



Sprachcaffe Languages Plus
Safeguarding Policy
Brighton
2017

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1. Policy Statement

1.1 Context

Sprachcaffe Languages Plus is a private language school in Brighton, East Sussex which provides English language courses to adults and young learners. The school is owned by Sprachcaffe, an international language travel company based in Frankfurt, which has booking offices and language centres all over the world.

Students can come to Sprachcaffe Languages Plus as:

- An adult student (18+)
- A an individual "U20" student (12-17)
- As part of a "closed group" of students (usually young learners)

"U20" refers to the Sprachcaffe catalogue aimed at students aged under 20 but for the UK, the only programmes offered are for students aged from 12 to 17 only. The programme is busiest in the summer months but there is also a programme advertised in spring and autumn. The programme consists of lessons and supervised activities.

"Closed Groups" are usually groups of young learners from high schools in their own countries. They may join our U20 programme but can also book outside the advertised dates and may request a different activity programme or organise this themselves. They usually travel with "Group Leaders" who are responsible adults from their home (often teachers from their own high schools)

Sprachcaffe Languages Plus has three main teaching locations in Brighton. 20 Queens Road is for adults aged 18+, 24 Holland Road is for younger students aged 12-17 and finally we offer summer classes also for younger students aged 12-17 in the campus at Brighton University.

Sprachcaffe Languages Plus offers accommodation in the form of homestays and residence (Hotel year-round and University Residence in the summer) to students of all ages and also offers an apartment with single and shared bedrooms to its adult students.

The purpose of this document is to raise awareness of safeguarding issues and to help build a trusting relationship between students and staff.

A full version of this document is available upon request from the Designated Safeguarding Lead. Policy availability is specified in chapter 1.12.

1.2 Terminology

An explanation of the following terminology for the purpose of this document:

Adult – a person aged 18 years old or over

Child – a person under the age of 18 (regardless of the age of consent in their native country)

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

Child Protection - protecting people under the age of 18 year from directly harmful behaviour in the form of physical, emotional and sexual abuse and neglect

Duty of Care - Adults who work with children (as professionals or volunteers) have a legal responsibility to look after the children properly; children depend on adults for their safety and well-being

Safeguarding – providing appropriate care for people (especially those aged under 18) and protecting them from things that could be harmful to them. Safeguarding includes health and safety, child protection and pastoral care. Organisations in the UK have a legal obligation to provide safeguarding to those aged under 18 as part of their duty of care

DSL - Designated Safeguarding Lead: overall safeguarding responsibility. The DSL should be involved in any major decisions.

DSP - Designated Safeguarding Person: first point of contact in the school or department looking after day to day matters.. Supported by the DSL.



1.3 Statement

Sprachcaffe Languages Plus is committed to safeguarding the wellbeing of every student at our school, especially vulnerable adults and those aged under 18.

Sprachcaffe Languages Plus recognises its duty of care to its students and meets its child protection responsibilities through safer recruitment, regular staff training, a clear code of conduct, child protection procedures and appropriate communication.

1.4 Under 18 years old entitlement

We believe that all children everywhere and without exception have the right to protection from abuse, regardless of gender, ethnicity, disability, sexuality or belief, in accordance with article 19 principles (protecting children from all forms of abuse) of the UNCRC (United Nations Convention on the Rights of the Child) 1989. Where there is a safeguarding concern, Sprachcaffe Language Plus will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

1.5 Adult's responsibilities

All adults associated with students aged under 18 have a legal "duty of care" and responsibilities to safeguard those aged under 18. This means to be aware, vigilant and know to report any concerns, even minor ones or allegations. Everyone who comes into contact with a child has a role to play in sharing information with the Designated Safeguarding Team and taking prompt action following the Safeguarding policy. **It is not the school's responsibility to investigate concerns but to receive, record and refer them correctly** and then await further instructions from the Local Safeguarding Children Board (LSCB).

Safeguarding & HR Manager- Designated Safeguarding Lead

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In the absence of the Designated Safeguarding Lead, or when it would be inappropriate to report a concern to the Designated Safeguarding Lead (e.g. in case of an allegation against the DSL) reports of concern should be referred to an on-duty Designated Safeguarding Person (DSP).



For details of location / department specific DSP's please see **Appendix 1**:

If it is not possible or appropriate to contact any of the designated safeguarding team, reports of concern can be referred to the following organisations. Anyone can do this:

For location/department specific helplines please see Appendix 1 – these are likely to be the most appropriate first point of contact for any concerns.

National Organisations

- **MASH (Multi-Agency Safeguarding Hub)- 01273290400**
- **NSPCC Whistleblowing helpline – 0800 028 0285 (freephone, 24/7)**
Raising a concern or an illegal activity within the organization
- **Police - 101, 999 in an emergency**

1.6 Associated Policies

This policy should be read alongside our procedures on:

- Safer Recruitment (**Chapter 5**)
- Missing Students (**Appendix 5**)
- Abusive Behaviour Policy (**Appendix 3**)
- Emergency Action Plan (**Appendix 4**)

These can be found as a part of this Safeguarding Policy or at the school office – please ask at reception or contact a member of the Designated Safeguarding Team (DSL or DSP) for copies.

1.7 Policy review

This policy will be reviewed by the Designated Safeguarding Lead and signed off by the UK General Manager. It will be reviewed on an annual basis or whenever an incident, new legislation or guidance suggests the need for a review.

1.8 Structure, roles and responsibilities

The staff listed below have a duty of care to safeguard the welfare of young learners and vulnerable adults.

- **Interns** - Assist the line manager with varied tasks e.g. reception interns are responsible for welcoming guests, answering questions and addressing complaints.
- **Teamers** - Responsible for supervising U20 students on excursions, activities, events and airport transfers. Also responsible for their pastoral care. The Teamers have daily group meetings with their students, during which they check the students are well and find out if there are any problems.
- **Teamer Coordinator** - Responsible for the overall running of the U20 activity programme. The Teamer Coordinator will supervise and support the Teamers and ensure important safeguarding procedures are followed such as Activity Preparation Forms, Report Forms, Risk Assessments, Concerns and Reports. The Teamer Co-ordinator is always a highly experienced Teamer that is knowledgeable about the school, the location and the systems and procedures relating to the U20 programme. The Teamer Coordinator will work closely with the School Coordinator, Groups Coordinator (if Groups are involved), ADOS and DOS.
- **Groups Coordinator** - Responsible for the general organisation of the closed groups.
- **School Coordinator** supervision of students while in and around school buildings and responsible for the Health and Safety of the premises
- **Teachers:** supervision of students in classes
- **DSL** -Overseeing the implementation of safeguarding through the school safeguarding policy, keeping certificates of training for all staff, and supporting and informing staff about issues and changes in regards to safeguarding. The DSL develops continued training methods and creates awareness.
- **DSP** – Supported by the DSL with all matters regarding safeguarding and being a first point of contact for staff and students who have any concerns or questions regarding safeguarding and child protection.
- **Group Leaders** - supervision and pastoral care of students in their closed groups.



- **Homestay and Transfer Coordinator** - Responsible for Homestay queries involving safeguarding. The Homestay and Transfer Coordinator regularly updates Homestay Hosts with changes to our procedures and requirements. Checking the Homestays on initial viewing and keeping records on each family. Ensuring students aged under the age of 18 are placed with DBS-checked Homestay Hosts and making sure the condensed safeguarding policy is distributed to them all.
- **Homestay providers** - Responsible for the welfare of students while they are at the homestay accommodation, for ensuring the curfew is respected and for reporting students who are late home or missing. The curfew is as follows for U20 students: If the student is under 16 the curfew is 10pm if the student is 16-17 the curfew is 11pm.
- **Booking Agents** - Responsible (before students' arrival) for informing the Director of Studies, The School Coordinator, The Teamer Co-ordinator and the relevant accommodation DSL of students that have physical disabilities, require help with personal care or require any other kind of extra support so that this can be arranged with teachers, Teamers and Homestay Hosts or accommodation staff.
- **Hotel staff-** Different responsibilities in housekeeping, restaurant and reception
- **Hotel Manager-** Responsible of the day to day operations of the Hotel and overall management of hotel staff
- **Director of Studies** - Mainly responsible for the teachers, classrooms and delivery of the curriculum to students.
- **UK General Manager-** Directs and oversees UK operations to make sure daily operations align with the vision of the company and plans are made for the future.



1.9 Under 18 year old students involvement

On arrival, any student aged under the age of 18 will be informed of the relevant sections of the safeguarding policy in order to define safeguarding, explain the expected behaviour with other students as well as adults, and how to raise concerns. These rules and guidelines will be delivered in the course induction.

1.10 Legal framework

This policy was produced with the guidance of the previous Safeguarding policies of Sprachcaffe Language Plus and the following legal acts: The Children Act 1989, Local Government Act 2000, Sexual Offences Act 2003, Children Act 2004, Protection of Freedom 2012 and Counter- Terrorism & Security.

1.11 Designated team working methods

Please see **Appendix.2** for the location/departmental specific structure of Sprachcaffe Language Plus' safeguarding team.

1.12 Policy availability

This Safeguarding policy is available in the following formats:

- Condensed version in welcome packs for staff, students, Homestay Hosts, Group Leaders and parents of under 18s
- On notice boards in the staffroom and offices of the school
- Condensed version read and signed by all staff, contractors, volunteers and Homestay Hosts members aged 18 and over
- Condensed version available in all classrooms/full version at Reception
- Available to any person upon request
- Available on our website

2. Code of conduct

The Code of conduct sets out guidelines of acceptable and unacceptable behaviour between student aged under 18 years' old students and adults.

2.1 Overview and principles

The code of conduct gives guidance for adults, staff at Sprachcaffe Languages Plus as well as under 18 year old students interacting with each other in order to create a safer school culture. It is designed to protect minors from abuse, and to protect staff and other adults from suspicion of abuse. All adults who work with Sprachcaffe Languages Plus School have to agree to comply with this.

2.2 Position of trust

According to Sexual Offences Act 2003 any person in position of trust engaging a sexual activity of any sort with students under the age of 18 is breaking the law.

2.3 Setting standards

Key points of the standards

- Interaction between adults and under 18 years old students
- Appropriate appearance
- Alcohol, drugs and smoking
- IT & social networks
- Accommodation
- Transport
- Favouritism and gifts
- Whistleblowing

2.4 Adult-Under 18 years old interaction

- Adults must always communicate with students in a manner appropriate to their age and understanding, always address them in a positive and supportive manner and avoid making any form of sexual reference.
- Teachers of students aged under 18 years old must ensure that lesson material is age appropriate and avoid controversial subjects such as sex, violence and drugs.

- Attention-seeking behaviour from students aged under 18 years old such as tantrums and crushes should be discouraged, and the DSL informed if there are any concerns.
- Inappropriate language should not be used

Adults should **not**:

- Make physical contact with any student. If a student initiates a hug, the adult should turn their body to the side so as to minimize contact.
- Socialize with or exchange personal contact details with students aged under 18 outside of school and the leisure program, including Facebook and other social networking sites.
- Be alone with an under 18 where they cannot be observed.

One to one lessons with under 18 students must take place in a room with the door open.

If a student is sent out of class for disruptive behavior, they can sit at reception for 15 minutes before being escorted back to their classroom.

If it is necessary to administer first aid to an under 18, this should be done in a place where it can be observed.

2.4.1. Interaction with over 18 years old

Adults must always communicate with students in an appropriate manner, always address them in a positive and supportive manner and avoid making any form of sexual reference.

- While the school understands that friendships can develop when students leave school, all staff must ensure that this interaction remains appropriate and the staff member should not instigate the exchange of personal details.
- If personal details are exchanged, staff must bring this to the UK General Manager's / Director of Study's attention.
- Please refer to staff / teamer handbooks for disciplinary procedures that apply to staff who do not abide by this conduct

2.5 Appropriate appearance

Staff must behave professionally at all times and act as good role models for under 18s, dressing appropriately and being easy to identify as a member of staff rather than a student. Provocative, revealing or overly casual attire is not acceptable.

Adults must be appropriately covered at all times in the presence of student aged under 18 (or any student)

- Teachers and other centre staff wear smart-casual attire, including smart jeans.
- Teamers and Teamer Coordinators always wear Sprachcaffe T-shirts.
- Staff should be extra sensitive on the effect of their appearance when at evening activities and on accommodation especially at night.

Adults must make sure that the students are aware of the required appearance from their side taking into account cultural sensitivity and their role as a student. This means that the length of skirts/shorts needs to be appropriate and clothing suggesting violence or illegal acts is prohibited.

2.6 Alcohol, drugs and smoking

Staff must never:

- Smoke or consume alcohol in the presence of under 18s.
- Be intoxicated (or under the influence of drugs, alcohol or legal highs) in the presence of under 18s.
- Encourage or endorse the use of tobacco, alcohol or drugs in the presence of under 18s or any other students at Sprachcaffe Languages Plus School.

Students will be informed that the consumption of alcohol or smoking on Sprachcaffe Languages Plus premises is prohibited. Any use of alcohol or smoking by underage students is seen as a serious contravention of rules and may result in immediate expulsion. These regulations are stated in the behaviour guidelines.

2.7 IT & social networks

Advice about e-safety is provided in welcome packs and on advice cards displayed at the school.

Under 18s are advised to be careful online and not to share any personal information or photographs with strangers. The school computers also have a filter, preventing students from accessing inappropriate websites.

Students are told that if they receive any unwanted contact online or by text message, they should inform a member of staff, especially their Teamer or Group Leader. This member of staff is then responsible for informing the DSP or DSL.

Staff must never take photographs of students aged under 18 on their personal phones or cameras. The student's own camera/phone can be used or the school's designated camera.

If students request a photograph with a member of staff, the staff member should hold both hands in front of themselves, clearly visible to the camera.

Photos/videos showing students should only be used in publicity with the students / parents consent in the form of signed consent forms available from the head office marketing department

2.8 Accommodation

- An adult must never enter a student's bedroom uninvited unless in an emergency e.g. fire or other need for evacuation.
- Before attempting to open the door of a bedroom occupied by an under 18 (or any student), adults must first knock and call the student's name twice, asking permission to open the door or announce that they will open the door in 10 seconds after knocking.
- Adults must not enter a bathroom or toilet when it is occupied by an under 18 (or any student).

2.9 Transport

When using taxi/coach companies, a written confirmation is required stating that the company is only using drivers who have been DBS checked. If in any cases staff need to use their own vehicles to transport under 18 years old students, they should be seated in the back and the staff member should inform the line manager the estimated time the journey will take and the estimated time of arrival to the destination.



2.10 Favouritism and gifts

Adults should not give/accept gifts or show favouritism to one child more than another.

2.11 Whistleblowing

We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues.

If necessary, they can speak with the DSL. Staff can also raise concerns by calling the NSPCC whistleblowing helpline on **0800 028 0285**.



3. Child protection

Sprachcaffe Languages Plus recognises its responsibility to take all reasonable steps to promote safe practice and to protect our students from harm, abuse and exploitation. As part of ongoing training, staff are made aware that the above issues exist and may arise although it is unlikely in our context. Sprachcaffe Languages Plus acknowledges our duty to act appropriately in response to any allegations, reports or suspicions of abuse.

We work together with all our staff, group Leaders and homestays to create an environment in which our students' rights are respected, they are safe from harm, and feel free to talk to any adult with issues which may arise.

3.1 Overview

Sprachcaffe Languages Plus meets the child protection responsibilities by:

- Creating procedures and policies
- Ensuring a condensed copy of the safeguarding policy is given to all adults working with children
- Training all staff

3.2 Nominated persons

Please see **Appendix.1**

3.3 Difference between concern and serious issue

Sprachcaffe Languages Plus will take reports of suspected abuse seriously.

Concern is something that is not right, based on something you have noticed or been told.

Serious issue indicates that the child could be in danger and it will need an urgent response.

3.4 Situations when adults need to respond

We understand that the following signs may indicate abuse, although they may also have other causes:

- A fellow student expresses a concern
- A student describes something that has happened to them
- A student has unexplained injuries, changes their dress to conceal injuries, suddenly avoids sports
- A student reverts to younger behaviour, becomes extremely nervous or attention seeking, or starts routinely underachieving
- A student steals or lies
- A student is preoccupied with sexual matters and is sexually provocative with adults
- A student looks unhappy and ill cared for, is withdrawn or aggressive, or has lingering health problems
- A student distrusts adults and other students, has difficulty making friends, or drastically changes their personality and behaviour

3.5 Identifying main forms of abuse

The four main types of abuse are physical, sexual, emotional and neglect. Bullying is identified as the fifth form of abuse.

- Physical abuse: violence, especially pre-planned
- Sexual abuse: forcing a child to take part in sexual activity of any kind, physical or non-contact are both form of sexual abuses. Contact abuse could be sexual touching, rape or penetration or making a child to take their clothes off. Non-contact sexual abuse activities are such as grooming, exploitation, or persuading children to perform sexual acts.
- Emotional abuse: Emotional maltreatment of a child such as blackmail, threats and intimidation
- Neglect: is the persistent failure to meet a child's basic physical or psychological needs (e.g. to protect child from harm, lack of adequate food/shelter)

Bullying is the act of hurting somebody else either physically or emotionally. Cyberbullying takes place online or through smart devices or tablets.

3.6 A child telling an adult

We encourage the students to talk openly and show them that they will be valued and listened to.

In case a student decides to disclose suspected abuse to an adult, these following steps should be followed:

The concerns should be taken seriously, recorded and passed on to the DSL, following this procedure:

1. Receive

- Listen calmly, try not to appear shocked by what you hear
- Accept what they say, show that that you take it seriously
 - DO NOT interrogate or ask leading questions

2. Reassure

- Reassure them that they have done the right thing in coming to you
 - Be honest, don't make promises you can't keep
- DO NOT promise confidentiality as you have a duty to refer the information

3. React

- Explain what you have to do next and who you need to talk to and that this will be on a need to know basis

4. Record

- Make brief notes at the time, write them up more fully as soon as possible using the concern form. (Copies available at Reception, in offices, the staffroom and teachers' class files)
- Take care to record timing, setting and personnel as well as what was said word by word
 - Be objective - include statements and observable things rather than your interpretations or assumptions
 - Do not destroy your original notes in case they are later required in court

5. Act

- Inform the DSL (or a DSP) immediately

3.7 Confidentiality

We recognise that all matters relating to child protection are confidential. All adults are responsible for maintaining confidentiality and share information on a need-to-know basis only with relevant persons, concerns should not be discussed with friends or family members.

3.8 Knowing and recognising secondary forms of abuse

Secondary forms of abuse are the following:

- **Child Sexual Exploitation** happens when under 18s receive something (e.g. attention, gifts, money) initially without needing to give anything in return, but at some point sexual activity is required by the exploiter in return for "something" to be given
- **FGM (Female Genital Mutilation)** is a non-medical partial or total removal of external female genital organs. It is illegal in UK and a form of child abuse. If discovered it needs to be reported to the police.
- **Bullying** is the act of hurting somebody else either physically or emotionally. Cyberbullying takes place online or through smart devices or tablets.
- **Peer to peer abuse**, abuse is not just adult to child, children may harm each other in various ways; gang violence, gender based violence and hate and revenge crimes, honour based violence (HBV) are different types of peer to peer abuse.

3.9 Vulnerable students and early help

Some children might be at higher risk of abuse. To make sure that everyone is equally treated we will give special attention to students:

- with special education needs and disability (SEND)
- with existing emotional/behavioural/mental health difficulties
- missing education
- privately fostered children
- affected by domestic abuse
- affected by substance misuse/drug use
- affected by poor parenting/missing from home or care/living in chaotic home situations
- at risk of gang and youth violence
- LGBT (lesbian gay bisexual transgender)
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- vulnerable to extremism or radicalisation.
- involved directly or indirectly in child sexual exploitation CSE or trafficking
- at risk of Honour Based Violence (HBV) including; e.g. forced marriage

This list is only an example of students that we should give special attention to.

Adults have the responsibility to notice emerging concerns and react as soon as possible whenever early help might be needed by sharing the concerns with the Designated Safeguarding staff. This will help to avoid harmful situations and reduce the impact of problems. Vulnerable students are aimed to be identified before arriving at the destination, this is done by the booking agents / sales staff in their home countries.

3.10 Keeping records

Records generated for the purpose of child safeguarding are processed in accordance with the Data Protection Act 1998, which requires that personal information held for these records is:

- Adequate, relevant and not excessive for the purpose which it is held
- Accurate and where necessary kept up to date
- Not kept for longer than necessary for its purpose

When records are created, they should be signed by the person or people making the statement. The safeguarding report form can be found in **the Appendix 2**.

3.11 Procedure if an adult is accused

In the situation where an adult is accused, please follow these steps:

1. Ensure that the child is safe and supported
2. Inform the DSL/senior manager as soon as possible
3. Make a clear written report (please see the safeguarding record form (Appendix. 2)
4. DSL/senior manager will contact local authorities (LSCB) if there is a concern about a child and local LADO (Local Authority Designated Officer) if there is accusations against staff if needed
5. The following steps will depend on the guidance provided by the local authorities

3.12 Procedure if the DSL/senior manager is accused

In the situation where the DSL/senior manager is accused, please follow these steps:

1. Ensure that the child is safe and supported
2. In this case other Designated Staff need to be informed
3. Make a clear written report (please see the safeguarding record form) (Appendix. 2)
4. Designated staff member needs to contact local authorities(LSCB if there is a concern about a child and local LADO if there is accusations against staff)
6. The following steps will depend on the guidance provided by the local authorities

3.13 Procedure if a child is accused

When a child is accused it is important to remember the need of support for both parties including the accused one.

- 1.** Ensure that both children are safe

- 2.** Inform the DSL/ senior manager as soon as possible

- 3.** Make a clear written report (please see the safeguarding record form) (Appendix. 2)

- 4.** Designated staff member needs to contact local authorities (LSCB if there is a concern about a child and local LADO if there is accusations against staff)

- 5.** The following steps will depend on the guidance provided by the local authorities

4. Training

It is important that all adults have regular training regarding safeguarding. Sprachcaffe Languages Plus recognises its responsibility to ensure that all adults working with under 18s are adequately trained in safeguarding according to their degree of contact and level of responsibility in relation to safeguarding.

4.1 Responsibilities

Basic Awareness training (level 1)-

All adults are expected to have Basic Awareness training

All staff

Volunteers

Interns

Hotel staff

Homestay providers

Teamers and Coordinators

Teachers

Group Leaders

Basic Awareness training can be done online and should be followed by a face to face training session. Adequate follow up will take place after completing the Basic Awareness training. This will be done using various methods including questionnaires, discussions and feedback.

The refresher training should happen annually, if there are any changes in legislation or whenever a safeguarding incident occurs.

Advanced Safeguarding (level 2)-

Designated Safeguarding Staff

Refresher training every 2 years

Responsibility to make sure all staff have Basic Awareness training

Specialist Safeguarding (level 3)-

Designated Safeguarding Lead

Refresher training every 2 years

Main point of contact with e.g. Local Safeguarding Children Board

Making sure all staff are trained adequately and that training is refreshed frequently by questions/feedback/refresher training sessions.



4.2 Safeguarding training

Basic Awareness training is free online. It can be found from the following link; <https://galleryteachers.com/service/safeguarding-basic-awareness-course/>

This must be supported with a face to face training from designated staff. This is part of the induction process for all staff and homestay providers.

Level 2 and 3 training are delivered face to face but can be found online from the following link: <http://www.englishuk.com/en/training>.

4.3 Recording training

All training will be maintained and recorded in safeguarding training folders which will be kept in the Designated Safeguarding Lead's office or electronically by the DSL

The folder will provide the following information; the dates of training, who completed, level and content of training and an evidence it was completed.



5. Safer recruitment

5.1 Overview

Sprachcaffe Languages Plus follows safer recruitment procedures for all staff and contractors, paid or voluntary. This means that we check for criminal records and the Barred List, follow up references, require all gaps in CVs to be explained satisfactorily and ensure that all new employees read and sign our contracts of employment before starting work. This includes that they have read and understood the code of conduct and safeguarding policy. These actions have been made to ensure that all the employees are suitable for working with children and it is part of our safeguarding policy.

5.2 Recruitment stages

In every stage of the recruitment process at Sprachcaffe Languages Plus safeguarding is mentioned as a part of the role and the safeguarding tasks are mentioned. This means job descriptions and adverts, communication with candidates, interview confirmation and the actual interview.

On confirmation of an interview, all applicants are informed that they need to provide us a copy of valid DBS check and a copy of most recent safeguarding training.

This applies to managers, teachers, administrative staff, housekeeping, Homestay Providers, Teamers and Teamer co-ordinators and interns.

During interviews, questions are asked to ascertain candidates' attitudes towards working with young people and that they are mentally and physically well enough to take on the role for which they are applying. These questions are adapted from suggested questions provided by English UK during level 2 Safeguarding Training.

5.3 Documents required from applicants

The enhanced Disclosure and Barring Service (DBS) is a government service that "helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children" by carrying out criminal record and Barred List checks. Proof of identity and certificates of relevant qualifications will be relevant. The candidates will also need to be able to explain the possible gaps in CVs, proof of identity and 2 references. Referees will be asked if they know of any reason why that person should not work with under 18 years old. Level 1 Safeguarding Basic Awareness certificate will be required from the applicants.

If they are successful in their interview, before starting the position, the following must be provided:

- New Employee Details (for payroll)
- Form for existing Employees (for the school)
- P46
- Children Act + DBS number
- Declaration regarding suitability to work with children
- Safeguarding Policy
- Prevent Policy
- Job Description
- Dress Code
- Sick Leave Procedures
- Contract

5.3.1 Applicants awaiting DBS

Applicants awaiting the issue of DBS certificates may begin work but will not be given unsupervised access to under 18s until the certificate has been seen by the manager responsible for recruitment. Homestays cannot host anyone before DBS has been received.

5.3.2 Applicants with a criminal record

The fact that an applicant has a criminal record does not automatically make the applicant unsuitable for the role. We will need to make a judgement about the applicant's suitability on a case by case basis. These facts will be considered: seriousness of offence, nature of appointment, age and frequency of offence.

The disclosure should be discussed with the candidate. A clear record of the decisions needs to be made with two staff members from senior management level.

5.3.3 Applicants where criminal check not possible

When recruiting from outside the UK, it is not possible to request a DBS check, so a National Police 'Certificate of Good Conduct' or 'Certificate of Criminal Record' is requested instead.

5.4 Homestay recruitment

Homestay recruitment process starts with the homestay completing the application with all the required documents: DBS check, gas certificate and fire risk assessment carried by the Homestay and Transfer coordinator and signed safeguarding policy. Once all the documents have been received the homestay coordinator will arrange a visit to ensure the suitability of the family.

5.5 Single central record

The recruitment process for interns/staff/homestays/group leaders will be completed with a recruitment process checklist. DBS certificates are not held by the school but details are noted in a single central record for homestays and also for staff

5.6 Prohibited list for teachers

This list applies to those who have Qualified Teacher Status (QTS). It does not apply ELT qualifications such as CELTA or DELTA. A person listed under the prohibited list is not allowed to undertake unsupervised teaching. Persons on this list have not necessarily committed a criminal offence but their behaviour might have been indicating that they could pose a risk to children. The purpose of the list is to protect children as well as keep maintain confidence and professionalism within the teaching profession. Whenever there is an applicant with QTS qualification Sprachcaffe Languages Plus is committed to checking the Prohibited List with the Employer Access Team.

6. Implementing safeguarding

Our students' welfare is our biggest concern. The following points will ensure that we look after students aged under 18 years old students as well as other students in the best way possible.

6.1 Use of risk assessment

Risk assessments are carried out for different situations to identify measures to control the risks at the schools, activities and transfers as well as at the homestay and residential accommodations. It is available for everyone at the school on Queen's road on the specific folder for them. Staff are expected to follow the risk assessments and provide evidence of doing so as well as feeding back to improve the risk assessments as well as updating them for any changes.

6.2 Levels of supervision and supervision ratios

- The required supervision ratio for U20s during excursions and leisure activities is 1 supervisor to a maximum of 20 students but our company's aim is to have 1 supervisor per 15 students depending on the nature of the activity,.
- Students on the U20 programme have separate accommodation, leisure activities and classes to adult students, unless they are over 18, in which case they may be placed in adult classes.
- U20 male and female students are accommodated separately but may have classes and leisure activities together.
- U20 students may have unsupervised free time. During unsupervised free time, U20 students are advised not to walk around alone but to stay in Brighton and Hove and be with at least one other student. The students have been told to be careful in the specific areas identified in the guidelines for under18's and to avoid any small back streets / unlit areas in hours of darkness and to stick to main roads wherever possible.
- Under 18s are required to inform their Teamer and Homestay Hosts about their plans during their free time and to respect their curfews. There are **specific guidelines** for the free time for under 18 years old students.
- On their first day, students may be escorted to school by their homestay hosts, but will normally be unsupervised with a map and clear instructions or they will have been shown the way.



- Students should arrive to the school with their roommates or classmates when possible. Should they have any problems, they can call their Teamer who will come and help them get to school, and can also escort them home if requested.
- Sprachcaffe Languages Plus has a strict curfew on the under 20 programme for every day of the week including weekends:
10.00 pm for students under 16
11.00 pm for students between 16-17 years old.

6.3 Missing students

Procedures for missing students are made for situations if the student is late.

Class

- If any student on the U20 programme is absent 10 minutes after class has started, the teacher will report the absence to the relevant Teamer or staff member on Reception. The Teamer/Reception staff member will attempt to contact them. If they are unable to contact them the school will follow the procedure outlined in the Missing Student Action Plan, which is located in Reception, the Accommodation Office and the Academic Office.

Excursions/activities

- If a student on the U20 programme is late for more than 15 minutes, or goes missing during, an out of school activity/excursion their Teamer will attempt to contact them. Teamers will have a reliable list of contact numbers for all students in their group with them at all times. If they are unable to contact them the school will follow the procedure outlined in the Missing Student Action Plan, which is located in Reception, the Accommodation Office and the Academic Office. Teamers will be very strict in ensuring that students congregate at the designated meeting times and places during the trip on time.

Curfew breaking

- Sprachcaffe Languages Plus has a strict curfew on the U20 programme: **10.00 pm** for students under 16 and **11.00 pm** for students between 16-17 years old. Groups are also expected to follow this curfew for their under 18 students. If Group Leaders wish to extend curfew times they must inform the school within 48 hours so that Homestay Hosts can be informed and the agreement of this curfew extension decision rests with the school. This policy is communicated in induction meetings with Group Leaders on arrival.

- If a student does not arrive home by their curfew, the Homestay Host must call the school to contact the Teamer Coordinator.
- If the Teamer is unable to contact or locate the student, the Police will be contacted.
- We encourage adult students to communicate appropriately with their Homestay Host and let them know when they will be returning if they are on a night out or a trip for the day.

Procedure in case the student does not arrive to the destination:

Contact immigration office (red phone at the Terminal) ask them if they have there our student (only if students is under 16 yours) if not contact Frankfurt office's emergency phone number. They have all the contact details for the student and the student's family. At this point it is their responsibility to contact the student's family and try to find information if the flight was missed or if something else occurred.

Procedure in case the student misses the flight on departure day:

If Sprachcaffe Language Plus has caused the reason why the student has missed the flight, first point of contact would be UK General Manager. We will do our best to provide the student with a new flight on the same day. In case there is no flights to the student's home country on the same day, the teamer will bring the student back to West Beach Hotel for the night.

If the student is responsible for missing his own flight, the UK General Manager needs to be contacted as well as the student's booking agent. The situation will be evaluated on a case by case basis.

Follow up

- The Teamer is responsible to contact the student
- The Teamer Co-ordinator is responsible for following up reports of missing U20 students and reporting to the DSL or to the DSP
- The DSL is responsible for following up reports

Student missing from the Homestay

If the Homestay Host does not know the whereabouts of the student, and they are not home 15 minutes after the curfew time, they will attempt to call the student. If the student does not answer the Homestay Host will inform the school on the emergency phone to contact the Teamer Coordinator. The Teamer Coordinator will attempt to contact the student. If there is no answer the Teamer and school will follow the procedure outlined in the Missing Student Action Plan.

6.4 Dealing with a concern

The process to deal with a concern is:

Listen sensitively to gather more information from the student

→

Record on the **safeguarding recording form** filling all the information and details gathered

→

Inform DSL/senior manager, if the concern is about a DSL/senior manager, tell someone else on the senior management level. The relevant senior manager will be in charge of decision making. Concerns should not be shared with friends or family members, only with relevant people.

→

Act according to investigations and discussions

→

Monitor as required until no further action can be noted. Once concern has been solved, feedback will be provided to the relevant staff members involved.

6.5 Accommodation

The accommodation offered is usually a single or twin room (sometimes triple rooms if specially requested). A maximum of four students may be accommodated in the same household at any one time, with no more than two students per room. We are aiming to accommodate different nationalities in the same household. Wherever possible, students of the same nationality should not be accommodated in the same house unless specifically requested. It is understood that this may not be possible when a certain nationality is predominant and in this case we should manage expectations and get consent forms signed where relevant. Those students under 16 should not be lodged in the same homestay as students over the age of 18 years, unless requested. The room must be clean and in good repair with adequate heating and lighting allowing privacy from members of the opposite sex. The room must have the following:

- **1 or 2 full size beds (or bunks)**
- **Wardrobe or drawers**
- **Mirror**
- **Window**
- **Desk (or table)**
- **Chair**

Students should be supplied with a towel, pillowcase and sheets, which should be changed every week. Normally the Homestay provider does the student's weekly washing and we do expect families to do one load of washing per student per week free of charge. Any additional loads would be at the homestay's discretion, and we expect the homestay to show the student how to use the washing machine if they would rather do their washing themselves.

Students are expected to keep their room tidy; however, the weekly cleaning of the room is the responsibility of the Homestay provider. Students must have the same access to the bathroom facilities as the rest of the household. Showers or shower attachments are preferred as most students come from cultures where this is the usual way of bathing as opposed to baths.

Whenever a student wants to stay away from the accommodation, a parental consent

6.6 First Aid & medical

Please see Appendix. 1 for the location/departmental specific First aider details.

6.7 Fire Safety

Fire action information is displayed in all the classrooms and common areas, students are walked through the fire drill during induction. Escape routes are clearly visible and students are informed of the fire escape process and shown where the safe area is. Regular fire drills are carried out with the staff. Fire drills are carried out at least 3 times a year and fire alarms are tested weekly.

All accommodation is equipped with smoke and/or heat detectors and the Homestay Coordinator must be provided with a copy of all annual gas safety certificates and fire risk assessment from Homestay Hosts.

6.8 Airport transfers

All students will receive a transfer confirmation letter before arrival.

For all students who are 18+ they will find the transfer driver with a named board waiting for them at arrivals. The drivers will normally arrive one hour after the flight has landed.

For all students under the age of 18 they will be met by one of our Sprachcaffe Teamers who will organise all aspects of their transfer and take the students to the destination. The students travel to and from the airport by taxis or coaches depending on the number of students.

The Homestay & Transfer Coordinator is the first point of contact for the arriving students.

If the student has booked a transfer with us we will inform the homestay provider of the estimated arrival time on the week of their arrival.

6.9 E-safety

Please see the **Code of Conduct** for specific details of our policy. The e-safety rules are displayed in the school's noticed board and the students are advised to tell an adult if something online makes them feel uncomfortable.



6.10 Radicalisation & Extremism prevent

Sprachcaffe Languages Plus Brighton understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into extremist activities, and seeks to meet its obligations. We ensure that through our school ethos we promote tolerance and respect to all cultures, beliefs and values.

Prevent Leads can be found in the Appendix 1.

Sprachcaffe Languages Plus respects the core British values:

Democracy
The rule of law
Individual liberty
Mutual respect and tolerance

Terminology

Radicalisation: act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Extremism*: holding extreme political religious views which may deny right to any group or individual; these can be expressed in vocal or active opposition to

* **extremism** can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as any religious extremism

Leadership

Responsibility for ensuring Prevent Duty is met is with the Director of Studies. Responsibility for the Prevent risk assessment and policy lies with the Director of Studies and UK General Manager. Their duties are to ensure delivery of an effective risk assessment/action plan and policy as outlined here, which will be reviewed annually.

Working with local partners

We make and maintain contact with local police/the local authority Prevent coordinator to understand their role and the support available and where appropriate share information. We also develop other appropriate Prevent links, e.g. English UK regional groups or local language school groups. All the contact with the local authorities will be recorded.

Training

Teachers and admin staff to complete the online training by Education and Training Foundation; 'practitioners' for teaching staff and 'support' for admin staff. Managers to complete 'leaders and managers' training. If available, local WRAP (Workshop Raising Awareness of Prevent) to be attended by lead staff.

In-house face to face training to take place regularly to supplement online training, to ensure that staff understand:

1. the context and expectations of prevent
2. their duty to implement this policy
3. terminology and risks associated with radicalisation and extremism
4. ways the school will counteract the risks
5. signs to notice that may cause concern
6. how to identify and support vulnerable students
7. know the lead Prevent staff within the school
8. know the importance of their own behaviour and professionalism in promoting British values and not discussing inflammatory subjects with students

Signs that may cause concern

- Students talking about exposure to extremist materials or views outside the school
- Changes in behaviour, i.e. becoming isolated
- Fall in standard of work, poor attendance, disengagement
- Changes in attitude, e.g. intolerant of differences/being closed minded
- Asking questions about certain topics (e.g. connected to extremism)
- Offering opinions that appear to have come from extremist ideologies
- Attempts to impose own views/beliefs on others
- Use of extremist vocabulary to exclude others or incite violence
- Accessing extremist material online or via social network sites
- Overt new religious practices
- Drawings or posters (e.g. in homestay) showing extremist ideology/views/symbols
- Students voicing concerns about anyone
- NB – concerns relating to a person under 18 are safeguarding issues and should be dealt with by the safeguarding staff (if different from Prevent staff) and, where necessary, the Local Safeguarding Children Board

6.11 Parental Consent

Parental consent form is needed for:

Parental consent forms must be received and signed before students arrive to cover free time as well as if students are to be allowed to miss supervised compulsory activities or lessons or to participate in free time activities that we do not recommend. These forms must be accessible by all DSP's.

Consent forms should also be received if students will appear in any photos or videos used in publicity

Finally, consent forms should be received with details of any special emergency medical treatment required for students with any medical conditions or ailments.

6.12 Private Fostering

For the students who are staying for more than 27 nights and aged under 18 years old private fostering arrangements are in place. Private fostering is when a child under 18 is cared by someone who is not their parent or "a close relative". The information regarding private fostering needs to be reported to Front Door for Families, Brighton and Hove City Council at least six weeks before the arrangement starts.

1. Appendix

Location / Department Specific information

	Brighton	Brighton	Brighton	Brighton
Location	Brighton	Brighton	Brighton	Brighton
Department / Building	Queens Road Premises	Holland Road Premises	West Beach Hotel	Homestay
Contact number	01273 201430	01273201430	01273 323161	01273322103
Who is this number for ?	Students, Staff, Head Office staff , agents, parents	Students, Staff, Head Office staff , agents, parents	Students, Staff, Head Office staff , agents, parents	Students, Staff, Head Office staff , agents, parents
"DSL"	Linda Engblom- Safeguarding & HR Manager			
"DSP"	Elizabeth Weedon - Assistant Director of Studies	Louise Heffernan- U20 Coordinator	John Squire- Hotel Manager	Craig Sharples- Homestay & Transfers Coordinator
Prevent Lead	Aleksandra Gratkowska, Director of Studies			
Emergency Number	01273 323161	077768622309	01273 323161	07948326443
Who usually holds phone	Hotel reception staff	Martina Smatova	Hotel Reception staff	Craig Sharples
Who is this number for ?	Students	Students	Students	Homestay providers
Phone Diverts to if busy / no answer / no signal	N/A	N/A	N/A	N/A
LSCB (Local Safeguarding Children Board)	01273290400	01273290400	01273290400	01273290400
LADO Darrel Clews	01273 295643	01273 295643	01273 295643	01273 295643
Police Child Protection Team	Dial 101 and ask for Brighton SIU			
Appointed First Aider	Elizabeth Weedon	Louise Heffernan	John Squire	Craig Sharples*
Trained First Aiders	Aleksandra Gratkowska, Anthony Norgard	Louise Heffernan, Martina Smatova	John Squire, Bernard Dodds	Craig Sharples
Location of First Aid Boxes	Ground Floor by the photocopier	in U20 coordinator's office, in reception, in teachers room on the first floor	At the reception, in the office downstairs	
Local Hospital	<ul style="list-style-type: none"> Brighton and Sussex University Hospital: 01273 696955 Brighton General Hospital: 01273 696955 	<ul style="list-style-type: none"> Brighton and Sussex University Hospital: 01273 696955 Brighton General Hospital: 01273 696955 	<ul style="list-style-type: none"> Brighton and Sussex University Hospital: 01273 696955 Brighton General Hospital: 01273 696955 	<ul style="list-style-type: none"> Brighton and Sussex University Hospital: 01273 696955 Brighton General Hospital: 01273 696955
Local Doctor	Walk in Clinic on Queens Road	Walkin Clinic on Queens Road	Walkin Clinic on Queens Road	Walkin Clinic On Queens Road
<i>*to be trained</i>				

2. Appendix

Safeguarding report form example

Date	
Student first name	
Student family name	
Gender	
Date of birth	
Current Age	
Nationality	
Group/Individual	
Student I.D	
Name of person noting concern	
Role/connection with school	
Date and time concern noted	
Location	
Witnesses (full names)	
<p>Concern <i>(please provide as much detail as possible)</i></p> <p>NB: If reporting a disclosure/allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more.</p>	
Signed	

Response to concern. This section to be filled in by the DSPs

Do parents/ Group Leader/ Agent/ Homestay/Teamer Co-ordinator/ U20s Product Manager others need to be informed?

Response	By whom <i>(full time)</i>	When <i>(date and time)</i>

All details discussed are strictly confidential between those parties involved and parties reporting the concern. This information is sensitive and potential harmful and must therefore be kept confidential at all times. External parties (Local Safeguarding Children Board, Police and Social Services may need to be informed if the concern becomes a referral).

3. Appendix

Abusive behaviour policy

SPRACHCAFFE LANGUAGES PLUS, BRIGHTON is committed to providing a safe, welcoming environment for all students and staff and will not tolerate any form of harassment and abusive or extremist behaviour.

The following are not tolerated at any of the SPRACHCAFFE LANGUAGES PLUS centres:

- Bullying of any kind (physical or verbal)
- Racism (of other nationalities, cultures or religions) and / or other forms of intolerance including but not limited to sexism and homophobia
- Activities which contradict core British values, in accordance with the government's Prevent policy
- Excessive and / or loud swearing
- Sexual harassment of any kind
- Aggressive behaviour towards staff, students or visitors (e.g. shouting at other students inappropriately, kicking furniture)
- Theft (stealing other people's property or property belonging to SPRACHCAFFE LANGUAGES PLUS or affiliated centres)
- Vandalism (e.g. deliberately breaking school furniture, computers, graffiti etc.)
- The viewing or reading of extremist material, either online or in any other form
- Any illegal activity

If a student experiences or witnesses bullying or abusive behaviour, they should contact a member of staff immediately.

These are:

- Teachers
- Director Of Studies
- Assistant Director of Studies
- Safeguarding & HR Manager
- Homestay & Transfers Coordinator
- Junior Coordinator
- Teamer Coordinator
- Teamers
- Homestay family
- Any other staff



Teachers and other staff are aware of the signs of bullying and abusive or extremist behaviour and if they experience or witness any such behaviour, they will contact the Director of Studies or DSL who will, if necessary, involve the General Manager of SPRACHCAFFE UK.

When the Director of Studies and, if necessary, the General Manager have been notified, an appropriate course of action will be decided.

Cases of abusive behaviour may result in disciplinary action in the case of staff or, in the case of students, termination of their course with no refund.

Important: It is the school's decision if a student's behaviour is unacceptable or not. If a student's behaviour is unacceptable and they have not listened to the verbal warnings given by SPRACHCAFFE LANGUAGES PLUS staff, the school will give them one written. If unacceptable behaviour occurs again, the school may prevent the student from taking part in classes and activities and arrange for the student to be sent home with no refund of any fees. In the case of U20 students, parents will be informed via their booking office of each occurrence.

Please note that the school may expel the student with no refund of fees and no written warning if the behaviour is very serious in the school's opinion.

SPRACHCAFFE LANGUAGES PLUS also reserves the right to involve the police if it believes their assistance is required to maintain the peace or to investigate a suspected criminal incident.

4. Appendix

Emergency Action Plan

- Immediate concern must be **safety of students and staff**. Deal with that straight away.
- Assess gravity of situation and decide whether it requires an EAP response
- If not, respond according to the situation, remembering that:
 - People are waiting to act based on your direction. They will want to help.
 - People will not think worse of you if you ask for some input from others before telling them what to do.
 - There is ALWAYS a solution.
 - Start keeping a log immediately, noting time, what happened and who was involved.
 - Allocate somebody else to take over your regular duties as required.
 - If necessary/possible keep a phone line free for incoming calls.
 - Communicate quickly to others who need to know, almost certainly including Head Office.
 - See information in Appendix 1 for emergency contacts- Hospital, Fire Brigade, LSCB and Police Station.

5. Appendix

Missing student plan step by step

If a student is late for class

- All students on the U20 programme sign in at reception upon arrival at the school.
- Reception/U20 Coordinator informs Teamer/Group Leader immediately.
- U20 Coordinator informs Teamer/Group Leader double check if student is in class.
- Group Leader/Teamer attempts to phone missing student after 15 minutes of absence.
- If no answer, The Teamer/Group Leader waits 5 minutes and calls again.
- If there is still no answer, the Teamer/Group Leader waits a further 5 minutes and calls again.
- If the student can't be contacted by telephone and other students have no information regarding the whereabouts of the student, the Homestay & Transfers Coordinator is called.
- The Homestay Coordinator contacts the Homestay.
- If the Homestay does not know the whereabouts of the student after leaving home for school The Teamer will try to contact the student again and continue to ask students about any information they may have of the whereabouts of the student.
- If the student is not present after one hour of absence the police will be called and informed about the missing student. Responsibility will then be handed over to the British Police.
- Parents will be informed of the situation after the police have been fully updated on the situation, if they are a Sprachcaffe student the U20s Product Manager will be called and asked to communicate with the families in their own language. Group Leaders will be required to contact the parents of their missing students.



If a student is late returning home

- The Homestay will inform the Emergency Number when the student is 15 minutes late from curfew of 10.00pm. The person who speaks to the homestay will inform the Teamer Coordinator.
- Group Leader/Teamer attempts to phone missing student (if the call is answered they are informed to return home immediately, Teamer/Group Leaders will then follow up with the Homestay Provider to ensure they are home.)
- If no answer, The Teamer/Group Leader waits 5 minutes and calls again.
- If there is still no answer, the Teamer/Group Leader waits a further 5 minutes and calls again.
- Other students will be called and asked about the missing student, preferably those close to them or living with them.
- The Teamer coordinator will try to contact the student again and continue to ask students about any information they may have of the whereabouts of the student.
- If the student is not present after one hour of absence the police will be called and informed about the missing student. Responsibility will then be handed over to the British Police.
- Parents will be informed of the situation after the police have been fully updated on the situation, if they are a Sprachcaffe student the U20s Clients Manager will be called and asked to communicate with the families in their own language. Group Leaders will be required to contact the parents of their missing students.



If a student is late for an activity

- Group Leader/Teamer attempts to phone missing student after 5 minutes of absence
- If no answer, The Teamer/Group Leader waits 5 minutes and calls again.
- If the student can't be contacted by telephone and other students have no idea of the whereabouts of the student. The Teamer/GL calls the school.
- The School will call the Homestay Provider if required.
- If the Homestay Provider does not know the whereabouts of the student after leaving home for school The Teamer will try to contact the student again and continue to ask students about any information they may have of the whereabouts of the student.
- Teamers may continue the activity only after the school has been informed of the absence. The school can then take responsibility for the absence.

By this point it is likely the student will show up at the school or contact will have been made. If not the following steps will be taken:

- If the student is not present after one hour of absence, the police may be called and informed about the missing student. Responsibility will then be handed over to the British Police.
- Parents will be informed of the situation after the police have been fully updated on the situation, if they are a Sprachcaffe student the U20s Clients Manager will be called and asked to communicate with the families in their own language. Group Leaders will be required to contact the parents of their missing students.