Atlas Safeguarding Policy

Safeguarding Policy for Children, Young People and Vulnerable Adults

Version Control

Version	Date	Action	Initials
V1	01/07/2025	First Draft	TM
V2	16/05/2026	Signed Final	AM

Signed: _____ _____ Amanda Morley Alan Brennan

Safeguarding Officer Director

Date: 16/06/2026 _____ 16/06/2026 _____ 1

Table of Contents

Section
Page

1	Introduction	3 - 6
2	Code of Conduct for Students	7
3	Code of Conduct for Atlas Language School	8 - 13
4	Child protection	14 - 21
5	Staff	22 -25
6	First Aid	26 - 27
7	Accommodation/Other practical Issues	28 - 34
8	Student Administration	34 - 37
9	Teacher Absence	37

10 Making Rules Known to Students and Staff 38 - 39 11 Missing Students 39

1 Introduction

The Designated Safeguarding Persons (DSP) for Atlas Language School Liverpool are Amanda Morley who acts as the School Manager (SM) and Sarah-Jane

Smith-Williams, Front of House Officer, during junior programmes at the Liverpool school. Both Amanda and Sarah-Jane have completed Level 3 of the Safeguarding training. Amanda is Designated Safeguarding Lead and Sarah-Jane is Deputy Safeguarding Officer. One of these two members of staff is always on the school site when junior programmes are running.

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Local Authority Designated Officer (LADO) – Liverpool
The LADO manages allegations and safeguarding concerns relating to adults who work or volunteer with children. Concerns should be discussed with the LADO promptly and in line with local safeguarding procedures.

Contact: In the first instance contact Liverpool Children's Services and request LADO advice.
Telephone: 0151 459 2606
Further information: Liverpool Safeguarding Children Partnership – LADO
Referral information: Liverpool City Council – Children at Risk / LADO information

Atlas Language School, Liverpool is a language school located in St John's House, 2 Queens Square, Liverpool L1 1RH. We accept students aged 17 and over onto our year-round courses, subject to parental consent where required. During the summer, students aged 16 and over may join our Young Adult Programme, subject to parental consent where required. In addition, we welcome closed groups of younger learners year-round. These groups are not mixed with other students. Accommodation is available with host families and in residential accommodation.

1.1 Who is covered by this policy?

ALL adults who have any contact in any form, with young people aged under-18 are covered by this policy. This is a Child Protection and Safeguarding Policy

1.2 How the Policy is Made Known to Those Covered

The Atlas Junior Safeguarding Policy will be made known to all adults in contact with persons under 18 years old through their roles in Atlas Language School, Liverpool. Electronic copies will be sent, and a hard copy will be available in a space accessible to all parties concerned. Atlas Junior Safeguarding Policies and Procedures document is disseminated to the following personnel:

- Management
- Teachers
- Activities Leaders
- Group leaders
- Relevant staff of any premises or services used by Atlas Language School, Liverpool

1.3 Definition of Important Terms

Adapted from the British Council “Care of Under 18’s Guidance” document 2015.

Under 18’s

The category under 18’s includes any students who have not yet reached their 18th birthday, regardless of the age of majority in their home country or the location of ELT provision.

Safeguarding

Safeguarding is the action taken to promote the welfare of persons under 18 and protect them from harm. It means caring for/looking after persons under 18 appropriately and protecting them from that which is not in their best interests; as such, it includes health and safety, child protection and pastoral care.

Connected to safeguarding is the phrase ‘Duty of Care; there is a legal responsibility that adults who work with persons under 18 as professionals or volunteers have a duty to look after them properly; persons under 18 depend on adults for their safety and wellbeing

Child Protection

Child protection means protecting children from abuse and direct harmful behaviour. The World Health Organisation defines abuse as.

‘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.’

Abuse is also defined as inflicting harm or failing to act to prevent harm (taken from the Government policy document Working together, 2013)

1.4 Relevant Legislation

The Children Act (1989) and (2004)

Article 19, The United Nation Convention on the Rights of the Child (1989)

1.5 Revising and Updating the Policy

The Safeguarding Officer or Academic Manager is responsible for reviewing and the signing off of the policy, The policy will be reviewed annually or more frequently if needed in response to changes in legislation or national guidance.

1.6 Policy Statement

Atlas Language School has a moral and legal obligation to ensure that all Atlas staff given responsibility for, or access to, young people under 18 years of age, provide those young people with the highest possible standard of care. Atlas is committed to devising and implementing policies so that all staff, or either adults with considerable access to persons under 18 as a result of Atlas activities, are aware of and accept their responsibilities to safeguard and protect persons under 18 and report any concerns about their welfare to appropriate staff and authorities, Atlas Language

School is committed to ensuring that:

- The welfare of persons under 18 is paramount;
- All persons under 18, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have rights in general and in particular the right to protection from all types of abuse;
- All suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately;
- All staff are covered by this policy and all staff have a responsibility to report concerns to the Designated Safeguarding Officer which is the School Manager. In the absence of the School Manager, the Deputy Safeguarding Officer takes on this role;
- All staff receive appropriate training;
- This policy is disseminated to all staff, read by all staff and understood by all staff.

Atlas Language School has a duty of care to safeguard all persons under 18 from harm. All persons under 18 have a right to protection, and the needs of disabled persons under 18 and others who may be particularly vulnerable must be taken into account. Safeguarding includes the use of IT and the internet. Atlas Language School will ensure the safety and protection of all persons under 18 through adherence to the Child Protection guidelines by Atlas Language School.

1.7 Policy Aims

The aim of this policy is to promote good practice and provide persons under 18 years of age with appropriate safety and protection while they are in the care of Atlas Language School, and to allow staff to make appropriate, informed and confident responses to specific child protection issues. This policy applies to both real world and online environment

1.8 Rights of Under 18's

All persons under 18:

- have rights. No one can take away a person under 18's right to be safe
- have a voice;
- have the right to say 'no' if any person tries to do something to them which

they feel is wrong;
- have the right to be supported against bullies;
- must feel they can tell an adult of any incident that frightens or confuses them or makes them unhappy;
- must know that if they go to an adult for help, they will be listened to seriously and supported;
- have the right to be treated with respect and to be safeguarded from harm.

2. Code of Conduct for Students (Under 18's)

The purpose of the Code of Conduct is to build trust between under 18s and adults in order to create a safe school culture. It is there to protect both adults and under 18s from any behaviour/actions which may be misconstrued

The Code of Conduct is sent to the agents to pass on to parents and students prior to their visit. It is also displayed in all Atlas Language School classrooms, residences, administration offices and teacher's rooms. See below;

- Speak English
- You must follow the UK laws
- Students must respect others at all times. Bullying will not be tolerated. Anyone caught bullying will be sent home
- Be polite to all students and staff
- Attendance at lessons is compulsory
- Participation in all excursions and activities is compulsory
- If a student is absent from classes or activities without permission, they will be subject to disciplinary procedures
- Fire escape, fire equipment are for emergency use only. They must not be used at any other time. Playing with a fire extinguisher is strictly forbidden. Heavy fines are imposed by the school if students do so.
- Smoking is not permitted in any of the buildings
- Bedrooms should be kept tidy and any damage done to the room, furniture or décor will be taken from their deposit, and if in excess of £50, charged to the student's parents/guardians
- Keycards and physical keys are the responsibility of the student, and if lost, the cost of replacement will be charged to the student

● We do not accept responsibility for loss of student's belongings ● Students must be careful not to endanger themselves or others at any time ● Drinking alcohol or taking illegal drugs is strictly forbidden. If caught, you will be sent home

- Wear your Atlas lanyard at all times
- Listen carefully and follow instructions from Atlas staff and your group leaders. Ask Atlas staff if you have a problem

3. Code of Conduct for Atlas Language School

The Atlas Junior Code of Conduct is issued to and signed by all members of staff prior to taking a position at Atlas Language School.

The purpose of the Code of Conduct is to build trust between under 18s and adults in order to create a safe school culture. It is there to protect both adults and under 18s from any behaviour/actions which may be misconstrued.

3.1 Good Practice

All staff should be encouraged to demonstrate exemplary behaviour in order to promote student welfare and reduce the likelihood of allegations being made. The following are practical examples of how to create a positive culture and climate.

You should:

- implement this policy at all times;
- work in an open environment – avoid private or unobserved situations and encourage open communication with no secrets;
- bear in mind that other people may interpret your actions, no matter how well intentioned, so err on the side of caution;
- challenge in a prudent manner unacceptable attitudes of behaviour from other members of staff or students and report the incident to the DSP/SM as soon as possible;
- set an example you wish to expect others to follow;

- treat all young people equally, avoiding favourites;
- respect the right of any person under 18 to personal privacy;
- make the experience of studying with Atlas enjoyable, and as stress-free as

possible, promote fairness; confront and deal with bullying;

- treat all under 18's (including disabled young people) equally, and with respect and dignity;
- put the welfare of each young person first;
- maintain a safe and appropriate distance with under 18's (e.g. it is inappropriate for staff to have an intimate relationship with a child or share a room with them);
- avoid unnecessary physical contact with young people. Where any form of manual/physical support is required, it should be provided openly and with the consent of the young person. This includes the administering of first aid (if you are appropriately qualified to do so). Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the young person's consent has been given. Keep any physical contact with a child brief and don't touch a child anywhere that would normally be covered by a swimming costume;
- use the procedure: demonstrate, ask permission, touch – if you have to touch a child – for example to demonstrate a sporting technique. However, it is always best to avoid touching at all and simply to demonstrate the technique;
- try to ensure that other students and if possible other staff members or group leaders are present if physical contact is prolonged or sensitive - for example to comfort a crying child, if someone is injured, or if you have to separate fighting persons under 18;
- Be an excellent role model – this includes not smoking or drinking alcohol in the company of young people;
- Give enthusiastic and constructive feedback rather than negative criticism; ● Recognise the developmental needs and capacity of all under 18's, avoiding pushing them against their will;
- Keep a written record of any injury that occurs, along with the details of any treatment given. This should be reported to the Designated Safeguarding Officer and recorded in the incident books provided;
- Recognise if a student is developing a 'crush' on you. Do nothing that might be construed as encouraging this. Inform the DSP/SM. Never flirt with a student or make sexually suggestive or provocative comments, even in jest.

3.2 Poor Practice

It is not always easy to distinguish poor practice from abuse. It is therefore NOT the responsibility of employees to make judgements about whether or not abuse is taking place. It is however their responsibility to identify poor practice and possible abuse and to act if they have concerns about the welfare of a person under 18.

Staff are breaking the law if they have sexual activity with under 18 year olds

(including 16 and 17 year olds). The Sexual Offences Act 2003 states that any person in a 'Position of Trust' engaged in sexual activity of any sort with students under the age of 18 is breaking the law, even though the legal age of consent is 16.

All adults associated with under 18's have responsibilities to safeguard them. They must be aware, vigilant and report any concerns to the DSP/SM, DoS, LCSB (Liverpool Safeguarding Children Partnership), NSPCC (National Society of Prevention of Cruelty to Children) or the Police.

You should not:

● spend time alone with a person under 18, away from others;
● permit abusive peer activities, such as bullying or initiation ceremonies; ● be in changing rooms, washrooms or toilets at the same time as under 18's. You should not be alone in bedrooms with persons under 18. Always warn persons under 18 before entering these places, for example, by knocking loudly on doors and loudly announcing your presence. In some of the residences, staff share toilet/bathroom facilities with students. Exercise caution when using these facilities. Any staff sharing toilet/bathroom facilities with students will be of the same sex;
● take young people alone in a car on journeys, however short; ● engage in rough physical or sexually provocative games or contact for any reason;
● engage in inappropriate language with young people whether by phone, email or online;
● hit, throttle, push, kick or otherwise act aggressively, either physically or verbally towards a child, even in pretence;
● enter persons under 18's room alone in a residence or invite persons under 18 into your room;
● take young people to your home where they will be alone with you;
● allow or engage in any form of inappropriate touching;
● allow persons under 18 to use inappropriate language unchallenged; ● make sexually suggestive comments or threats to a child, even in jest; ● threaten, frighten, intimidate or reduce a child to tears as a form of control; ● fail to report, act upon, and record any allegations made by a child; ● do things of a personal nature for persons under 18 that they can do for themselves*;
● invite or allow persons under 18 to spend time with you alone and unsupervised;

*It may be sometimes necessary for staff to do things of a personal nature for persons under 18, particularly if they are young or disabled. These tasks should only be carried out with the full understanding and consent of the child concerned and the group leader. There is a need

to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Do not take on the responsibility for tasks for which you are not appropriately trained.

3.3 Dress Code

All teachers should be suitably attired for their role. Clothes should be neat and clean. Smart casual clothing is appropriate. When on duty, all Atlas staff should wear lanyards so they are readily identifiable to Atlas Junior students. Group leaders, other Atlas staff and employees of premises used by Atlas or any other relevant persons. Staff are asked not to expose their upper chest or midriff, and for clothing to be at least knee-length, and not tight and revealing

3.4 Pastoral Care

The SM is also the DSO (which includes responsibility for Child Welfare) and has overall responsibility for dealing with students' personal problems.

Students are told in the Code of Conduct and during induction that they should speak to their Group Leaders and/or Atlas staff if they have any problems. They are encouraged to report any abusive or unsettling behaviour, or any other difficulties or problems that they may have. With regard to personal problems, in school, students should first speak to their teacher and/or DSO/SM), or to the Deputy SO, who will report to the DSO/SM. On trips and excursions, students should speak to Activity Leaders. In the residence, students should speak to the staff responsible for supervising their residence or the School Manager. If a student wishes to discuss any aspect of their classes or lessons, they should speak to the DoS. All Atlas teachers have level 1 safeguarding training, and the DSP/SM has level 3 safeguarding training along with the Deputy SO

3.5 Student Feedback

Day One:

During the student welcome talk, students are told that they can report any problems with welfare to the DSO/SM or their Group Leader, who will take action to remedy the problem

End of Course Feedback

An electronic feedback form is sent relating to general well-being and contentment. The feedback is seen by the Director of Operations and SM, any issues will be dealt with in an appropriate manner, liaising with the group leaders, the student and any other relevant party.

3.6 Electronic Contact with Students Under the Age of 18

Staff must exercise the same discretion and maintain the same professional distance in any electronic contact with under 18 year olds as they would in normal day-to-day life. Electronic contact includes phone communications (including texting) and online environments. Broadly speaking, never engage in electronic communication with any students under the age of 18, in particular.

For safety reasons, for under 18s travelling independently, information will be passed to them via the school phone which is accessed by FOH staff and the SM. The students will also have access to the emergency phone number held by the SM.

Good Practice

- Never initiate electronic contact with a child;
- If a child contacts you electronically, keep your tone friendly, professional and neutral;
- Avoid situations that involve the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings;
- If a child seeks to develop an inappropriate personal relationship with you electronically, do nothing to encourage this; inform the DoS and send a copy of any relevant communications. Do not engage in electronic communication with a student;
- If a child confides sensitive information to you electronically, such as details of abuse, react as described in this policy. Record the details and send a copy of all relevant communications to the DSO/SM or Deputy SO;
- Do not initiate or accept ‘friendship’ requests from children, however innocent these requests might seem, on any forms of social media as this provides access to photos and other intimate details of each other’s personal lives;
- Do not establish or seek to establish social contact with under 18’s students during or after the course;
- Do not give personal email addresses or personal phone numbers to students under 18;
- Do not communicate via email, text, phone or social networking sites, blogs,

web pages or instant messaging services with under 18's;

- Do not post photos or videos of students under 18 on any social networking sites;
- Do not distribute (by any means) images or information about students of any age;
- Always avoid becoming personally involved in a student's personal affairs;
- Always be aware that personal web profiles can be viewed by anyone and therefore you should be especially cautious about public web profiles and privacy settings.

4. Child Protection

Atlas Language School meets its child protection responsibilities through a rigorous training programme on induction day providing understanding of what child abuse is and guiding the staff through how to deal with abuse if it occurs and to how to report it.

All incidents should be reported to the DSO/SM. If the DSO/SM is not available, then to the Deputy SO

4.1 Definition of Abuse

Child abuse in any form of physical, emotional, or sexual mistreatment or lack of care that leads to injury or harm.

Abusers may be an adult or adults, or another child or children.

An abused child is a girl or boy under the age of 18, who has suffered physical injury, neglect, emotional or sexual abuse.

There are four types of child abuse

(Adapted from ://https://thesafeguardingacademy.com/1245-2/)

1) Physical Abuse

Physical abuse 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 by fabricating the symptoms of, or deliberately inducing these in a child.

2) Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve telling a young person that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include deliberately silencing them or 'making fun' of what they say or how they communicate. It may occur when the young person is constantly criticised, given negative feedback, or expected to perform at levels that are above their capability. Bullying (including cyber-bullying) is also emotional abuse. All types of ill-treatment feature some level of emotional abuse.

3) Sexual Abuse

Sexual abuse involves forcing or encouraging a young person to take part in sexual activities, not necessarily involving violence, whether or not he/she is aware of what is happening. The activities may involve physical contact, or non-contact activities such as showing pornography to young people, or encouraging them to behave in sexually inappropriate ways. Sexual abuse is perpetrated by men and women.

4) Neglect

Neglect is 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. This may include failure to provide adequate food, clothing and shelter; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision (including the use of inadequate caregivers), or access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Neglect in sports or other physical activities could occur when a supervisor fails to keep the young person safe, or expose them to unnecessary risk of injury

4.2 Signs and Symptoms of Abuse

It is often very difficult to discern whether or not a child is being abused. It is not up to you to investigate, but to be vigilant. Some common signs of abuse are;

- inadequately explained or unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries;
- disclosure from a young person to you, another adult, or another young

person – the young person describes what appears to be an abusive act involving them;
- another young person or adult expresses concern about the welfare of a young person;

- unexplained changes in a young person's behaviour e.g. becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper; ● a young person seems frightened of, unwilling to approach someone ● inappropriate sexual awareness;
- engaging in sexually explicit behaviour.

4.3 Reporting

Important Contacts

If a child is at immediate risk, call the police on 999

Handling Allegations: The Duty to Report

All Atlas staff must acknowledge their responsibility to report any Child Protection issues to the DSP/SM or the relevant authorities. This must be done with both diligence and sensitivity. It is vital to report all suspected incidents of abuse in accordance with the procedures laid down in this document. Do not hesitate to report suspected incidents of abuse out of a sense of possible disloyalty to colleagues, or through fear of having exercised incorrect judgement. The protection of students under 18 is paramount and, as you have regular contact with those students, you play a crucial role in identifying circumstances and cases in which a student needs protection. Remember, if in doubt, report.

Why Should You Report?

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour;
- To prevent the problem worsening or widening;
- To protect or reduce risks to others;
- To prevent becoming implicated yourself.

If an Adult is Accused of Inappropriate Behaviour/Abuse

If an adult is accused of inappropriate behaviour/abuse, then said adult will be interviewed by both the DSO/SM and the DoS. The Directors of Atlas Language

School will be immediately informed and will make an immediate decision about whether any individual accused of abuse should be temporarily suspended further police and social services inquiries. Irrespective of those findings, Atlas will assess all individual cases to decide whether the member of staff can be reinstated and how this can be sensitively handled.

This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by the police. In such cases, Atlas will reach a decision based upon the available information which could suggest that on a balance of probability; it is more likely than not that the allegation is true. The welfare of the child should remain of paramount importance throughout

If a Child is Accused of Inappropriate Behaviour/Abuse

What are the warning signs?

Behaviours that may indicate increased risk include;

- regularly minimising, justifying or denying the impact of inappropriate behaviours on others;
- making others uncomfortable by consistently missing or ignoring social cues about others' personal or sexual limits and boundaries;
- preferring to spend time with younger children than their peers; ● insisting on physical contact with a child even when that child resists; ● responding sexually to typical gestures of friendliness or affection; ● reluctance to be alone with a particular child; becoming anxious when a particular child is nearby;
- offering alcohol/drugs, sexual material or inappropriate 'privileges' to younger children;
- linking sexuality and aggression in language or behaviour;
- engaging in sexually harassing behaviour online or in person; and forcing any sexual interaction;
- turning to younger or less powerful children to explore sexual curiosity; ● the inability to control inappropriate sexual behaviours involving another child after being told to stop;
- taking younger children to 'secret' places or hideaways to play;
- 'special' undressing or touching games;

The sign that a child is being sexually abused by another child would be the same as the signs as already discussed in this document.

What can we do to help prevent sexually harmful behaviour between children?

- Set and respect physical boundaries;
- Encourage children to respect themselves and others;
- Demonstrate to children that it is alright to say "no" and that they need to

accept “no” from others;

- Encourage children to speak up if someone acts in a way that makes them uncomfortable;
- Stay aware of how children are interacting with one another;
- Talk with children and listen to what they have to say;

- Set clear guidelines and keep a careful eye on children’s internet and video game use;

What Happens After Reporting?

- You should be given information on the nature of the progress of any enquiries;
- Your line manager (for Academic Staff, the DoS, for all the staff, the DSO/SM) has a responsibility to protect you from harassment or victimisation. If it is your line manager you suspect of a child protection issue, go directly to the School Manager. If you suspect the DSO/SM, an approach should be made to the management of Atlas Language School, Dublin, and/or the relevant authorities;
- No action will be taken against you if the concern proves to be unfounded and was raised in good faith;
- Malicious allegations may be considered a disciplinary offence;

Self-Reporting

There may be occasions when an employee has a personal difficulty, maybe a physical or mental problem, which they know to be impinging on their professional competence. Each staff member has a personal responsibility to discuss such a situation with their line manager so that professional and personal support can be offered to the member of staff concerned. Confidentiality cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of under 18’s.

4.4 Confidence on Handling a Disclosure from a Child – The 3 R's

(adapted from British Council website)

What should you do if a child comes to you and tells you that they are being abused? It's normal to feel overwhelmed and confused in this situation. Child abuse is a difficult subject that can be hard to accept and even harder to talk About. Persons under 18 who are abused are often threatened by the perpetrators to keep the abuse a secret. Thus, telling an adult takes a great amount of courage. Persons under 18 have to grapple with a lot of issues, including the fear that no one will believe them. So, care must be taken to remain calm and to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

1) Receive

Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and may shut down.

Accept what is being said without judgement. Take it seriously.

2) Reassure

Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously.

Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.

Tell the child that you will need to tell some people, but only those whose job it is to protect persons under 18

Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

3) React

Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions.

Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do

anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions.

Do ask open questions like "Is there anything else you would like to tell me?"

Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for persons under 18 with disabilities and for persons under 18 whose preferred language is not English.

Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to.

4) Record

As soon as possible after the child has confided in you, make some notes, if possible, writing some of the words the child used. These notes will help you when reporting the incident to the DSO/SM or relevant authority and may even be used as evidence at a later date.

5) Report

Report the incident to the DSO/SM as soon as possible, who will take things from there. If the child is in immediate danger, call the police on 999. The DSO/SM or DoS

will record the information in the official records online

4.5 Anti-Radicalisation Policy

Introduction

Atlas Language School is fully committed to the safeguarding of its students and to provide equal education opportunities for all. Safeguarding against radicalisation is as important as safeguarding against any other vulnerability.

All staff members will need to understand what radicalisation is and the importance of being vigilant against it. To do this, all staff will be given regular training and updates.

What is Radicalisation?

It is the act or process of causing someone to adopt radical positions on political, economic or social conditions. This can also be extended to habits in the mind. Extremism is seen as the holding of extreme political or religious views.

Behaviours to Look Out For:

- Possession of objects or symbols connected to an extreme cause
- Habits and behaviours become more centred on an extremist ideology, group or cause
- They try to recruit others to the cause
- A student is seen in the presence of suspected extremists
- Loss of interest in other friends and relatives not associated with the cause
- Using insulting derogatory names for other groups

Procedure

If a student is suspected of being radicalised, it must be reported to the DSO/SM as soon as possible. The parents/guardians will then be contacted to discuss the incident or evidence in more detail. A meeting will take place, and it will be noted in the safeguarding file. The safeguarding officer will follow-up in two to four weeks to see if there has been any changes in behaviour or attitude.

If there are then any serious concerns about potential radicalisation or extremism, the school will contact the police.

For more information see the PREVENT strategy:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachmentdata/file97976/prevent-strategy-review.pdf

4.6 FGM – Female Genital Mutilation

FGM is a form of child abuse. FGM is illegal in the UK yet is still practiced in certain cultures and religions. In the event that you have suspicions that FGM has taken please advise the DSO/SM who in turn will contact the government authorities who have a help-line dedicated to FGM that is anonymous and open 24/7 on 0800 028 3550

5. Staff

Atlas Language is committed to safer recruitment which includes not only Atlas staff but also the recruitment of Homestay and outside agencies. Group leaders will undergo correct checking by the agencies.

5.1 Safer Recruitment

To ensure safe recruitment our job descriptions in adverts or other materials state that:

- all references will be followed up during the recruitment process and prior to any offers of employment;
- all gaps in CV's must be explained satisfactorily prior to any offers of employment;
- proof of identity and qualifications will be required. As we recruit from a distance, scanned copies of all relevant certificates must be sent as part of the job application;
- Candidates will have to bring a valid form of identification (passport) and original degree and CELTA or equivalent certificates to the induction day to be checked and photocopied by the School Manager. If the School Manager is satisfied that the documents are legitimate, he/she signs and file the copy. The candidate cannot be put in any position of responsibility with children until the School Manager is sure of their identity and that they have met the minimum qualifications required.
- Reference requests will ask specifically whether there is any reason that the

candidate should not be engaged in situations where they have responsibility for, or substantial access to persons under 18.

- Evidence or disclosure of a criminal record will not necessarily result in a candidate not being appointed to a position. Naturally, the nature of the disclosure will be taken into account and if deemed irrelevant to dealing with young people, the candidate may well be successful if all other employment criteria are met. Such issues will be dealt with on a case-by-case basis
- No host family will be permitted to host under 18s unless full police checking has been returned
- The School Manager will have a single central record of all homestays who are permitted to have under 18's

The Interview

- During the interview the candidate will be asked about how they feel about working with under 18 year olds
- The candidate will be advised that they will be going through the Safeguarding policy in their induction

Suitability Checks: Disclosure and Barring Checks/Police Checks

- Appropriate suitability checks will be required prior to confirmation of employment: all prospective teaching staff and activities leaders are informed in the job advertisement and during the interview that references will be followed up and that the previous employers will be contacted. Candidates with enhanced checks issued within the last three years must show the

original document or provide their online reference number. Other candidates will be informed that their details will be sent for DBS checks.
- Group Leaders: our agents have been asked to confirm that Group Leaders have had suitability checks in their own countries. Confirmation of these checks from the agents is on file.
- Atlas only uses private bus companies whose drivers have had suitability checks.

Delayed Suitability Checks

In the event of the above mentioned persons not holding suitability checks at the time of the course due to delays:

1. They will not be allowed to spend time unsupervised with under-18 students, and when in the presence of under-18 students they must be accompanied by a member of staff who has undergone suitability checks.

2. They will not be allowed to sleep or use toilets, showering facilities or changing rooms in the same area as under-18 students
3. A Risk Assessment must be carried out on said persons in relation to the role they will take up with minors and will continuously monitor how the unchecked adult is being managed
4. For England and Wales citizens, a Barred List check will be carried out

These persons must also demonstrate that they are in the process of obtaining a suitability check.

Where Criminal Checks are Not Possible

Where for whatever reason, a criminal check is not possible, the candidate will not be employed.

5.2 Training

The Designated Safeguarding Officer (School Manager) has completed an Advanced Safeguarding (Level 3) course online.

The Deputy Safeguarding Officer (Front of House Officer) has completed an Advanced Safeguarding (Level 3) course online.

All members of the teaching staff are required to complete an online safeguarding course prior to staff induction day.

Each member of staff must also read and sign off on reading this safeguarding policy, the staff handbook and understand the staff code of conduct.

An electronic copy of this Safeguarding Policy will be sent to all staff. 22

5.3 Staff Management

Staff Induction

During the induction day all staff will be:

● informed of the fire safety procedures for all relevant premises; ● reminded of the relevant Code of Conduct and asked to sign an agreement to abide by the code;
● taken through the Atlas Safeguarding Policies and Procedures; ● required to provide evidence of having done the Level 1 online safeguarding course. This is paid for by Atlas and sent out to staff pre-course. Any staff that have not completed the course must do so before the students arrive; ● introduced to the relevant Risk Assessments and informed of procedures for acting in accordance with the preventative measures outlined in the Assessments.

5.4 Support for Staff

The Atlas Junior team operates through a collaborative approach, with the Director of Studies, School Manager, and Front of House staff all playing an active role in facilitating and supporting junior groups. These staff members work closely with teaching and operational teams to ensure the effective delivery of programmes and the welfare, supervision, and safeguarding of students at all times.

The Director of Studies is available for consultation from 8:30am daily, and the School Manager and Front of House team are available throughout the day to provide operational and safeguarding support as required. Clear communication channels are maintained, and staff are provided with direct contact details for key personnel to ensure timely advice, reporting, and response to any safeguarding or welfare concerns.

6. First Aid

The first aid kits are kept in reception on the second floor and by the fire exit on the third floor. It is the responsibility of the First Aid Officer to store and maintain the kit

The Designated Safeguarding Officer/SM and a member of FOH are trained in administering first aid and they, or another trained member of staff will be present at all times when students are in class, having lunch, or at supervised study in the college.

Trained members of staff must follow the procedures laid down in the Code of Conduct above for administering first aid.

Any time first aid is administered to a student it must be noted on an accident/incident form.

6.3 During Activities and Excursions

For Atlas activities and excursions, a trained first aider (An Activity Leader) is responsible for keeping and maintaining the first aid kit and for administering any necessary first aid. Staff take first aid kits to all activities and excursions. They must follow the procedures laid down in the Code of Conduct above for administering first aid. Any time first aid is administered to a student it must be noted on an accident/incident form.

Activity leaders must ensure that there is a first aid kit available during all activity and excursion sessions.

6.4 Local Medical facilities

The Atlas Language school in Liverpool is located close to the Royal hospital. Students and staff will be taken here in the case of an emergency or medical issue.

7. Accommodation/Other Practical Issues

7.1 Airport or Train Station Transfers

All groups or individual students are met at the airport or train station (organised in advance with the relevant agent) by an Atlas member of staff if transfers are booked.

Procedures for Transfers

Meeting the Group

The relevant staff member will;

- be at the airport 30 minutes before the group arrives, i.e. if the flight is due at 11.00am, they will be in the arrival hall at 10.30 am;
- once they see on the airport screens that the plane has landed, they will find a spot where the group can easily see them, and hold up the Atlas sign with the group's name on it as soon as people start coming out;
- give the group a warm welcome and introduce themselves;
- take them away from other arriving passengers while asking them how their flight was, if all students are together or if they are still waiting for somebody, if everybody has their luggage etc, and explain to them that you are all going to walk together to the bus.

- Call/message the bus driver and School Manager to say that they are with the group now.

Once on the Bus the Staff Member will

- Ask the students to leave their luggage so the bus driver can store everything on the bus while the group gets on the bus
- Take a register to make sure that everyone is present

Late Flight, Lost Bags and Non-Arrivals

If the flight is delayed or the group or students don't come out on time, the staff member will wait for 90 minutes after the flight arrives. There may be delays related to immigration, lost baggage etc.

After 90 minutes, call the School Manager to see how to proceed. The School Manager will contact Atlas headquarters in Dublin who will contact the agent or parents of the student and inform the School Manager how to proceed.

If there is lost baggage, the Atlas staff member will make sure the group leader or student has informed the airline company and given the correct address of the student and also ensure that they have been given a reference number.

On the Bus

The staff member will;

- Give the group leader/s or students (if accompanied) their welcome pack (if applicable)
- Sit down next to the group leaders or students (if possible) and chat to them, answering questions if they can. If the group leaders or students have any urgent questions, the staff member will call the School Manager on their behalf.

Arrival at the Residence

Upon arrival at the residence, the on-site service team will welcome the group, show them the facilities, their rooms and explain the accommodation rules along with emergency evacuation in case of fire.

7.2 Identifying Atlas Staff

All members of Atlas staff wear red Atlas lanyards with their name, role, and photo.

7.3 Identifying Atlas Students

Under 18 year old Atlas students must wear blue Atlas lanyards at all times, in the school, on trips, excursions and during activities.

Adult students do not wear lanyards. All students, adults and under 18s, have student cards.

7.4 Accommodation Rules

If students have any questions about or problems with their apartment during their stay, they should contact the School Manager.

Rules

- RESPECT all students and staff at all times;
- Students in their buildings at 10.30pm and in their own rooms with lights out and making no noise at 11.00pm;

- All students must sleep in their allocated room, and not move mattresses and bed linen to other rooms;
- All music, TV and games should be kept to a low volume. They should not be heard outside rooms;
- Always remember to take key cards with you when leaving. The door locks automatically when they close behind you;
- Do not open the door of the residence of your room door to anyone you don't know;
- Students MUST NOT leave the building without an Atlas staff member or group leader after lights out, except in the case of a fire alarm;
- Do not leave any clothes to dry on windows;
- Keep your room clean and tidy;
- Alcohol and/or smoking are prohibited for students inside the room or anywhere else;
- No guests from other host families or other flats in the residence are permitted in your room;
- Do not be late for class;
- Please speak to your School Manager if you have any problems or concerns;

7.5 Meals

Residential Students

Meals are provided according to the booking.

Special Dietary Requirements

During the registration process, students are asked to inform Atlas of any special dietary requirements, dislikes, or other food related issues such as vegetarianism, veganism, diabetes, coeliac, allergies or other intolerances. The School Manager and caterers are informed as appropriate.

7.6 Laundry Service

There is a launderette on site. It is available 24/7 and accessible with the key fob. Under 16s will not do their own laundry.

7.7 Contact with Parents and Legal Guardians or Nominated Representatives

Group leaders and the School Manager must have 24-hour contact numbers for two parents and guardians.

All Group Leaders and/or agents are provided with the School Manager's contact number, which can be used outside office hours.

7.9 Host Family Accommodation

All bedrooms and bathrooms must allow for privacy. All bathrooms must have locks.

The following handouts will be sent to all students and Homestays prior to the student arriving.

Advice for Host Family Accommodation

		GIVE YOUR MOBILE PHONE TO YOUR HOST FAMILY
		Always keep your student card with you
		Ask your host family where/when you can wash your clothes. They may offer to wash them for you or show you how to use the washing machine.

		In the UK we flush toilet paper down the toilet and do not have separate bins. Sanitary towels or tampons should be wrapped in toilet paper and put in the bathroom bin.
		If you're sick and cannot come to school, you must contact your Group Leader or ask your host to ring the school as soon as possible. It is important that someone knows where you are.

		Always switch off lights and heaters when you leave a room.
		Showers should be 5-10 minutes. Host families may also ask that you shower at particular times, based on the hot water supply.
		You should be home for all evening meals or let your host family know in advance if you will not be home for dinner. This means you must go home directly after your group activities.
		You should not use the kitchen without permission, nor help yourself to food or drink unless your host family gives you permission to do so.
		Keep your bedroom tidy.
		No takeaway food in bedrooms or in your host's house without their permission.
		Do not lose your key if you are given one - IF YOU DO, YOU WILL HAVE TO PAY FOR ANY COSTS

		Keep valuable items locked in your suitcase – ATLAS WILL NOT ACCEPT RESPONSIBILITY FOR LOST OR STOLEN

		ITEMS
		Do not make noise – especially after you go to bed or when you come in during the evening.
		If you would like to invite your friends to your host family's house, please ask your host first if this is okay.
		Never accept lifts from strangers or go anywhere with them. Go everywhere with a friend if you can.
		Do not carry a lot of money and do not show expensive items in public. Especially not in the city centre or in crowded places.
		NO FIGHTING OR BULLYING ANYWHERE OR AT ANY TIME.
		No smoking is allowed anywhere or at any time for students under the age of 16.

⚠		No alcohol is allowed anywhere or at any time, nor is illegal drug use.

8. Student Administration

8.1 Attendance Policy

The Atlas policy on student attendance and punctuality is made known to the teachers and activity leaders during the staff induction day and to group leaders and students during induction on their first day.

All absences, action taken, and outcomes are logged in the appropriate form.

Student Absences

Students are expected to attend all classes, be on time and participate in class. Attendance will be taken at the beginning of each lesson and will be combined for all classes. Being absent from school means a lost learning opportunity. Atlas Language School expects 100% attendance from students.

Authorised Absences

Absences can only be authorised by the school for legitimate reasons, which include the following:

- Illness
- Medical or dental appointments (wherever possible these should be arranged outside of school hours)
- Days of religious observance
- Exceptional family circumstances e.g. bereavement

In cases where a student cannot attend class due to illness, Atlas Language School will excuse the student's lack of attendance for that day. The student or the student's Group Leader should inform the Director of Studies before classes are due to begin, so alternative arrangements for supervision can be made, and appropriate action regarding the health and safety of the student can be taken.

If a student is absent due to illness for more than two days, he or she should attend a doctor and get a note.

In cases where a student cannot attend class due to visiting parents or guardians, at least 5 days' notice should be given to the School Manager. These parents or guardians must send an email with a request to take students out of lessons or activities and be accompanied by a digital version of their ID. Upon arrival at the campus, they will sign in, the School Manager will check their ID, and they will sign a waiver, taking responsibility for the student while outside of Atlas Language School's supervision.

In certain special circumstances, the School Manager may agree to grant a student emergency leave which is not directly connected to illness or injury such as bereavement. The student must demonstrate to the School Manager that the situation is a true emergency, and parents or guardians must contact the school to validate the situation.

The following absences will not be authorised by the school:

- Speaking on the phone
- Shopping
- Birthdays

Absence sheets must be kept up to date. If a student makes a level change, please ensure your attendance sheet is changed to reflect this and inform the Director of Studies if it has not already been changed.

Checking Attendance, Dealing with Absence or Latecomers

Students are told during induction to inform their Group Leader and FOH if they know they will be late or absent for a legitimate reason

The teacher/activity leader conducts a roll check at the start of each lesson/session. If after 15 minutes a student is absent, teachers/activity leaders must inform the Director of Studies in case of classes and the Activity Manager in the case of activities. Group leaders will then be contacted, and an attempt will be made to contact the student by phone or by knocking on their bedroom door. If the student cannot be reached and their health and safety may be at risk, the police should be informed.

If a student is absent from classes or activities without permission, they will be subject to the following disciplinary procedures:

1. They will receive a verbal warning from a member of staff
2. They will be interviewed by a senior member of staff. The Group Leader (if applicable) will be informed.

3. They will receive a written warning. A privilege will be removed such as missing an activity or excursion
4. The parents or guardians and/or agent will be informed

5. They will be expelled from the school and sent home. Any cost involved in early return will be the responsibility of the parent or guardian

8.2 Going to the Toilet

As the toilets are shared with persons over 18 possibly coming and going unchecked, people under 18 may be vulnerable when going to the bathroom. Therefore, if students go to the toilet, it is better to tell them to wait until the break, or, in extreme circumstances, they can go accompanied by another student.

Many students ask to go to the toilet as they want to go for a walk and play on their phones, so ask them to leave their phones in the classroom when they go to the toilet. Give them a time limit and monitor whether they have taken an excessively long amount of time.

8.3 Fire Safety Policy

A full fire safety policy is in the policies folder, but regular drills are held and fire marshals have been appointed – posters indicating who the fire marshals are can be found in the student's room. Fire risk assessments have been completed for both floors in the school building. Fire safety is covered in both the student and teacher induction.

8.3 Leisure Programme

Supervision ratios are 1:15 for all students

Other Leisure Time

Students will be allowed unsupervised time for activities such as shopping while on excursion. This is specified in the information given to agents and Group Leaders prior to the course.

During unsupervised periods students can:

- visit shops within a designated area
- sit or play in designated area near a designated meeting point either on or near Atlas premises or on excursions and trips

During unsupervised periods students cannot:

- remove Atlas lanyards
- engage in any illegal or anti-social behaviour, such as shoplifting, underage smoking or drinking, purchasing or consumption of illegal narcotics and/or engaging in aggressive or threatening behaviour
- encourage or pressurise another or other students to engage in any of the

above
- leave the designated area
- return to the residence without informing a Group Leader or member of Atlas staff

Procedures to ensure these rules are adhered to:

- A member of staff will be present at a designated meeting point throughout the unsupervised period
- Students wear Atlas lanyards at all time for identification purposes ● Periods of unsupervised leisure are brief, no more than an hour. If free time is longer than an hour, students must check in with Atlas staff at intervals of an hour at a designated meeting point

9. Teacher Absence

In the case of teacher absence, the Director of Studies will substitute for the absent teacher.

Teachers are informed during induction that they must contact the Director of Studies as early as possible prior to any expected absences so alternative arrangements can be made.

The Director of Studies will contact any teachers not in the school at least 15 minutes before class begins. If there is no contact with the teacher and they have still not arrived by the time class begins, the Director of Studies will substitute for the absent teacher, while the School Manager attempts to contact the teacher.

10 Making Rules Known to Students and Staff

10.1 Student Induction

All students are sent a copy of the Student Handbook and Atlas Junior Code of Conduct for students prior to the trip. The code has been translated into Spanish, French and Italian and is disseminated through the relevant agents in each country. Copies of the Code are pinned to the notice boards in each classroom.

10.2 Staff Induction

All staff are sent a copy of this Atlas Junior Safeguarding Policy and relevant staff handbooks at least two weeks prior to induction.

There is a full day staff induction prior to the first week of the Atlas Junior Programme.

Areas covered that relate to safeguarding include:

- The Director of Studies and School Manager check all original documents: identification degree, CELTA or equivalent certificate, DBS and/or police check certificate, then copies and signs the copies if satisfied that they are genuine, or contacts relevant body or organisation if not satisfied.

- An orientation tour of the Atlas premises, including the management office, teacher's room classrooms, computer room, sports and activity facilities, photocopiers, toilets, entrances, exits, the restaurant and the fire assembly point.
- Fire safety policy and procedures for the school premises
- A check that all staff have completed Level 1 Safeguarding online training course. If they haven't, they must do it before the students arrive ● A session on the Atlas Safeguarding Policy and Procedures. Teachers sign that they have read and agree to uphold the policy
- A session on the importance of reading and following preventative measures outlined in risk assessment for the college, afternoon and evening activities and excursions.

11. Missing Students

Procedures Following a Child reported Missing or Lost

- If a teacher or activities leader suspects that a child is missing from a lesson or activity, they will contact the School Manager immediately.
- The School Manager will try to call the student. The student's mobile should be left on (See Code of Conduct)
- If the student cannot be contacted, then a member of staff will make a thorough search of the building and/or site and immediate surroundings including storage areas and toilets.
- If the pupil is not found after this initial search, and/or approximately 20 minutes from the initial report of them deemed missing, the school office will inform the DSL who will be notified immediately and they will ensure that the parents have been informed by the responsible teacher.
- The Designated Safeguarding Officer will decide at which point the police will be called.
- All relevant emergency contacts for students will be used to inform parent/guardian(s) accordingly. However, until such time as the pupil is safely returned to the care of the parent/guardian(s), the Designated Safeguarding Officer remains responsible for the care and welfare of the pupil, including offsite.

- All incidents will be reported in the incident book. This Report must outline the steps being taken to avoid any repeat incident, communication with parents and actions to be taken following the risk assessment process to mitigate future risk.

6.5 Emergency Plan for Onsite and Offsite Major Incidents

The following is a definition of a major incident:

A major incident is any emergency that requires the implementation of special arrangements by one or more of the emergency services and will generally include the involvement, either directly or indirectly, of any large numbers of people

Atlas Language School has in place a policy for the following onsite and offsite major incidents

Introduction

1a Onsite Firearms Attack

1b Onsite Weapons Attack (Knives, Spears, Clubs or any other examples of dangerous weapons)

1c Onsite Bomb Incident

2a Offsite Firearms Attack

2b Offsite Weapons Attack (Knives, Spears, Clubs or any other examples of dangerous weapons)

2c Offsite Bomb Incident

For onsite major incidents, the emergency plans are derived