

Safeguarding Policy

PURPOSE

Safeguarding is the process of protecting children (under 18s) and vulnerable adults from abuse or neglect, preventing impairment of their physical and mental health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.

EF is committed to safeguarding and promoting the welfare of children and young adults, irrespective of race, gender or ability, and expects all staff and volunteers to share this commitment. We believe that every child has a right to feel safe and protected from any situation or practice that may result in a child being physically or psychologically harmed

AIMS & OBJECTIVES

- To support the child's development in ways that will foster security and confidence.
- To provide an environment in which children and vulnerable adults feel safe, secure, valued and respected, so they may approach adults if they are in difficulties, believing they will be effectively listened to.
- To safeguard the welfare of students through positive measures
- To raise the awareness of all teaching and non-teaching staff of the need for safeguarding and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children and young adults thought to be at risk of harm and to ensure that we contribute to assessments of need and support packages for those in need.
- To emphasise the need for good levels of communication, between all members of staff.
- To develop a structured procedure within the school which will be followed by all members of the staff in case of suspected abuse.
- To develop and promote effective working relationships with other agencies where required, especially the Child Protection/Safeguarding Partners.
- To ensure that all staff working within our school who have access to children and young adults have been checked as to their suitability, including verification of their identity, qualifications and undertaking an Enhanced DBS check.
- To ensure that a Single Central Register of staff is maintained in all schools.
- To ensure that any weaknesses identified in child protection and safeguarding are addressed promptly.
- To undertake an annual review with VP of Operations & Director of Accreditation and Compliance.

PROCEDURES

Safe School, Safe Staff

We will ensure that:

- All staff understand and fulfil their responsibilities
- There are designated persons responsible for safeguarding (Designated Safeguarding Lead) who will have undertaken Specialist Safeguarding training. This training will be updated every 2 years.
- The DSLs will be supported by an appropriate number of Designated Safeguarding Officers, who will receive Advanced Safeguarding training, with training updated every 3 years.
- It will be made clear to the school team who the DSL and DSO are in the school and the School Director will ensure that there is always someone of this level available to speak to about a concern.
- All members of staff are provided with child protection awareness at induction, including the school safeguarding policy.
- All School Directors/centre managers will be trained to specialist level in safeguarding to equip them with the awareness and knowledge ensure safeguarding policies and procedures are robust & effective and support a whole school safeguarding approach.

- Refresher safeguarding awareness training relevant to EF International Language Campuses will be provided to all staff on an annual basis.
- All members of staff and volunteers know how to respond to a student who discloses abuse through safeguarding training.
- All staff understand their duty to report any child protection concerns to a Safeguarding Officer.
- Concern/Allegation forms will be made available for staff to make written disclosures.
- Verbal reports of concerns/allegations will be put in writing using the available forms.
- External sites where non-EF staff members are in direct contact with children will be risk assessed, and it will be ensured that appropriate DBS checks have been carried out.
- We will ensure that child protection concerns are referred to the local Child Protection/Safeguarding Partners for advice and that any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service for consideration for barring following resignation or dismissal.
- Homestay hosts accommodating under 18s will be required to complete an Enhanced DBS with Question 66 being answered Yes, to confirm that the activity is taking place in their home.
- Under 18s and vulnerable adults will not be placed in accommodation where a DBS is not in place, in accordance with our Safer Recruitment Policy.
- Weekly staff & teacher meetings will include reference to safeguarding, offering a regular opportunity for school staff to receive updates, discuss issues and raise concerns.
- Regular school Health & Safety Committee meetings will include safeguarding as a discussion point.
- Regular school Welfare Committee meetings will include safeguarding as a discussion point.

Designated Lead/Safeguarding Officer(s)

There will be at least two senior members of staff nominated as Designated Safeguarding Leads and responsible for Safeguarding in the school. They will be trained to Specialist Level and will have the knowledge and skills to recognise and act on child protection concerns. They will act as a source of expertise and advice. They will be responsible for coordinating action internally and liaising with outside agencies. At least one of these staff members will lead a monthly Welfare Committee meeting, which will include discussion of any safeguarding related issues or concerns. The responsibilities of the Designated Safeguarding Lead will be laid out in a specific job description.

In addition, named Designated Safeguarding Officers will be known to both staff and students. They will hold Specialist or Advanced Level training. There will be sufficient Designated Safeguarding Officers to ensure that someone from the safeguarding team is always available to manage a concern. The responsibilities of the Designated Safeguarding Officer will also be laid out in a specific job description.

This school safeguarding team will help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues with teachers and school leadership staff.

Recruitment

All staff will be carefully selected, screened, trained and appropriately supervised. This is achieved by operating safer recruitment procedures in accordance with the requirements of accrediting bodies and the Disclosure and Barring Service. In addition, those from external agencies (not employed by EF) who have unsupervised contact with students under the age of 18 will have had the necessary checks made by their employer or other agency. Please refer to our Safer Recruitment Policy for further information.

When employing staff, the centre will:

- carry out an Enhanced DBS with barred list check
- request additional overseas police check for applicants who have been working abroad
- check the Prohibited List when recruiting teachers who are QTS
- require an application form as well as a CV
- conduct an online search on all shortlisted candidates
- ensure all applicants have read and signed the Children Act 1989 declaration form
- ask all staff to complete the online Safeguarding Level 1 training and Safeguarding and Prevent Training
- confirm identity to establish that applicants are who they claim to be (through official documents) and have the appropriate status to work in the UK

- ensure that references are checked and that any gaps in previous employment history are accounted for, offering referees an opportunity to share any concerns about candidate suitability

If a DBS check is still being processed at the commencement of employment, the centre will restrict the responsibilities/duties that a member of staff may undertake, and, in accordance with our Safer Recruitment Policy, a risk assessment will be put in place.

Induction

All new members of staff will receive induction training, which will give an overview of the organisation, EF's mission statement and ethos, the structure and services provided. They will be advised of their role in the organisation together with identifying and reporting abuse, and confidentiality issues.

All staff will receive regular Safeguarding Awareness training to allow them to fulfil their responsibilities in respect of child protection effectively. This will be arranged through the Designated Safeguarding Lead and will be refreshed annually.

External suppliers

An authorized representative of all external suppliers and contractors to our schools will sign a Safeguarding Statement, confirming that they are aware of the need to safeguard young and vulnerable adults within our school communities and share this commitment. They will undertake to ensure their employees and sub-contractors are informed and have been appropriately vetted to work with children. See Appendix A Sample Supplier Safeguarding Statement.

Student welfare induction

Following enrolment all students receive a welfare induction where they receive the appropriate information as follows:

- The names of the staff responsible for safeguarding
- Who to consult if they have a problem with their classes, accommodation or personal issues
- Curfew times where appropriate
- The School Code (EF Community Standards)
- Health and safety advice
- The legalities relating to buying alcohol, visiting pubs, drugs use and so on.
- An orientation tour of the centre and the city will form part of the induction programme, during which any relevant issues relating to contextual safeguarding will be covered
- Students are shown to recognise when they may be at risk and how to get help when they need it

Students with special educational needs and disabilities

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the person's disability without further exploration
- They may be disproportionately impacted by experiences such as bullying without outwardly showing any signs
- They may not be able to recognise that bullying is taking place although the impact of it is being felt
- Difficulties may arise in overcoming communication barriers

EF staff will identify students who might need more support to be kept safe or to keep themselves safe by carrying out pre-booking needs assessments to ensure that special needs can be met, arranging to meet the student soon after arrival and having regular touch points throughout the stay.

Accommodation

Students under the age of 18 are not permitted to book a course with 'own accommodation' or 'no accommodation' unless it has been agreed in advance that they are staying locally with appropriate supervising adults and signed documents from the parents/legal guardian are received and on file. The supervising adult should be someone known personally to the student's parent/legal guardian. EF reserves the right to inspect any non-EF accommodation to ensure its suitability for young or vulnerable adults and will do so as soon as such an arrangement is proposed. EF will retain the right throughout the student's stay to request that the student moves to EF accommodation should concerns arise. Students aged under 18 may only move into own accommodation from EF accommodation under the conditions

outlined above. Advice from local safeguarding partners will be sought and followed regarding any information about homes which may be unsuitable for use.

Restrictions to length of stay for juniors aged under 16 and disabled students aged under 18

We comply with UK legislation regarding the provision of homestay accommodation for students under the age of 16, therefore the maximum number of nights a student under the age of 16 may be allocated to homestay accommodation is 27 nights. A change of accommodation to extend the course/stay is not permissible. This maximum length of stay also applies to students aged under 18 with disabilities. Under 16s are limited to maximum stay of 4 weeks in residential accommodation in some accredited destinations (Bournemouth).

Homestay accommodation

All homestay hosts are visited and assessed before they can accept a student. Revisits take place approximately every 18 months and further monitoring takes place by checking student evaluations where any concerns may be addressed by an interim visit. The Homestay/Accommodation Manager will ensure that appropriate DBS checks are made across our homestay host database, and we ensure that under 18s are twinned together, and not placed with over 18s. Students on Junior courses are allocated to specifically selected homestay hosts.

Health & safety checks on housing include provision of gas safety certificates and undertaking fire risk assessments. The EF document tracker allows the Accommodation Manager and School Director to easily access and monitor compliance documentation for hosts.

Homestay hosts are provided with an EF handbook on hosting overseas students and supporting documentation for hosting younger students. Through MyEF for Hosts they have access to Keeping Children Safe in Education 2023.

Monitoring safeguarding in homestay accommodation

Hosts will be fully informed of safeguarding responsibilities as part of the initial visit and annual revisiting programme. Guidance is also given in writing in the EF Homestay Handbook and the online MyEF Host platform. Changes or updates in safeguarding practice or requirements will be communicated to registered hosts by the Accommodation Manager via an effective means such as newsletters, social media or SMS text messages. Ongoing monitoring of those currently hosting under 18s or vulnerable students will be undertaken by the Accommodation Manager using the EF Homestay Safeguarding Checklist (Appendix H) as an opportunity to check understanding and enforcement of safeguarding by the host as well as discuss any specific issues or concerns. Records of checks and conversations will be kept and followed up. Homestay safeguarding checks will be undertaken if there are specific concerns or on an ad hoc basis.

Residential accommodation

Where residential accommodation is used by both under 18s and over 18s the accommodation is split according to age. Under 18s are then split by male/female with separate bathroom facilities.

18th birthdays

The following procedure will be followed for students who reach the age of 18 during their stay:

Homestay – student will be offered the option to either move to a new +18 home or stay with the current host, on the understanding that restrictions for under 18s will still apply.

Residence – student will be required to move to 18+ accommodation. This should be booked by residence staff in advance of arrival to ensure availability.

When discussing moves around an 18th birthday with students, staff will also offer welfare advice on how to handle new freedoms.

Overnight stays

Wherever possible, students should stay in their EF allocated accommodation. If students under the age of 18 wish to spend a night outside their EF accommodation in a different location, a parental consent form must be completed for each occasion, detailing where the student will be staying and with whom, together with a return date and approximate time. Students must be supervised by an appropriate adult, ideally known in person by the parents. Such trips are not generally authorized during weekdays unless for exceptional reasons. Parental consent forms are not required if the student will be participating in an EF supervised trip, unless the trip is to an overseas destination.

Curfews

16- and 17-year-olds on adult courses must return home by 23.00 hrs (Sunday to Thursday) and 24.00 hrs (Friday to Saturday). These curfew times apply to homestay and residential students, and absences will be followed up by duty staff. If contact has not been established with a missing student within one hour of curfew time, police will be notified, in line with EF Missing Student Policy.

Liability waivers

Under 18s on adult courses require a Liability Waiver to be signed by their parent/guardian prior to their arrival at the centre. For students on junior courses, their parent/guardian signs the Junior Code of Conduct prior to their arrival.

Attendance in school and daily monitoring

Under 18s and juniors are required to attend all lessons daily. Attendance is checked for each main block of the day and absence of any under 18s or vulnerable adults will be immediately followed up with notification to police authorities, if necessary, as per the EF Student Attendance policy. The School Director will ensure that appropriate attendance procedures are in place and being followed.

Attendance at activities and excursions

Any unexpected absence from extracurricular activities or excursions by under 18s or vulnerable adults will be followed up immediately by staff. Supervising activities staff will contact the EF Emergency Phone for support.

Sickness

Schools will have systems in place to ensure all students have access to medical care during their stay. Under 18s will be accompanied to all medical appointments by a member of staff. Any under 18 who is unable to attend school due to sickness will be appropriately supervised and/or monitored during any period of illness.

Adult supervision

Supervision on all extra curricula activities & in residential accommodation for under 18s is 1:20.

Risk assessments

The School Director and DSL will undertake an annual Safeguarding Risk Assessment. All other risk assessments undertaken in the school will include specific consideration of under 18 and vulnerable students or other safeguarding concerns. A risk assessment for unsupervised time for under 18s will be in place, in addition to a risk assessment for unsupervised time for students attending junior programmes.

Shared building use for mixed age students

Any school or residence which has a mixed age range of students will be appropriately managed. Risk assessments will be undertaken with consideration given to minimising risk in areas such as access by non-EF persons or intruders, identification of younger students, shared bathrooms, access or exposure to inappropriate material and inappropriate interactions between students of different age groups.

Identification of younger students

Use of coloured wristbands will identify younger students within the school community. Older students will be informed at induction about their responsibilities around the care and well-being of younger students.

Use of building(s) for non-school activities

Consideration to safeguarding requirements will be given in the event of any use of school buildings for non-school activities, even if younger students will not be involved in these activities.

Safe space for LGBTQ+ students

EF recognises that LGBTQ+ students may find speaking up and sharing concerns with staff particularly difficult. Consideration will be given to how the school can create and offer a safe space to such students by way of communication and signposting in information shared with the student body. Bookings will be managed on a case-by-case basis, with a student-centred approach. Accommodation staff will refer to EF's room policy for supporting transgender and gender expansive students in room allocations.

Use of surveillance equipment

As detailed in EF's Use of CCTV Policy, use of CCTV surveillance equipment in schools and residential accommodation will be clearly signposted to all students and staff. Students and parents will be informed in advance of any internal use of private CCTV or other surveillance equipment in homestay accommodation, ensuring they have the opportunity to request alternative accommodation.

PREVENT - SAFEGUARDING STUDENTS WHO ARE VULNERABLE TO EXTREMISM

Prevent is a government strategy to stop people becoming involved in violent extremism.

At EF we seek to protect staff and students against the messages of all violent extremism including, but not restricted to, those linked to religious ideology, extreme supremacist ideology, paramilitary groups and extremist Animal Rights movements. The core British values of democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs are included in the student handbook and introduced through lessons.

Risk reduction

The Designated Safeguarding Lead and Safeguarding Officers will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's SEND policy, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

Response

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the Designated Lead or Safeguarding Officer. Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action.

INDICATORS OF VULNERABILITY TO RADICALISATION

Extremism may include the following: The demonstration of unacceptable behaviour by using any means or medium to express views which encourage, justify or glorify terrorist violence. Behaviour which seeks to provoke others to terrorist acts or serious criminal acts, or to foster hatred which may lead to inter-community violence.

- Identity Crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- Personal Crisis – They may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration, events affecting the student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Special Educational Need – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

More critical risk factors could include:

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature

Due to the sensitivity of this subject within an international environment any concerns must first be discussed with the School Director and senior management to seek appropriate external professional advice before deciding any action plan.

Staff receive training in Prevent issues and EF has developed a full Prevent Policy.

Confidentiality

The Company and its staff will ensure that all data about students is handled in accordance with the requirements of the law, and any national and local guidance. Any member of staff who has access to sensitive information about a child or the child's family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know. Regardless of the duty of confidentiality, if any member of staff has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the Safeguarding Officer. All child protection concerns are recorded and stored securely by the Designated Safeguarding Lead and/or School Director.

Associated EF policies

Safeguarding forms part of the following additional policies, which should be read alongside the EF Safeguarding Policy:

EF Child Protection Policy	EF Disciplinary Policy
EF Disability Policy	EF E-safety Policy
EF Anti-bullying Policy	EF First Aid Policy
EF Homestay Placement Policy	EF Safer Recruitment Policy
EF Health & Safety Policy	EF Mental Health & Wellbeing Policy
EF Missing Student Policy	EF Search & Confiscation Policy
EF Student Attendance Policy	EF Prevent Policy

EF Mandatory Safeguarding Training Strategy

	REQUIRED TRAINING	ROLE	VALIDITY
Ireland	Tusla Children First Level 1	All staff	3 years
Ireland	iHasco Safeguarding Level 2	All staff	1 year
Ireland	Tusla Mandated Person	Dublin School Director	2 years
Ireland	Tusla Level 3 DLP	Designated Liaison Person Deputy Designated Liaison Person	2 years
UK	British Council Level 1	All staff	1 year
UK	Advanced Level 2	Designated Safeguarding Officer Homestay Manager Homestay Visitor	3 years
UK	Specialist Level 3	Designated Safeguarding Lead School Director Senior Operations	2 years
UK	British Council Online Introduction to safeguarding for homestay hosts	Homestay hosts – <i>recommended</i>	N/A
Ireland / UK	Safer Recruitment	All hiring managers	1 year

Information and review

For further information on safeguarding and sources of guidance and advice, all staff should refer to the UK Government Department of Education's [Keeping Children Safe in Education 2025.pdf](#) a copy of which will be made available to all staff in school.

School policies and safeguarding procedures will be subject to ongoing review and updated where required, at least on an annual basis, with reference to the key statutory and non-statutory guidance:

- Working Together To Safeguard Children (2018)
- Keeping Children Safe in Education (2025)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- UK Council for Child Internet Safety

Each school will have an individual full length version of this policy with school specific information.