

Safeguarding Policy



1. Purpose

Lewis School of English is committed to safeguarding and promoting the welfare of all children and young people under the age of 18 and to responding appropriately to any child protection concern. Every child has the right to feel safe, to be listened to, and to be protected from harm regardless of age, sex, disability, race, religion or belief, sexual orientation, language, nationality, culture, family background or immigration status.

This policy explains how the School seeks to:

- safeguard students under 18
- recognise and respond to concerns about abuse, neglect or exploitation
- provide clear guidance on professional boundaries and safer practice
- support staff, hosts, group leaders and other adults working with under-18s
- ensure concerns are reported, recorded and managed properly
- provide safe arrangements for on-site, off-site, online and accommodation-based provision

This policy should be read alongside other linked policies and procedures, including online safeguarding, accommodation, lost student, attendance, discipline and staff conduct documents.

2. Scope

This policy applies to:

- all students under 18
- all staff, including permanent, temporary, casual and any agency staff
- any volunteers
- homestay hosts and adult members of host households where relevant
- group leaders
- activity leaders and residential staff
- contractors, visitors and third-party providers where relevant
- online teaching and digital communication
- all School sites, off-site activities, transport and accommodation arrangements

Organisations with more than one site may have one main safeguarding policy supported by site-specific arrangements. Lewis School of English will ensure that local contacts, reporting routes and procedures are clear for each centre and programme.

3. Definitions

3.1 Safeguarding

Safeguarding is the wider responsibility to protect children from maltreatment, prevent impairment of health or development, ensure they grow up in safe and effective care, and take action to enable the best outcomes.

3.2 Child protection

Child protection is part of safeguarding and refers to action taken to protect specific children who are suffering, or are likely to suffer, significant harm.

3.3 Child

For the purposes of this policy, a child is any person under the age of 18.

3.4 Low-level concern

A low-level concern is any concern, no matter how small, that an adult working with children may have acted in a way that is inconsistent with the staff or host code of conduct, even if it does not meet the threshold for referral to statutory agencies.

4. Safeguarding leadership and contacts

4.1 Designated Safeguarding Lead (DSL)

Name: Larissa Ribeiro
Job title: Academic Manager
Email: larissa@lewis-school.co.uk
Phone: +44 23 80228203

4.2 Deputy Designated Safeguarding Lead(s)

Name: Alistair Walker
Job title: Owner / Director
Email: alistair@lewis-school.co.uk
Phone: +44 23 80228203 / +44 7801 089301

4.3 Site-specific contacts

Southampton: As above
Winchester Off-Peak Centre: As above
Winchester Summer Centre 2026: details to be confirmed
Out-of-hours / emergency contact: Southampton +44 7517 426376, Winchester to be confirmed.

4.4 If the DSL is unavailable

Any safeguarding concern must be reported immediately to the Deputy DSL. If neither the DSL nor Deputy DSL is available, the concern must be reported to the most senior available manager. If there is immediate danger or risk of harm, staff must contact emergency services or children's social care without delay.

4.5 Conflict of interest

If a concern involves the DSL, owner, Managing Director or another senior leader, the matter must be escalated to an alternative senior contact and/or the Local Authority Designated Officer (LADO), so that the concern can be considered independently.

4.6 Useful contacts

LADO Southampton: 023 8083 2556 / LADO@southampton.gov.uk

Children's Social Care Southampton: 023 8083 3336

Emergency out-of-hours duty team: 023 8023 3344

NSPCC: 0207 825 2500 Helpline: 0808 800 5000 www.nspcc.org.uk

Childline: 0800 1111 www.childline.org

Samaritans: 08457 909090 www.samaritans.org.uk

Disclosure and Barring Service (DBS): www.gov.uk/db

Police emergency: 999

Police non-emergency: 101

5. Responsibilities

5.1 The DSL

The DSL is responsible for:

- leading safeguarding and child protection practice across the School
- receiving and assessing safeguarding concerns
- making referrals to children's social care, the police, the LADO or other agencies where appropriate
- keeping secure safeguarding and low-level concern records
- overseeing staff, host and group leader safeguarding awareness
- ensuring the policy is reviewed and implemented
- monitoring patterns and recurring concerns
- ensuring safeguarding arrangements are clear across all provision, including online learning and accommodation

5.2 Senior managers

Senior managers are responsible for:

- supporting the DSL
- making sure safeguarding procedures are followed
- ensuring centre-specific arrangements are clear
- supporting safer recruitment and supervision
- ensuring concerns are acted on promptly

5.3 All staff and adults covered by this policy

All staff, hosts, group leaders and other adults must:

- read and follow this policy
- maintain professional boundaries
- remain alert to possible signs of abuse, neglect or exploitation
- report concerns promptly
- record concerns factually and accurately
- report low-level concerns
- understand that safeguarding is everyone's responsibility

5.4 Students

Students under 18 should be told:

- who they can speak to if they are worried
- that they can speak to staff about their own safety or the safety of another student
- that they should report inappropriate behaviour, bullying, abuse or unsafe situations

6. Recognising abuse and harm

Abuse may be a single incident or a pattern of incidents. It may be caused by adults or by other children. Concerns may arise in person, online, in accommodation, during activities, in transport, or through a disclosure.

The four main categories of abuse are:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

Staff must also be aware of:

- bullying and cyberbullying
- peer-on-peer abuse
- sexual harassment and sexual violence
- child sexual exploitation
- criminal exploitation
- grooming
- trafficking

- radicalisation and extremism
- forced marriage
- female genital mutilation
- domestic abuse
- online abuse and image-based abuse
- serious self-harm or suicidal risk where this becomes a safeguarding matter

7. What to do if a child discloses abuse or if you have a concern

If a child discloses abuse, or if you have a concern:

1. Stay calm.
2. Listen carefully.
3. Take the child seriously.
4. Do not promise confidentiality.
5. Do not ask leading questions or investigate yourself.
6. Reassure the child that they have done the right thing by telling you.
7. Record the concern as soon as possible, using the child's own words where possible.
8. Report immediately to the DSL or Deputy DSL.
9. If the child is in immediate danger, contact emergency services without delay.

8. Recording concerns

All safeguarding concerns, disclosures, allegations, low-level concerns and relevant incidents must be recorded promptly, factually and securely.

Records should include:

- date, time and place
- who was present
- what was seen, heard or disclosed
- the exact words used where possible
- any visible injuries or significant behaviour
- actions taken
- who the concern was reported to
- any follow-up decisions

Examples of incidents that should be recorded include:

- a child making a disclosure
- a child appearing distressed or frightened
- an adult accidentally hurting a child
- a child appearing to misunderstand or be upset by an adult's behaviour
- a significant welfare or behaviour incident
- an accident or incident that requires parental notification
- any low-level concern about an adult's conduct

Records must be:

- stored securely
- access-restricted
- shared only on a need-to-know basis
- retained in line with safeguarding and data protection requirements

9. Low-level concerns

Lewis School of English recognises that low-level concerns may be early warning signs and should not be ignored.

Examples may include:

- over-familiar behaviour
- unnecessary one-to-one contact
- breaches of communication rules
- inappropriate jokes or language
- avoidable contact in private spaces
- taking unauthorised photos
- failure to follow safeguarding procedures

Low-level concerns must be reported to the DSL or, if they relate to the DSL, to an alternative senior manager. The School will record and review them and decide whether:

- no further action is needed
- advice or management action is required
- a formal safeguarding or disciplinary process is needed
- a referral to the LADO or another agency is appropriate

10. Allegations against staff, volunteers, hosts or other adults

Any allegation that an adult working with children has:

- behaved in a way that has harmed or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved in a way that indicates that they may pose a risk to children
must be treated seriously and reported immediately to the DSL or, where appropriate, directly to the LADO.

No member of staff should investigate an allegation themselves.

Where appropriate, the School will:

- consult the LADO promptly
- follow local safeguarding partnership procedures

- consider immediate protective action
- keep accurate records
- support the child and other affected parties appropriately

I 1. Allegations or harmful behaviour by another child

Safeguarding concerns can also involve one child harming another. This may include:

- bullying
- sexual harassment
- sexual violence
- coercion
- image-sharing
- intimidation
- physical violence
- online abuse

Such concerns must be:

- taken seriously
- recorded
- reported to the DSL
- risk-assessed promptly
- managed in a way that supports and protects all students involved

I 2. Behaviour and professional boundaries

All adults covered by this policy must maintain clear professional boundaries.

Adults must:

- act as appropriate role models
- treat children with dignity and respect
- communicate clearly and professionally
- use only approved communication channels
- avoid favouritism
- respect privacy and cultural sensitivity
- understand that they may be in a position of trust

Adults must not:

- use inappropriate, humiliating or sexualised language
- shout aggressively at, ridicule or humiliate a child
- engage in rough physical play or horseplay
- be alone with a child where this is avoidable
- enter bedrooms or private spaces without good reason and appropriate procedure
- share personal contact details

- meet students socially outside authorised arrangements
- engage in sexually suggestive behaviour or conversation
- show pornographic or otherwise inappropriate material
- make contact with children online or by phone outside authorised school arrangements
- take photographs or video recordings of children unless authorised by the School for an approved purpose
- keep, use or share such images for personal use or as keepsakes; authorised images must be sent to Head Office and deleted from personal devices after the programme or when no longer needed
- permit or encourage inappropriate behaviour by others

If personal care or support is required, this should normally take place only where another adult is aware of the situation or present where appropriate.

13. Photo, video and publicity use

Photographs or video recordings of students under 18 may only be taken where this has been authorised by the School for an approved purpose.

Any authorised images may only be used:

- for approved School purposes
- in line with parental or guardian consent
- in line with the School's publicity, safeguarding and data protection procedures

Authorised images must be shared with Head Office as required and deleted from personal devices after the programme or when no longer needed. They must not be kept, used or shared for personal purposes or as keepsakes.

Unauthorised photography, filming, screenshots, recording or storage of images is not permitted.

14. Mixed-age settings and age-appropriate arrangements

The School may teach or supervise students of different ages. Under-18s need clear safeguards when they are in mixed-age environments.

The School will:

- identify under-18s clearly in welfare and safeguarding systems
- set clear expectations for interaction between under-18s and adult students
- risk-assess mixed-age classes, social spaces, accommodation and activities
- set age-appropriate rules for social activities, free time and accommodation
- make sure under-18s know who to contact if they need help

15. Online safeguarding, digital communication and AI

Safeguarding applies online as well as offline.

Risks may include:

- cyberbullying
- grooming
- coercive contact
- harmful content
- image-sharing
- impersonation
- misuse of AI tools to create deceptive, harmful or sexualised content
- inappropriate adult–student communication

The School will:

- use approved platforms and accounts
- provide guidance on safe online behaviour
- restrict personal messaging between adults and under-18s
- respond to online concerns through normal safeguarding routes

15.1 Online learning procedures

For online junior courses, and for adult online provision involving under-18s where relevant:

- students and parents/guardians will receive clear information before the course begins
- online rules and reporting routes will be explained in the welcome information and first lesson
- parents/guardians will be informed of the arrangements
- display names, camera use and online conduct rules will be explained clearly
- recording, screenshots and sharing lesson content without permission are not allowed
- students must not share personal information unnecessarily online
- online safeguarding concerns must be reported through the DSL-led safeguarding route

Relevant staff teaching online will receive appropriate guidance and training in online safeguarding procedures.

16. Accommodation, transport and off-site activities

16.1 Accommodation

Where under-18s are placed in homestay or other accommodation, the School will:

- assess suitability and safeguarding arrangements
- provide hosts with safeguarding guidance
- set expectations on privacy, bedrooms, bathrooms, visitors, smoking, alcohol and supervision
- require concerns to be reported promptly

16.2 Transport

Where transport is arranged or recommended by the School, the School will:

- use suitable and appropriately checked providers where required
- provide clear guidance on collection, drop-off and supervision
- risk-assess airport transfers and off-site travel
- give students age-appropriate safety guidance

16.3 Trips and off-site activities

Risk assessment, supervision levels, meeting points, registers and emergency contacts must reflect the age, vulnerability and needs of students involved.

17. Safer recruitment, suitability checks and delayed checks

Lewis School of English is committed to safer recruitment and to preventing unsuitable people from working with children.

This includes, where relevant:

- identity checks
- reference checks
- right to work checks
- qualification checks
- role risk assessment
- DBS checks where the role is eligible

No adult may begin a role involving regulated activity with children until all legally required checks for that role are completed.

If a check is delayed in a role that does not involve regulated activity, the School will complete a written risk assessment before the person starts, and may permit work only where:

- there is appropriate supervision
- duties are restricted
- there is no unsupervised work with under-18s
- the arrangements are approved and monitored

17.1 Homestay host recruitment and training

Where the School recruits or approves homestay hosts for under-18s, the process will include:

- homestay application forms
- references
- homestay visits and suitability checks
- DBS checks where relevant
- online safeguarding training
- a homestay agreement
- homestay host guidance via an introductory guide and dedicated website

17.2 Group leaders

Where group leaders accompany under-18s, the School will require:

- confirmation that appropriate suitability checks have been completed
- relevant declarations or evidence where required
- briefing on safeguarding expectations and emergency procedures
- agreement to follow the School's safeguarding policy and rules

18. Training and induction

All relevant staff will receive safeguarding induction and regular updates appropriate to their role.

This may include:

- reading key policies
- recognising abuse and exploitation
- responding to disclosures
- reporting concerns and low-level concerns
- professional boundaries
- online safety and AI-related risks
- local procedures and emergency contacts

Relevant staff will normally receive safeguarding updates or refresher training at least annually. Staff may be asked to confirm that they have read and understood the School's safeguarding documents.

DSLs and Deputy DSLs must receive appropriate training for their role.

Hosts, group leaders and staff involved in online delivery should also receive safeguarding information relevant to their specific role.

19. Specific safeguarding issues

19.1 Female genital mutilation

Staff must be aware that FGM is a safeguarding issue. Relevant professionals must follow applicable reporting duties where required by law.

19.2 Radicalisation and extremism

Concerns that a child may be vulnerable to radicalisation must be treated as safeguarding concerns and reported to the DSL immediately.

19.3 Child sexual exploitation and criminal exploitation

Staff must remain alert to coercion, secrecy, controlling relationships, missing episodes, inappropriate online contact and other warning signs.

19.4 Missing students

A missing student is a safeguarding concern and must be managed under the School's lost student and emergency procedures.

19.5 English Plus / work placement

Where the School offers English Plus or placement-based provision, it retains a duty of care and must consider the safeguarding arrangements of partner organisations.

20. Confidentiality, information sharing and data protection

Safeguarding information will be handled sensitively, lawfully and on a need-to-know basis.

Staff must not promise confidentiality to a child where a safeguarding concern exists.

Personal information will be handled in line with the Privacy Policy for Students and, where relevant, the Data Protection Breach Response Policy.

Data protection does not prevent the sharing of information where necessary to protect a child. The School will handle safeguarding information in line with its safeguarding duties and data protection procedures.

21. Whistleblowing

All staff and adults covered by this policy must report concerns about unsafe practice, misconduct or breaches of professional boundaries by colleagues or other adults.

Anyone who raises a genuine concern in good faith will be supported and will not be penalised for doing so.

Students, parents, guardians, hosts and group leaders can raise concerns through the School's safeguarding and complaints routes. Full School policies and procedures are available at: <https://lewis-school.co.uk/school-policies/>

22. Linked documents

This policy should be read alongside:

Safeguarding and incident forms
Lost Student Policy – On-Site
Lost Student Policy – Off-Site
Attendance & Lateness Policies – Junior / Adult
Discipline Policies – Junior / Adult
Under-18s in Adult School Policy
Emergency Action Plan
Homestay website (Lewis Hosts' Hub)
Group Leader Handbook and forms
Relevant student and staff handbooks
Online Safeguarding Risk Assessment
Online Courses Welcome Booklet - Juniors
Privacy Policy for Students
Data Protection Breach Response Policy

Full School policies are available at: <https://lewis-school.co.uk/school-policies/>

23. Review

This policy will be reviewed:

- annually
- after any significant safeguarding incident
- after relevant legal or regulatory changes
- whenever linked policies are materially revised

Version: SP-0326

Policy owner: Larissa Ribeiro, Academic Manager / Designated Safeguarding Lead

Approved by: Alistair Walker, Director / Deputy Designated Safeguarding Lead

Date approved: 29 March 2026

Last reviewed: 29 March 2026

Next review date: 1 March 2027