

POLICY: SAFEGUARDING & CHILD PROTECTION

EMBASSY EDUCATIONAL SERVICES (UK) LTD

Embassy Summer
Embassy Study Tours
Global Achievers Academy

Last Review: April 2025

Policy:	Embassy Educational Services (UK) Ltd Safeguarding & Child Protection
Version:	3.1
Synopsis:	All members of Embassy Educational Services (UK) Ltd staff (including contracted, agency and volunteer staff), group leaders, parents, agents, homestay providers and third-party contractors residing, studying or working at/for Embassy Educational Services (UK) Ltd operated sites.
Policy Owner:	Embassy Educational Services (UK) Ltd UK Operations Department
Relevant to:	Embassy Educational Services (UK) Ltd UK (Embassy Summer, Embassy Study Tours, Global Achievers Academy) – collectively referred to as Embassy Educational Services (UK) Ltd staff, host families, college providers, contractors, agents, parents, group leaders, students.
Introduced:	1 st March 2011
Next review:	April 2026
Related Documents:	<p>Specific policies that should be read in conjunction with this document are:</p> <ul style="list-style-type: none"> ES Staff Handbook EC Equality and Diversity Policy Embassy Educational Services (UK) Ltd DBS Policy Embassy Educational Services (UK) Ltd Safer Recruitment Policy EC Homestay Recruitment Procedure SOP EC's Code of Conduct for those working with Under 18's Embassy Educational Services (UK) Ltd Missing Person Procedure (Found in Plans for Foreseeable Events) EC Whistleblowing Policy EC GDPR Briefing Note Sexual Harassment Prevention Policy Wellbeing Policy Embassy Educational Services (UK) Ltd Anti-Bullying Policy Embassy Educational Services (UK) Ltd Plans for Foreseeable Events Embassy Educational Services (UK) Ltd Accommodation & Allocation Guidelines Embassy Educational Services (UK) Ltd Ratio & Supervision Guidance Embassy Educational Services (UK) Ltd Attendance & Absenteeism Policy Embassy Educational Services (UK) Ltd Individual Welfare Practice Guidance Embassy Educational Services (UK) Ltd Disciplinary Procedures Embassy Educational Services (UK) Ltd Complaints Procedure Embassy Educational Services (UK) Ltd Student Code of Conduct Embassy Educational Services (UK) Ltd Site Risk Assessments Embassy Educational Services (UK) Ltd Group Leader Guide <p><i>All related policies are reviewed annually.</i></p>
Date(s) modified/ reviewed:	April 2025 Annually

Publication:	This policy is made available to staff, homestay providers and contractors via email. This policy is available to agents and external parties via the company websites: www.embassysummer.com www.globalachieversacademy.com
Signature:	Lisa James Managing Director, EC Young Learners

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1. Introduction

Embassy Educational Services (UK) Ltd is committed to safeguarding and protecting children in its care from harm (these children are defined as any person under 18 years old, or 18 year olds, enrolled on a given part of an Embassy Educational Services (UK) Ltd course.

Embassy Educational Services (UK) Ltd will apply this policy entitlement equally to all children regardless of gender, ethnicity, disability, sexuality or belief.

The department recognises that the nature of its services presents unique environments and activities with their own particular risks to the safety and wellbeing of its students.

This policy describes the Embassy Educational Services (UK) Ltd student safeguarding principles and approach. It highlights action that is taken to promote the welfare of children and protect them from harm. It outlines the safeguarding roles, responsibilities of staff and the procedures for identifying and managing safeguarding concerns and issues.

This policy supports Embassy Educational Services (UK) Ltd's statutory duty to safeguard and promote the welfare of children and gives due regard to: Keeping Children Safe in Education.

September 2024 and Working Together to Safeguard Children, December 2023; and is pursuant to The Education (Independent School Standards) (England) Regulations, April 2019 and Department for Education Boarding Schools National Minimum Standards, March 2015. Those who work with children and senior leaders are required to read Part 1 and Annex A of Keeping Children Safe in Education.

1.1. Local Agency Contacts (UK only)

Please see our individual safeguarding policies by location for the local agency (LADO etc) or Multi-Agency Safeguarding Hub (MASH) contacts.

In an emergency dial 999 and ask for the Police.

1.2. School Contacts

A full list of all summer contacts is available in our Summer Contacts 2024 file. The 24-hour emergency numbers for Embassy Educational Services (UK) Ltd, (+44) 07771 845 978.

The Global Designated Safeguarding Lead for Embassy Educational Services (UK) Ltd is Lisa James, Managing Director, contactable by email at LisaJames@ecenglish.com.

The UK Designated Safeguarding Lead (Embassy Summer) is: **Jamie Gantley**
JamieGantley@ecenglish.com

The UK Designated Safeguarding Deputy Lead (Embassy Summer) is: **Taliesin Dowse**
TaliesinDowse@ecenglish.com

The North America Designated Safeguarding Lead (Embassy Summer) is: **Catherine Dalipe**
CatherineDalipe@ecenglish.com

The Malta Designated Safeguarding Lead (Embassy Summer) is: **Laura Monserrat**
LauraMonserrat@ecenglish.com

The Global Designated Safeguarding Lead (Global Achievers Academy) is: **Lisa James**
LisaJames@ecenglish.com

The Global Designated Safeguarding Lead (Embassy Study Tours) is: **Taliesin Dowse**
TaliesinDowse@ecenglish.com

The senior management and leadership team, comprising of the EC Board of Directors, EC YL Managing Director, Global Operations Director, Embassy Educational Services (UK) Ltd Operation Managers, Programme Managers and Centre Managers ensures that the school complies with its duties under the legislation below:

- Children Act 1989
- Children Act 2004
- Education Act 2002 and 2011
- Safeguarding Vulnerable Groups Act 2006
- Education and Inspections Act 2006
- Children and Young Persons Act 2008
- School Staffing (England) Regulations 2009
- Equality Act 2010
- Education Act 2011
- Protection of Freedoms Act 2012
- Police Act 1997
- Police Act 1997 (Criminal Records) Regulations 2002
- Police Act 1997 (Criminal Records) (No. 2) Regulations 2009.
- Prevent Strategy HM Government
- Counter Terrorism and Security Act 2015 (Prevent Duty)
- Working Together to Safeguard Children 2023
- Online Safety Act 2023
- Keeping Children Safe in Education 2024

2. Application of this Policy

This policy applies to all permanent, contracted, agency and volunteer staff, including those who do not have cause to come into direct or regular contact with students in order to carry out their daily duties.

This policy also applies to those who provide homestay accommodation for students, third party contractors, visitors and Group Leaders and anyone else who has cause to visit the Embassy Educational Services (UK) Ltd centres.

3. Policy Aims

The purpose of the safeguarding policy is to set the policies, practices and provisions in place to ensure all possible steps are taken to:

- Provide a safe environment for the students
- Ensure that all staff act according to the best interests of the students
- Outline responsibilities of all staff and specific roles

- Reduce the potential risk pupils/students face of being exposed to abuse, extremism, radicalisation, exploitation or victimization
- Swiftly and efficiently identify and manage cases where students are at risk or have unmet welfare needs
- Promote the importance of student safeguarding and welfare across all activities
- Regularly evaluate the company approach and practices and audit company records with regard to safeguarding and make any improvements needed

4. Embassy Educational Services (UK) Ltd Safeguarding Principles

The principles below underpin company provisions and practices in relation to child protection:

- The summer school site provides a safe and secure environment for all students
- Homestay and residential accommodation provide a safe and secure environment for all students
- All students feel safe and secure and protected from harm
- All students know who to turn to for help, advice or support, can access services confidentially, quickly and easily, and have access to 24-hour support
- A Designated Safeguarding Lead and deputy is appointed for the summer school and has responsibility for the safeguarding and welfare of all students
- The Centre Manager has overall accountability for the safeguarding and welfare of students in a given centre
- All staff share the responsibility to protect students from harm, which includes being vigilant in identifying possible safeguarding issues and following relevant school policies and procedures relating to safeguarding and welfare
- Students and staff have effective means by which they can raise safeguarding concerns or report issues and are enabled to give their views frequently on the effectiveness of child protection provisions and practices in the summer school
- All staff are aware of members of the Safeguarding and Welfare team and know who to turn to if they need help or advice or have concerns
- Staff have at least one reliable means to contact all students quickly and directly
- All relevant summer school staff are aware of the special needs or particular vulnerabilities of individual students
- The whereabouts of all students under 18 is always known and adequate supervision is ensured
- In cases where a student under the age of 18 is unaccounted for, procedures to locate the student are immediately invoked
- The summer school has procedures in place that enable child protection concerns and incidents to be dealt with promptly and effectively and in line with relevant legislation.

5. Embassy Educational Services (UK) Ltd Approach to Safeguarding

Embassy Educational Services (UK) Ltd's best practice approach to safeguarding follows the UK Government Department of Education's guidance set out in Keeping Children Safe in Education, September 2024, which defines the role Embassy Educational Services (UK) Ltd should take in protecting the children in the school. As a global provider we have found KCSIE to be the most detailed and effective approach.

Excerpt 1 From Keeping Children Safe In Education, September 2024

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Excerpt 2 From Keeping Children Safe In Education, September 2024

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Excerpt 3 From Keeping Children Safe In Education, September 2024

Role of school and College staff

School and college staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

All staff have a responsibility to provide a safe environment in which children can learn.

All staff should be prepared to identify children who may benefit from early help.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Any staff member who has any concerns about a child's welfare should follow the processes set out in paragraphs 49-55. Staff should expect to support social workers and other agencies following any referral.

Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as local authority children's social care.

The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction.

This should include:

- the child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse).
- the behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying).
- staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing)
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part one of this document should be provided to staff at induction.

All staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All staff should be aware of their local early help process and understand their role in it.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

6. Roles and responsibilities

6.1. Governance

Embassy Educational Services (UK) Ltd is a department of EC English owned by a single proprietor Embassy Educational Services Ltd, part of EC English and forms part of this Governance structure. Embassy Educational Services (UK) Ltd is also a member of Young Learners English UK and the Sussex Safeguarding Forum, as well as accredited by the British Council in the UK, FELTOM in Malta, ASSET in the US and Languages Canada in Canada, to ensure that best practice for safeguarding of young people is in line with industry standards.

The Proprietor will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of the Keeping Children Safe in Education, September 2024 guidance.

The Proprietor undertakes an annual review of safeguarding arrangements across all Embassy Educational Services (UK) Ltd schools.

6.2 Designated Safeguarding Lead

The summer school department has a Designated Safeguarding Lead, and Deputy Designated Safeguarding Lead who takes over duties and responsibilities when the Designated Safeguarding Lead is unavailable.

The Designated Safeguarding Lead has overall responsibility for the safeguarding and welfare of students, supported by other members of school staff. The Designated

Safeguarding Lead is the school representative for any safeguarding issue requiring interagency working.

The Designated Safeguarding Lead, Centre Manager and Welfare Manager form the most senior safeguarding group of the school and in the event of one of these members of staff being implicated in a child protection enquiry/incident, the guidance is to contact the LADO (UK only) or local child protection service as required. Further information on the procedure to be followed in the event of allegations against staff members can be found in the Embassy Educational Services (UK) Ltd Policy on Reporting of Concerns or Allegations of Harm to Students.

The Designated Safeguarding Lead is responsible for:

- Ensuring that all staff are aware of and understand the role of the Designated Safeguarding Lead
- Ensuring that all staff are conversant with and follow the procedures outlined in this policy and those that directly support it
- (UK only) Ensuring that all staff have read and signed Department for Education guidance set out in Keeping Children Safe in Education and all updates as they are published
- Providing advice and support to all staff on issues relating to child protection
- Ensuring all staff, including the Centre Manager, have completed and hold an up-to-date certificate for safeguarding awareness training which is updated every 3 years.
- Ensuring all staff complete Prevent training, either face to face or on-line.
- Ensuring all staff receive frequent (at least annually) safeguarding briefings and updates so that their safeguarding practices are current.
- Ensuring that they and their deputy have completed and hold an up-to-date certificate for level 3 child protection training which is updated every 2 years.
- Ensuring that all staff training required and completed in relation to child protection is recorded in a central training log and audited regularly to identify training needs and any recording gaps.
- Ensuring that all new staff, including temporary staff and volunteers, receive induction which includes the school's Child Protection Policy, the Staff Code of Conduct for those working with under 18's, the identity of the Designated Safeguarding Lead and access to Part 1 of Keeping Children Safe in Education through the Training section of the Embassy Educational Services (UK) Ltd Staff Portal.
- Ensuring that all students receive a full induction and timely updates on matters relating to safeguarding and welfare.
- Ensuring that all students have sufficient and appropriate means to report concerns, issues and incidents.
- Maintaining a complete and up-to-date record of all child protection-related concerns, issues, incidents, reports, referrals and complaints.
- Reporting children at risk to the Local Authority Designated Officer (LADO), Local Safeguarding Partners - local authority, the police chief officer, and the clinical commissioning group (CCG).
- Ensuring that children in need are getting appropriate individual support, advice and access to services.

- Working holistically and in partnership with other agencies that can provide welfare and safeguarding support and information to students.
- Ensuring that literature and information from agencies who provide welfare and safeguarding services to students are readily available and students are aware of the range of services on offer.
- Ensuring that this policy is made available to students and to their parents/guardians

6.3. The Deputy Designated Safeguarding Leads

The Deputy Designated Safeguarding Lead is responsible for supporting the Designated Safeguarding Lead in their duties and responsibilities day-to-day, and for assuming these duties and responsibilities in their absence.

6.4. Centre Manager

The Centre Manager has overall accountability for the safeguarding and welfare of students at a particular summer school site.

6.5. Welfare Manager

The summer school Welfare Manager is a go-to person for students with queries, needs or concerns relating to their welfare. In addition, the Welfare Manager provides support and information to colleagues on welfare matters. The Welfare Manager liaises closely with the Designated Safeguarding Lead where there is a particular concern about a student's welfare. In the absence of a Welfare Manager the Centre Manager assumes their responsibilities.

6.6. All staff

All staff are responsible for monitoring for signs and symptoms of physical and psychological abuse and neglect and reporting any concerns in accordance with the Embassy Educational Services (UK) Ltd Policy on Reporting of Concerns or Allegations of Harm to Students. All staff are responsible for identifying and reporting to the DSL all students who could benefit from early help.

In the event a staff member has concerns that another member of staff is not fulfilling their responsibility for safeguarding then this must be reported to the Centre Manager or the DSL in their absence. Further information on the procedure to be followed in the event of allegations against staff members can be found in the Embassy Educational Services (UK) Ltd Policy on Reporting of Concerns or Allegations of Harm to Students.

All other concerns must be reported via the EC Whistleblowing Policy

Staff are expected to promote positive behaviour in students, encourage them to follow Code of Conduct, follow disciplinary procedures in cases of misconduct, set an appropriate example to students and help and encourage them to stay safe.

7. Child protection policies, practices and provisions

This section describes the summer schools' policies and procedures, practices and provisions put in place to keep the students safe.

7.1. Staff recruitment

Please refer to the Embassy Educational Services (UK) Ltd Safer Recruitment and Selection Policy for the full recruitment process for the following:

- Temporary and permanent staff, including part-time, ancillary and voluntary staff
- Agency and contract staff, including part-time, ancillary and voluntary staff
- Third party contractors

All recruiting managers will complete Safer Recruitment training either in house or (UK only) via the NSPCC on-line training.

7.2. Staff induction process

All Embassy Educational Services (UK) Ltd staff undergo a process of induction to ensure they are adequately prepared for their role and responsibility. This process includes:

1. Receipt of EC's Code of Conduct for those working with Under 18's
2. Receipt of company policies such as Safeguarding and Health & Safety
3. Receipt of Staff relevant handbooks
4. Receipt of Keeping Children Safe in Education, Part 1
5. Pre arrival online training with learning assessment
6. In centre arrival induction

Online training and the in-centre induction include a detailed description of our policies, procedures, practices and provisions in relation to the safeguarding and welfare of our students, specifically the Safeguarding & Child Protection Policy, relevant handbooks & EC's

Code of Conduct for those working with Under 18's, the identity of the Designated Safeguarding Lead and their deputies. In addition, all UK staff must read and sign a current copy of Part 1 of the Department for Education guidance, Keeping Children Safe in Education as part of the onboarding process. Evidence that online training has been completed is retained in a central record.

Staff are familiarised with relevant reporting lines and communication channels within the school to enable them to effectively raise concerns or issues.

Safeguarding awareness training (equivalent to Level 1) and internal training on security and health and safety are given as part of the online training of all staff.

Staff are informed about the contents of student inductions, the student Code of Conduct, and expectations for their own conduct.

7.3. DBS referral when staff leave the summer school (UK only)

The department has a duty to inform the Disclosure and Barring Services (DBS) and/or National department for Teaching & Leadership (NCTL) if a member of staff who leaves the

school has been involved in a substantiated child protection allegation, or any other incident about which the DBS must be made aware, and will do this promptly.

The referrals team can be contacted on 01325 953 795 or at PO Box 181, Darlington DL1 9FA.

Please refer to the Embassy Educational Services (UK) Ltd Safer Recruitment Policy for further information.

7.4. Staff training

The table below shows the mandatory safeguarding and welfare-related training completed by specific members of staff within Embassy Educational Services (UK) Ltd U.K. operations. Other staff may complete some of the training shown below, but it is not mandatory for them to do so.

'Staff' refers to all temporary and permanent full-time and part-time staff, including voluntary staff.

TRAINING	STAFF
British Council Safeguarding for Activity Staff/ Teachers/Homestay Hosts/Managers, as relevant to position	All staff will complete course respective to Role
Higher level safeguarding (equivalent to L3 for safeguarding lead)	Designated Safeguarding Lead, Nominated Safeguarding Lead, Deputy Designated Safeguarding Lead, Programme Managers
Higher level/advanced safeguarding training (equivalent to L2)	Welfare Managers, Centre Managers
Online Health and Safety	All staff
First Aid	Designated First Aiders
Safer Recruitment	All those with an active role in recruiting staff

7.5. Staff Conduct

Staff must ensure that their conduct does not pose any risk to the safeguarding and welfare of students and must set them a good example. They must also ensure that their behaviour and actions do not place students and other members of staff at risk of harm or allegations of harm to a student.

Staff must follow the behaviour standards set out in the Staff Handbook, and Embassy Educational Services (UK) Ltd Policies which is made available on the Embassy Educational Services (UK) Ltd Staff Portal.

7.6. Sexual Harassment Prevention

Embassy Educational Services is committed to maintaining a work environment where all individuals are treated with respect and dignity. We believe that every employee, intern, student, and third party has the right to work and interact in a professional atmosphere that promotes equal opportunities and prohibits any form of harassment, including sexual harassment. Embassy strictly prohibits sexual harassment in any form, whether by employees, supervisors, managers, students, or third parties. This includes any unwanted physical contact, inappropriate remarks, or any behaviour that creates a hostile or intimidating environment.

To ensure a safe and respectful environment, Embassy will provide training on sexual harassment prevention and awareness for all employees and managers. We are committed to addressing and preventing any actions or behaviours that could be perceived as harassment. Detailed information on supervision and monitoring practices can be found in the Embassy Educational Services (UK) Ltd's Sexual Harassment Prevention policy document.

7.7. Group Leaders

There is a systematic process to ensure adults accompanying students on Embassy Educational Services (UK) Ltd courses have undergone appropriate suitability checks in their home country in line with relevant guidance.

Accompanying adults will be required to declare their suitability to work with children on arrival. They will also receive a copy of the Safeguarding Policy Summary, the Group Leader guide, the Code of Conduct and an induction containing further information on company Safeguarding & Welfare Policy, roles, responsibilities and communication lines.

7.8. Visitors to the summer school

Embassy Educational Services (UK) Ltd operates at host institutions which have specific policies and practices for visitors on site. Regardless:

Embassy Educational Services (UK) Ltd identification must be worn by all staff, students and group leaders.

Prior authorisation for Embassy Educational Services (UK) Ltd visitors to the summer school must be arranged whenever possible. When this is not possible, the summer school

Centre Manager and other relevant staff must be informed of a visit to the Embassy Educational Services (UK) Ltd as soon as possible after the visitor arrives.

Staff who bring visitors onto the premises are responsible for them and must chaperone them during their visit. Staff who have a verified DBS check in place do not need to be chaperoned, these individuals must be entered onto the SCR (Single Central Register).

Staff must ensure that visitors/third-party contractors carrying out works in the summer school, for whom they are responsible, wear the appropriate safety clothing and equipment and display the appropriate safety signage. Staff are also responsible for ensuring that all related risk assessment requirements are met.

7.9. Supervision

The Centre Manager is responsible for the safeguarding and welfare of boarders whilst they are in residential boarding accommodation. The Centre Manager is responsible for the safeguarding and welfare of students on and off site.

Full details of supervision and monitoring practices can be found in the Embassy Educational Services (UK) Ltd's Ratio & Supervision guidance document.

7.10. Homestay accommodation

Homestay accommodation is provided by:

1. Hosts International Ltd
2. Hosts Consultancy (UK)
3. EC English Language Schools (directly) (Malta)

All homestay accommodation providers are assessed for suitability and agreed services are outlined in the Homestay Provider Service Level Agreement.

Homestay Consultancy receive information and training regarding the safeguarding and welfare of the students they host and all members of the homestay household over 16 years of age have an enhanced DBS check.

Hosts International meets the standards for registration with the Accreditation U.K. as a provider of homestay, private home and independent self-catering accommodation for adults and under-18s for accredited providers in the UK.

Full details regarding homestay safeguarding and welfare practices and provisions can be found in Embassy Educational Services (UK) Ltd's Service Level Agreements with external providers.

7.11. Off-site visits

Embassy Educational Services (UK) Ltd produces risk assessments for every trip. These are made available to staff and generic control measures are communicated through pre-excursion checklists. Emergency contacts and procedures are made known to all staff. Clear guidance on supervision and free time is provided. Approved transport providers are

used. Where we use public transport, we provide additional risk assessments to ensure we cover this part of the trip too.

7.12. Student induction

All students undergo an induction process on arrival at Educational Services (UK) Ltd:

- All students receive the Student Welcome Information pack. All students attend an induction presentation to highlight the rules, regulations, safety and communication systems in the school
- All students undertake an induction lesson designed to reinforce and check the understanding of points 1 & 2.

Handbooks, inductions or noticeboards cover the following areas:

- Embassy Educational Services (UK) Ltd Rules
- Expectations of student behaviour as defined by the student Code of Conduct
- Specific rules, guidelines and procedures relating to general welfare and safeguarding, security, health and safety and to summer school residences
- Information on other key summer school policies and procedures
- A guide to who's who in the summer school
- Information about summer school facilities and resources, and extra-curricular activities
- Information relating to their academic programme and studies
- Information about the local area, use of local facilities and activities and places of interest outside of the summer school
- Information on summer school-based and independent services available to offer advice on safeguarding and welfare matters and to support safeguarding and welfare needs that may arise
- Information and assistance to support their financial, medical, social, cultural and religious needs where relevant.

7.13. Students' attendance and whereabouts

Attendance at lessons, activities or supervised accommodation sessions is compulsory for all students under the age of 18.

Staff must know the whereabouts of all students during the summer school day and during the hours of curfew. All junior students must be accounted for in morning, afternoon and evening sessions. Vulnerable students (for example, individuals or students out of age range) must be checked at evening curfew.

In addition, homestay providers must be aware of the whereabouts of the students they host during the summer school day and the hours of curfew.

Full information can be found in Embassy Educational Services (UK) Ltd Absence and Attendance Guidelines.

Any student whose whereabouts cannot be accounted for immediately invokes Embassy Educational Services (UK) Ltd Missing Person Procedures (Plan for Foreseeable Events).

7.14. Missing person procedures

If staff or homestay providers cannot account for the whereabouts of a student, Embassy Educational Services (UK) Ltd Missing Person Procedures are immediately invoked.

Early stages include attempting to contact the student and any known friends or local guardians, and searching summer school premises, including the student's bedroom, and surrounding areas, if applicable. If a student cannot be found, the situation is escalated to the Designated Safeguarding Lead, their deputy or to the person holding the emergency phone if the incident occurs outside of summer school hours.

Please refer to Embassy Educational Services (UK) Ltd Missing Person Procedures (Plans for Foreseeable Events) and site risk assessment for further details.

7.15. Student conduct and discipline

All students are encouraged to behave in a positive way, and responsible behaviour is noticed and acknowledged by staff. As guidance for all students, they are asked to follow a Student Code of Conduct. Students who choose not to follow the code will be subject to Embassy Educational Services (UK) Ltd Disciplinary Policy and Procedures.

This code and the associated behaviour policies are rigorously upheld by staff to safeguard the welfare of all students and staff and to prevent potentially harmful behaviour from escalating.

Please refer to Embassy Educational Services (UK) Ltd student Code of Conduct and Embassy Educational Services (UK) Ltd Disciplinary Procedure for further information.

7.16. E-safety

Embassy Educational Services (UK) Ltd schools recognise that e-safety is an area of growing concern. Whilst the summer school cannot exert full control over how students choose to conduct themselves online and using electronic devices, maximum effort is made to guide students in making good choices. In addition, certain measures are put in place to prevent the use of electronic devices and the internet for specific potentially harmful purposes.

Staff must not enter into a personal relationship with a student, including a friendship online, or take photographs or videos that include students other than for authorised purposes. Authorised photographs and videos of students must never be posted online except where staff have given permission to do so for the purposes of marketing and official authorisation has been received from the relevant student(s).

Further details regarding E-safety can be found on site-specific risk assessments.

7.17. Online Safety and Use of Digital Devices

Embassy Educational Services (UK) Ltd is committed to promoting safe use of the internet and digital devices. While students' online activity cannot be fully monitored, support and guidance are provided to help them make safe and responsible choices.

Staff must not form online friendships with students or use personal devices to communicate with them. Photographs and videos may only be taken using authorised equipment and for approved purposes.

Further details on internet safety are included in site-specific risk assessments.

7.18. Anti-bullying

Embassy Educational Services (UK) Ltd has a zero-tolerance policy on bullying, which applies to students and staff. Steps are taken to prevent it from occurring as well as to eradicate it if it does. Any bullying incident (including cyber-bullying) will be treated as a child protection concern when there is reasonable cause to suspect the student is suffering or likely to suffer significant harm.

There is a well-developed programme of activities and provisions in place to promote social development and integration and equality and diversity amongst the student population. Staff are encouraged to look out for signs of bullying and report any concerns or issues to the summer school Welfare Manager.

Staff encourage students to report any concerns they have about themselves or fellow students to any member of staff they feel comfortable confiding in.

Please refer to Embassy Educational Services (UK) Ltd Anti-Bullying & Harassment Policy for further details.

7.19. Equality and diversity

All members of the summer school community are expected to be familiar with company policy on equality and diversity and to uphold the principles set out within it. In addition, everyone is encouraged to take a role in promoting equality and embracing diversity.

Please refer to EC Equality and Diversity Policy for further details.

7.20. Alcohol use and illegal substances

The Student Code of Conduct gives students specific rules with regard to the use of alcohol and drugs and is clear that illegal substances must not be solicited, sold, used or brought onto summer school premises at any time. Student misconduct with regard to alcohol and illegal substances is dealt with through Embassy Educational Services (UK) Ltd Student Disciplinary Policy and Procedures.

However, it is also recognised that behaviour with regard to alcohol and illegal substances may be indicative of a psychological or emotional issue, and staff are made aware to look out for signs and symptoms of underlying issues. Staff can report any concerns they have about students in accordance with the Embassy Educational Services (UK) Ltd Policy on Reporting of Concerns or Allegations of Harm to Students.

7.21. Peer-on-Peer Abuse

Embassy Educational Services (UK) Ltd recognises that students may be vulnerable to harm from other students. This includes bullying, sexual harassment, and other inappropriate behaviour.

Peer-on-peer abuse will never be tolerated or passed off as banter or part of growing up. Any incidents will be treated as safeguarding concerns and handled in line with our procedures.

Staff are trained to identify the signs of such abuse and must report any concerns to the Designated Safeguarding Lead.

7.22. Staff and student Wellbeing

Embassy Educational Services (UK) Ltd understands that students away from home may face emotional challenges, as well as our staff. Mental health and wellbeing are an essential part of safeguarding.

Staff are trained to recognise signs of poor mental health and take appropriate steps to ensure support is offered. Staff and students are encouraged to speak to management or other trusted staff.

Additional guidance is available in our Wellbeing Policy.

7.23. Low-Level Concerns

Embassy Educational Services (UK) Ltd promotes a culture of openness where all concerns can be reported, even if they do not meet the threshold of harm.

Low-level concerns may include boundary-blurring behaviour or actions that could be misinterpreted. All such concerns must be reported to the Designated Safeguarding Lead or Centre Manager.

Records of these concerns are kept securely and reviewed regularly.

7.24. Female Genital Mutilation

Embassy Educational Services (UK) Ltd is committed to ensuring that female students are safeguarded against FGM. Staff and teacher who suspect that FGM has been carried out must report these concerns to the DSL or their Deputy who will immediately seek further advice from the child protection services. In the event that that a student has been observed to have undergone FGM or the student informs staff that this has happened, the Police will be notified immediately.

7.25. Honour Based Violence

In the event a student is identified as possibly being a victim of honour-based violence, this must be referred to the Designated Safeguarding Lead who will refer the student to the appropriate local services.

7.26. Child Sexual Exploitation

In the event a student is identified as possibly being a victim of child sexual exploitation, this must be referred to the Designated Safeguarding Lead who will refer the student to the appropriate local services (see appendix 3).

7.27. Monitoring for and recognising signs and symptoms of abuse and neglect

All staff complete safeguarding awareness training which contains details on how to identify potential cases of abuse.

Staff are expected to be able to recognise signs of physical, sexual and emotional abuse and neglect and report these as soon as possible to the Designated Safeguarding Lead or their deputy.

Further details of recognising the signs of abuse can be found in the Reporting of Concerns or Allegations of Harm to Students Policy

Excerpt from Keeping Children Safe in Education, Sept 2024

All school and College staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

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

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including

cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Staff must also be able to identify signs of other potential child protection issues, such as bullying, gang violence, children running away, child sexual exploitation, and children forced to undergo arranged marriage, radicalisation to violent extremism or female genital mutilation. Staff are made aware that child-on-child abuse exists and that it must be considered when identifying potential issues. Information on this and other issues can be found in the latest Department for Education guidance set out in Keeping Children Safe in Education, Part 1 of which is read and signed by all staff.

7.28. Reporting Students at Risk

If a child is believed to be at risk of harm, staff are trained to report this to the Designated Safeguarding Lead immediately. The Designated Safeguarding Lead escalates this straight away to the local safeguarding board or police.

If the Designated Safeguarding Lead or their Deputy cannot be reached immediately, for example if the risk is imminent or is identified outside of office hours, the member of staff involved must report the case to the safeguarding board and local police straight away. The Designated Safeguarding Lead must ensure that all staff can access the information they require to be able to do this in an emergency.

7.29. Supporting students in need

We recognise that the students are, in general, more likely to need additional support due to the fact that the vast majorities are a long way from home and experiencing a new culture and environment.

Embassy Educational Services (UK) Ltd schools arrange lots of activities around the students' timetables to promote integration and a community feeling for students. Provisions are put in place to accommodate specific needs, and we ensure that opportunities to forge friendships with other students are plentiful and accessible.

Staff monitor for potential issues and report any concerns they have. Students are also enabled to identify any needs they have that are not being met by talking to any member of summer school staff and providing feedback via student surveys.

Student communal areas and notice boards provide students with up-to-date information on other independent sources of information, support and advice.

7.30. Supporting vulnerable students

Some students may be more vulnerable to harm than others, for example students very young, outside of centre's suggested age range, students with special educational needs, disabilities or chronic medical conditions, including students who are adults. Students who are vulnerable or who have additional needs, including adults, as well as students outside of a centre's suggested age range, have additional care plans in place as a measure to ensure that they are protected from potential harm based on a risk assessment. Additional measures may include regular check-ups with welfare staff and additional or earlier residential curfews.

As is the case for all students, members of the school management team are available to students 24 hours a day to help with queries, concerns and issues.

7.31. Prevent – Awareness and Referral

Excerpt from The Prevent duty, Departmental advice for schools and childcare providers, June 2015

In order for schools and childcare providers to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified.

Protecting children from the risk of radicalisation should be seen as part of schools' and childcare providers' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Schools and childcare providers can also build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The Prevent duty is entirely consistent with schools' and childcare providers' existing responsibilities and must not be burdensome.

Embassy Educational Services (UK) Ltd recognises the positive contribution it can make towards protecting its students from radicalisation to violent extremism. To that end we plan to take further steps to minimise the risk of this eventuality by engendering British, US, Canadian or Maltese values through the school ethos.

(UK only) All staff receive Prevent training. If there are concerns that a student, through changes in behaviour and language, is at risk of becoming radicalised then these need to be reported to the Designated Safeguarding Lead or their deputy immediately and they will seek advice from the LADO, local safeguarding board or the Police.

DfE Prevent helpline 020 7340 7264 or counter-extremism@education.gsi.gov.uk

The police non-emergency number 101

Crimestoppers 0800 555 111

Anti-Terrorism Hotline 0800 789 321

Information on internet filtering and monitoring can be found on site-specific risk assessments.

7.32. Working with parents/agents

Potentially sensitive information is discussed with parents/guardians/agents with the full knowledge and permission of the student unless there is a safeguarding imperative requiring this to be over ridden.

Parents/guardians/agents are consulted about the specific needs of students who are chronically unwell, have special educational needs or disabilities, or are identified as being vulnerable in some other way.

In addition, parents or agents are contacted early on in disciplinary procedures, especially where there is an issue with a student's attendance, if a student is missing residential curfews, or for any other issue that poses a risk to a student and/or their peers.

7.33. Wider safeguarding and welfare support

Summer school provisions and practices, outlined in this section, are bolstered by the external networks and support the summer school has put in place for students.

The operational team at head office is responsible for ensuring each summer school has established local contacts with GP practices, dentists and hospitals.

In addition, the summer school DSL or Deputy may engage the support of the Local Authority Designated Officer (LADO), national embassy, LSCB, police or other appropriate services when they are concerned that a child is at risk.

7.34. Supporting staff involved in child protection cases or the subject of allegations

The department takes seriously its duty of care to all those who are involved in child protection issues, whether it is reporting a concern, acting as a witness or indeed being the subject of an allegation. Staff members, who are directly implicated or involved in a reported issue, will be provided with a named contact, obtainable from Human Resources, who will provide each individual with confidential support, and progress updates where appropriate.

If a staff member is the subject of an allegation, the department primary duty of care must be to protect all students.

There will be no detrimental action taken against staff that raise or are the subject of genuine concern that turns out to be unfounded. If staff are subject to malicious allegations, then they can be assured that this will be dealt with under the disciplinary procedure.

Guidance on addressing allegations against members of staff is found in the Embassy Educational Services (UK) Ltd Policy on Reporting of Concerns or Allegations of Harm to Students.

7.35. Securing the views of students and staff

Students and staff are requested to provide their feedback about school policies, practices and provisions during their early lessons and at the end of their stay through surveys. The school forms student committees to hear views directly and feedback is a standing agenda for staff and Group Leader meetings.

7.36. Confidentiality and reporting and recording information

Records and reports pertaining to child protection issues are stored securely by summer school staff with access restricted to those who need to know their content in order to ensure a holistic approach to the management of student safeguarding and welfare.

Students are advised that information they share may need to be shared with third parties where there may be a risk of harm to others.

7.37. Data protection

As part of EC, the school needs to collect and use certain types of information about people with whom it deals in order to operate. This includes personal information about current, past and prospective employees, suppliers, clients/customers, professional advisors and administrators, and other organisations with whom it communicates.

In addition, it may occasionally be required by law to collect and use certain types of information to comply with the requirements of Government departments for business data. This personal information must be dealt with properly in the matter it is collected, recorded and used, and this will be in line with UK data protection legislation.

Further details can be found in EC GDPR Briefing Note document.

7.38. Summer school self-evaluation

The department monitors the implementation and outcomes of each of its policies and procedures during an annual self-evaluation cycle and carries out critical reviews and revisions to ensure that they are fit for purpose and that areas for improvement are identified. As part of the safeguarding governance structures, the department's annual review is reported to the Embassy Educational Services (UK) Ltd Quality & Insurance Board as part of the annual review of safeguarding.