avoids the need for renewing DBS checks www.gov.uk/dbs-update-service</p> <ul style="list-style-type: none"> i) can only join Update Service when a DBS check is done/renewed, or within 30 days of certificate being issued ii) is then portable; new employers will know immediately that person is clear to start working with under 18s iii) allows employers to check status of staff / homestay's DBS as frequently as required. Employers must have the DBS holder's written permission to access the holder's DBS record. Information for employers on how they use the Update Service www.gov.uk/government/publications/dbs-update-service-employer-guide iv) Update Service currently costs £13 per year (price as at January 2022)
14	Do I have to do checks on sub-contractors?	<ul style="list-style-type: none"> i) if you do not employ somebody, you cannot apply for a DBS check on them

		<ul style="list-style-type: none"> ii) instead ask their employer to confirm in writing that all employees working with provider's under 18s will have clear DBS checks iii) if using self-employed sub-contractors, e.g. disco DJ, that person must show you their current DBS certificate
15	Why does the wording refer to the organisation's safeguarding policy?	<ul style="list-style-type: none"> i) policy needs to be a practical document with evidence that procedures are in place for any irregular recruitment situations, especially around pre-appointment checks ii) policy must reflect what provider does / will do if these situations arise

Practical help

- * [Document 21](#) (see S1) has a lot of detailed, helpful information, particularly in the FAQ section
- * EUK provide a half-day Safer Recruitment training session: <https://www.englishuk.com/safeguarding>
- * link to [Document 25](#) Safer Recruitment: pre-appointment checks
- * link to [Document 26](#) Safer Recruitment Interview Sample Questions
- * link to [Document 27](#) Reference form for positions working with children
- * link to [Document 28](#) DfE: Regulated activity in relation to children
- * link to [Document 29](#) International criminal records check directory

Criterion S5

Section: Safeguarding Under 18s

Wording	Evidence
<p>S5 There are suitable arrangements for the supervision and safety of students during scheduled lessons and activities.</p> <p>Requirements Students under the age of 16 are not placed in classes with students of 18 years or older.* Sufficient adult supervision for all activities arranged by the provider, taking into account the nature of the activity, age, gender and needs of the students. (Group leaders and other adults travelling with students under 18 will be responsible only for students in their own group.) Provision of a leisure programme appropriate to the age, ability and interests of the students (for under 16s, the cost should be included in the course fee).</p> <p><i>*Where, exceptionally, courses are intentionally provided for under 16s mixed with adults, the provider must demonstrate a sound rationale, clear recruitment information, and effective systems to protect under 16s from unsuitable materials, activities and relationships.</i></p>	<ul style="list-style-type: none"> - Interviews with managers/staff - Talking to activity staff - Talking to group leaders - Teacher focus group - Inspector observation <p>Documentation</p> <ul style="list-style-type: none"> - Induction documents (16) - Supervision ratios (44) - Information for group leaders (45) - Risk assessments (46) - Leisure activity information (47) - Safeguarding policy (49) - Staff handbooks/notes (52) - Teacher handbook/notes (53) - Student handbook/notes (54) - Record of follow-up for student absences (62))

Background information

* providers must have adequate supervision and safety procedures in place for all times of the day; this criteria refers to structured times

* providers must be clear about who has responsibility for under 18s at any time

* leisure programmes are normally an integral and expected part of any course, especially for under 16s

Questions to ask	Some helpful information
<p>1 How are the ages chosen; under 16s not to be with 18s?</p>	<p>i) there needs to be a stated lower limit for joining adult courses which is based on age rather than the school making subjective decisions about individual students' levels of maturity</p> <p>ii) students' learning needs vary a lot between teens (15 years) and adults. BC inspection criteria T26 requires teachers to deliver lessons that are appropriate to the needs of the group and individual learners</p> <p>iii) 15 year olds can share teenage interests and levels of maturity with 16 / 17 year olds.</p> <p>iv) 18 year olds are adults in safeguarding terms.</p>

2	We have small closed groups with 14-19 age range and, after testing, an 18+ student is in the same level as under 16s; what should we do?	<p>Various issues to consider, not only academic;</p> <ul style="list-style-type: none"> i) 'normally' is used in criteria wording, meaning that exceptions may happen ii) has the safeguarding policy addressed the exceptional scenario and are staff aware of those procedures? 18+ needs to be clearly identified, to follow the course rules (i.e. same as for younger students) and be told expectations of his / her behaviour, i.e. as an adult s/he cannot get too friendly with younger students, especially those under 16 iii) maturity; how will the adult cope in a class with materials and teaching style pitched for teens? iv) is the syllabus strictly level based? If so, is this appropriate for a small closed group? Consider using a task-based syllabus allowing for multi-level classes so classes can be arranged by age rather than level v) check your publicity - if you have clearly stated that you will never place 18+ with under 16s you would be contradicting your own publicity.
3	Sometimes an agent sends a student aged 15 on a 16+ adult course without telling us. What are we to do then?	<p>A booking issue as much as an academic / safeguarding one:</p> <ul style="list-style-type: none"> i) review booking process. Require passport evidence of student's DoB before arrival ii) on arrival, transfer 15 years student to junior course within organisation or find alternative course at a school that has age-appropriate courses iii) have procedure for dealing with this scenario in safeguarding policy
4	<p>Leisure activities; - what are the right supervision ratios on site / off site?</p> <p>** BC Handbook publishes guidelines from the DfE for 'Safety of Pupils on Educational Visits', i.e. 1:6 (under 8s), 1:10 (8-10s), 1: 15-20 (11+). Providers would be expected to exceed these ratios if the safety and welfare of the students required it. There should be enough supervisors to deal with an emergency.</p>	<p>The BC Handbook provides guidelines based on ratios issued by the Department for Education almost 20 years ago for UK resident children familiar with the language and culture. ELT providers are working with a different set of under 18s. Using the DfE ratios as a broad guide, each provider should</p> <ul style="list-style-type: none"> i) use risk assessments to decide appropriate supervision ratios for all activities ii) risk assessments should be current / ongoing documents, allowing for changes to usual situations / procedures, e.g. students with additional needs / weather / demonstrations – which may require changes to supervision levels iii) supervision ratios may, if appropriate, include, in addition to staff present at the activity, staff who are very close by, e.g. onsite: in office / teachers room or offsite: if activity is in adjacent / nearby space. iv) student safety must always be top priority with sufficient staff close enough to respond in the event of an emergency. v) risk assessments for each activity may point to varying supervision ratios; staff running activities usually prefer set ratios as it helps calculating number of staff required, allocating staff etc. The set ratios can be within a range and open to changes if required. vi) clear guidelines in staff handbooks should give strategies for helping with any staff ratio difficulties, e.g. change activity / use one large area for two activities which could be supervised by fewer staff / how to access extra staff. vii) provider to have emergency staffing back-up procedure ready for when situations change or higher than usual staff ratios are required. viii) English UK offer Risk Assessment training day (see Practical help section below)
5	Group leader responsibilities:	Overall responsibility for safety of students is with the provider, not the group leader.

	<p>(a) we get them to sign a disclaimer that the school isn't responsible when they take their students away from the main leisure programme. That covers us doesn't it?</p>	<ul style="list-style-type: none"> i) provider has local knowledge and needs to evidence how they have safeguarded under 18 students (legal 'duty of care'), even when they go off with their group leader ii) this done by <ul style="list-style-type: none"> (a) risk assessment for activity led by group leader, prepared and explained by provider's staff and signed by group leader. Risk assessment to address that group leader may not have local awareness / understanding (b) issuing general 'staying safe' guidelines for students and group leaders iii) if provider feels group leader's proposed activity is unsafe (e.g. group leader with minimal English on first visit to UK taking group of students shopping in nearby city when local derby football game is scheduled), provider must not allow it to happen / offer safe alternative / send staff member to accompany; whatever ensures safety of students iv) parents signing consent forms agreeing to group leader taking an unsafe activity does not make it acceptable (or safe!); parents do not have the local knowledge or the ultimate responsibility that the provider has v) these procedures, with explanations about the provider's safeguarding responsibilities, should be sent to agents / group leaders at time of agreeing contract / before they arrive so that when procedure is used, it isn't a surprise. Information to be sent with positive slant; 'we want your students to have good and safe time; which is our legal responsibility in UK.' vi) some providers set time limits for group leaders to request a change to their social programme; e.g. tell us by mid-morning break and we can prepare risk assessment and discuss it before afternoon activity vii) if group leaders wish to change itinerary during excursion; procedures required for how providers respond in this situation, e.g. can do 'dynamic' risk assessment (see risk assessment training in Practical Help section below)
6	<p>Group leader responsibilities: (b) if an individual booking student is invited to join a group from his country for a safe outing, e.g. birthday pizza visit, surely that is OK?</p>	<p>Group leaders can only be responsible for those in their own group; so it would be as if the student were going alone for a pizza. Therefore,</p> <ul style="list-style-type: none"> i) the arrangement is not acceptable for students on a junior course unless <ul style="list-style-type: none"> (a) a member of the provider's staff accompanied the group (b) it fitted with the provider's guidelines on what students may do alone during unsupervised time (see S6) ii) for 16/17 year olds on an adult course, it would be acceptable if joining the group fitted the normal levels of supervision / what students may do during unsupervised time as advertised by the provider. <p>This criterion would not be met if any group leaders are given responsibility for students who are not part of their group.</p>
7	<p>We only supply lessons (and accommodation) for a closed group; the agent organises the rest of their programme, led by the group leader. Surely we don't have to produce risk assessments for everything they do?</p>	<ul style="list-style-type: none"> i) ensure the safety of under 18 year old students for all activities supplied by the ELT provider, which would include travel to-from school if accommodation is involved. Do risk assessments. ii) ensure contract is clear about what provider is responsible for and what times handover of responsibility takes place

		<ul style="list-style-type: none"> iii) provide a general risk assessment / guidelines about 'staying safe in local area' iv) offer guidance and information on UK safety expectations and procedures; for example advise agent to request risk assessments from excursion destinations, coach companies, etc. and offer help interpreting those. Also advise, in writing, against any proposed excursions / activities that are dangerous (e.g. local derby football game) v) have evidence that provider has done best to ensure safety of under 18s even during times when provider is not contractually responsible for students.
8	What does the phrase 'a leisure programme appropriate to the age, ability and interests of the students' mean?	<p>A best practice leisure programme will have the following:</p> <ul style="list-style-type: none"> i) student choice, from a ii) wide variety of activities that cater for a wide range of interests (not necessarily daily, but across any week) iii) non-sport alternatives for those who don't enjoy sport iv) activities that suit different ages; e.g. a course with age range 11-17 has some separate activities for younger and older students, with age split to suit the activity, student body etc v) some activities involving whole student body to generate a positive community atmosphere vi) activities that cater for students of different abilities, so that all students can succeed vii) offer an opportunity for organised mixing of students / nationalities by the provider setting student groupings for some activities viii) sometimes male / female separated groupings may be appropriate, e.g. residential courses with activities based in accommodation Houses ix) take account of student feedback and requests for activities x) encourage / allow students to interact with local residents positively xi) enhance students' understanding / appreciation of UK culture and leisure.
9	Our leisure programme is limited due to lack of space and facilities.	<p>Providers need</p> <ul style="list-style-type: none"> i) facilities and activities suitable for both outdoors and indoors (bad weather – see W24) ii) usually spaces are available for hire from local educational facilities / sports & other clubs / churches / community groups iii) when using hired facilities, provider must produce own risk assessment and not depend on hirer's, which has been prepared for local residents not international students iv) providers should make clear in publicity if using local hired facilities that are not part of their own campus.
10	Some of the leisure activities are optional and the under 16 students have to pay to join them. Is that OK?	<p>Extra / optional activities at additional cost are fine for any age, if</p> <ul style="list-style-type: none"> i) provider's publicity gives information about them, including the approximate cost / cost range, e.g. 'our additional activities range in price from £10 (cinema trip) to £50 (theatre visit)' ii) for under 16s, there is a full and attractive leisure programme, at no extra cost, included as part of the course iii) payment and cancellation / refund terms for any optional extras to be clear in publicity.
11	What is the threshold for following up on absent students?	Attendance at all classes and activities should be checked and recorded by staff. A procedure should be in place for following up on absent under 18s within half an hour (British

		Council requirement). There should be a clear procedure for checking attendance - under 18s should be clearly marked on registers, any absence noted and communicated (in many cases the DoS will check each class and will follow up).
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Practical help

- * English UK provide a training day on Risk Assessments <https://www.englishuk.com/safeguarding>
- * NSPCC guidance on supervision ratios <https://www.nspcc.org.uk/preventing-abuse/safeguarding/recommended-adult-child-ratios-working-with-children-guidance/>

Criterion S6

Section: Safeguarding Under 18s

Wording	Evidence
<p>S6 There are suitable arrangements for the supervision and safety of students outside the scheduled programme.</p> <p>Requirements Clear rules for what students may do outside the scheduled lesson or activity times and without supervision, appropriate to the age of the students and the location. Hosts, group leaders and residence supervisors are aware of the rules (including the time they are expected to return for meals and at night). Procedures in place to ensure these rules are adhered to.</p>	<ul style="list-style-type: none"> - Interviews with managers/staff - Talking to activity staff - Talking to group leaders - Talking to homestay hosts - Student focus group - Inspector observation <p>Documentation</p> <ul style="list-style-type: none"> - Induction documents (16) - Tutorial proformas (34) - Information for group leaders (45) - Risk assessments (46) - Safeguarding policy (49) - Staff handbooks/notes (52) - Teacher handbook/notes (53) - Student handbook/notes (54) - Parental consent (50, 79) - Completed enrolment records (59) - Record of follow-up for student absences (62) - Completed tutorial records (71)

Background information

- * unsupervised periods are when under 18 students are most vulnerable; providers have a legal Duty of Care to safeguard them
- * risk assessments are the best tool for addressing unsupervised situations
- * procedures developed from risk assessments are more effective when shared with all involved, i.e. students /staff / group leaders / homestays / parents / others
- * rules for students need to be checked, with a response if students are not following them

	Questions to ask	Some helpful information
1	What is meant by 'between and outside scheduled lessons and activities'?	Any period when students are not supervised in classes or scheduled activities. Providers should: i) examine students' day / week / course, identifying what students are doing every moment and who is responsible for them

		<ul style="list-style-type: none"> ii) times that need addressing will be situation dependent, e.g. residential or homestay, age and location of students etc. iii) typical times may be: <ul style="list-style-type: none"> - journey homestay-campus - movement around campus - breaks and meal times - free times (a) during excursions (b) at end activities / meals (c) weekends for homestays - sometimes arrival in and departure from UK (see W6) iv) provider produces risk assessments for all those times; issues may have already been addressed in premises risk assessment v) also consider airport transfers, overnight stays, weekends away, with parental consent acquired.
2	What sort of rules are required?	<p>Situation and age dependent; but rules (and guidelines / procedures) should</p> <ul style="list-style-type: none"> i) help students stay safe / safer ii) be extrapolated from risk assessments; evidence that provider has acted on identified risks iii) may be similar to those a UK responsible parent would give to their own children, e.g. having curfew times, always carrying charged mobile phone and school / homestay contact numbers iv) include any (campus / local) areas to keep away from v) when formulating rules, provider also to consider how to check rules are being followed.
3	Are others supposed to get exactly the same rules, guidelines and procedures as the students?	<ul style="list-style-type: none"> i) all stakeholders must know exactly what students have been told ii) each group of stakeholders to receive additional information, e.g. <ul style="list-style-type: none"> (a) what to do supervising and / or checking the students (b) how to react if students miss check-in times - there must be a clear procedure on this (c) possible outcomes if students repeatedly ignore rules.
4	How / when should this information be given?	<p>When:</p> <ul style="list-style-type: none"> i) levels of supervision, and fact that there will be times without supervision, required as part of publicity for under 18s (see S3) ii) student rules to be sent to parents / agents / group leaders before arrival, so that parents and students sign consent form confirming they have read, understood and accepted school rules iii) on arrival at homestay, e.g. via welcome pack from school explained by homestay host / in school, with further explanation iv) reiterated during course from all staff and stakeholders and via notices around school. <p>How:</p> <ul style="list-style-type: none"> v) clear, brief age / level appropriate written information, with graphics if appropriate (using under 18 year-old students to produce graphics can make them more effective) vi) include maps for clarification vii) to homestays as part of handbook, re-iterated prior to under 18s arriving

		<p>viii) brief written information (easier to remember and available for future reference) to be supported with verbal explanations during induction, classes, from homestays, group leaders etc, plus reminders throughout course as necessary</p> <p>ix) notices around premises / campus, e.g. No Entry notices for out-of-bounds areas.</p>
5	This criterion is about 'unsupervised time'; if it is unsupervised, how can we check that students are following the rules/guidelines/procedures?	<p>Situation, location, age dependent, may include</p> <p>i) having time limits on unsupervised periods, e.g. journey campus – homestay; students to arrive by xx time and if student doesn't arrive, homestay knows procedure for checking / alerting provider</p> <p>ii) registers at end of unsupervised periods</p> <p>iii) duty staff doing random checks of areas during unsupervised time, especially out of bounds areas. When done early in course, helps students realise rules are being checked</p> <p>iv) checks that students have their 24 hour emergency contact information, e.g. always before getting on bus for excursions, before leaving homestay (especially if very young)</p> <p>v) involving local stakeholders (e.g. bus companies, shopkeepers) to tell provider if students are in wrong areas / out at wrong times / not behaving appropriately</p> <p>vi) CCTV cameras / night-security staff for residential campus</p> <p>vii) provider must have appropriate sanctions ready for students not following rules / safety guidelines, e.g. grounding students / making them stay with staff throughout next excursion etc.</p> <p>viii) group leaders to realise they have important role ensuring provider's rules (especially about student safety) are to be followed by their students (make agreement to enforce student rules part of signed group leader contract).</p>
6	Why are times for meals specifically mentioned?	<p>Situation, age dependent; however, usually, meals with homestays are important</p> <ul style="list-style-type: none"> - so provider knows what students are eating - if students do not return to homestays for meals, e.g. evening meal, the period of unsupervised time can be too long and, if in the evening, can be less safe.

Criterion S7

Section: Safeguarding Under 18s

Wording	Evidence
<p>S7 There are suitable arrangements for the accommodation of students.</p> <p>Requirements Provider is responsible for providing accommodation and all meals unless alternative arrangements have been made by the parent(s) or legal guardian and confirmed in writing. A responsible adult (known to and vetted by the provider) is always present overnight and normally when students under 16 are at home or in residence. Providers ensure that students under 16 lodged by them or their agency in homestay or residential accommodation are not lodged with students of 18 years or older. In residential accommodation, the ratio of supervising adults to students must be at least 1:20 for students aged 12–17, and 1:15 for students under 12 at all times.</p>	<ul style="list-style-type: none"> - Interviews with managers/staff - Talking to group leaders - Talking to homestay hosts - Student focus group <p>Documentation</p> <ul style="list-style-type: none"> - Accommodation placement (42) - Information for group leaders (45) - Staff handbooks/notes (52) - Student handbook/notes (54) - Record of follow-up for student absences (62) - Accommodation records (77)

Background information

- * accommodation is a less-safe time for under 18s, especially when providers sub-contract to homestays, over whom providers have less control
- * the lack of control increases when providers use accommodation agencies for homestays
- * clear expectations of accommodation and welfare standards are required
- * providers must be ready to handle emergencies, which are always more challenging if occurring at night

Questions to ask	Some helpful information
1 When we work with closed groups, we don't always provide the accommodation; sometimes the agent organises it for the group. Surely that is OK.	i) The word 'normally' is used, which recognises that providers will not always be required to arrange accommodation ii) The opening phrase states 'suitable arrangements will be made for the accommodation of students.' If providers are not organising accommodation for students, they still have some responsibility under their safeguarding 'duty of care' for under 18 students. Providers also have local knowledge. Providers could exercise their duty of care by, e.g. offering to give written feedback to agent / group leader on the suitability of accommodation that's been arranged, or at least alerting agent to things agent should be checking; for example:

		<ul style="list-style-type: none"> - the location of accommodation; is it a safe area for the age of student? - are travel arrangements to the location easy / appropriate, especially after dark (e.g. public transport followed by long walk)? - will it involve sharing with 18+ people, (e.g. a hostel / hotel / university residence block)? - is it clear what meals are included? <p>iii) The agent arranging accommodation will benefit from guidance and the provider's local knowledge. The cheapest option is not always an appropriate one for under 18s.</p>
2	We regularly get 16/17 year olds on adult courses whose parents have arranged for them to stay with 18+, family members – or sometimes want them to live on their own in rented or purchased accommodation. Surely we can't go against the parents' wishes?	<p>To carry out proper duty of care, provider needs to retain right of approving accommodation arrangements for under 18s joining their courses, including visiting the premises. Some situations will be straightforward; others not; school may need to delay independent living arrangement until the student is aged 18. Duty of care points to consider:</p> <ul style="list-style-type: none"> i) how close are family members; immediate or 'cousins'? ii) how old are family members and how long have they been resident in UK? Will they know how to responsibly supervise an under 18 relative and also how to deal with any problems related to the accommodation (tenancy agreements / broken boilers / paying Council tax etc.) iii) location of accommodation; is it in safe area for under 18s, especially after dark iv) best practice is to use the standards the provider would apply to a homestay applicant offering to take under 18s; if the proposed independent accommodation doesn't match that standard, it should not be approved v) if accommodation arrangement is agreed, the under 18 student should receive increased welfare tutorials, especially in the early weeks, with provider's staff checking details carefully (meals, laundry, other people visiting house,). Although rare, it is possible that student has been brought to UK for illegal purposes or is subject to family abuse, so the provider must always be careful to carry out duty of care vi) under 18s living alone, e.g. in property purchased by their parents, however mature an individual may be, should not be accepted by the provider; it is impossible for provider to carry out proper duty of care vii) to avoid difficulties, information about accommodation for under 18s not arranged by provider must be made clear to parents before booking, as in some cultures, it would be considered normal for a 17 year old to live independently with his 18 year old cousin.
3	We have under 18s on non-residential courses; they just come for morning classes so we are not involved in accommodation or meals	<p>With all courses, those open to anyone or closed groups, ensure that</p> <ul style="list-style-type: none"> i) the publicity / contract is clear about what is / isn't included in the price. There must be no possibility of misinterpretation ii) that what is offered is appropriate for the age of students; e.g. if students are on campus for only morning lessons, they still need access to drinks / snacks during break; either brought with them or supplied / sold by the provider iii) accommodation / meal arrangements should be clear both in publicity and confirmed in student enrolment documents at time of booking.

4	Does the second bullet point mean that homestays can't ever go out or go away for a weekend when they are hosting students under 16?	<p>Provider has ultimate 'Duty of Care' for students. An emergency, e.g. fire, loss of electrical power, intruder, can happen at any time and students must not be left overnight to deal with potential dangers without adult help.</p> <ul style="list-style-type: none"> i) overnight there must always be an adult present who is known to the provider and has been DBS checked. Providers must ensure homestays understand this as part of their contract; if a homestay needs to be away, they work with the provider to ensure the safety of the student(s) with proper supervision by a checked and known person ii) homestays going out for an evening will be situation dependent; (age of students, where going, who lives next door / upstairs, who is left in homestay etc.). 'Normally' has been used which recognises that homestays will sometimes be away from the home. Providers to inform homestays of guidelines / limits and ensure homestays inform the provider as required by the guidelines.
5	Why have the words 'in residence' been added to this bullet point?	<p>Providers using residential accommodation must follow similar standards</p> <ul style="list-style-type: none"> i) that anyone (staff or group leader) left in charge of students, especially overnight, must be DBS / police checked (this is a legal requirement) ii) that there are always sufficient staff in a residence overnight (see point 7 below); this includes emergencies when the duty staff / group leader may be called away, in which case a replacement must be found iii) that 'normally' staff / group leaders will be scheduled to be in the residence when students are there, e.g. after meals, during downtime, during evening house time etc. This adult cover will require duty rotas, clearly communicated to all, and may mean restricted access to residences by students iv) a photo board showing staff / group leaders living in a residence to be displayed in a common area of the residence, e.g. foyer, common room, with a bold indicator of who is on duty at any time and where to find them v) staff bedrooms to be identified easily to students, on floor plans and with signs / pictures on bedroom doors. All staff to be aware that they may need to respond to students, even if they are not 'on duty'; students should always be helped, never turned away.
6	a) A boarding school would have under 16s lodged in the same residence as 18s; surely we can do the same.	<p>An 18 year old student is a non-police checked adult according to UK safeguarding laws. Boarding schools know their students over a long period and 18 year olds (and those turning 18) have usually been in the school for months / years before becoming adults. Providers are required to safeguard under 18s, especially from unchecked adults, therefore (a):</p> <ul style="list-style-type: none"> i) do a risk assessment of the residence and how the 18+ students and under 16s can be lodged apart, on separate floors / in separate sections and, preferably using separate showers / toilets ii) via the risk assessment, identify any areas where additional supervision may be required iii) this approach applies to closed groups as well as random wrong-age individuals joining a course

	<p>b) What happens when 15 and 18 year old siblings ask to share a homestay?</p> <p>c) What about under 18s sharing with other adult members of their family?</p>	<p>iv) if an 18 year old has joined a 'junior' course, they must follow the junior course rules (not UK law), e.g. no alcohol, be clearly identified to all staff, be given limits / rules about interaction with younger students, especially under 16s.</p> <p>(b) provider</p> <p>i) has request in writing from agent or parent (and copies of student passports to check they are siblings)</p> <p>ii) produces risk assessment to identify problems with 18 year olds joining junior course, 15 year olds joining adult course, and how they will address those</p> <p>iii) provider checks homestay is willing to accept both junior and adult at same time and clarifies rules for both.</p> <p>In either case it is wrong for providers to accept wrong-age students onto a course without (a) trying to dissuade them (b) doing something, e.g. producing a risk assessment which shows evidence of thought going into how to best handle the situation from safeguarding perspective (c) remembering that the provider has other students who did not expect to have a wrong-age student on the course (d) being aware that not following the published age-range goes against M22 criteria about publicity.</p> <p>Dealing with wrong ages as part of closed groups, see S5 point 2.</p> <p>c) Students from the same family may share homestay accommodation on request, normally with separate bedrooms (see W9 and W17). Provider would need to discuss with host whether they would feel comfortable with the situation. Standard rules for student conduct should apply with clear rules about curfew times.</p>
7	<p>Can group leaders can be included in accommodation ratios?</p>	<p>Group leaders can be included in ratios; they can only be responsible for their own students; e.g. a residence with 40 beds accommodating one group of 34 students plus two group leaders, cannot have additional students who are not part of the group unless there is also a resident member of provider's staff.</p>
8	<p>What level of first aid facilities are required in a residence?</p>	<p>See W1 and W8. Situation dependent: do a risk assessment.</p> <p>i) Think about</p> <ul style="list-style-type: none"> - location (how far from medical services / A&E?) - age and number of students - provider's staff; what medical facilities/equipment are they trained to use? - nature of the course (any elements that are more likely to bring injuries, e.g. sports, especially if to high level) - type of campus / facilities; does anything require special first aid provision. Is there a medical room on site? <p>ii) As a minimum there must be First Aid boxes, kept in locked locations which are accessible and indicated around the campus / building, usually one per residence for ease of night-time access.</p>

Criterion S8

Section: Safeguarding Under 18s

Wording	Evidence
<p>S8 There are suitable arrangements to ensure contact between the provider and parents, legal guardians or their nominated representatives concerning the welfare of students.</p> <p>Requirements Effective measures and information are in place to enable 24-hour contact with parents or legal guardians of students. Parents, legal guardians or agents of students have a telephone number that can be used to contact the provider outside office opening hours.</p>	<ul style="list-style-type: none"> - Interviews with managers/staff - Talking to group leaders <p>Documentation</p> <ul style="list-style-type: none"> - Completed enrolment records (59) - Student records (60)

Background information

- * effective systems to suit the situation are needed; systems that ensure contact and the ability to discuss welfare issues
- * contact with parents is needed in case of emergencies, and in case group leaders and/or language tour operators are not available
- * the provider's stakeholders must be able to contact the provider 24x7, in case of an emergency in the student's own country

	Questions to ask	Some helpful information
1	We collect parent contact details on the parental consent form; which the group leader brings	The provider needs parental contact information before arrival; something may happen to a student and / or the group leader while travelling to the centre.
2	The agent refuses to provide us with parent contact details and says we can always contact the agent 24x7	<ul style="list-style-type: none"> i) agents' emergency contact numbers can be unreliable; check it at weekends / late evenings etc ii) collect parent contact details as part of the student check-in process.
3	We get parent contact details as a lot of them can't speak English, there isn't much point.	<ul style="list-style-type: none"> i) ask for language information on parental consent form <ul style="list-style-type: none"> a) do they speak English – what level? b) what languages do they speak (well) c) do they have a family member / friend / neighbour who speaks English if necessary? ii) keep record of which languages staff speak iii) identify any local foreign language speakers who may be able to help in emergencies iv) identify older / helpful / good English level speakers amongst students; only use if appropriate.
4	Giving number to stakeholders	i) Number must be given in range of ways, whilst always being available on website in case stakeholders lose it. Exactly when and where given will be situation dependent: e.g. age of under 18s, type of course etc.

		<ul style="list-style-type: none">- information to parents / students- student handbook- information to group leaders / group leader contract- contract with language tour operators- around school- added to student's mobile phones- on student emergency card <p>ii) emergency phone must be shared amongst several staff; it breaches Health & Safety laws if only one person has it</p> <ul style="list-style-type: none">- if person on rota to have emergency phone is unavailable, there must be somebody to pass it to- person with emergency phone must ensure that they have a signal if they are going away / out, and that battery is always charged- it must be answered by somebody who has sufficient knowledge and responsibility to be able to make helpful decisions in difficult situation. This person needs immediate access to the relevant (student / parent / homestay / agent) contact details.
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