

LiA POLICIES

You can find all our policies on our website at the following link: [LiA Policies](#)

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Language in Action

Safeguarding & Child Protection Policy

1. INTRODUCTION

1.1 STATEMENT OF INTENT

A person under 18 years old is designated a child by English law. It is the legal responsibility of the school to protect under 18 students from abuse and to report any suspicions or allegations of abuse. This safeguarding legislation is set out in [The Children Act \(1989\) and \(2004\)](#), and [Safeguarding Vulnerable Groups Act 2006](#). The DfE guidance 'Keeping Children Safe in Education' (re-issued in September 2016) and the Counter-Terrorism and Security Act (2015) also inform this policy.

Language in Action, part of Malvern International, is committed to ensuring that all students, and in particular those under 18, are able to study in a safe and secure environment.

Safeguarding is the company's general duty of care towards all under 18 students, acting 'as a caring parent would'. This extends to all members of staff and adults in contact with under 18s through their role with the organisation, including group leaders, all of whom are issued with this policy and asked to familiarise themselves with it.

All staff receive training relevant to the role and are made aware of the roles of the Designated Safeguarding Lead (DSL) and who holds this role within the organization: Emiliano Sallustri (Director).

Child protection involves protection from abuse, which includes neglect, physical, emotional and sexual abuse.

Language in Action works with closed groups of high school students. This year, the maximum age has been raised to 21, as students who were supposed to join junior centres through Italian government schemes in 2020 and 2021 and couldn't participate due to pandemic, will be given the possibility to join the programme even though they are no longer in high school.

Students will be divided in classrooms as follow: 12 to 16 years old groups; 14 to 17 years old groups; 16 years old and over can join adult classrooms at Malvern House London with limited supervision by LiA staff depending on the programme.

18+ years old from Italian scheme enrolled in LiA programmes are not allowed to be placed in classes and flats with any student aged under the age of 16, this only occurs in exceptional circumstances, i.e. a closed group of classmates coming over from the same school group where some students turn 18 during their stay.

1.2 AIMS

- To provide clear policies and procedures for all aspects of the student's stay in Language in Action centres, including accommodation and all off-site activities.
- To ensure that all staff and adults who come into contact with our students are familiar with our Safeguarding and Child Protection Policy, which includes our Code of Conduct and reporting procedures.



- To ensure that all students under 18 and their parents are aware of our policies and the various support services available to them.
- To ensure that all staff who come into regular unsupervised contact with students under 18, including administrative support staff, are checked for their suitability through the DBS (Disclosure and Barring Service) and receive an appropriate level of safeguarding training.
- To have clear procedures for monitoring the welfare of under-18 students, as well as for acting upon any problems which arise involving such students.
- To set boundaries and expectations to protect staff and all adults who come into contact with our students from any behaviour or actions which might be misconstrued.
- To have clear administrative procedures with secure confidential record-keeping and to review and update this policy regularly and at least once a year.
- This policy sets out the entitlement to protection for all under 18 students, regardless of colour, race, nationality, ethnic or national origin, sex, marital status, religion, sexual orientation, disability or other difference.
- Though this policy is specifically designed for the needs of under 18 students, some of the content will be relevant to over-18 students, who may be classed as vulnerable adults if their level of English is low.
- See also Language in Action Prevent Policy for details of policies and procedures to safeguard students of all ages against radicalisation and extremism.

1.3 CODE OF CONDUCT

All adults who have contact through our organisation with students under the age of 18 are expected to:

- Treat all under-18s with dignity and respect, regardless of ethnicity, race, religion, sex or sexual orientation.
- Be aware that an under-18 student is a child by UK law and that the adult who has contact with them is in a position of trust.
- Behave as a 'caring parent' would towards the student. Under 18s vary in maturity and emotional development and may be vulnerable to abuse.
- Be receptive and open to what students may relate and deal with any concerns promptly, following Language in Action procedures.
- Provide an excellent role model of behaviour to students at all times and be mindful of the impact of your behaviour on under-18s, who may be easily influenced.
- Language used should be appropriate and clothing should be modest. Avoid smoking in front of under-18s and do not encourage the use of non-prescription drugs and drinking alcohol.
- Avoid at all times any inappropriate physical contact or touching and flirtatious behaviour, which could be misconstrued.
- Be friendly and supportive but maintain an appropriate 'distance' – do not seek or encourage friendship with an under-18 student.



- It is a criminal offence under the Sexual Offences Act 2003 for any adult in a position of trust to engage in any sexual activity with an under 18 student.
- Limit your use of mobile phones, social networking and other forms of digital/electronic contact to class or social programme use. Staff members should not give out personal numbers or contact details. Personal friendships on Facebook and other social networks between adults and under-18s are not appropriate.
- Avoid being alone with an under-18 student, especially in an enclosed space. If possible, have another adult or member of staff present, but if unavoidable, let other adults know about any meetings and leave the door open.
 - The privacy of children should be respected at all times. This requires particular care in residential accommodation, where adults should not enter the sleeping, bathroom, shower or toilet areas when children are undressing or using the facilities.
 - Do not encourage extremist views or behaviour and report any that are observed to a senior member of staff.
 - Report any concerns about any under-18 student to the Welfare Officer of your centre who will escalate to the DSL (the Director) who will investigate and deal with the matter according to our procedures.
 - In cases of suspected child abuse, this must be reported to the Welfare Officer of your centre who will escalate to the DSL (the Director) who will investigate the allegation and contact the appropriate authorities if applicable.
 - All centre management staff is required to attend weekly safeguarding meetings with summer centre staff and bi-weekly meetings with DSL or Deputy DSLs.

2. ADMINISTRATIVE PROCEDURES

2.1 DESIGNATED PERSONS AND STAFF TRAINING

- Deputy safeguarding leads. There is a minimum of two designated Deputy DLS to cover for absence of DSL (Director). Each summer centre has a Welfare Officer responsible for internal safeguarding and welfare of students, whose name is displayed prominently in the centre and on relevant documentation. Each summer centre has also at least one Level 2 safeguarding Officer to cover for absence of WO.
- The role played by CPOs is of Designated Safeguarding Person, a broader umbrella term, covering all areas of looking after under 18s. However, the title Child Protection Officer is used instead, to ensure clarity for all whose first language is not English.
- The Director is the Designated Safeguarding Lead (DSL) and has overall responsibility for the implementation of the Safeguarding and Child Protection Policy.
- All Language in Action staff who have any contact with students should receive Level 1 safeguarding training as part of the induction process, to ensure an understanding of our policies and procedures.
- DSL and Deputy DSLs are trained at Level 3. Though the DSL cannot delegate overall responsibility, at least two other senior members of staff are trained to Level 3 to provide cover for the DSL during absences. Welfare Officers in each centre are also trained at Level 3.



- Residences, homestay providers, classroom providers, agency group leaders, airport transfer companies coming into contact with our under-18 students will also receive a copy of our Safeguarding and Child Protection Policy, with particular reference to the code of conduct.
- 'Refresher' training at Level 3 for all CPOs should be carried out at least every two years.
- CPOs should keep abreast of current knowledge on safeguarding with regular updates of information from websites and other sources.

All training must now include: from 2015: Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), Whistle-blowing - legal obligation on staff to report, preventing radicalisation. From 2016: Peer-on-peer abuse (especially bullying/gender issues), so called 'Honour based' violence, individual to report FGM to police direct (as well as to DS), increased vulnerability of pupils with SEND (Special Educational Needs and Disability).

2.2 RECRUITMENT / HR & DBS CHECKS

2.2.1 Recruitment Process

- Staff recruitment advertisements must include reference to Language in Action's commitment to safeguarding.
- Candidates are required to fill an application form, where they are asked to provide name, contact telephone number and email address of two referees. They are also invited to provide details of any gaps in their employment history, to self-disclose relevant criminal convictions and to declare that contents of form are true.
- Candidates are also informed in the 'Invitation to interview' that
 1. suitability checks will be required
 2. any gaps in their CVs will be investigated during the interview
 3. references will be followed up. Referees will be asked specifically if they have any concerns with regard to the applicant working with under 18s
 4. proof of identity & original qualification certificates will also be required.
- At the interview, an open and measured discussion takes place about any offences or other matter that might be relevant to the position. Candidates are also informed that they will be required to sign a 'Suitability to work with Children declaration' and to complete an application for a DBS/police check.
- Upon successful interview, two references should be obtained using the Language in Action Reference Request form, which includes a question regarding suitability to work with under- 18s.
- Written references should be verified with a follow-up, which must be recorded on the induction check list.
- Employment offers must state that they are subject to receipt of satisfactory references and a satisfactory DBS/police check.

2.2.2 DBS Checks

- Before starting work, new employees must be given an application form to complete for an enhanced DBS check for children, unless they subscribe to the DBS online update service. The completed form must be returned, and the online application made within one week.



- If the new employee is registered with the online update service, they should be asked for their ID and for written permission to access this. The designated person/s within the management team should then complete the check and the results should be recorded in the central register. If their status has changed, a new check must be carried out.
- Existing DBS checks can be accepted while waiting for the results of a new check to come through BUT only if: a) it is an enhanced check b) it is not more than 3 years old c) there are no other causes for concern. This also applies to existing staff members who have a break of 3 months or more.
- All permanent staff living in the UK should be encouraged to register for the update service. This must be done either when the application is made, or within 30 days of issue of the certificate.
- Appropriate local police checks will be required from applicants living overseas. If applicants lived for more than 3 months in different countries within the previous 5 years, they will be required to provide a police check from each different Police country Department.
- Key members of staff from Agency partners are asked to sign a Declaration to state their staff have undergone checks to work with underage students. Agency group leaders (and other agency staff members) must receive a copy of the Safeguarding and Child Protection policy and being inducted on it upon arrival. They are also asked to read and sign the Code of Conduct and a suitability to work with children self-declaration.
- A register of staff DBS checks (Staff Central Records) is kept on the Language in Action Teams dedicated folder which is updated by the management team. Management team must see original certificates, take copies, which must then be signed, dated, scanned and stored in a digital folder.
- The results of the check will be forwarded to the Malvern group HR manager, who will review any negative results with the Director. If the results give any cause for concern whatsoever, the contract will be terminated.
- Further DBS checks should be carried out on existing staff whenever there is a cause for concern, using the online updating service if possible.

What to do if the DBS has not arrived by employees start work

No one should be allowed to start work before the DBS disclosure is received. The practice of awaiting a DBS disclosure is sometimes difficult to implement fully due to the practicalities on the ground of having to ensure minimum staffing levels at all times.

Therefore, new staff will only commence employment before receipt of a clear DBS check in exceptional circumstances, which must be risk assessed, authorised by a senior manager and recorded in the DBS log.

The member of staff must have two valid references clearly stating their suitability to work with under 18s. All candidate references are followed up, asking specifically whether there is any reason that they should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18.

The member of staff has completed a Suitability to Work with children declaration form before commencing employment

The member of staff has successfully completed all other aspects of the recruitment process subject to our safer recruitment policy

While awaiting the results of the DBS check, special measures are in place to limit related risks with clear risk assessment for each individual case.

These specific measures are to be used only in exceptional circumstances when the delivery of services will be affected and all other alternatives have been considered and exhausted.



What to do if the disclosure comes back with a criminal record

Where the DBS check discloses a criminal record, an assessment to decide the relevance of the criminal record and suitability of the individual to carry out the duties of the post will be made. To reach a fair and balanced decision this assessment will involve an evaluation of the associated risks. Protection of the applicant's rights and interests must be weighed against the rights and interests of young learners, including LIA's duties and responsibilities towards the same. The same process also applies to Homestay hosts who have a criminal record.

See our Policy statement on the recruitment of an ex-offender.

2.2.2 General HR

All staff must be informed about the school's Safeguarding & Child Protection Policy by a member of the management team during their induction.

- The Safeguarding & Child Protection Policy is displayed in the staffroom and is also accessible to all staff via shared drives.
- Any member of staff who has concerns or suspicions with regards to a colleague's behaviour towards underage students is obliged to inform a senior member of staff. All such incidents will be investigated.

2.3 STUDENT ENROLMENT

- Language in Action does not normally accept students under the age of 12 years old if part of a closed group, and below 14 years old if individual (not part of a closed group).
- Language in Action does not accept students not coming from agencies.
- Students can be so divided in classrooms: 12 to 16 years old groups; 14 to 17 years old groups; 16 years old and over may join adult classrooms with limited supervision by LiA staff depending on the programme chosen.
- 18 to 20 years old students can be part of groups composed by underaged students if part of high school programs in their own countries
- Language in Action works with Agencies who carry out enrolment, cancellation and refund procedures with students' groups or individuals directly and consistently with LiA Students Terms & Conditions, Agents Terms & Conditions and Refund policies, which are available on the Language in Action website.
- LiA sends Student Forms to agents to be completed by parents prior to students' arrival (with special attention to complete emergency contact details and parents' contact details). In case of inaccurate information, agents are promptly asked to solicit parents to fill all the mandatory blanks.
- Student Forms are stored in LiA dedicated folders and accessible to Centre Management and Head Office staff remotely.
- The 'Student Form' contains student personal information (including next of Kin Level of English and emergency contact) information on allergies and medical conditions, as well as parental Consent.



2.4 ACCOMMODATION

- Irrespective of the type of accommodation, unless specifically by the written request of the parent/guardian of the children concerned under no circumstances will a child be placed in the same room as an adult. Children sharing a flat / corridor will be of the same gender. This applies to all our types of accommodation.
- A responsible adult is required to be present overnight at host homes/residences and will normally be present but always contactable when children under 16 are at home.
- Curfew time for Under 18's is 11 pm Friday and Saturday and 10.30 pm all other days of the week. Under 16s must remain at their homestay or residence once they have returned from any activity, excursion, or class, unless accompanied by an authorised group leader. This information is included on the parental consent form
- LIA requires that underaged students who are not part of a group must book a half or full board meal plan, regardless the accommodation required.
- LIA must have written assurances from its professional accommodation partners that they have clear policies for students under 18 and are responsible for screening their staff, including DBS checks, where appropriate
- Homestays should also be informed via agencies of LIA rules for curfew and should contact the agency who will contact the LIA staff in charge for that student pastoral care (Centre Management, Head Office) if the student arrives home late.
- Host families/Residences should ensure that any adult visitors should not be left alone with under 18 students at any time.
- Individual students aged 16 and 17 years old who have enrolled on adult courses are expected to travel independently between the school and residence, as stipulated on the LIA Parental Consent Form
- For all visa national students, homestay accommodation for students under 18 must be pre-booked and confirmation sent to the student for submission with their visa application.

2.5 AIRPORT TRANSFER

- Individual students under 18yo who book with Language in Action are strongly recommended to use Language in Action's airport transfer service. Concerning groups, the agent's accompanying leaders can be exclusively in charge for the students' transfers if as part of the agreements between agents and parents/guardians – LIA will be anyway informed of all the transfer details and procedures.
- Language in Action requires from its airport transfer partners that their drivers are DBS checked, or a member of LiA staff will accompany the student/group.
- Students under 18 will be flagged on the airport transfer booking form so that drivers are aware of their age. The driver will wait for the student for 2 hours. If the under 18 student does not come through, the driver will check with the Immigration Authorities to see whether they are being held. If that is the case, the driver will call the school to seek advice on what to do next.
- If the driver has to stay for longer than 2 hours, the student will bear the additional cost (as stated in the Terms and Conditions).



3. SAFETY MEASURES/DEALING WITH STUDENTS/CONTACT WITH STUDENTS

3.1 GENERAL MONITORING AND WELFARE

- Welfare Officers with appropriate training are responsible for enforcing this policy in the centre. They are also the first point of contact for any concerns relating to students under 18.
- Students under 18 will be informed about the school's Safeguarding and Child Protection Policy during their first day induction, and will be given a digital copy of it in their Student Induction pack. Centre staff carrying out the induction should stress the importance of maintaining up-to-date contact information.
- Students under 18 are encouraged to speak to any member of staff anytime they have issues or doubts. They are also offered weekly time slots to do so. All staff constantly ask for feedbacks from students' agency group leaders and monitor students to ensure that they are settling in well and to 'nip in the bud' any problems that they may be experiencing.
- Centre management staff must make every effort to ensure that the contact information of the student is completed and is up to date, including full contact details of their accommodation, their agent and family.
- Teachers and Activity Leaders, who are usually the first line of contact with students, should be vigilant for any problems or issues which may be affecting them and report them promptly. Students' ages are recorded on class registers and teachers should be informed of this at induction.
- All staff should be vigilant at all times and report any concerns about students or other members of staff to the Welfare Officer of the centre.

3.2 TEACHING

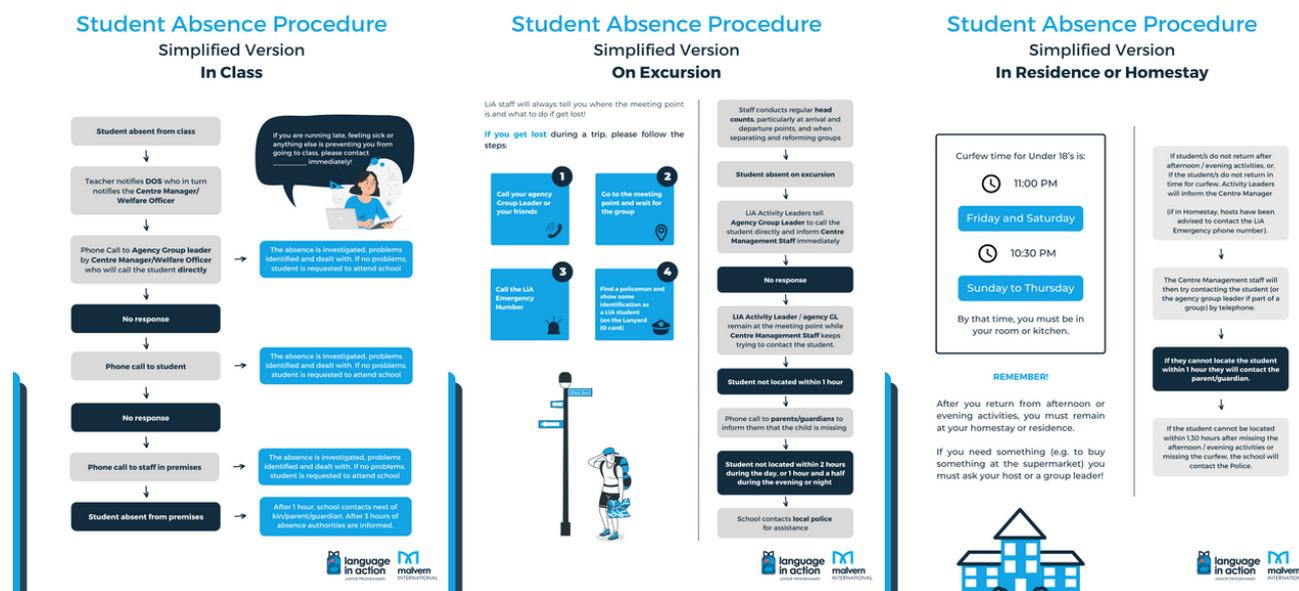
- At induction, teachers are requested to read the Safeguarding & Child Protection Policy, which is posted in the staff room. If a teacher suspects that there is a problem, s/he should inform the Director of Studies immediately, who will then report it to a CPO.
- Teachers should be mindful that they may need to adapt some of their teaching material if it is inappropriate for students under 18 and should endeavour to set a good example to their students (see Code of Conduct above).
- Where possible, tutorials with individual students under 18 should take place in a public area or if in a room, with the door open.
- Private meetings between staff and students under 18 outside the normal teaching environment are strongly discouraged. Where such meetings cannot be avoided, teachers should inform another staff member that they are taking place.
- Intimate or sexual relationships between staff and students under 18 are an abuse of trust which may constitute a criminal offence and will lead to dismissal.

3. SAFETY MEASURES/DEALING WITH STUDENTS/CONTACT WITH STUDENTS

3.3 MISSING/ABSENT STUDENT

In case of an underage student being absent or missing from class/excursions/accommodation, the following procedure will be adhered to:

(NB. If the student is part of a group, please contact the group leader directly, rather than the student)



3.4 SOCIAL ACTIVITIES, ALCOHOL AND TOBACCO

- All social activities are carefully planned and organised to be suitable to the age of all students involved.
- Staff accompanying social activities should not give out their personal phone numbers but should use the Language in Action emergency mobile phone.
- Supervision ratios of staff (including agency group leaders) to students should follow as a minimum DfE guidelines of 1:15/20 for ages 12+. More staff should be provided if necessary, taking into consideration the level of risk as identified in the risk assessment of the activity. There should be enough supervisors to deal with an emergency.
- Under-18 students cannot participate in activities held on premises or public places (other than restaurants), where alcohol is sold or served, such as pubs, bars or clubs.
- It is against the law for anyone under 18 to buy alcohol in a pub, off-licence, supermarket, or other outlet, or for anyone to buy alcohol for someone under 18 to consume in a pub or a public place. The use or storage of illicit substances on LIA-rented premises is strictly prohibited and will result in immediate removal from campus and the prospect of referral to law-enforcement agencies.



- It is against the law to sell or give drugs and tobacco products to under 18s. In the UK it is illegal to smoke in any enclosed workplace, public building or on public transport.
- All students are informed of the laws and school policies on alcohol and tobacco products during their first-day induction.
- Curfew time for Under 18's is 11 pm Friday and Saturday and 10.30 pm all other days of the week. Under 16 must remain at their homestay or residence once they have returned in the evening, unless accompanied by a group leader.
- LIA activities and excursions programme is modelled to be suitable for underaged students in terms of contents and procedures. Even in case of 18+ students' participation, they must comply with the underaged students regulations that will be applied for the whole group anyway, regardless the age of each participant.

LIA can organise activities and excursions addressed exclusively to students aged 18+ but they will take place separately from all underage students.

3.5 E-SAFETY

The majority of students within the school are under 18 and therefore the following measures are put into place:

1. Students are not allowed to use computers on main premises. In exceptional cases, adult supervision is required to protect children from viewing inappropriate material.
2. Careful monitoring to ensure there is no use of phones in class, in accordance with the class rules for all students, including under 18s.
3. Informal monitoring during break times or social activities when students are using their own tablets, phones and computers.
4. Encouraging teachers, especially those of closed group under 18 classes, to discuss e-safety issues in class.

3.6 EXTREMISM AND RADICALISATION

Language in Action, part of Malvern International forms a multicultural community which promotes the core British values of tolerance, understanding and respect between all students and staff, regardless of background. Staff receive training on this and there is a comprehensive anti-radicalisation and extremism (Prevent) policy. While any of our students may be vulnerable to exploitation by extremists of any nature, under-18s are particularly at risk due to their age and inexperience. All staff should be especially vigilant when overseeing under-18s in this respect and should report any concerns directly to the Welfare Officer. See also Anti-radicalisation (Prevent) policy for further details.



4. CHILD ABUSE

4.1 DEFINITION OF CHILD ABUSE

Child abuse is any action which causes significant harm to a child and includes neglect, physical, emotional and sexual abuse. FGM (female genital mutilation) and CSE (child sexual exploitation) incorporate various forms of abuse. All forms of abuse may cause serious and long-lasting physical and emotional harm to a child, which affects their development and well-being. Staff receive training in what constitutes abuse and how to recognise it. Staff should remain vigilant even if they expect the likelihood of abuse in the school to be low.

4.2 RECOGNISING CHILD ABUSE

It is important to recognise signs of abuse, which may vary with age of the child. Not every child will exhibit every symptom. As well as signs, children may tell you of abuse, so adults should be receptive to this.

4.3 SEXUAL ABUSE

Sexual abuse is forcing or enticing a young person to take part in sexual activities, which can happen in person and also over the internet, so the abuser might be in a different country to the victim. Even if a child is happy with the attention and willing, it is still sexual abuse if s/he is underage. There is a high incidence of teen abuse of other teens; befriending/loving a needy friend, then turning on them. Signs of abuse may include:

- Acting in an inappropriate sexual way with objects or peers
- Nightmares, sleeping problems
- Becoming withdrawn or clingy
- Personality changes, seeming insecure
- Unaccountable fear/dread of particular places or people
- Changes in eating habits
- Physical signs such as unexplained soreness around genitals, sexually transmitted diseases
- Becoming secretive

4.4 EMOTIONAL ABUSE

Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development.

Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. Children who are emotionally abused are usually suffering another type of abuse or neglect at the same time, but this isn't always the case.

It is often persistent, for example in bullying and can be compounded by abuser making children wary of authority/other adults trying to help them.

Signs may include:

- Delayed physical or emotional development
- Shows extremes of passivity or aggression, often switching erratically between them
- Sudden speech disorders
- Overreaction to mistakes, or continual self-depreciation
- Neurotic behaviour (rocking, hair twisting, self-mutilation)



4.5 PHYSICAL ABUSE

Physical abuse is deliberately causing physical harm to a child, through any means including punching, hitting, kicking, burning, shaking etc.

MSP (Munchhausen Syndrome by Proxy), the abuse of another person, typically a child, to seek attention/sympathy for the abuser; creating symptoms for the victim to obtain repeated medical care.

Signs may include:

- Has unexplained bruises, burns, etc.
- Bruising - look for symmetry (2 black eyes/bruising on both shoulders) as a sign of abuse
- Burns or scalds that have a clear edge are usually caused deliberately not accidentally
- Finger marks need to be checked; does the story fit/sound plausible?
- Wearing clothes to cover injuries, even in hot weather.
- Refusal to undress for sports, or join swimming sessions.

4.6 NEGLECT

Neglect is the ongoing failure to meet a child's basic needs and is the most common form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. Neglect can happen in all levels of society (e.g., leaving children unattended is neglect)

Signs of neglect may include:

- Often hungry; may beg or steal food.
- Badly dressed in clothes that need washing
- Poor appearance and personal hygiene; unwashed, hair not brushed
- Lacks needed medical or dental care
- Often tired
- Might abuse alcohol or other drugs

4.7 CONTROLLING, COERCIVE, AND THREATENING BEHAVIOURS

Often seen in teenage abusive relationships where one partner dominates the other in a range of ways, e.g., forced sexual activity, repeated insults and put downs, stopping partner from seeing friends/family, checking on partner all the time (texts/social media etc.), using physical violence, taking money, forcing partner to work, controlling what partner wears.

The dominant partner makes the other feel subordinate and deprives them of ways to be independent. They may use threats, humiliation and intimidation to harm and punish their victim. These behaviours are often also evident in 'honour' based violence, female genital mutilation (FGM) and forced marriage.



4.8 FGM (FEMALE GENITAL MUTILATION)

FGM includes procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The procedure has no health benefits for girls and women and can cause severe and lasting physical and mental harm. It is illegal in the UK. FGM is a cultural procedure which affects predominantly communities of African origin. It is also practiced in some Middle Eastern and Asian communities. It is mainly carried out on girls between infancy and age 15.

Signs may include:

- difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- unusual behaviour after a lengthy absence
- reluctance to undergo normal medical examinations
- asking for help, but may not be explicit about the problem due to embarrassment or fear.

4.9 CSE (CHILD SEXUAL EXPLOITATION)

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection in return for engaging in sexual activities with the abuser(s).

Any young person may be at risk regardless of gender, ethnicity, sexuality, religion, or background. Likewise, the offenders do not fall into a particular pattern, but are more likely to be male than female – offenders may also form part of a gang that seeks to gain from the exploitation of children. Some children are "groomed" through "boyfriends" who then force the child or young person into having sex with friends or associates.

Signs may include:

- going missing for periods of time or regularly returning home late
- skipping school or being disruptive in class
- appearing with unexplained gifts or possessions that can't be accounted for
- experiencing health problems that may indicate a sexually transmitted infection
- having mood swings and changes in temperament
- using drugs and/or alcohol
- displaying inappropriate sexualised behaviour, such as over-familiarity with strangers, dressing in a sexualised manner or sending sexualised images by mobile phone ("sexting")
- they may also show signs of unexplained physical harm, such as bruising and cigarette burns

4.10 BULLYING AND CYBERBULLYING

Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt the recipient both physically and emotionally.

Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. The victim can feel that there's no escape because it can happen wherever they are, at any time of day or night.



5. REPORTING CONCERNS OR ALLEGATIONS

A concern refers to concern about an under-16 student's wellbeing.

An allegation is a claim or assertion that an adult may have:

- harmed a child
- possibly committed a criminal offence
- behaved in a way to suggest possible harm in the future

It is the duty of all staff and adults with contact through the school to under 18s not to ignore concerns and allegations. Adults who are not Language in Action staff members should contact the Director.

The procedure for staff is:

I. Report the concern or allegation immediately to the Welfare Officer.

II. In the case of an allegation, the Welfare Officer should inform the DSL (or CPOs in case of his absence) immediately, who will inform the Local Designated Area Officer (LADO) at the Local Children Safeguarding Board (LCSB).

Contact details for London Safeguarding Children Board and Partnerships can be found on:

<https://www.londonscb.gov.uk/london-scb-contacts/>

III. If staff have concerns or allegations regarding senior management, they should contact the local LADO directly. They can also contact the NSPCC whistleblowing helpline for support and advice on 0800 028 0285.

IV. Complete the Concerns and Allegations form, available in the staff room and drive.

V. Further information on responding to concerns and allegations can be found in the above folders.

VI. Details to be documented by a Welfare Officer (or DSL for allegations) in a private area of Microsoft Teams and a note should be left in the student's profile on the Student Form.

VII. The Welfare Officer will look into the concern (DSL if allegation), follow through with any actions and with ongoing monitoring.

6. RECORD KEEPING & INFORMATION STORAGE

6.1 LOCATION OF INFORMATION AND RECORDS

All staff are informed at induction that safeguarding information and blank forms are stored with open access at these locations:

Shared Google Drive

- In the case of reports of concerns and allegations, these are kept in a confidential folder, with protected access limited to the DSL, CPOs and Centre management staff.
- Hard copies of confidential information are kept in a locked cupboard in the school office.
- This policy document is reviewed at least annually.

Language in Action

(Malvern Brighton School)
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language
in action
JUNIOR PROGRAMMES

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INTERNATIONAL

6.2 RELATED POLICIES

There are several policies related to the Safeguarding and Child protection:

- Anti-radicalisation (Prevent)
- Recruitment
- Anti-bullying
- Cyber-bullying & E-safety
- Health and Safety

All policies can be found in the Language in Action Staff Handbook and Teacher Handbook provided to all staff prior to the commencement of the employment and in the staff shared Drive.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Anti-Radicalisation and Extremism (Prevent) Policy

1 Statement

Language in Action understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways shown below, after setting the context.

Involving

Everyone

2 Context

- Language in Action normally accepts students aged from 12 to 17 years (18 to 20 years old students can be part of groups composed by underaged students if part of high school programs in their own countries) and from many different countries around the world.
 - The school has centres in London which have a multi-cultural local population.
 - The school has always promoted a multi-cultural environment where respect for and tolerance of others' beliefs is expected and required.
 - The school promotes core British values, British culture & traditions reflecting and celebrating the multi-cultural diversity of the UK today. Where appropriate this may be incorporated as part of class delivery, but students are also given an overview of this on their first day at our centres as part of the induction process.
-

3 Strong Leadership

- Responsibility for ensuring Prevent Duty is met is with the Director, Emiliano Sallustri (Designated Safeguarding Lead -PREVENT is considered part of Safeguarding).
- Responsibility for the Prevent risk assessment/action plan (see point 4 below) and policy lies with the Director, Emiliano Sallustri.
- The Operations Manager, Daniele Pluchino and the Summer Operations & HR Manager, Beatrice Bellina are designated CPOs to cover for absence of DSL.
- Each LIA centre has a Welfare Officer who is responsible for ensuring Prevent Duty is met within the centre and to report any issue to the DSL.
- Their duties are to ensure delivery of an effective risk assessment/action plan and policy as outlined here.

Involving

Lead person/s for PREVENT



4	Risk Assessment of current situation and Action Plan for future <p>A risk assessment/action plan has been produced showing what is already being done and what still needs to be done; it will be reviewed and updated at least annually.</p>	Involving Lead person/s for PREVENT
5	Working with local partners <ul style="list-style-type: none">• Make and maintain contact with the local police/local authority. Prevent Leads to understand their role and the support available, (e.g. via the Channel process).• Make contact with local authority to ascertain other useful local agencies.• Develop local area Prevent links with other similar organisations.• Share information with all local organisations as appropriate.	Involving Lead person/s for PREVENT
6	Understanding terminology <ul style="list-style-type: none">• 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 or religious views which may deny right to any group or individual. Can be expressed in vocal or active opposition to• Core British values: including (i) democracy, (ii) the rule of law, (iii) individual liberty (iv) respectful tolerance of different faiths or beliefs. <p>*NB:extremism can refer to a range of views, e.g., racism, homophobia, right-wing ideology, as well as any religious extremism.</p>	Involving To be transmitted to staff, students, agency group leaders & premises staff
7	Understanding risk of extremism <ul style="list-style-type: none">• Staff, students & other adults (agency group leaders, premises staff etc) may arrive at school already holding extremist views.• Or, whilst part of the school, they may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials via hardcopy or online, inspirational speakers, friends or relatives being harmed, social networks.• People who are vulnerable are more likely to be influenced.• Their vulnerability could stem from a range of causes: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime or discrimination, bereavement	Involving To be transmitted to staff



8 Ways to counteract risks

- Promote a safe and supportive international environment via clear expectations of accepted behaviours and those, including radicalisation and extremism, which will not be tolerated.
- Promote core British values during classes and through notices displayed around the centres. Approach is to educate that this is how things are in UK; may be different to student's country.
- Where possible, develop critical awareness skills to counter the acceptance of extremism without question, especially of online material.
- Challenge radical or extremist views in any context (formal or informal) via stated procedures. In most situations this would require an immediate response, referring to international environment of school, and tolerance expected, then reporting concerns (see section 10).
- Be ready to react when world or local events (e.g. Paris attacks) cause upset and the likelihood of conflicting feelings being expressed. Prevent lead to take initiative in these situations.
- Have strong filters on IT equipment and clear rules on accessing extremist/ terrorist websites/use of social networks to exchange extremist/terrorist views.
- Ensure that extremist speakers do not use premises to distribute material or expound views; have system for vetting any visiting speakers/presenters.
- Staff get to know students, their home circumstances and friendship groups. Through knowing students well, it is easier to spot changes in behaviour.
- Staff to be observant and vigilant in noticing any signs of radical or extremist behaviour.
- Welfare and all staff to work hard supporting any students identified as vulnerable.
- All LIA summer centres' staff receive 'Basic Safeguarding Awareness' and 'Prevent for Practitioners' trainings, with follow up session on training and induction days.
- Staff awareness: Radicalisation and Extremism Referral Form and procedure to use it are made known to staff members.

Involving

Lead person/s to ensure (a) training for all staff, students, agency group leaders, premises staff sub-contractors so that (b) delivery is effective



9 Training

- Documents & face to face training ensure staff understand this policy, i.e.
 - i) understand context and expectations of Prevent
 - ii) their duty to implement the policy
 - iii) understand terminology and risks associated with radicalisation and extremism
 - iv) how to identify and support vulnerable students
 - v) ways the school will counteract the risks
 - vi) signs to notice that may cause concern
 - vii) know the lead Prevent person and procedures for communicating concerns
 - viii) know the importance of their own behaviour and professionalism in (a) being exemplars of British values and (b) not discussing inflammatory subjects with students (Code of Conduct).
- Keep record of staff training on LIA Teams dedicated folder.
- Ensure that premises providers have Prevent policy.
- Students, premises providers and agency group leaders must be made aware of key parts of the policy:
 - a) understanding terminology
 - b) importance of maintaining a supportive and tolerant society within the centre
 - c) what core British values are and why they are considered important
 - d) any changes to school rules, particularly those regarding IT
 - e) that they must report any concerns/incidents, and procedure for that.

Involving

Lead person/s to prepare materials to suit each group being trained; (a) staff (b) students (c) premises providers (d) agency group leaders (e) sub-contractors

10 Signs that may cause concern

- Signs that may cause concern
- Students talking about exposure to extremist materials or views outside school
- Changes in behaviour, e.g. becoming isolated
- Fall in standard of work, poor attendance, disengagement
- Changes in attitude, e.g. intolerant of differences /having a closed mind
- 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 accommodation) showing extremist ideology/views/ symbols
- Students voicing concerns about anyone

Involving

Lead person/s to ensure all other adults are aware of signs

NB: Any concerns relating to a person under 18 are safeguarding issues and should be dealt with by safeguarding staff and, where necessary, the Local Safeguarding Children Board contacted: London Safeguarding Children Board and Partnership <https://www.londonscb.gov.uk/london-scb-contacts/>



11 How and when to react to concerns

- Any staff member with concerns will report it to the Welfare Officer of the centre and complete the Radicalisation and Extremism Referral Form.
- The Form will be forwarded immediately to the company Prevent Lead Emiliano Sallustri (emiliano.sallustril@malverninternational.com, phone +44 (0) 7471830607)
- Confidentiality assured for the person reporting a concern.
- Everyone told to report any concern or incident, however small.
- Reassurance that all will be dealt with sensitively and carefully.
- Prevent Lead to report to local police and social services if necessary.

Involving

Lead person/s to ensure everyone has info.

Reviewed:

Mar 2022

Reviewed by:

Emiliano Sallustri, Director

Next Review:

Mar 2023

Review by:

Compliance Team



Language in Action Anti-Bullying Policy

Aims

- Language in Action is committed to the health, safety and well-being (both physical and emotional) of all of its community members, both students and staff, and will deploy stringent and active measures to safeguard these aims and provide a safe environment in which the community can develop.
- To make clear that Language in Action encourages students and staff to speak out against instances of bullying with assurances that each situation will be treated with gravity and integrity.
- To follow Language in Action's Safeguarding and Child Protection policy if bullying involves any students under the age of 18.
- To ensure that staff are vigilant in looking for signs of bullying and readily available to listen to students who feel they have been subjected to bullying
- To keep detailed records to enable patterns of behaviour to be easily identified and to prevent future instances of bullying wherever possible.
- To fulfil its responsibility relating to the legislative obligations under the following Human Rights Act 1998, Race Relations (Amendment) Act 2000.

1. Definitions

The Office of Children and Young People's Services' Anti-Bullying Strategy defines bullying as a persistent, deliberate attempt to hurt or humiliate someone. Language in Action will adhere to this definition for the purposes of this policy, which applies to staff and students of all ages.

2. Management Statement on Bullying

Bullying will not be tolerated in any form. Students and staff are encouraged to speak out if they are being bullied or aware of someone who is being bullied. All allegations of bullying will be thoroughly investigated, and the punishments will be severe and can include suspension or expulsion.

3. Types of Bullying

There are various types of bullying, but most have three common features:

1. It is deliberately hurtful behaviour.
2. It is repeated over time.
3. There is an imbalance of power, which makes it hard for those being bullied to defend themselves.

Bullying may take various forms, including:

- Physical: Kicking, hitting, pushing, and intimidating behaviour or interference with personal property.
- Verbal: Psychological threats, taunts, shunning/ostracism, name-calling/verbal abuse or the spreading of rumours.
- Racist: Physical, verbal, written, on-line or text abuse or ridicule based on differences of race, colour, ethnicity, nationality, culture or language.



- Faith or culture-based: Negative stereotyping, name-calling or ridiculing based on religion, faith or culture.
- Sexist: Use of sexist language or negative stereotyping based on gender.
- Sexual: Unwanted/inappropriate physical contact or sexual innuendo.
- Homophobic: Name-calling, innuendo or negative stereotyping based on sexual orientation or use of homophobic language.
- Disability: Name-calling, innuendo, negative stereotyping or excluding from activity based on disability or learning difficulties.
- Gifted/Talented: Name-calling, innuendo, ostracism or negative peer pressure based on high levels of ability or effort.
- Cyber Bullying: Abuse online or via text message, interfering with electronic files, setting up or promoting inappropriate websites and inappropriate sharing of images from webcams/mobile phones.

4. Consequences of Breach of Policy

Any student or staff member found to be bullying other members of the community can be expected to face disciplinary consequences.

5. Consequences of Breach of Policy

This policy is applicable within all premises used by Language in Action, as well as in all excursions and any other activity organised by Language in Action.

6. Specific Areas of Responsibility

Emiliano Sallustri (Director) Daniele Pluchino (Operations & welfare Manager) and Beatrice Bellina (Summer Operations & HR Manager) and any other member of the LIA Head Office will:

- Ensure that all staff have an opportunity to discuss strategies and review them
- Determine the strategies and procedures
- Discuss development of the strategies with the centre management staff
- Ensure appropriate training is available
- Ensure that the procedures are brought to the attention of all staff, students and parents/guardians

The Centre Managers/ Activity Managers & Welfare Officers will:

- Be responsible for the day-to-day management of the policy and systems
- Ensure that there are positive strategies and procedures in place to help both the bullied and bullies
- Keep the LIA Head Office informed of all incidents
- Arrange relevant staff training
- Determine how best to involve parents/guardians in the solution of individual problems for students under 18.
- Report incidents to the LIA Head Office when they arise.



All staff will:

- Be responsible for ensuring that LIA positive strategies are implemented
- Be aware of LIA's policy and procedures with regards to bullying
- Deal with any incidents by reporting them to the Centre management staff
- Never let any incidences of bullying pass by unreported, whether on-site or during an off-site activity

7. Dealing with Incidents

For each LIA centre, the incident will be reported to the Welfare Officer / Centre Manager who will investigate immediately. If there is a racial element to the incident or other reason for the staff to escalate the matter, then a member of the Head Office will also be immediately informed.

The details of the incident will be recorded by the Welfare Officer / Centre Manager and hard and soft copies will be stored in secure folders.

The DoS, agency group leaders and the teachers of the affected student, will be informed and encouraged to monitor the situation.

Sanctions against the perpetrator will be determined by the Centre management staff / Head Office where appropriate.

8. Counselling and Support

If there is a perceived need for counselling and support, Language in Action will, in appropriate cases, suggest guidance, professional services and/or counselling for both bullies and the bullied. In the first instance Language in Action's trained Welfare Officers will speak to the student and ascertain whether this is an appropriate course of action. For incidents of a serious nature, the agent will be contacted and also the parent/guardian in the case of an under 18 student.

Whilst staff members are always willing to offer sensitive advice and support to students, the affected students will be aware that any information divulged to staff about illegal activity cannot be held in confidence if there is a potential risk to others.

Bullying of staff members should be reported in the first instance to the line manager or their line manager's manager. All managers should inform a Head Office member of any incidents of bullying.

9. Monitoring and Evaluation

The Language in Action Head Office will keep and consider reports on serious incidents. These reports will be discussed by Language in Action / Malvern International management team to determine what can be learned from these incidents and how they have been handled, with a view to improving the School's strategies.

APPENDIX A: Advice to Students

If you are being bullied:

- Be firm and clear, make eye contact and tell the bully to stop
- Move away from the situation immediately, if possible
- Inform a member of staff as soon as possible.



After an incident of bullying:

- Tell a member of staff.
- Ask a friend to accompany you if you need support in discussing the incident
- Keep on speaking up until someone listens
- Do not blame yourself for what has happened.

When discussing the incident with a responsible person be clear on:

- What has happened
- How often this has happened
- Who was involved
- Who witnessed the incident
- Where the incident happened
- What you have done about it already.

APPENDIX B: Advice to Staff

Signs of Bullying:

- A student's behaviour may change suddenly
- They may start avoiding classes for no obvious reason
- They might seem happy in the UK but miserable at school
- They may have bruises, scratches or other physical injuries.

Always report any issue to your line manager who will deal with the situation immediately

Support for the affected student:

- Listen to them and reassure them that you believe them
- Treat their concerns and feelings seriously
- Support them by standing up to the bully
- Talk through their options with them
- Follow up claims as soon as possible
- If a parent/guardian has made contact, set a deadline for resolution and stay in regular contact with them according to your line manager
- If the situation cannot be resolved effectively within the existing centre management structure, or if you feel you are unable to cope, refer the matter immediately to a member of the Head Office.
- Provide accurate records for the Head Office who will ensure that they are kept secure.
- Continue to monitor the situation.

Feedback and Further Information

Language in Action welcomes all constructive feedback on this and any other school policy.

If you would like further information please contact the Director at emiliano.sallustri@malvernplc.com or +44 (0) 7471 830607

Reviewed:

Mar 2022

Reviewed by:

Emiliano Sallustri, Director

Next Review:

Mar 2023

Review by:

Emiliano Sallustri, Director



Language in Action Attendance Agreement Policy

A minimum attendance of 80% is a Language in Action requirement and a visa requirement of the UK Home Office for any person who is here on a Student Visa. All students **MUST** attend 80% of their course.

Language in Action makes every effort to help students to attend their classes. This includes giving reminders, sending warning letters and arranging appointments between the student and the DoS/Centre Manager when necessary. However, there are times when a student continues to keep poor attendance even after these measures have been taken.

If the attendance of a student falls below 80% they may be placed 'Under Review'. This means that they may not attend classes until they have signed an Attendance Agreement with the school. If an agreement is not signed the student's course will be terminated without refund and any accommodation booked through the school will also be terminated without refund. The UK Home Office may also be informed of this termination.

The Attendance Agreement is a formal understanding that is signed by a member of the Head Office and the student.

It establishes in writing that the student accepts that their attendance is not meeting the required level and that this is not acceptable and cannot continue.

The Attendance Agreement states that the school now requires the student to attend every lesson from this point forward – unless they have been given an Authorised Absence by a member of the Head Office.

It also establishes in writing that the penalty for breaching this agreement is that the student will have their course terminated immediately. There will be no refund of course fees.

If the student is staying in accommodation provided by Language in Action, they will be asked to leave the accommodation. There will be no refund of fees paid for accommodation.

The UK Home Office may also be informed of this termination of course. The UK Home Office will then decide whether they wish to terminate the student visa that has enabled them to stay in the UK.



Formal Attendance Agreement

This is an agreement between Language in Action, represented here by the Head Office, and the undersigned:

.....
I accept that I am required to attend a minimum of 80% of the course I have booked.

I accept that my attendance has fallen far below this required minimum.

I accept that in order to continue with my course, I must not miss another lesson without permission from the Head Office. I also promise that I will not be late again for the remainder of my course.

I agree to these conditions.

I understand that if I break this agreement, my course - and any accommodation I have booked through the school - may be ended immediately.

I understand that if this happens, I will not receive a refund. The UK Home Office may also be informed that I have broken the conditions of my visa regarding course attendance.

Signed.....(Student)

Signed.....(LIA Head Office)

Date.....

Reviewed:
Apr 2022
Reviewed by:
Emiliano Sallustri

Next Review:
Apr 2023
Review by:
Emiliano Sallustri



Language in Action Attendance Policy

The following attendance policy is made known to students, staff and other stakeholders by the following means:

- Posters in classrooms and residences;
 - Covered in the student first day induction;
 - Included in the Student Induction Pack;
 - Covered in the staff induction;
 - Included in the Staff Handbook and the Teacher Handbook (in staff room & on shared drive);
 - Available in the policies section of the Language in Action website.
-

The Home Office requires all students on a course in language schools, colleges and universities to attend **100%** of their classes with the minimum of **80%**.

If students do not attend at least **80%** of their course, they will not be able to get a final certificate or report and may have problems with future visa extension/renewal.

The UKVI will be informed of all students on a Tier 4 Visa whose attendance of their course falls below **80%**.

Please advise students that what they need to do is:

If you are sick

Inform the school 30 minutes before the start of the class. This will be taken as authorised absence.

If you are sick for 3 days or more, you must bring in a doctor's note.

If you would like a holiday

Holidays may not be taken during term time without prior arrangement.

If you take time off without notifying us

If you do not arrange time off with LIA or call in when you are sick, this will be taken as **unauthorised absence** and your attendance will be affected.



If your attendance starts to fall the following procedures will be followed:

If your attendance starts to fall below 83%

We will inform you either in person or via a note given to you by your leader/teacher that we are concerned about your attendance, reminding you about the under 80% attendance

**If your attendance falls below 80%
(without permission)**

You will be given a verbal warning. This will be kept on your record.

**If your attendance is below 80% and has continued to drop since your verbal warning OR you miss 3 days in a row
(without permission)**

You will be issued a 1st Written Warning and you will be given an appointment to go and see the DoS/Centre Manager to explain your unauthorised absence. This will be added to your record.

**If your attendance is below 80% since your 1st written warning and it has continued to drop OR you miss a further 3 days in a row
(without permission)**

You will be issued with a 2nd Written Warning, and you will be given an appointment to go and see the DoS/Centre Manager to explain your continued unauthorised absence. This will be added to your record and your agent/parent notified you are on your final warning. This is your last chance to improve. You will be issued an **Attendance Agreement** by a member of the Head Office. This will explain the terms and conditions of your course and the attendance policy. If you continue to fail to come to school without permission, you may be expelled from the school without refund.

**If you have missed 10 days in a row
(without permission)**

The UK Home Office will be informed that you have broken the conditions of your Visa. You will be asked to leave the school and we will inform your parent and/or agent. If you are on a Tier 4 visa, you will be asked to leave the country immediately.

Reviewed:

Apr 2022

Reviewed by:

Emiliano Sallustri & Academic Manager

Next Review:

Apr 2023

Review by:

Emiliano Sallustri & Academic Manager



Language in Action Behaviour Policy

Overview

Language in Action believes all its students have the right to enjoy their experience and work towards their educational goals without their classes and recreational activities being disrupted by the misconduct of another student.

We make the parameters of unacceptable behaviour very clear to the whole student body during the induction process. Teachers and Activity Leaders address incidents of minor general misconduct (minor misdemeanours) in the classroom and recreational activities as they occur. Any health and safety issues - such as those related to fire and smoke alarms - are made very clear during induction, as are UK laws regarding smoking and drinking alcohol.

Misconduct warranting expulsion

Regrettably, we may still have incidents where a student's behaviour may lead to them being excluded from our courses and activities due to Serious Misconduct. It is impossible to exactly define all of the cases where we may consider this action; however, we can define general scenarios whereby Language in Action is left with no choice but to send the student home, including:

- Repeated and blatant refusal to follow instructions in class, on activities or in accommodation;
- Where behaviour poses a clear health and safety risk to themselves and others;
- Behaviour that repeatedly spoils the enjoyment of the course by other students;
- Behaviour that can be described as abusive, aggressive, racist, violent or serious in any other manner;
- Where a student breaks the law of this country.

Process

It is very rare that a student would be excluded from the course and activities following one incident. The Centre Management staff will conduct a thorough investigation into any allegation of serious and/ or continued misconduct and notify the Head Office who will take proper action. The student will then meet with Centre Manager, Welfare Officer and agency group leader formally to discuss their findings. The student has the right to be accompanied during this meeting. In order for expulsion to take effect, Language in Action Head Office must be consulted and through them the agency and parents.

In cases of general misconduct, we would normally seek at this time to give the student fair warnings that the behaviour is unacceptable, and that he/she is in danger of being sent home if it continues, following the steps of our Student Disciplinary Procedure.

Language in Action would then ensure that parents/guardians/key contact and - where appropriate - the agent is informed that a student has been warned that they are in danger of being excluded from the course. In the event of serious and/ or continued misconduct, a student may be excluded from the course.



Language in Action will ensure that return travel arrangements are suitably organised and that the student is escorted to the appropriate place for return travel. Care will always be taken so that the student is returned safely and we will liaise with parents/guardians/key contacts/agents/transport providers as appropriate.

Staff will take all necessary care to ensure that the student is properly cared for from the time that the student is informed of the decision to the point where the student goes through the departure gate at the airport.

Reporting

All issues of problematic behaviour are recorded by the Centre Management staff. In the event of exclusion, all stages leading up to that decision should be properly recorded including minutes of meetings held with students involved. This report will be made available to the student upon request.

Student Disciplinary Procedure Table

Level of Incident	Action to be taken
<h3>1. Minor Misdemeanours</h3> <p>Examples including but not limited to:</p> <ul style="list-style-type: none">• Repeatedly talking in mother tongue in class• Rowdy behaviour in the canteen and other campus spaces• Skipping dinner queues• Breaking curfews• Rudeness to staff or contractor (impoliteness)• Not following instructions on trips <p>First offence leads to Action (A) Second offence leads to Action (B)</p>	<h3>A. Informal Verbal Warning</h3> <p>Used with small or rare student misdemeanours that do not warrant a formal record. Usually given by Teachers or Activity Leaders.</p>
<h3>2. Misdemeanours</h3> <p>Examples including but not limited to:</p> <ul style="list-style-type: none">• Frequently misbehaving in class• Frequent lateness• Rarely but intentionally disobeying staff instructions• Lesser forms of bullying (e.g. Unfriendliness to peers) <p>First offence leads to Action (B) Second offence leads to Action (C)</p>	<h3>B. Formal Verbal Warning</h3> <p>Defined as verbal warnings recorded as incidents and given by the management team, ideally the Centre Manager or Director of Studies.</p> <p>Verbal warning logged and student reminded that should it (or a similar event) happen again then more serious disciplinary sanctions be employed</p>



3. Serious or Continuous Misconduct

Examples including but not limited to:

- Continuing to behave in the same manner following a Formal Verbal Warning
- More serious forms of bullying (e.g. Physical or emotional)
- Persistent misbehaviour in class Underage smoking & alcohol drinking
- Small, isolated but intentional damage (e.g. Setting off a fire extinguisher)

First offence leads to Action (C)
Second offence leads to Action (D)

C. Written Warning

Both the Operations & Welfare Managers should be notified in order to issue a written warning. These managers will inform the student's agent and request that parents be informed.

Centre Manager to arrange a meeting with the Group Leader, Student & Welfare Assistant in order to issue the Written Warning.

4. Misconduct warranting expulsion

When a student's behaviour is bad enough that it is:

- Repeated after a written warning
- Seriously endangers themselves or others
- Continuously and consciously disrupts the programme from themselves or others
- Becomes uncontrollable for centre staff

Breaks British Law Examples including but not limited to:

- Drug abuse including so called legal highs.
- Constant and intentional disobeying of instructions
- Serious and malicious damage to property (e.g., smashing windows, etc.)
- Any physical, verbal or sexual abuse of students or staff

D. Expulsion from programme and/or centre

In order for expulsion to take effect, Operations & Welfare Managers must be consulted and through them the agency and parents.

Students and group leaders should also know of the Complaints Procedure.

The Operations & Welfare Managers will inform the Centre Manager of the level of expulsion these include:

- Permanent removal from lessons and/or activities. At this point they become the sole responsibility of the Group Leader
- Permanent removal from the centre. The student will be asked to leave the campus and the agency will be expected to arrange for travel home. If this cannot be arranged immediately, the agency will be asked to arrange temporary accommodation & supervision for this student whilst they organise further travel arrangements.

Reviewed:

Mar 2022

Reviewed by:

Emiliano Sallustri, Director

Next Review:

Mar 2023

Review by:

Emiliano Sallustri, Director



Language in Action

Student Complaints Policy and Procedure

1. Purpose and scope

This document contains Student Complaints Procedures.

The scope of the procedures is restricted to complaints in respect of the students' experience at LIA, including services and facilities provided.

2. Principles

- 2.1. Students may ask for information, advice and help in making a complaint from anyone they wish. At any stage, the student has a right to be accompanied/represented by another person who may speak on the student's behalf if s/he requires it.
- 2.2. LIA welcomes comments and suggestions from students as to how the School might enhance its effectiveness and/or improve its service. Students are encouraged to give suggestions.
- 2.3. The School recognises that from time to time students may have complaints about facilities or services they receive from its staff.
- 2.4. These procedures aim to provide a simple and comprehensible means by which students may raise comments, suggestions and complaints with appropriate staff.
- 2.5. The School will ensure that the service and care provided to any student making a comment, suggestion or complaint will not suffer in any way as a result of the action taken, but the School expects that students will not engage in frivolous or vexatious complaints.
- 2.6. The School will maintain the confidentiality of comments, suggestions and complaints as far as possible. However, the service provider should normally be informed that a complaint has been made and that it is being investigated.
- 2.7. The above paragraph does not in any way prejudice existing procedures for dealing with staff disciplinary matters.

3. Complaints Procedure

3.1. Informal Stage (refer to 2.1 above):

It is hoped that many problems will normally be dealt with informally, in a spirit of conciliation without the need for recourse to a formal procedure. As a first step, a student who is unhappy with the service he/she has received, should try to resolve the matter with his/her teacher or with the Director of Study/Academic Manager or with the Activity Leaders / Activity Manager & Welfare Officer/ Centre Manager. In many cases, that person can best respond to the complaint. However, if the response to the informal complaint is unsatisfactory the student has the right to use the formal complaints procedure set out below. A student should only use this formal complaints procedure if he/she considers that the complaint is too serious to be dealt with informally or is dissatisfied with the results of informal discussions.



3.2. School Stage:

If the student wishes to make a formal complaint under these procedures, they must raise the complaint with the Centre Manager who will give them a complaint form to fill out.

Written complaints involving the Centre Manager should be sent to the Language in Action Head Office, directly via email or completed on the Language in Action complaints form available in the centre.

The Centre Manager will normally respond in person to the student's letter within 48 hours. If the Centre Manager thinks that the complaint needs further investigation, they will explain to the student (or their agent) how the complaint will be processed. The complaint will be investigated fully (normally this will also involve an invitation for the student to discuss the complaint in person) and the student will normally receive a written response within 5 days.

If the student is satisfied with the response received, and does not wish to take the complaint further, the information gained from the complaint will be used to improve the service provided by the School.

3.3. Appeals

If the complaint is not resolved within 5 days or is unsatisfactory to the student, the student should refer the complaint to the Language in Action Head Office.

The Head Office will investigate the complaint (normally this will involve an invitation for the student to discuss the complaint in person with themselves or a person they have nominated) and the student will normally receive a written response within 3 working days.

If the student is satisfied with the response received, and does not wish to take the complaint further, the information gained from the complaint will be used to improve the service provided by the School.

If the student is not satisfied with the response the Directors will convene a meeting of a Complaints Committee. Prior to the meeting the aggrieved student will be informed of the right to be represented at the hearing.

3.3.1 Composition of the Complaints Committee

No member of the Complaints Committee shall have had any previous connection with the case. The Complaints Committee will be comprised of:

- The complainant
- One Member of Board of Directors, or, the Director or Operations Manager or Academic Manager, or the HR Manager (as appropriate)
- One Student Representative
- One Teacher

3.3.2 Terms of Reference for Appeals

The terms of reference of the Complaints Committee shall be:

- To consider a student's complaints in respect of her/his experience at the School, including services and facilities provided by Schools or any support departments.
- To report its decisions to the Board of Directors and Student Representatives where appropriate.



3.4. Final appeals

If the student is not satisfied with the results of the appeals stage they are encouraged to contact the accrediting bodies for the school:

- **The British Council:** British Council Customer Service UK, Bridgewater House, 58 Whitworth Street, Manchester, M1 6BB
- **The Independent Schools Inspectorate:** C A P House, 9-12 Long Ln, London EC1A 9HA

APPENDIX: PROTOCOL FOR MEETINGS OF A COMPLAINTS COMMITTEE

- The Chair shall confirm to the parties the nature of the grievance.
- The Chair will ask the aggrieved student (or representative) to present his/her case in support of the grievance, and to introduce any witness(es) in support of the grievance.
- The Committee may ask questions, through the Chair, of the student and/or representative and/or his/her witness(es) at any time.
- The Chair will ask the person against whom the grievance has been raised to respond to the grievance, and to introduce any witness(es) in support of the response.
- The Committee may ask questions, through the Chair, of the person against whom the grievance has been raised and his/her witness(es) at any time.
- The Chair will ask the student (or representative) bringing the grievance to summarise his/her case.
- The Chair will ask the person against whom the grievance has been raised to summarise his/her case.
- The parties will be asked to leave the meeting and the Committee will consider the evidence that has been heard, and may at this stage choose to reconvene the hearing to a later date in order to obtain further evidence or advice from other parties. Should this be the case, all parties will be invited to attend the reconvened meeting.
- The Chair will announce the Committee's decision, either by calling the parties together or in writing. The outcome of the hearing will be confirmed in writing within five working days.

Reviewed:

Mar 2022

Reviewed by:

Emiliano Sallustri, Director

Next Review:

Mar 2023

Review by:

Emiliano Sallustri, Director



Language in Action

Student Lateness Policy

POLICY

- All Students (regardless of visa type) are expected to arrive on time for all class and activities start times.
- Teachers and Activity Leaders are expected to set standards with regards to timekeeping.
- Any student arriving after the class start time will be marked 'Late'.
- Students arriving more than 15 minutes late to any part of the class or leaving more than 15 minutes early to any part will be marked late-absent.
- Any student who arrives more than 15 minutes late may be admitted to the class after the break.
- The academic team runs reports that will identify students with poor timekeeping and meetings will be arranged between the student (and/or agency group leader if part of a closed group) and DoS/Centre Manager to address this and bring about improvement.
- In the case of students with a student visa (over 11 months) or a short-term visa, the DoS/Centre Manager should be notified immediately if students are persistently late as this will affect attendance and, therefore, visa compliance.
- Students may claim to have valid excuses for patterned lateness. LiA will not accept any reasons for continued lateness to class.
- All teachers should be aware that good attendance and time-keeping is the cornerstone to quality education. This must be encouraged at all times. Language in Action teachers have a contractual duty to monitor student performance and attendance/timekeeping.

RELATED POLICIES

- General policy for absent/missing students
- Attendance policy
- Student Disciplinary Procedure

Reviewed:

Apr 2022

Reviewed by:

Emiliano Sallustri

Next Review:

Apr 2023

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Emiliano Sallustri



Language in Action

Cyber-Bullying Policy and Procedure

Language in Action embraces the advantages of modern technology in terms of the educational benefits it brings, however the company is mindful of the potential for bullying to occur.

Central to the company's anti-bullying policy is the belief that 'all students have a right not to be bullied' and that 'bullying is always unacceptable'. The company also recognises that it must 'take note of bullying perpetrated outside school which spills over into the school'.

Under powers granted by the EIA 2006, the Welfare Officer or Welfare Manager is able to police cyber-bullying, or any bullying aspects carried out by students on or off site.

Definition of Cyber-Bullying

Cyber-bullying is an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself.

By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile phones
- The use of mobile phone cameras to cause distress, fear or humiliation
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- Using e-mail to message others
- Hijacking/cloning e-mail accounts
- Making threatening, abusive, defamatory or humiliating remarks in chat rooms, to include Facebook, YouTube or any social media.

Legal Issues

Cyber-bullying is generally criminal in character. The law applies to cyberspace.

- It is unlawful to disseminate defamatory information in any media including internet sites.
- Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.
- The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

Policy

Language in Action educates its students both in the proper use of telecommunications and about the serious consequences of cyber-bullying and will, through meetings and lessons, continue to inform and educate its students in these fast-changing areas. Language in Action trains its staff to respond effectively to reports of cyber-bullying or harassment and has systems in place to respond to it.



Language in Action endeavours to block access to inappropriate web sites, using firewalls, antivirus protection and filtering systems and no student is allowed to work on the internet in the Computer Room, where available, or any other location within the school which may from time to time be used for such work, without a member of staff present. Where appropriate and responsible, Language in Action audits ICT communications and regularly reviews the security arrangements in place. Whilst education and guidance remain at the heart of what we do, Language in Action reserves the right to take action against those who take part in cyber-bullying.

- All bullying is damaging but cyber-bullying and harassment can be invasive of privacy at all times. These acts may also be criminal acts.
- Language in Action supports victims and, when necessary, will work with the Police to detect those involved in criminal acts. Language in Action will use, as appropriate, the full range of sanctions to correct, punish or remove students who bully fellow students or harass staff in this way, both in or out of school.
- Language in Action will use its power of confiscation where necessary to prevent students from committing crimes or misusing equipment.
- All members of the School community are aware they have a duty to bring to the attention of the Welfare Officer any example of cyber- bullying or harassment that they know about or suspect.

Guidance for Staff

If you suspect or are told about a cyber-bullying incident, follow the protocol outlined below:

Mobile Phones

- Ask the student to show you the mobile phone
- Note clearly everything on the screen relating to an inappropriate text message or image, to include the date, time and names.
- Make a transcript of a spoken message, again record date, times, and names.
- Tell the student to save the message/image.
- Go with the student and see the Welfare Officer, or in his/her absence, contact your line manager.

Computers

- Ask the student to get up on-screen the material in question
- Ask the student to save the material
- Print off the offending material straight away
- Make sure you have got all pages in the right order and that there are no omissions
- Accompany the student, taking the offending material, to see the Welfare Officer
- Normal procedures to interview students and to take statements will then be followed particularly if a child protection issue is presented.



Guidance for Students

If you believe you or someone else is the victim of cyber-bullying, you must speak to an adult as soon as possible. This person could be a teacher, group leader or the Welfare Officer.

- Do not answer abusive messages but log and report them
- Do not delete anything until it has been shown to your teacher, group leader or the Welfare Officer (even if it is upsetting, the material is important evidence which may need to be used later as proof of cyber-bullying)
- Do not give out personal IT details
- Never reply to abusive e-mails
- Never reply to someone you do not know
- Stay in public areas in chat rooms

Guidance for Families, Accompanying Adults and Agents

It is vital that all students are aware of the serious consequences of getting involved in anything that might be seen to be cyber-bullying. Language in Action informs agents and agency staff of the cyber-bullying policy and the procedures in place to deal with cyber-bullying.

- Parents, agency staff, group leaders and agencies can help by making sure the child in their care understands the school's policy and, above all, how seriously Language in Action takes incidents of cyber-bullying.
- Parents can also explain to their sons or daughters' issues relating to cyberbullying
- If parents or any responsible adult believe that a child in their care is the victim of cyber-bullying, they should save the offending material (if need be, by saving an offensive text on their or the child's mobile phone) and make sure they have all relevant information before deleting anything
- The responsible adult should contact the Welfare Officer as soon as possible. A meeting can then be arranged with the Welfare Officer, which may involve other relevant members of staff
- E-SAFETY AT HOME Several sites offer helpful advice to parents, particularly with respect to how they can best monitor their child's use of the computer at home.

Language in Action

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Important and useful information can be found on the following site:

www.nextgenerationlearning.org.uk/safeguarding-learners/Safeguarding-learnerscontent/Parents-and-carers/

The Code of Conduct is explained and discussed with students at induction and during lessons.

National Bodies

Further support and guidance may be obtained from the following:

www.teachernet.gov.uk/wholeschool/behaviour/tacklingbullying/cyber-bullying
www.bullying.co.uk

The following information can be downloaded from the above website:

- Safe to Learn: Embedding anti-bullying work in schools (2007)
- Cyber-bullying Guidance and Resources.
- Safe to Learn

Cyber-bullying Summary Leaflet

www.antibullying.net/cyber-bullying1.htm

For an Information Sheet for Teachers and other Professionals who work with Young People for information on safeguarding learners

www.becta.org.uk

Beatbullying Anti-Bullying Alliance Rochester House National Children
Bureau 4 Belvedere
Road 8 Wakley Street London SE19 2AT EC1V 7QE

020 8771 3377 or 020 7843 1901

www.beatbullying.org or www.anti-bullyingalliance.org.uk

Reviewed:

Mar 2022

Reviewed by:

Emiliano Sallustri, Director

Next Review:

Mar 2023

Review by:

Emiliano Sallustri, Director



Language in Action

General policy for absent / missing students

A. On Excursion

The Activity Manager should ensure that students and agency Group Leaders are fully aware of the itinerary – in many cases agency GLs / individual students will receive a leaflet with these details. Students should know where the meeting point is and what to do if they are separated from the group.

If they are lost when on a trip the students should be told to:

1. Call their agency Group Leader (or their friends)
2. Go to the meeting point and wait for the group
3. Call the LiA emergency number
4. Find a policeman and show some identification as a Language in Action student (on the lanyard ID card)

Activity Leaders and agency Group Leaders should conduct regular head counts, particularly at arrival/departure points, and when separating and reforming groups.

If a student becomes lost, an Activity Leader should phone the Centre management staff immediately who will take proper action. The Activity Leader should continue trying to contact the student on their mobile phone. If the student is from a group, the Activity Leader should contact the agency Group Leader and inform them of the issue and ensure the agency Group Leader helps in locating the student.

If it is towards the end of the day and the group need to leave, the student's agency Group leader and/ an Activity Leader should remain behind at the meeting point to locate the student. The rest of the group should leave with the other Activity Leaders.

(Bear in mind staff to student supervision ratios. Ask another member of staff to reach the group if necessary).

Missing students on excursion is not a common occurrence, but it can happen. However, it is rarer still for us not to find them quickly, particularly now that mobile phones are in common usage.

Further actions

The Centre Manager / Welfare Officer will continue trying to call the student on their mobile.

If the student has not been located 1 hour after the agreed meeting time, the school will contact parents/guardians to inform them that the child is missing.

If the student has not been located within 2 hours during the day, or 1 hour and a half during the evening or night after the meeting time has been set, the school will contact the local police for assistance.



B. On Site

Classes

If Under 18 students do not come to class for registration the teachers should inform the DoS/Centre Management Staff immediately.

As soon as the Centre management staff discovers that a student is absent, they will try to contact the student (or the agency Group Leader if the student is part of a group) by mobile phone. They will also contact the staff in the premises that they are staying at.

Further action

If after 1 hour the student still hasn't been located, the parent/guardian will be contacted and advised. If the student has not been located within 3 hours, the School will contact the Police to advise them of the situation. However, if there is real cause for concern do not wait too long to inform them. The police will give advice on further action to be taken.

C. In Residence or Home Stay

Under 18 students are provided with a Curfew. This is:

Curfew time for Under 18's is 11 pm Friday and Saturday and 10.30 pm all other days of the week. Under 16s must remain at their homestay or residence once they have returned in the evening, unless accompanied by a group leader.

If student/s do not return after afternoon / evening activities, or, if the student/s do not return in time for curfew, Activity Leaders will inform the Centre Manager (if in Homestay, hosts have been advised to contact the LiA Emergency phone number).

The Centre Management staff will then try contacting the student (or the agency group leader if part of a group) by telephone.

If they cannot locate the student within 1 hour they will contact the parent/guardian.

If the student cannot be located within 1,30 hours after missing the afternoon / evening activities or missing the curfew, the school will contact the Police.

This policy is included both in the Staff Handbook and in the Teacher Handbook. It is explained to all staff (both academic and operational) during their induction. This procedure is also explained to all students.

Reviewed:

Mar 2022

Reviewed by:

Emiliano Sallustri, Director

Next Review:

Mar 2023

Review by:

Emiliano Sallustri, Director



Language in Action

Alcohol, Drug and Substance Abuse

ALCOHOL

Our policy is to forbid the consumption of alcohol on our premises unless at a specifically authorised business or social function.

DRUGS

The possession, use or distribution of drugs for non- medical purposes on our premises is strictly forbidden. If you are prescribed drugs by your doctor which may affect your ability to perform your work, you should discuss this issue with your line manager.

SUBSTANCE ABUSE

Any employee who is found consuming alcohol, drugs or intoxicating substances on our premises or is found to be intoxicated at work will face disciplinary action on the grounds of gross misconduct under our Disciplinary Procedure.

- If we suspect there has been a breach of the prohibition on substances, or your work performance or conduct has been impaired through substance abuse, you may be asked to undergo a medical examination to determine the cause of the problem. If you refuse to undergo a medical examination in such circumstances, your refusal will constitute gross misconduct in accordance with our Disciplinary Procedure.
- If, having undergone a medical examination, it is confirmed that you have been positively tested for a controlled drug, or there is evidence of alcoholism, or you admit that there is a problem, we may suspend you from your employment to allow us to decide whether to deal with the matter under the terms of our Disciplinary Procedure or to require you to undergo treatment and rehabilitation.
- If you are offered rehabilitation, we will determine in consultation with our medical advisor an appropriate period of time during which you will be required to undergo medical treatment. During the period of rehabilitation, we will determine whether you are fit to return to work. If you are not judged fit to return to work, you will take unpaid leave.
- If at any time you disobey an instruction given to you by us with regard to the rehabilitation or suffer a relapse during or following treatment, we may withdraw support and proceed to deal with the matter under the terms of our Disciplinary Procedure.
- On your return to work after having been declared fit for work by our medical advisor, should there be any recurrence of the original problem or your performance has been impaired by the problem and you can no longer perform at the required level, you will be subject to disciplinary action under our Disciplinary Procedure.

We may ask to search you or any of your property held on our premises at any time if there are reasonable grounds to believe that the prohibition on substances is being or has been infringed. The search will be carried out in accordance with our rules with regard to searches. If you refuse to comply with these search procedures, your refusal will normally be treated as amounting to gross misconduct entitling us to take disciplinary action.

We will inform the police of any suspicions we may have with regard to the use of controlled drugs by our employees on our premises.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Anti Harassment of Staff Policy

Aim

To define what constitutes harassment and outline the procedures to be taken if it occurs.

Policy

All employees are entitled to a working environment which respects their personal dignity, and which is free from any objectionable conduct. Harassment is a disciplinary offence and incidents will be dealt with under our Disciplinary Procedure (See also Language in Action Anti-bullying Policy).

In Language in Action, harassment is defined as:

- Bullying of colleagues, especially junior colleagues by behaving in an intimidating manner
- Unfavourable conduct at work, whether verbal or non-verbal, towards someone based on their disability which could affect their dignity at work
- Offensive conduct, whether verbal or non-verbal, which is of a sexual or racial nature or other conduct based on someone's race, sexual orientation and/or gender which affects the dignity of men or women at work.

A single incident can amount to harassment if sufficiently grave. Examples of harassment or bullying would include:

- Spreading malicious rumours, or insulting someone by word or behaviour (copying memos that are critical about someone to others who do not need to know, ridiculing or demeaning someone – picking on them or setting them up to fail)
- Exclusion or victimisation
- Unfair treatment
- Overbearing supervision or other misuse of power or position
- Unwelcome sexual advances – touching, standing too close, the display of offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected
- Making threats or comments about job security without foundation
- Deliberately undermining a competent worker by overloading and constant criticism
- Preventing individuals progressing by intentionally blocking promotion or training opportunities.

Bullying and harassment are not necessarily face to face. They may also occur in written communications, email, phone, and automatic supervision methods such as computer recording of downtime from work or the number of calls handled if these are not applied to all workers. Bullying and harassment can make someone feel anxious and humiliated. Feelings of anger and frustration at being unable to cope may be triggered. Some people may try to retaliate in some way. Others may become frightened and de-motivated. Stress, loss of self-confidence and self-esteem caused by harassment or bullying can lead to job insecurity, illness, absence from work, and even resignation. Almost always job performance is affected and relations in the workplace suffer.



PROCEDURE

Informal Stage

If you are the recipient of unwanted conduct amounting to harassment it is entirely acceptable to try to resolve the problem, if you prefer, by explaining to the individual concerned that the behaviour is not welcome, that it offends or makes you uncomfortable and that it interferes with your work.

If you have been subjected to harassing or bullying behaviour you may seek confidential assistance from your line manager who will assist and advise you in devising means of preventing a reoccurrence of the unwanted behaviour.

An informal approach to line managers will be treated as confidential and will not result in any report to anyone within the business unless there is a health and safety risk to other employees, or a criminal offence is involved.

If you prefer, where you find it too difficult or embarrassing to take up the matter yourself, your line manager will participate in an informal meeting between you and the individual concerned or will, at your request, approach the individual on your behalf.

The informal stage will not result in any formal internal investigation or disciplinary action but is intended to enable you to resolve the matter yourself without it going any further.

If the unwanted behaviour relates to your line manager, you may seek confidential assistance from your line manager's superior.

If you consider that you may have been subjected to conduct amounting to a criminal offence (such as a sexual assault) you are entitled to seek the assistance of a Head Office member (Emiliano Sallustri, Daniele Pluchino, Beatrice Bellina) to accompany you to make a formal complaint to a police officer or to provide you with any other assistance you may require. The Head Office will outline the circumstances of the case to your line manager and will liaise with them to arrange compassionate leave if appropriate.

If you prefer to seek advice from outside the company you could contact the Citizens Advice Bureau, the Acas helpline (0300 123 11 00 Open Monday – Friday 8am–8pm and Saturday 9am–1pm) or the Equality and Human Rights Commission (EHRC) at www.equalityhumanrights.com. Try to talk to colleagues to find out if anyone else is suffering, or if anyone has witnessed what has happened to you – avoid being alone with the bully or harasser.

Formal Stage

Where informal resolution is not appropriate, is not requested, or where the outcome has been unsatisfactory, then you may bring a formal written complaint to your line manager. If the complaint relates to your line manager, you can send it directly via email to the Summer Operations & HR Manager Beatrice Bellina at beatrice.bellina@malvernplc.com

If possible, you should keep notes of the harassment so that the complaint can include:

- The name of the alleged harasser
- The nature of the alleged harassment
- The dates and times when the alleged harassment occurred
- The names of any witnesses
- Any action already taken by you to stop the alleged harassment.

Language in Action

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All complaints will be thoroughly investigated and, wherever possible, within one week of the complaint being made. They will be conducted in an independent and objective manner by someone unconnected with the allegations and at least of equal grade/status with the alleged harasser. You should be aware that in addition to your rights under the internal procedure, you could be entitled to take your case to an Employment Tribunal if you wish. The time limit for bringing such a claim is usually three months. Further information can be obtained from the Director Emiliano Sallustri.

Investigations will be carried out with sensitivity and with due respect for the rights of both the complainant and the alleged harasser. All those interviewed will be permitted to be accompanied by a friend, colleague or representative of their trade union or professional organisation.

The importance of confidentiality will be stressed to all those interviewed, who will be strictly forbidden to discuss the complaint with colleagues or friends. Breach of confidentiality may give rise to disciplinary action.

The investigation will focus on the facts of the complaint. Notes will be kept of all stages of the investigation and those interviewed will receive notes of the interview to agree on. Parties will not be required to repeat distressing or embarrassing details any more than is necessary.

Wherever possible, consideration will be given to ensuring that the complainant and the alleged harasser are not required to work together whilst the complaint is under investigation. Where it is not practical to offer alternative duties to one or other party, the complainant will be given the option of remaining home on special leave if so desired.

The complainant will be kept informed of the general progress of the process of investigation and will be informed whether the complaint has been upheld and is to result in disciplinary action. The rights of the alleged harasser as to the confidentiality of the details of any disciplinary action will be respected unless there is a health and safety risk to other employees or a criminal offence is involved.

Any complaint that is unfounded and not made in good faith, for example a malicious complaint will be treated as a disciplinary offence.

Details of all formal complaints of harassment will be collated and annually reviewed by the Director with a view to ensuring that every effective step has been taken to prevent harassment at work and to monitor the effectiveness of the complaints procedure.

Reviewed:

Apr 2022

Reviewed by:

Emiliano Sallustri

Next Review:

Apr 2023

Review by:

Compliance Team



Language in Action Buildings Management

AIM

To ensure that all the buildings which fall under the management of Language in Action comply with the buildings regulations and are maintained in the best possible conditions.

POLICY

- All buildings must be checked on a regular basis for compliance with Health and Safety regulations.
- All buildings must be kept clean and tidy. In all residential accommodations cleaning of bedrooms and common areas is done weekly. Where bathroom facilities are shared, there is a daily cleaning of these spaces. Where breakfast is not provided in a canteen, LIA staff regularly checks common kitchens and request extra cleaning if necessary.
- The LiA centre staff will conduct a daily buildings check in the each centre.
- Any problems should be dealt with quickly and effectively, to minimise disruption to services and risks to health and safety.

PROCEDURES

1. Staff should report all problems to the Welfare Officer or Centre Manager
2. The Centre Manager will resolve all problems as quickly as possible, contacting venue staff or external providers where necessary.
3. All problems will be logged and assessed for health and safety implications.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Company Credit Card Policy and Procedures

Introduction:

The company may issue credit cards to staff members who travel frequently or who incur high levels of company expenditure. The cards are only available for business use and are to be used predominantly for expenses and not for the purchase of equipment etc. which must adhere to the normal procurement process.

Applying for a Language in Action, part of Malvern International Credit Card:

Application forms for a credit card must be completed, authorised by the Head of Department and returned to the Finance Section. The application will be reviewed and if approved a Company Credit Card supplied by the bank, will be issued along with a declaration agreeing to the terms of use of the card.

- Cards should only be for business use and under no circumstances should they be used for personal transactions. (Personal use of the card may lead to disciplinary action).
- Every expense paid via a card must be supported by a valid receipt.
- Cards will have a maximum credit limit of that is agreed by the line manager of the department.
- Company Credit Cards should not be used to withdraw cash under any circumstances.
- Corporate card transactions are to be uploaded to PLEO on a weekly basis during the month.

Settling Corporate Card Expenditure

- Company card statements are not issued to cardholders. However, anyone who would like to view their transactions can apply for online view -only access to their account.
- Receipts should be scanned or photographed with a smart phone, and the PDF image file attached to the relevant line of your expense claim.
- Failure to process a claim for expenditure incurred on a corporate card within 2 months of the costs being incurred may result in the card being suspended. Cards will only be re-instated once all claims have been entered.
- Line Managers will check transactions to ensure that the expenditure relates to genuine business activities, that the claim adheres to this Policy and that all receipts have been attached.

Returning a Company Card

When a member of staff leaves Language in Action, part of Malvern International, the company credit card must be returned to the Line Manager or the Finance office before their finish date. All expenditure incurred must be processed and approved on a company card expense claim prior to the card holder leaving the company.

Reviewed:

May 2022

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Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Critical Incidents on Excursions Policy

Introduction

Social Programme activities and excursions are an indispensable part of a broad and balanced curriculum. They are an opportunity to extend the learning of all students, including an enrichment of their understanding of British Culture and values.

Social Programme activities should be available to all students and be organised accordingly, with particular consideration being given to any students who are Under 18, and/or with a disability, especially when selecting venues and organising transport.

Our Social Programme activities are local and within the UK. The guidelines and procedures below should be followed when staff are taking any students outside of the main premises, whether within the local environment or further afield.

Good planning ensures the safety and well-being of students and staff.

Roles and Responsibilities

Prior to any excursion, the Activity Manager / Welfare Officer in the centre will:

- Ensure that visits comply with the guidelines in the Health and Safety Policy
- Ensure that the member of staff leading the excursion is competent to oversee the coordination of all off-site education and support them in understanding the excursion carefully and the related Risk Assessments. support them in attending relevant training courses – including First Aid when required.
- Ensure all agency Group Leaders have the excursion sheet and a clear understanding of the itinerary and Health & Safety guidelines and procedures.
- To ensure that in the event of a major incident or accident, the school's guidelines are adhered to in terms of informing parents, staff and the media

Role of the Activity Leaders:

The Activity Leader has full responsibility for the safe running of the activity including pre-planning and following guidance during the visit. To achieve this the Activity Leader, in accordance with the Activity Manager, will:

- Plan the itinerary in such a way as to account for all times on the visit including travelling time
- Complete any pre-visit documentation or bookings that need to be made as required by the Activity Manager
- Have prior knowledge of the venue – either through desk-research or pre-visit.
- Ensure they have reviewed and signed the Risk Assessment for any planned visit
- Have a full list of students and their mobile phone numbers/contact detail (or of the agency group leaders if part of a closed groups)
- Maintain awareness of health and safety and security throughout the trip. Continuously monitor the appropriateness of the activity during the prevailing conditions
- Ensure that they carry emergency mobile phone, first aid kit if possible, and have the number of the Centre Management staff. The telephone number for Emergency Services in the UK is 999.
- Inform students on the itinerary and meeting points. Ensure students wear their lanyard (with ID card and school emergency phone number) at all times and are aware of the school emergency phone number and procedures to follow in case of emergency.



Security Awareness Guidance

Counter terrorism policing has significantly increased its international presence in the last two years. Related to this, security in the areas and venues that we visit has an increased presence and we all have a role in maintaining vigilance to protect ourselves and others from the global terror threat.

Although exceedingly rare, terrorist attacks do still occur around the world. These have included explosive devices that have been left at venues and Marauding Terrorist Attacks (MTAs). MTAs are fast-moving, violent incidents where assailants move through a location aiming to find and kill or injure as many people as possible. Most deaths occur within the first few minutes of the attack, before police are able to respond.

MTAs can take many forms and include a combination of the following:

- A lone attacker, multiple attackers or multiple groups of attackers
- Arrival at a location on foot, in a vehicle or an attack perpetrated by insiders
- Entering a venue without using force or forcing entry using an explosive device, a vehicle, coercion of someone with access or a combination thereof
- Attackers armed with bladed weapons, firearms, pipe bombs, petrol bombs suicide vests or multiple weapons

Signs to look for

- People in stationary vehicles watching a building or structure
- Vehicles moving slowly near public buildings, structures or bridges, or parked in suspicious circumstances
- People using recording equipment, including camera phones, or seen making notes or sketches of security details
- Someone suspicious paying close attention to specific entry and exit points, stairwells, hallways or fire escapes
- People loitering at or near premises for long periods and watching staff, visitors and deliveries for no apparent reason
- People asking detailed or unusual questions about buildings and business operations, facilities (such as room layouts), security or parking for no apparent reason
- People acting suspiciously – apparent nervousness, extreme agitation – perhaps wearing bulky clothes or carrying a backpack that they keep fiddling with
- Anyone in 'off limits' areas, plant rooms and staff only areas

If you have any concerns, report this immediately to the security manager at the venue, a Police Officer nearby or call 999

In the case of incident

The UK Police guidance if you become involved in an incident is 'Run, Hide, Tell'.

RUN: to a place of safety. This is a far better option than to surrender or negotiate. If there's nowhere to go, then...

HIDE: It's better to hide than to confront. Remember to turn your phone to silent and turn off vibrate. Barricade yourself in if you can. Then finally and only when it is safe to do so...

TELL: the police by calling 999.



Evacuation

Emergencies can develop very rapidly. Staff must be equipped to move the students to a total or relative place of safety without delay. The Activity Leaders should familiarise themselves with escape routes, exits and evacuation signage at all points during the excursion and particularly while arriving at the venue. These should be pointed out to students upon arrival at a new venue. The following actions will help:

Escape routes

- Plan escape routes and make sure they remain available and unobstructed

Signs and lighting to help evacuations

- Consider signage for people unfamiliar with escape routes. Ensure that students understand the signage on display – particular attention should be paid to students with disabilities

Places of Safety

- Identify places of safety in the immediate surroundings. Plan how you will evacuate people to a place of relative safety from where they can make their way to a place of total safety

Vulnerable people

- Plan to provide additional assistance to people with a disability, people with learning difficulties, those with limited mobility and children

Communicating with Emergency Services/the school

- Don't assume somebody else has already called emergency services. Call emergency services as soon as you are able. Call your line Manager as soon as it safe for you to do so.

Transfer of Authority for an Emergency/Major incident

If the emergency services declare an emergency/major incident the Activity Leader will work under the command of the police and emergency services. However, the police may declare one part of the area of the incident location to be safe enough to return authority to the Activity Leader so that they can respond to the emergency/major incident. The Activity Leader should return the entire group to the centre.

After the Incident

The school will debrief the Activity Leaders and the students. The school will have been in contact with parents/guardians throughout the incident and will update them after the incident. Counselling services will be offered to all students and staff.

Communicating with the Media

The organisations CEO will lead on all communication with the media. Language in Action staff are required to not discuss any aspect of the incident with representatives of the media without permission from the organisations CEO.



Language in Action Emergency Plan of Action

This EPoA is to be executed by the designated Activity Leader, appointed by the Activity Manager. In the event of an emergency:

- Establish nature and extent of the emergency.
- If there are injuries, establish their extent and have first aid administered (if you, or another member of the group, have been trained or feel capable – but be aware of consequences that might follow were you to give incorrect treatment).
- Telephone relevant emergency services- 999 or launch 112 app.
- Establish names of the injured and ensure that all other members of the group are accounted for and safe.
- Advise other staff and Group Leaders of the incident and that emergency procedures are in operation.
- Ensure that an adult from the group (agency Group Leader or LIA staff members) accompanies casualties to hospital or if on your own you go with the injured student(s) or staff members; the Emergency Services will look after the rest of the party until another member of staff arrives.
- Ensure that the remainder of the group are adequately supervised by Group Leaders and any other LIA staff throughout and arrange for their early return to accommodation, accompanied by Group Leaders.
- Arrange for one adult (LIA staff member or Group Leader) to remain at the incident site to liaise with emergency services until the incident is over and all students, Group Leaders and staff are accounted for.
- Control access to telephones until contact is made with the Centre Manager and until they have had time to contact those directly involved. Pass full details of the incident (name, nature, date and time of incident, location of incident, details of injuries, names and telephone numbers of those involved, action taken so far).
- Identify alternate telephone numbers in case telephone lines become jammed.
- The Company will arrange to contact the parents or next of kin of those involved. In serious incidents the parents or next of kin of all party members should be informed.
- Write down accurately and as soon as possible all relevant facts and witness details and preserve any vital evidence.
- Complete an accident report form as soon as possible.
- No one in the group should speak to the media. Names of those involved in the incident should not be given to the media as this could cause distress to their families.
- No one in the group should discuss legal liability with other parties.

Reviewed:

Apr 2022

Reviewed by:

Emiliano Sallustri and Daniele Pluchino

Next Review:

Apr 2023

Review by:

Emiliano Sallustri and Daniele Pluchino



Language in Action

Data Protection Policy (GDPR compliant)

Overview

On the 25th May 2018 the General Data Protection Regulation (GDPR) will be applicable and the current Data Protection Act (DPA) will be updated by a new Act giving effect to its provisions. Before that time the DPA will continue to apply.

This Policy sets out the manner in which personal data of staff, students and other individuals is processed fairly and lawfully.

Language in Action, part of Malvern International, collects and uses personal information about staff, students, parents or carers, seasonal centres, suppliers, providers, agents, and other individuals who come into contact with the company and its seasonal centres. This information is gathered to enable us to provide education, accommodation, travel, and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that our schools comply with their statutory obligations.

Language in Action, part of Malvern International, has a designated data controller who ensures that we comply with the Data Protection Principles in the processing of personal data, including the way in which the data is obtained, stored, used, disclosed, and destroyed. Language in Action, part of Malvern International, must be able to demonstrate compliance. Failure to comply with the Principles exposes Language in Action, part of Malvern International, and its staff to civil and criminal claims and possible financial penalties.

Aim

This Policy will ensure:

Language in Action, part of Malvern International, processes personal data fairly and lawfully and in compliance with the Data Protection Principles.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities under this policy.

That the data protection rights of those involved with the company are safeguarded. Confidence in the company's ability to process data fairly and securely.

Scope

This Policy applies to:

Personal data of all company employees, interns, volunteers, contractors, board members, students, parents and carers, agents, seasonal centres, suppliers, providers, and any other person carrying out activities on behalf of the company.

The processing of personal data, both in manual form and on computer. All staff and board members.



The Data Protection Principles

The company will ensure that personal data will be:

- Processed fairly, lawfully and in a transparent manner;
- Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed;
- Accurate and, where necessary, kept up to date;
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;
- Processed in a way that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- Kept securely and accessible only to authorised persons.

The company will be able to demonstrate compliance with these principles.

The company will have in place a process for dealing with the exercise of the following rights by Board members, staff, students, parents and members of the public in respect of their personal data:

- To be informed about what data is held, why it is being processed and who it is shared with;
- To access their data;
- To rectification of the record;
- To erasure;
- To restrict processing;
- To data portability;
- To object to processing;
- Not to be subject to automated decision-making including profiling.

Roles and Responsibilities

The Director responsible for ensuring the appointment of a 'Data Controller' (usually this person will be the Operations Manager).

The Data Controller serves the function of Data Protection Officer. They will have responsibility for all issues relating to the processing of personal data and will report directly to the Director.

The Data Controller Officer will comply with responsibilities under the GDPR and will deal with subject access requests, requests for rectification and erasure, data security breaches. Complaints about data processing will be dealt with in accordance with the LiA Complaints Policy.

The Data Controller is responsible for ensuring that all departments and their support services implement good data protection practices and procedures and for compliance with the Data Protection Principles.

It is the responsibility of all staff to ensure that their working practices comply with the Data Protection Principles. Disciplinary action may be taken against any employee who breaches any of the instructions or procedures forming part of this policy.



Reasons/purposes for processing information

We process personal information to enable us to: provide education, training and educational support services such as accommodation and travel to our clients. It is also necessary for us to ensure the Safeguarding of our students and maintain student welfare. In addition, this information is required for us to administer our centres, maintain our own accounts and records and to support and manage our employees.

Our residential and classrooms providers also use CCTV systems to monitor and collect visual images for security and the prevention of crime.

Type/classes of information processed

We process information relating to the above reasons/purposes. This information may include:

- name and personal details
- family/next of kin details
- financial details
- education details
- employment details
- student and disciplinary records
- vetting checks
- goods and services
- visual images

We also process sensitive classes of information that may include:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs of a similar nature
- offences and alleged offences

who the information is processed about

We process personal information about:

- our students and pupils
- agents or other professional services
- school staff
- members of school or company boards
- suppliers
- complainants and enquirers
- individuals captured by CCTV images



Who the information may be shared with

We sometimes need to share the personal information we process with the individual concerned and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- education, training, careers and examining bodies
- agents (domestic or overseas)
- members of staff
- family, associates and representatives of the person whose personal data we are processing
- local and central government
- healthcare professionals
- social and welfare organisations
- police forces
- courts
- current, past or prospective employers
- business associates and other professional advisers
- suppliers and service providers
- financial organisations
- security organisations
- press and the media

Transfers

It may sometimes be necessary to transfer personal information overseas. When this is needed information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of the data protection act.

Reviewed:

Mar 2022

Reviewed by:

Emiliano Sallustri, Director

Next Review:

Mar 2023

Review by:

Emiliano Sallustri, Director



Language in Action

LIA Privacy and Cookies Policy

Language in Action takes data privacy seriously and when we process your personal data or that of your children or wards we are processing it in compliance with the General Data Protection Regulation (GDPR). Please read this privacy and cookies policy carefully to understand why data is being collected and what we do with that data once in our possession. Further information about data privacy may be found in our terms of business document.

What type of personal data will we collect from you?

The personal data we collect will depend on the nature of the services we are providing and what we are contracted to do for you. Typically, where relevant, this might include the following:

1. Contact details (including your name, address, date of birth, and email address)
2. Photographic identification and proof of address documents (to carry out due diligence)
3. Professional information (such as job title, previous positions, and professional experience)
4. Banking and financial details (to establish the source of funds where a transaction is involved)

Where necessary to act in your child or ward's best interests, we may need to process personal data which is very sensitive in nature such as diversity and health related details. In some circumstances, we may need to share this information with third parties, for example health and social care professionals, a court or other regulatory bodies. If you volunteer sensitive personal data, you will be allowing us to process it as part of engaging our services.

On what basis can we process your personal data?

Our reasons for processing your personal data are as follows:

1. It is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you. The retainer between you and us, which is made up of our terms of business and engagement letter, sets out the terms of the contract and the services we will provide
2. It is necessary for the purposes of our legitimate interests, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you). To determine this, we shall consider a number of factors, such as what you were told at the time you provided your data, what your expectations are about the processing of the data, the nature of the data, and the impact of the processing on you.
3. It is necessary in order to comply with mandatory legal obligations to which we are subject under EU or UK law.

Personal data collected from you about other people

In commercial matters, in the course of providing our health and social care and other professional services to you we will hold and use personal data about you and/or your employees. When you provide personal data to us relating to your employees, you confirm that you are allowed to do so. You should ensure that those individuals understand how their data will be used by us.

In personal matters, you may be providing other third-party data to us, for example details about your family members, in which case we will use such data as a data controller in our own right and will comply with data protection legislation in relation to use of that data. You must have the authority to disclose personal data if it relates to someone else and all data disclosed should be complete, accurate and up to date.

What are we going to do with your personal data?

We will hold and use personal data about you to:

- Verify your identity and establish the source of funding in any transaction.
- Carry out appropriate anti-fraud checks (by conducting online searches using a third-party identity provider). Please note that this will not affect your credit rating.
- Communicate with you during the course of providing our services, for example providing you with advice and dealing with your enquiries and requests.
- Prepare documentation to access services and/or complete transactions.



- Carry out appropriate anti-fraud checks (by conducting online searches using a third-party identity provider). Please note that this will not affect your credit rating.
- Communicate with you during the course of providing our services, for example providing you with advice and dealing with your enquiries and requests.
- Prepare documentation to access services and/or complete transactions.
- Carry out obligations arising from any contract entered into between you and us as part of your educational, health and social care services.
- Refer you to another of our departments about additional legal services which may benefit you.
- Statistical purposes so we can analyse figures to help us manage our business and plan strategically for the future.
- Seek advice from third parties in connection with the services we provide.
- Respond to any complaint or allegation of negligence against us.
- Prevent money laundering or terrorist financing in accordance with financial crime regulations.
- Improve the products and services we provide.
- Customize our website for you.
- Send you information about products, services, offers and other things we think might be relevant to you.

How long we keep your personal data for?

We will only retain your personal data for as long as is necessary to:

- Carry out health, care and educational services.
- Establishment or defence of legal claims (for example negligence claims) that could be made against us.
- Compliance with legal obligations under EU/UK law (anti-money laundering regulations say your identification and source of funds information must be kept for a minimum period from conclusion of the matter). We will keep your data in accordance with our data retention and erasure policy, a copy of which is available on request.

Who your personal data will be shared with?

We may, when required and necessary, share your personal data with other organizations. Depending on the work we are undertaking for you the other organizations may include:

- Our organization's 'data processors' who are contractors from whom we obtain operational services including IT, message-taking, typing and secretarial support, costs draftsmen, secure document storage and shredding.
- Other 'data controllers' that provide professional or commercial services, such as solicitors, accountants, medical and health and social care practitioners.
- Experts that you and we agree are necessary to assist us to progress your matter.
- Providers of insurance, health and social care, educational and other related services to you and/or to our organisation.
- The CQC, Department for Education, the Information Commissioner's Office (ICO) and organisations involved with the preparation, assessment and certification of quality standards for which our organisation is seeking or maintaining accreditation.

Your Rights

Here is a list of the rights that you have under the data protection legislation:

- The right to be informed about the processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the "right to be forgotten");
- The right to request access to your personal information and to obtain information about how we process it;
- The right to move, copy or transfer your personal information ("data portability"); and
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request. This is to ensure that your data is protected and kept secure.



Controlling information about you

If you have agreed that we can use your information for marketing purposes, you can change your mind easily, via one of these methods:

- Send an email to us;
- Write to us.

We will never lease, distribute or sell your personal information to third parties unless we have your permission, or we are required to disclose your personal details by law. Any personal information we hold about you is stored and processed under our data protection policy, in compliance with the Data Protection Act 1998.

Security of your personal data

Your data will be held on secure servers within the European Economic Area ("EEA") with all reasonable technological and operation measures put in place to safeguard it from unauthorised access. Where possible any identifiable information will be encrypted or minimised.

Erasure of personal data

Where we obtained your personal data to fulfil our contractual obligations to you, or if we have a legitimate interest for processing your personal data, we will erase that data as soon as it is no longer necessary to retain it in relation to the purpose for which it was originally collected.

If you are not our client, your personal data may be processed to enable us to provide legal advice to our client and may also be used in legal proceedings on behalf of our client. We are allowed to use your personal data because it is in the legitimate interests of our client.

(for example under the terms and conditions of a loan agreement) to do so. We may also have to use your personal data to comply with our own legal and regulatory obligations.

Cookies

Cookies are small text files that are placed on your computer by websites you visit. Cookies help make this website work and provide information to us about how users interact with our site.

We use this information to improve our website. The cookies we use help to provide us with anonymised, aggregated technical information. This is principally so that we can make sure that the website is easy to navigate, identify the areas that are of interest to visitors and generally improve the site and our services. The information that we collect in this process will not identify you as an individual. We do not seek to identify individual visitors unless they volunteer their contact details through one of the forms on the site. In some circumstances, our records will identify organisations visiting our site and we may use that information in managing our relationship with those organisations, for example, in considering how to develop the services that we offer them.

By using our website, you agree that we can place these types of cookies on your device. When you accessed this website, our cookies were sent to your web browser and stored on your computer. If you wish to remove them, you can manage this via the settings on your browser but note that this may impact your ability to utilise this and other websites. The way to clear cookies varies from one browser to another.

You should look in the "help" menu of your web browser for full instructions. For your reference, please click the following links for details on how to manage cookies in each of the major web browsers:

- [Internet Explorer](#) • [Firefox](#)
- [Chrome](#)
- [Opera](#)
- [Safari](#)
- [Safari for iPad and iPhone](#)

Language in Action

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JUNIOR PROGRAMMES

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INTERNATIONAL

Lodging a complaint

Language in Action only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the ICO.

Contacts

If you have any questions about our privacy policies, want to exercise your right to see a copy of the information that we hold about you, or think that information we hold about you may need to be corrected, want to delete all or any part of it or to object to the processing on legitimate grounds, please contact our Director, Mr Emiliano Sallustri, or our Operations Manager, Mr. Daniele Pluchino, at Language in Action Head Office (Malvern Brighton School): 20 Queens Rd, Brighton BN1 3XA, UK - Phone: +44 (0)1273 661575

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action Disability - Staff

AIMS:

Language in Action is committed to employing people with disabilities.

POLICY:

Language in Action will:

- Interview all applicants with a disability that meet the minimum criteria for a job vacancy and consider them on their abilities.
- Ensure there is a mechanism in place to discuss at any time and at least once a year with disabled employees what both parties can do to make sure the disabled employee can develop and use their abilities.
- Ensure that students whose disability affects mobility have a PEP (Personal Evacuation Plan) completed with them in case of emergency.
- Make every effort when employees become disabled to make sure they stay in employment.
- Take action to ensure that all employees develop the appropriate level of disability awareness needed to make these commitments work.
- Each year, review these commitments and what has been achieved, plan ways to improve on them and let employees and the Employment Service know about progress and future plans.
- Any conduct which breaches this policy will not be tolerated and action may be taken under our Disciplinary Procedure.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action Disabled Student Policy

AIMS:

- To support and welcome students who have a physical or learning disability and to minimise the impact that their disability has on their learning and overall experience of the school.
- To give this support with minimal effect on the normal procedures and practices for the class as a whole.

POLICY:

- To gain information on any disabilities before the student arrives in the school.
- To decide whether or not the school can reasonably accommodate the student's needs and if not, to communicate the reasons for this decision and to give guidance as to alternative study institutions.
- To inform all involved (centre staff, agency group leaders, LiA-rented premises staff) of disabled students prior to their arrival.
- To ensure that all staff are well informed about procedures and strategies for dealing with students with disabilities in the classroom and in the centre, as appropriate.
- Physical disabilities include but are not limited to: wheelchair users, blind and deaf students.
- Learning disabilities include but are not limited to: dyslexia and dyspraxia.

PROCEDURE:

- Head Office to check completed Student forms for summer arrivals for any declared disabilities, so that we know which centre the student will study in.
- Students with disabilities should not have their application confirmed before it has been checked that the particular centre can meet their needs and in the case of physical disabilities, ensure their safety.
- Agency partners to inform LiA Head Office with student details, centre chosen and arrival date.
- A decision should be made jointly by the above staff and communicated to agency partners, who will then inform the student or agent directly and suggest alternative institutions, if necessary.
- If the student is accepted, all members of the Centre staff should be informed, as well as the class teachers.
- For all other disabilities that affect learning, information and advice will be provided to the teachers by the DoS.
- Centre Manager is responsible for informing and supporting the centre staff on non-classroom matters.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Disciplinary Procedure (STAFF)

AIM

The purpose of this procedure is to enable all our employees to be aware of both the responsibility of Language in Action and its employees in investigating and dealing quickly, fairly and consistently with allegations of unacceptable conduct or performance. The procedure is designed to help and encourage all employees to achieve and maintain appropriate standards of conduct, attendance and job performance.

We may depart from the precise requirements of our Disciplinary Procedure where it is expedient to do so and where the resulting treatment of the employee is no less fair.

POLICY

It is our policy that if disciplinary action has to be taken against employees it should:

- Only be undertaken after an investigation and disciplinary interview have been carried out; and
- Be appropriate to the nature of the offence that has been committed; and
- Be fair and consistent with previous action in similar circumstances, provided that action proved to be appropriate.

PROCEDURE

There are four stages in the procedure, but the particular stage used at any time will depend on:

- The seriousness of the offence; and/or
 - Whether a previous stage in the procedure has already been used.
- **Stage One – Oral Warning**
 - You will be advised by your line manager that the warning constitutes the first formal stage of this procedure and a note of it will be placed on your personnel file and remain in force for six months.
 - An Oral Warning will be given in respect of a less serious offence, infringement or case of incapability.
 - **Stage Two – Written Warning**
 - This will be given to you by your line manager for a more serious offence or if a further offence occurs while a previous offence remains in force on your file.
 - A written warning will be forwarded to you and a copy kept on your file for 12 months. Stage Three of the procedure may be considered if there is no satisfactory improvement.
 - **Stage Three – Final Written Warning**
 - This will be confirmed to you in writing by your manager and will state that if you commit a further offence of misconduct or, as the case may be, unless your work improves within the period specified, your employment will be terminated.
 - A Final Written Warning will be given following the use of Stage Two or without the use of Stage Two where the offence, infringement or case of incapability is of a more serious nature. A note will be placed on your file and remain in force for 12 months.
 - **Stage Four – Dismissal**
 - Dismissal will be notified to you in writing by a Director. Dismissal will take place following further misconduct after a warning has been given under Stage Three of the procedure or, where the dismissal relates to incapability, inadequate or no improvement in performance, following a warning under Stage Three of the procedure.



Note that no one will be dismissed for a first offence unless their conduct amounts to gross misconduct warranting summary dismissal.

If a warning under Stages One to Three relates to your incapability to perform your duties (e.g., poor performance, incompetence, unsuitability or lack of application) the warning will specify the improvement required of you and will state a period after the warning date at the end of which your work will be reviewed. If the warning is a Final Written Warning relating to your capability, it will state a period in which your employment must improve after the date of the warning, failing which your employment will be terminated.

GROSS MISCONDUCT

Gross misconduct will result in immediate dismissal without notice or pay in lieu of notice. Dismissal will be notified to you in writing.

PROCEDURE IMPLEMENTATION

The following steps will be taken, as appropriate, in all cases of disciplinary action:

- Investigations
 - No action will be taken before a proper investigation has been undertaken by your line manager into the matter complained of. If appropriate, your line manager may, by written notice, suspend you on full pay whilst investigations into the alleged offence take place. You will not normally be suspended for more than five working days unless, in the opinion of your line manager, a longer period of suspension is reasonably necessary in the circumstances. During any period of suspension, you will not be entitled to access to any of our premises except at the prior request or with the prior consent of a Director and subject to such conditions as they may impose.
- Disciplinary hearing
 - You will not be disciplined without first being given the opportunity to state your side of the case at a disciplinary hearing. You will be given details of the complaint against you at least three working days before the hearing and you will have the right to be accompanied by a fellow employee of your choice or an accredited trade union official. A disciplinary hearing may go ahead in your absence if you fail to turn up.
- Appeals
 - You have a right to appeal against any disciplinary decision to a Director who did not hear the original disciplinary hearing. You must inform the Director in writing of your wish to appeal within five working days of the date of the decision which is the subject of your appeal and detail the reasons for your appeal.
 - The appeal hearing will be conducted as soon as possible after receipt of notice of appeal. You will be given an opportunity to state your case and will be entitled to be accompanied by a fellow employee of your choice or an accredited trade union official. An appeal hearing may go ahead in your absence if you fail to turn up. The decision of the person carrying out the appeal will be notified to you in writing and will be final and binding.

OFFENCES WHICH WILL LEAD TO DISCIPLINARY ACTION

Offences under the Disciplinary Procedures fall into three categories:

- Misconduct
- Gross misconduct
- Incapability

The following lists give examples of each of these categories. The lists are not intended to be exclusive or exhaustive and offences and cases of incapability of a similar nature will be dealt with by this procedure.



The following lists give examples of each of these categories. The lists are not intended to be exclusive or exhaustive and offences and cases of incapability of a similar nature will be dealt with by this procedure.

- Misconduct
 - Abusive behaviour
 - Failure to devote the whole of your time, attention and abilities to our business and its affairs during any working hours
 - Horseplay or disorderly conduct
 - Minor acts of discourtesy towards clients or employees
 - Minor breaches of our rules and policies
 - Minor negligence including misuse of or damage to our property
 - Persistent or irregular absenteeism
 - Poor timekeeping
 - Serious loss of time through smoking
 - Sexual or racial harassment (depending upon the degree of severity)
 - Unauthorised absence
 - Insubordination (depending on degree of severity)
- Gross misconduct
 - Breach of duty of good faith or dishonesty even though it may be isolated
 - Deliberate damage to our property
 - Deliberate sleeping during working hours
 - Falsification of reports, accounts, expense forms, or self certification forms
 - Professional disqualification
 - Refusal to carry out reasonable instructions
 - Serious breaches of our rules and policies
 - Serious negligence or recklessness in the conduct of our business
 - Sexual or racial harassment (depending upon the degree of severity)
 - Taking, being in possession of or under the influence of non-prescribed drugs, drinking or drunkenness at work
 - Theft or unauthorised possession of property belonging to us or to any employee
 - Unauthorised disclosure of confidential information or information in regard to which we owe a duty of confidence to anyone
 - Unauthorised entry to computer records
 - Violent, dangerous or intimidatory conduct
 - Insubordination (depending on degree of severity)
- Incapability
 - Incompetence
 - Lack of application
 - Poor performance
 - Unsatisfactory sickness record
 - Unsuitability

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Dress Code Policy

AIM

To ensure that all staff, in particular those who are client-facing, dress in a professional manner, which is appropriate to their role within the company.

NON UNIFORM DRESS CODE

We encourage everyone to maintain their dress and personal appearance in a manner that is professional in our business environment. Your appearance, professional conduct, actions and the impressions you make on students, clients and other professionals with whom you come into contact are important not only for your own advancement and job satisfaction but for the continuing development of the business. Requirements may be different according to your position.

TEACHERS

Students expect their teachers to look professional, although they should also be approachable and friendly. Teachers should wear clothing that they are comfortable in (as many class activities require movement) and it should be clean and in good repair.

MANAGERS

When meeting clients or potential clients, managers should be dressed appropriately, wearing suits or similar smart dress. At other times a smart casual dress code should be adopted. Sportswear is not acceptable.

CENTRE STAFF

Centre staff should wear clothing that is appropriate to their role and is not likely to be viewed as offensive, revealing or sexually provocative. This clothing should not distract, cause embarrassment or give rise to misunderstanding. Clothing should be absent of any political or otherwise contentious slogans. If a uniform is provided, it should be worn at all times and kept in a clean and neat condition. Any item of uniform provided will remain company property and should be returned if the employment terminates.

ADMINISTRATIVE AND OTHER STAFF

All other staff should maintain a neat, clean and professional appearance and in a manner appropriate to their specific role. If you are unclear as to what we would regard as an appropriate standard of dress, you should seek guidance from your line Manager.

INAPPROPRIATE ATTIRE

This includes, but is not limited to, dirty, torn or frayed clothing; sportswear; clothing that reveals underwear; garments with offensive slogans.

Any employee who fails to comply with these rules may be subject to disciplinary action.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action E-Safety Policy

INTRODUCTION AND AIMS

Language in Action recognises the benefits and opportunities which new technologies offer to teaching and learning and prides itself on its integration of technology into the learning environment.

We provide internet access to all learners and staff and encourage the use of technologies in order to enhance skills and to enable our students to achieve their learning goals. However, the accessibility and global nature of the internet and different technologies available mean that we are also aware of potential risks and challenges associated with such use. This e- safety policy should be read alongside other relevant school policies relating to Safeguarding and Child Protection, Bullying, Welfare and Discipline.

CREATION, MONITORING AND REVIEW

This policy has been created by the Director in consultation with other stakeholders and its impact is monitored regularly with a full review being carried out annually. The policy will also be reconsidered where particular concerns are raised or where an e-safety incident has been recorded.

POLICY SCOPE

The policy applies to all users of Language in Action's IT systems, both on the premises and remotely. The e-Safety Policy applies to all use of the internet and forms of electronic communication such as email, mobile phones and social media sites.

ROLES AND RESPONSIBILITIES

The primary point of contact for all concerns regarding e-Safety is Language in Action's designated Child Protection Officers (Welfare Officers) or Director (Designated Safeguarding Lead of the company). All staff are responsible for ensuring the safety of students and colleagues, and should report any concerns immediately to either their line manager, Welfare Officer (in the case of an under 18 student) or, if required, Director or Deputies DSL in case of DSL absence. Staff are required to inform all IT users of this policy. When informed about an e-safety incident, staff members must take particular care not to guarantee any measure of confidentiality towards either the individual reporting it, or to those involved.

When any incident pertaining to e-Safety is reported, Language in Action undertakes to thoroughly investigate the incident and to review the existing school policies, updating them where required.

SECURITY

The school will endeavour to ensure that the school network is safe and secure. Every effort will be made to keep security software up to date. Appropriate security measures will include the use of enhanced filtering and protection of firewalls, servers, routers, work stations etc. to prevent accidental or malicious access of school systems and information. Digital communications, including email and internet postings, over the school network, will be monitored in line with all Language in Action policies.



BEHAVIOUR

Language in Action will ensure that all users of technologies adhere to the standard of behaviour set out in our Terms and Conditions.

The school will not tolerate any abuse of IT systems. Whether offline or online, all communications by staff and learners should be courteous and respectful at all times. Any reported incident of bullying or harassment or other unacceptable conduct will be treated seriously and in line with the student and staff disciplinary codes.

Good conduct includes only using mobile telephones and other devices at appropriate times so as not to disrupt the learning of others. Students are asked to switch off mobile devices when in class.

Where conduct is found to be unacceptable the school will deal with the matter internally. Where conduct is considered illegal, the school will report the matter to the police.

APPROPRIATE USAGE FOR STUDENTS UNDER 18

The majority of students within the school are under 18 and therefore the following measures are put into place:

- Students are not allowed to use computers on LiA-rented main premises. In exceptional cases, adult supervision is required to protect children from viewing inappropriate material.
- Careful monitoring to ensure there is no use of phones in class, in accordance with the class rules for all students, including under 18s.
- Informal monitoring during break times or social activities when students are using their own tablets, phones and computers.
- Encouraging teachers, especially those of closed group under 18 classes, to discuss e-safety issues in class.

USE OF IMAGES AND VIDEO

The use of images, or photographs, is popular in teaching and learning and should be encouraged where there is no breach of copyright or other rights of another person (e.g., images rights or rights associated with personal data). This will include images and audio and video files downloaded from the internet and those belonging to staff or learners.

Photographs of activities on the main premises should be considered carefully and have the consent of the Centre Management staff before being published. Approved photographs should not include names of individuals without prior written consent.

More information can be found in our Data Protection policy.

Language in Action

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PERSONAL INFORMATION

Language in Action is committed to keeping the personal information of its staff and students secure. The school collects and stores the personal information of learners and staff regularly (e.g., names, dates of birth, postal and email addresses, assessed materials, etc.). Language in Action undertakes to keep this information safe and secure and not to pass it on to third parties without the written consent of the affected person(s).

No personal information can be posted to the school website without the permission of the person(s) affected unless it is in line with our Data Protection Policy. No personal information for either learners or staff will be available on the website without prior written consent.

Staff must keep learners' personal information safe and secure at all times. When using an online platform, all personal information must be password protected. Every user of IT facilities is required to log off on completion of any activity, or where they are physically absent from a device for any period.

Where personal data is no longer required, it must be securely deleted in line with Language in Action Data Protection policy.

INCIDENTS AND RESPONSE

Where an e-safety incident is reported to the school, this matter will be dealt with very seriously. The school will act immediately to prevent, as far as reasonably possible, any harm or further harm occurring. If a learner wishes to report an incident, they can do so to their teacher, group leader, or the Welfare Officer for students under 18. Where a member of staff wishes to report an incident, they must contact their line manager as soon as possible, or the Welfare Officer for under 18 students. Following any incident, the school undertakes to review what has happened and decide on the most appropriate and proportionate course of action. Sanctions may be put in place, external agencies may be involved, or the matter may be resolved internally depending on the seriousness of the incident. Serious incidents will be dealt with by senior management, in consultation with appropriate external agencies where applicable.

FEEDBACK AND FURTHER INFORMATION

Language in Action welcomes all constructive feedback on this and any other school policy. If you would like further information, please contact the Director Emiliano Sallustri at emiliano.sallustri@malvernplc.com or +44 (0)7471830607.

Reviewed:

Apr 2022

Reviewed by:

Emiliano Sallustri

Next Review:

Apr 2023

Review by:

Emiliano Sallustri



Language in Action Equal Opportunitites Policy

Aim

Language in Action is an equal opportunities establishment. We are committed to ensuring within the framework of the law that our workplaces are free from unlawful discrimination on the grounds of colour, race, nationality, ethnic or national origin, gender, sexual orientation, age, marital status, religion, disability or part-time working.

We aim to ensure that all our students, staff and partners achieve their full potential and that all decisions are taken without reference to irrelevant or discriminatory criteria.

We are committed to ensuring that all our employees, staff and partners - and applicants for the purposes of establishing any of these relationships in the future - are protected from unfair and unlawful discrimination.

Implementing equality of opportunity

- Recruitment (employment of staff and recruitment of students) and all management decisions will be made on the basis of fair and objective criteria. Our selection procedures are reviewed annually, as a response to changes in legislation whenever these might occur, and, in light of any incidences where unforeseen unfairness of practice has been identified. This is to ensure that our actions are appropriate for achieving our equal opportunity aims and objectives and also for avoiding unlawful discrimination.
- Regarding employment of our staff team, Job Descriptions shall be limited to those requirements which are necessary for the effective performance of the job. Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary.
- Staff, Students and our partners have a right to equality of opportunity and also a duty to implement this policy themselves. Breach of the Equal Opportunities Policy is potentially a serious matter. If you believe you may have been disadvantaged on discriminatory grounds you are entitled to raise the matter through the Grievance Procedure or Complaints procedure.

Implementation of this policy is the responsibility of every employee.

Reviewed:

Apr 2022

Reviewed by:

Emiliano Sallustri

Next Review:

Apr 2023

Review by:

Emiliano Sallustri



Language in Action Feedback Policy

1. POLICY STATEMENT

To enable Language in Action to provide a responsive quality service it is essential to actively seek the views of students who use our services. Experience demonstrates that the wealth of information gained from listening to our students will add considerable value to the quality of service we provide. Ensuring that all students and staff have access and opportunity to feed back their views and experiences is an essential part of how we ensure that we continue to improve what we offer.

2. INTRODUCTION

Students have a right to have their views heard and acted upon. This includes complaints, compliments, comments, questionnaires and the full range of approaches to facilitate feedback. The School will ensure that information gained is acted upon to improve, plan, develop and evaluate the services delivered.

The Student Feedback Policy aims to ensure that:

- The information received as a result of complaints, compliments, comments and questionnaires and other forms of feedback is used to improve services provided to students.
- The School response to complaints is fair and equitable to both the complainant and staff involved.
- Investigations of complaints are performed in a thorough and timely manner, facilitating the resolution of concerns in an open and conciliatory way (please see the LiA complaints policy).

3. WHAT IS A FEEDBACK?

Compliment

Positive feedback in writing (often in the form of a thank-you card or comment on the questionnaire) or verbally regarding the service received by students.

Comment/Concern

An issue raised in writing or verbally to any member of staff within the school identifying concerns about the service provided or proposing ways of improving the service for students (these comments can also be positive feedback). Response to these issues if required should be on the spot when possible.

Complaint (formal)

An expression of dissatisfaction in writing with some or all of the services provided requiring a formal investigation and written response. For the purpose of the formal complaints procedure "in writing" means:

- (a) Written by or on behalf of the complainant – this is particularly relevant for people who have English as a second language.
- (b) Written by an employee of the school;
- (c) Complaints that are received electronically via e-mail by either an employee of the school or student.

Please refer to the Student Complaints Policy or Staff Grievance Policy

Forms of feedback collected

A range of approaches is in place across the school to obtain feedback from students:

- First week survey
- End-of-course survey
- Informal meetings with agency group leaders
- Suggestion boxes

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4. RESPONSE TO FEEDBACK

The school will take feedback seriously. Every effort will be made by staff to act on feedback at the time if possible.

In the case of a formal complaint the process of investigation will comply with LiA Complaints Policy and Procedures.

Statistical results from key questions on the initial and end of course questionnaires will be reported to the Centre Management team during the weekly general meeting.

All results from questionnaires will be reviewed at team level to improve delivery. They will ensure that themes emerging from feedback are identified and that action is taken that demonstrates, where possible, benefits to students. These arrangements will show that lessons have been learned, and the student experience has improved, as a result of complaints, compliments, comments, questionnaires and all other forms of feedback.

5. EQUALITY AND DIVERSITY

The school is committed to ensuring that, as far as is reasonably practicable, the way we provide services to students and the way we treat our staff reflects their individual needs and does not discriminate against individuals or groups on the basis of their ethnic origin, physical or mental abilities, gender, age, religious beliefs or sexual orientation.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

First Aid Policy and Procedure

AIM

To provide adequate first aid to staff and students in case of injury or illness.

Language in Action take Health and Safety seriously in order to create a low-risk environment and anticipated emergencies are of a minor level. We seek to supply sufficient help in case of injury or illness until the emergency services arrive.

PROCEDURES:

First Aiders

- The Health & Safety Lead is to plan and implement first aid training. For this purpose, a training log is to be kept and regularly monitored. It is the H&S Lead's responsibility to assess training requirements as appropriate for the number of staff and students in each building.
- First aiders are selected based on personal qualities and their working arrangements. First aiders must be reliable, able to stay calm in an emergency, fit enough to rapidly attend an incident. The person must be willing to provide first aid to anyone at any time whilst at work and to attend training courses to obtain and retain their qualification. Their working hours and location should make them easily available throughout the working day.
- Training is to be given by an approved agency such as St John Ambulance or similar.
- All first aiders can safely look after the casualty whilst the emergency services are called over, and are to be retrained after three years.
- All staff and students in each Language in Action building are to be informed of the first aid-trained staff.

EQUIPMENT

- First aid boxes should be available in every building and the location should be clearly marked and easily accessible.
- The contents should be regularly checked by the H&S Lead. If supplies are used up at an unusual frequency, the first aider should alert the H&S Lead to this. Boxes are restocked according to need.
- First aid boxes should contain the following: guidance leaflet, sterile plasters, sterile eye pads, triangular bandages, safety pins, wound dressings, cleansing wipes, disposable gloves. Under no circumstances should drugs of any kind be included in the first aid box or distributed by the first aider.

RECORDS

- Accident log books are to be kept in each first aid kit. A note must be made by the first aider each time assistance is provided for both injury and illness.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Handling of DBS Certificate Information

SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL OF DISCLOSURE AND BARRING SERVICE (DBS) CERTIFICATES AND CERTIFICATE INFORMATION

GENERAL PRINCIPLES

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Language in Action complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

STORAGE AND ACCESS

Certificate information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

HANDLING

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a **criminal offence** to pass this information to anyone who is not entitled to receive it.

To note: those registered care homes which are inspected by the Care Quality Commission (CQC), those organisations which are inspected by Ofsted and those establishments which are inspected by the Care and Social Services Inspectorate for Wales (CSSIW) may retain the certificate until the next inspection. Once the inspection has taken place, the certificate should be destroyed in accordance with the Code of Practice.

USAGE

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

RETENTION

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

DISPOSAL

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.



Language in Action Health and Safety Policy

Setting the scene

Language in Action (the Employer) takes health and safety issues seriously and is committed to protecting the health and safety of its staff and all those affected by its business activities and attending its premises. This policy is intended to help the Employer achieve this by clarifying who is responsible for health and safety matters and what those responsibilities are.

Language in Action genuinely cares for its staff and want to portray this in the health and safety policy. Language in Action used the HSE example policy statement and other guidance available on the HSE website at www.hse.gov.uk/risk. This helped them to think about the things that should be documented and built into their own health and safety policy, such as remote working, staff consultation and training etc.

Language in Action decided that Emiliano Sallustri (Director and deputy H&S Lead of the company) Daniele Pluchino (Operations & Welfare Manager, H&S Lead of the company) and Beatrice Bellina (Summer Operations & HR Manager, deputy H&S Lead of the company) would be the most competent (experienced and capable) people to take responsibility for health and safety issues.

Daniele Pluchino presented the policy statement at the staff meeting and decided to review and update the document every year or straightaway if there are any major changes in the workplace.

Daniele Pluchino has overall and final responsibility for health and Safety.

Daniele Pluchino, Emiliano Sallustri and Beatrice Bellina have day-to-day responsibility for health and safety.

Statement of general Policy

Language in Action will:

- Take reasonable steps to safeguard the health and safety of staff, people affected by the Employer's business activities and of people visiting its premises;
- Identify health and safety risks and finding ways to manage or overcome them;
- Provide a safe and healthy place of work and safe entry and exit arrangements, including during an emergency situation;
- Provide and maintain safe working areas, equipment and systems and, where necessary, appropriate protective clothing;
- Provide safe arrangements for the use, handling, storage and transport of articles and substances;
- Provide adequate information, instruction, training and supervision to enable all staff to do their work safely, to avoid hazards and to contribute positively to their own health and safety at work.
- Ensure any health and safety representatives receive appropriate training to carry out their functions effectively;
- Provide a health and safety induction and appropriate safety training
- Promote effective communication and consultation between the Employer and staff concerning health and safety matters and will consult with staff directly relating to health and safety;
- Regularly monitor and review the management of health and safety at work, making any necessary changes and bring those to the attention of all staff.

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Responsibility of:

- The Health & Safety Lead of the company has overall responsibility for health and safety. There are two nominated Deputy Health & Safety Leads to cover in case of his absence.
- The welfare officers assigned to each Summer Centre have day-to-day responsibility on the Health and Safety matters and the duty to report to the Centre Manager and the Head Office.
- Any concerns about health and safety matters should be notified to the Health & Safety Lead or Deputy H&S Leads.

Action/ Arrangements

- Relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed when working habits or conditions change).
- Staff given necessary health and safety induction and provided with appropriate training and personal protective equipment. We will ensure that suitable arrangements are in place to cover employees engaged in work remote from the main company site.
- Staff routinely consulted on health and safety matters as they arise but also formally consulted at regular health and safety performance review meetings or sooner if required.
- Escape routes well signed and kept clear at all times. Evacuation plans are tested from time to time and updated as necessary.
- Toilets, washing facilities and drinking water provided.
- System in place for routine inspections and testing of equipment and for ensuring that action is promptly taken to address any defects.
- Staff are made aware of the location of the first Aid equipment and the accident reporting arrangements at induction.

Signed (Employer)

Dated

Date of scheduled Review

You should review your policy if you think it might no longer be valid, e.g. if circumstances change.

Reviewed:

Apr 2022

Reviewed by:

Daniele Pluchino, Operations & Welfare Manager
Emiliano Sallustri, Director

Next Review:

Apr 2023

Review by:

Daniele Pluchino, Operations & Welfare Manager
Emiliano Sallustri, Director



Language in Action

Lockdown Procedures

RATIONALE

As part of our Health and Safety procedures the school has introduced Lockdown Procedures. On very rare occasions, it may be necessary to seal off the school so it is not accessible from the outside. This will ensure that pupils, staff and visitors are safe in extreme situations where there is a hazard in the school grounds or outside the school, in the near vicinity. A lockdown would be implemented when there are serious risks to the school community, for example:

- An intruder on the school site (with the potential to pose a serious risk to staff and pupils)
- A reported incident/civil disturbance in the local community (with the potential to pose a significant risk to the safety of staff and pupils in the school)
- A warning being received regarding an environmental risk locally (serious pollution, smoke plume, gas cloud etc.)
- A major fire in the immediate vicinity of the school
- The close proximity of a dangerous dog/other animal roaming loose.

Notification of Lockdown

The school will be notified if lockdown procedures are to take place on hearing an announcement stating that we are in lockdown or partial lockdown. The relevant authorities will then be called by the designated member of staff.

During a lockdown direct communication with staff will be limited, due to lack of telephones in individual classrooms. Communication will have to be through the following methods:

- The Director/Senior Manager on-site will use WhatsApp texting service, to notify 'Language in Action Leaders' and Senior colleagues, whereby instructions/updates can then be immediately sent to all staff mobile phones
- Where staff have access to a computer, through the email system.

Procedures

- First aid boxes should be available in every building and the location should be clearly marked and easily accessible.
- The contents should be regularly checked by the H&S Lead. If supplies are used up at an unusual frequency, the first aider should alert the H&S Lead to this. Boxes are restocked according to need.
- First aid boxes should contain the following: guidance leaflet, sterile plasters, sterile eye pads, triangular bandages, safety pins, wound dressings, cleansing wipes, disposable gloves. Under no circumstances should drugs of any kind be included in the first aid box or distributed by the first aider.

Communication with Parents

- Parents and agents will be notified of the lockdown as soon as practical to do so via the schools established email service.
- Pupils will not be released to under their own supervision or to parents or transport during a lockdown.
- Parents and agents will be asked not to call school as this will tie up emergency lines.
- If the end of the school day is extended by a lockdown, parents and agents and host families will be notified, and will receive information about the time and place pupils can be picked up, either from school staff or the Emergency Services.
- Parents will be informed as soon as possible following any serious incident, as to the reasons for the lockdown being called.



Partial Lockdown'

This may be as a result of a potential risk to pupils, staff and visitors in the school. It may also be as a result of a warning being received regarding the risk of air pollution.

Procedures

- All pupils and staff to remain indoors and external doors and windows must be locked.
- In the event of air pollution, air vents must be closed where possible, as an additional precaution. Emergency Services will advise as to the best course of action in respect of the prevailing threat.
- Free movement within the building may be permitted depending on the circumstances.
- Staff will conduct an ongoing dynamic Risk Assessment based on advice from the Emergency Services. This will then be communicated to staff, who can then inform pupils where appropriate.
- 'Partial Lockdown' should be seen as a precautionary measure which puts the school in readiness should the situation escalate, whilst retaining a degree of normality.

Review

These procedures will be reviewed annually as part of the Health and Safety procedures.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Malpractice Policy and Procedure

Language in Action treats all cases of suspected malpractice very seriously and will investigate all suspected and reported incidents of possible malpractice. The purpose of this Policy (and Procedure) is to set out how allegations of malpractice in relation to all qualifications are dealt with. The scope of the policy is to provide:

- A definition of malpractice
- Examples of student and centre malpractice and maladministration;
- Possible sanctions that may be imposed in cases of malpractice.

*The term 'malpractice' in this policy is used for both malpractice and maladministration

INTRODUCTION

- For the purpose of this document 'malpractice' is defined as:
 - Any act, or failure to act, that threatens or compromises the integrity of the assessment process or the validity of qualifications and their certification. This includes: maladministration and the failure to maintain appropriate records or systems; the deliberate falsification of records or documents for any reason connected to the award of qualifications; acts of plagiarism or other academic misconduct; and/or actions that compromise the reputation or authority of Language in Action. and its delivery partners.
- Language in Action will report all relevant cases of suspected malpractice to relevant boards, accepting that in certain circumstances Malvern House may take action of its own, including imposing sanctions.

MALPRACTICE BY STUDENTS

- Some examples of student malpractice are described below. These examples are not exhaustive and all incidents of suspected malpractice, whether or not described below, will be fully investigated, where there are sufficient grounds to do so.
 - Obtaining examination or assessment material without authorisation. Arranging for an individual other than the student to sit an assessment or to submit an assignment not undertaken by the student.
 - Impersonating another student to sit an assessment or to submit an assignment on their behalf.
 - Collaborating with another student or individual, by any means, to complete a coursework assignment or assessment, unless it has been clearly stated that such collaboration is permitted. Damaging another student's work.
 - Inclusion of inappropriate or offensive material in coursework assignments or assessment scripts. Failure to comply with published examination regulations. Disruptive behaviour or unacceptable conduct, including the use of offensive language, at one of our centres or at any assessment venue (including aggressive or offensive language or behaviour). Producing, using or allowing the use of forged or falsified documentation, including but not limited to:
 - personal identification;
 - supporting evidence provided for reasonable adjustment or special consideration applications; and
 - Language in Action results documentation, including certificates.
 - Falsely obtaining, by any means, a Language in Action certificate. Misrepresentation or plagiarism
 - Fraudulent claims for special consideration while studying. Possession of any materials not permitted in the assessment room, regardless of whether or not they are relevant to the assessment, or whether or not the student refers to them during the assessment process, for example notes, blank paper, electronic devices including mobile phones, personal organisers, books, dictionaries / calculators (when prohibited). Communicating in any form, for example verbally or electronically, with other students in the assessment room when it is prohibited.



- Copying the work of another student or knowingly allowing another student to copy from their own work.
- Failure to comply with instructions given by the assessment invigilator, i.e., working beyond the allocated time; refusing to hand in assessment script / paper when requested; not adhering to warnings relating to conduct.

MALPRACTICE BY EMPLOYEES AND STAKEHOLDERS

- Examples of malpractice by, teachers, tutors and other officers, are listed below. These examples are not exhaustive and all incidents of suspected malpractice, whether or not described below, will be fully investigated, where there are sufficient grounds to do so.
 - Failure to adhere to the relevant Language in Action regulations and procedures, including those relating to centre approval, security undertaking and monitoring requirements as set out by Language in Action.
 - Knowingly allowing an individual to impersonate a student.
 - Allowing a student to copy another student's assignment work or allowing a student to let their own work be copied.
 - Allowing students to work collaboratively during an assignment assessment, unless specified in the assignment brief.
 - Completing an assessed assignment for a student or providing them with assistance beyond that 'normally' expected.
 - Damaging a student's work.
 - Disruptive behaviour or unacceptable conduct, including the use of offensive language (including aggressive or offensive language or behaviour).
 - Allowing disruptive behaviour or unacceptable conduct at the centre to go unchallenged, for example, aggressive or offensive language or behaviour.
 - Divulging any information relating to student performance and / or results to anyone other than the student.
 - Producing, using or allowing the use of forged or falsified documentation, including but not limited to:
 - personal identification;
 - supporting evidence provided for reasonable adjustment or special consideration applications; and
 - CIPS results documentation, including certificates
 - Falsely obtaining by any means a Language in Action certificate.
 - Failing to report a suspected case of student malpractice, including plagiarism, to Language in Action Senior Management.
 - Failure to keep examination question papers, examination scripts or other assessment materials secure, before during or after an examination.
 - Allowing a student to possess and / or use material or electronic devices that are not permitted in the examination room.
 - Allowing students to communicate by any means during an examination in breach of regulations.
 - Allowing a student to work beyond the allotted examination time.
 - Leaving students unsupervised during an examination.
 - Assisting or prompting candidates with the production of answers.

POSSIBLE MALPRACTICE SANCTIONS

- Following an investigation, if a case of malpractice is upheld, Language in Action may impose sanctions or other penalties on the individual(s) concerned. Where relevant we will report the matter to the Board, and Language in Action may impose one or more sanctions upon the individual(s) concerned. Any sanctions imposed will reflect the seriousness of the malpractice that has occurred.



- Listed below are examples of sanctions that may be applied to a student, or to a teacher, tutor, invigilator or other officer who has had a case of malpractice upheld against them. Please note that:
 - this list is not exhaustive and other sanctions may be applied on a case-by-case basis.
 - where the malpractice affects examination performance, Language in Action may impose sanctions of its own.
- Possible study centre sanctions that may be applied to students
 - A written warning about future conduct.
 - Notification to a Parent/Carer, employer, regulator or the police.
 - Removal from the course.
 - Expulsion.
- Possible sanctions that may be applied to teachers, tutors, invigilators, and other officers
 - A written warning about future conduct.
 - Imposition of special conditions for the future involvement of the individual(s) in the conduct, teaching, supervision or administration of students and/or examinations.
 - Informing any other organisation known to employ the individual of the outcome of the case.
 - Language in Action may carry out unannounced monitoring of the working practices of the individual(s) concerned.
 - Dismissal.

PROCEDURES

Reporting a suspected case of malpractice

- This process applies to, teachers, tutors, invigilators students and other centre staff, and to any reporting of malpractice by a third party or individual who wishes to remain anonymous.
- Any case of suspected malpractice should be reported in the first instance to the Director. In cases where the Director is directly implicated, suspected malpractice should be reported to the CEO of Malvern House International.
- A written report should then be sent to the person identified in 5.2, clearly identifying the factual information, including statements from other individuals involved and / or affected, any evidence obtained, and the actions that have been taken in relation to the incident.
- Suspected malpractice must be reported as soon as possible to the person identified in 5.2, and at the latest within two working days from its discovery. Where the suspected malpractice has taken place in an examination, the incident be reported urgently and the appropriate steps taken as specified.
- Wherever possible, and provided other students are not disrupted by doing so, a student suspected of malpractice should be warned immediately that their actions may constitute malpractice, and that a report will be made to the centre.
- In cases of suspected malpractice by centre teachers, tutors invigilators and other officers, and any reporting of malpractice by a third party or individual who wishes to remain anonymous, the report made to the person in 5.2 should include as much information as possible, including the following:
 - the date time and place the alleged malpractice took place, if known.
 - the name of the centre teacher/tutor, invigilator or other person(s) involved
 - a description of the suspected malpractice; and
 - any available supporting evidence.
- In cases of suspected malpractice reported by a third party, or an individual who wishes to remain anonymous, Language in Action will take all reasonable steps to authenticate the reported information and to investigate the alleged malpractice.



Administering suspected cases of malpractice

- Language in Action will investigate each case of suspected or reported malpractice relating to qualifications, to ascertain whether malpractice has occurred. The investigation will aim to establish the full facts and circumstances. We will promptly take all reasonable steps to prevent any adverse effect that may arise as a result of the malpractice, or to mitigate any adverse effect, as far as possible, and to correct it to make sure that any action necessary to maintain the integrity of qualifications and reputation is taken.
- Language in Action will acknowledge all reports of suspected malpractice within five working days. All of the parties involved in the case will then be contacted within 10 working days of receipt of the report detailing the suspected malpractice. We may also contact other individuals who may be able to provide evidence relevant to the case.
- The individual(s) concerned will be informed of the following:
 - that an investigation is going to take place, and the grounds for that investigation;
 - details of all the relevant timescales, and dates, where known;
 - that they have a right to respond by providing a personal written response relating to the suspected malpractice (within 15 working days of the date of that letter);
 - that, if malpractice is considered proven, sanctions may be imposed either by Language in Action (see section 6, below) reflecting the seriousness of the case;
 - that, if they are found guilty, they have the right to appeal.
 - that where Malvern House has a duty to inform other relevant authorities / regulators, this will be done after time for the appeal has passed or the appeal process has been completed. This may also include informing the police if the law has been broken and to comply with any other appropriate legislation.
- Where more than one individual is contacted regarding a case of suspected malpractice, for example in a case involving suspected collusion, we will contact each individual separately, and will not reveal personal data to any third party unless necessary for the purpose of the investigation.
- The individual has a right to appeal against a malpractice outcome if they believe that the policy or procedure has not been followed properly or has been implemented to their detriment.

Records of all malpractice cases and their outcomes are maintained by Language in Action for a period of at least five years and are subject to regular monitoring.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Performance Reviews (Appraisals) Non-teaching staff

AIM

To ensure that the performance of staff is regularly and fairly appraised, leading to clear goals for professional development and providing an opportunity for two-way feedback.

POLICY

All permanent staff at LiA have an annual performance review (appraisal), usually in March each year, where the opportunity is given for staff to provide feedback and offer suggestions for improving the school. Seasonal staff working for less than three months are given a performance review (appraisal) during their services and asked for feedback on the school.

The employee's performance is assessed by their line manager and is measured against the requirements of the job description, which are reflected in the performance review (appraisal) form criteria.

Job descriptions for Head Office are reviewed after the performance review (appraisal) process each year. For summer temporary staff, JDs are reviewed after the performance review (appraisal) process during their service. If any changes are made as a result, affected staff are given a revised job description to sign.

We constantly review performance of all staff members in formal or informal meetings with their line managers.

POLICY

A meeting will be arranged with sufficient notice between the staff member and reviewer. All necessary paperwork will be distributed to the staff member with adequate time for preparation.

Performance review (appraisal) forms are distributed before the review to encourage reflection and to form the basis of the discussion. It is essential that the employee and reviewer also refer to previous appraisals (if applicable) to ensure continuity of development and to assess the implementation of previous goals.

The Performance Review (Appraisal) form and any other notes or relevant paperwork may be brought into the meeting, which will be led by the line manager.

Any other relevant information will also be taken into consideration (e.g., extra training, additional qualifications, first aid or fire responsibility etc.).

If any negative areas are being addressed, clear and adequate evidence must be provided and agreeable time goals for the expected improvement. Additional training will also be offered where needed.

After the review, the staff member is given a copy of her/his review form and the original is filed in their personnel file, held by their line manager. S/he will also be given a letter detailing any pay rises, and a new copy of their contract or extension to contract where applicable, and the relevant information passed on for payroll purposes to the Finance Manager.

If any amendments are made to job descriptions as a result of performance reviews (appraisals), those affected will be asked to sign the revised copy, which will be added to their file.

If a contract is not extended, then reasons must be clear and fair. Prior agreement of the Director should be sought to eliminate any unfairness or discrimination.



Language in Action

Policy Statement on the Recruitment of Ex-offenders

- As an organisation using the Disclosure & Barring Service (DBS) to assess applicants' suitability for positions of trust, Language in Action complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.
- Language in Action is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.
- We actively promote equality of opportunity for all with the right mix of talent, skills, and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications, and experience.
- A Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, all application forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- Where a Disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to a designated person within Language in Action and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.
- Unless the nature of the position allows Language in Action to ask questions about your entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.
- We ensure that all those in Language in Action who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- At interview, or in a separate discussion, we ensure that an open and measured discussion takes place about any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- We make every subject of a DBS Disclosure aware of the existence of the DBS Code of Practice and make a copy available on request.
- We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment. Having a criminal record will not necessarily bar you from working with us. This will depend on the nature of the position and the circumstances and background of your offences.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action Recruitment Policy

In addition to complying with statutory requirements and fulfilling the staffing needs of Language in Action, part of Malvern International, our human resources policy and procedures aim to achieve the following:

- Attract the most appropriate staff for the programmes the company offers;
- Ensure that recruitment, selection and opportunity for on-going employment is as fair as possible;
- Ensure staff have the opportunity for continuous professional development.

To this end, Language in Action, part of Malvern International, will:

- Be rigorous and fair in order to recruit the most suitable applicant for the job;
- Ensure no one receives less favourable treatment on grounds of gender, marital status, sexual identity, religious belief, political opinion, race, work pattern, age, disability or HIV/AIDS status, socio-economic background, spent convictions, trade union activity or membership, or on the basis of having or not having dependents;
- Require all candidates to address specific areas of the job in the same way in their application and in the interview;
- Look for evidence of behavioural competencies and skills from previous positions;
- Use the best methods of assessment available to compare applicants' abilities against the job requirements;
- Treat applicants as valued people keeping them informed of the process and current state of their application;
- Make offers which are conditional upon satisfactory references and the production of original certificates for the relevant qualifications and notify applicants of this in all advertisements for jobs that Language in Action place;
- Undertake all such activities in a professional manner.

Advertising

Our use of further advertising will depend on the nature of the vacancy. When projections allow prediction of a staff short-fall or a vacancy requires a particular skill set or qualifications profile, an advert will be placed on appropriate EFL websites. However, the nature of the business is that we may need to recruit at short notice. On-file CVs, in this case, will provide the first pool of potential candidates.

In all advertisements for posts and prior to or at interview, applicants are advised that:

- References will be followed up;
- Gaps in their CV must be accounted for;
- Photo ID & original qualification certificates must be provided;
- Suitability checks will be required (Enhanced DBS) & referees will be asked if they know of any reason why the applicant shouldn't work with under 18s.

Language in Action

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Recruitment procedure

Applicants are asked to fill a Language in Action application form available on LiA website to check the essential requirements for the post.

An invitation letter to interview is sent to shortlisted candidates, who are then interviewed by two members of LiA Head Office.

Each applicant is assessed in the following way:

- An interview with two members of LiA Head Office, typically both the Director/Summer Operations Manager and Academic Manager for Academic staff, and Summer Operations Manager and Operations Manager for the Operations staff, using standardised questions for each role to keep the process as fair as possible.

The applicants will also have:

- An opportunity to ask questions;
- A check (using the starter checklist document) that all relevant documents have been received and checks carried out.

Selection

An offer of employment may be made at the interview and/or as soon as LiA has confirmation of staff required for each centre, and the terms and conditions explained. Offers are subject to two satisfactory references and a satisfactory Enhanced DBS / police check. Successful applicants will be given a training and induction prior to summer centre opening.

The terms and conditions of employment state that all academic and operative staff must be prepared to work with juniors and so all academic and operative staff are required to sign a 'Suitability to work with Children Declaration' and all referees are specifically asked to confirm that the applicant is suitable to work with children.

Reviewed:

Mar 2022

Reviewed by:

Emiliano Sallustri and HR Manager

Next Review:

Mar 2023

Review by:

Emiliano Sallustri and HR Manager



Language in Action Resources Policy

AIM

- To provide the necessary resources to our staff in order to teach all levels, courses and class types offered at LiA centres and to further their professional development.
- To maintain a clear understanding of current developments in ELT.
- To ensure that students can access required resources and computing facilities, are familiar with the resources and facilities offered by Language in Action, and are encouraged to use them to promote independent learning.

POLICY

- To regularly review all teaching spaces and support facilities available to students and staff.
- To review all courses and materials frequently in Academic Team meetings.
- To incorporate teachers' opinions and choices through liaising with them directly and via teacher meetings.
- To keep up to date with current developments in ELT provision.
- To maintain a receptive and experimental approach to the selection of our resources.
- To provide each staffroom with clearly-labelled bookshelves containing resources for each level and course type.
- To signpost readily accessible online resources.
- Resources include books and online resources. Facilities include access to computer equipment and free WiFi for students and staff.

PROCEDURE

- Twice per year, the Academic Management Team will check the resource requirements
- Teachers will be informed of all new resources that become available, which will be clearly labelled and displayed.
- Teachers should be asked to volunteer for trials of all types of materials, including coursebooks, supplementary and online materials.
- Resources are stored according to level and skill/system in the staff room.
- Teachers are encouraged to use these resources within the staff room.
- Teachers may borrow books provided that they are well looked after and returned promptly in the same condition.
- Feedback from student and teacher surveys will be monitored and comments/complaints regarding resources/facilities will be responded to and/or actioned appropriately.
- All academic staff are consulted regularly on additions to resources. Time is allocated regularly in teachers' meetings for the discussion of resources in the school and staff are encouraged to make suggestions for specific materials of types of materials. There is a resources request form on the staff room notice board, which teachers can add suggestions to.
- There are Resources lists in the Academic Teams folder, which should be updated periodically by a member of the Academic Team.
- Supplementary materials are drawn from a wide range of published materials and are designed to complement the main course book. Schemes of work allow for teachers to supplement frequently to enhance the learning experience of the students.
- Course books will typically be alternated each term to ensure that course content remains fresh and challenging for students and teaching staff alike.
- Any photocopying should follow copyright rules and referenced appropriately, unless stated as photocopyable on the worksheet itself.
- Teachers are encouraged to share any material that they have created themselves; teachers may be timetabled (at admin rate) to create materials for courses such as teacher courses.
- Any resources which have previously been written on, or are in bad condition, should not be used with students.



Language in Action

Responding to challenging student behaviour Policy

AIM

To deal with challenging student behaviour as soon as it arises to minimise its impact on the teacher and the other students in the class.

POLICY

- All students should be clearly informed of expected classroom, excursion and any other activity behaviour towards their teacher, staff and fellow students, with clarification as to what constitutes poor conduct.
- Teachers and Leaders should feel supported by their managers and the organisation as a whole, when confronted with poor conduct from students.
- Managers should be informed as soon as possible in order to tackle the problem before it escalates.
- Managers should consider the behaviour of all parties and should be fair and impartial in their judgement and actions.

PROCEDURE

- The expectations of student conduct and discipline are provided in the terms and conditions in the student induction pack and on the Language in Action website (see below *)
- In the first instance of poor conduct, the staff member should speak to the student to point out which behaviour is unacceptable, the impact it is having on staff member and/or other students and to give clear goals of expected behaviour.
- The staff member should also inform their line manager of the situation and update them as it proceeds.
- If there are no improvements, the line manager should speak to the student to hear their explanation, assess the situation and reiterate goals set. S/he should also inform the Head Office.
- If the poor behaviour continues, the line manager will inform the student that if there is no improvement within a stipulated timeframe, further action will be taken according to the disciplinary procedure.
- If the poor behaviour persists and as a last resort, the student should be expelled, according to disciplinary procedure.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action Grievance Procedure

Aim

The object of the Grievance Procedure is to enable employees who consider they have a grievance or complaint arising from their employment with us to have it dealt with at the nearest appropriate level within as short a time as possible. Any employee wishing to use this procedure can do so freely and without prejudice to their position. It applies to all employees irrespective of their position within the business. Individual and collective issues may be dealt with in the same manner. Formal Grievances must be made in writing.

It is expected that all reasonable attempts will be made to attend the meetings specified within this procedure.

PROCEDURE

Informal Grievance

- Employees experiencing problems in the workplace should first raise the matter with their line manager with the aim of seeking informal resolution to the issue(s). The line manager will meet with the employee(s) and, where appropriate, other relevant parties to clarify the matter and to seek a resolution that addresses concerns.
- If the grievance relates to the line manager then the employee(s) should raise the issue informally with your line manager's superior.
- If the matter is not satisfactorily resolved through the informal route, or is considered too serious to seek informal resolution, then a formal grievance can be raised.

Individual and collective Formal Grievances

- If you wish to raise a question in respect of a personal grievance you may first refer the matter in writing to your line manager through the grievance form.
- Your line manager will invite you to attend a meeting to discuss the matter normally within 48 hours. Within five working days following that meeting your line manager will write to you with a decision and your right of appeal to the LiA Head Office.
- If, in your opinion, a satisfactory answer is not forthcoming or where the grievance relates to the conduct of your line manager, and you do not feel able to discuss the matter with them or if the problem is of a highly personal nature, you are entitled to refer the matter in writing to the Language in Action Head Office, directly via email to the Summer Operations & HR Manager Beatrice Bellina at beatrice.bellina@malvernplc.com to resolve the issue.

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If a satisfactory answer is not forthcoming within three working days at this level, you may refer the matter in writing to the Director Emiliano Sallustri at emiliano.sallustri@malvernplc.com whose decision will be final and binding.

The informal and formal routes to deal with allegations of bullying, harassment or victimisation is outlined in the Company's Anti-harassment of staff policy.

Former employees

If you have left your employment before or during a grievance, your line manager will decide on the appropriate procedure to be followed.

Time limit

To assist in obtaining a satisfactory solution to any issue as quickly as possible, the time limit specified for any level of negotiations may be extended.

Reviewed:

Apr 2022

Reviewed by:

Emiliano Sallustri

Next Review:

Apr 2023

Review by:

Emiliano Sallustri



Language in Action

Staff Inductions (Non-Teaching Staff) Policy

AIM

To ensure that new staff are familiar with the systems, procedures, buildings and personnel within the school, to enable them to function effectively and professionally from the commencement of their employment.

POLICY

- The induction should cover all aspects of the school: HR; Health and Safety; Language in Action policies (including Safeguarding & Child protection) and ethos.
- The induction should provide a brief overview of all departments within the organisation and the operational links between them.
- The Head Office is responsible for producing and implementing a training programme for each new employee.
- New staff should be given ample opportunities to ask for clarification and should be helped to settle into their new role.

FIRST DAY INDUCTION

The following papers need to be signed and filed by a member of Head Office:

- Job description
- H&S induction form
- Personal details & Emergency contact details forms (if not already submitted)
- P45/P46 (if any)

Before you embark on job-specific training, it is worth taking every new recruit through the same basic induction. Here is a list of topics to be covered:

1. Premises
2. Immediate team
3. Health & Safety
 - a. Trained personnel and H&S officer
 - b. First aid kits
 - c. Emergency exits and meeting points
 - d. Fire hazards
 - e. General safety notice
4. Language in Action organogram
5. Safeguarding & Child protection policy (all staff must be trained in safeguarding to level 1/2/3 depending on the role)
6. Policies and payroll
7. General info about Language in Action
 - a. LiA history
 - b. Our centres and methodology
 - c. Other MH schools
8. Basic visa compliance
9. How to work the phones and computer (where applicable)

Please don't assume that any of the above is irrelevant for a new recruit due to the department they work in. All LiA staff should have a basic understanding of the roles of each department and how they work together. Take plenty of time to take all new staff through things they need to know about their employment to help them feel a part of this company and comfortable in their new job. Request an email ID from IT in advance so it is ready on the new staff member's first day (where applicable).

Every new staff member should have access to a copy of the Staff Handbook (all staff) and Teachers Handbook (for teaching staff)



Language in Action Staff Sickness Policy

If staff are sick/unable to come to work, they are requested to notify their line managers as soon as possible prior to the commencement of their shift.

Teachers must call the DoS a minimum of two hours before the start of their first class or the night before, where possible. Text messages, voice-mail messages and emails are not acceptable.

Teachers must also call the DoS at their centre before the end of their shift to notify whether they will be returning the following day. Teachers should give clear indications on when they expect to return to work, and keep Language in Action updated during their illness. Any absence over 7 days will require a doctor's certificate.

Residential Staff must notify their line manager immediately, so that they will take proper action to cover for their absence.

For hourly-paid staff, sick pay will be paid according to the statutory rules if applicable. For statutory guidelines refer to the Government website:

<https://www.gov.uk/employers-sick-pay/entitlement>

For monthly-paid staff, full payment for time off is at the discretion of the line manager. The Finance Manager should be notified of any salary deductions to be made.

Patterned or persistent sickness without supporting documentation from a doctor may result in disciplinary procedures (see "Disciplinary and Grievance Rules and Procedures").

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action

Student Representation and Feedback

AIM

To provide a channel of communication between students and management regarding students' concerns and views on any aspect of Language in Action's policies and services, with a view to improving our services.

POLICY

- Language in Action has an open communications policy. It strongly encourages all students to voice their views and opinions through their teachers or centre staff, as appropriate. Students may also use any of the regular surveys or put their concerns in writing at any time by completing the Complaints Form.
- All views and opinions from students are treated seriously and will be responded to as quickly as possible.
- Language collects feedback through the following ways:
 - In their first week, students are asked to complete a first-week feedback survey. They are given a QR code which takes them to a survey on Microsoft Forms. Responses are checked by the centre management staff and discussed with Head Office during the weekly meeting, and any action required is taken immediately. Action points are decided and action taken by the relevant department.
 - At the end of week 2, the DoS or Senior Teacher visits each class and displays a QR code linking to the end-of-course survey. Students complete the survey on their phones, with the DoS available to support students with technical or language issues as required.
 - Any students who do not attend classes are spoken to separately by the DoS or Senior Teacher, who provides them with the QR code and any necessary support.
 - Results from each survey are collated in Microsoft Forms and printed for discussion by the Centre Manager, Activity Manager and DoS during the weekly meeting. Action points are decided and action is taken by the relevant department. The report and resulting action points are discussed by the Centre Manager and Head Office.
 - All the above surveys contain questions which seek feedback on teaching, accommodation, excursions and activity programme, facilities and quality of services provided.
 - General, collated feedback results on teaching are shared during teacher meetings, with any individual feedback being shared with individual teachers, as well as during informal and formal meetings between centre management team and students/group leaders if part of a closed groups.
- Complaints are filtered by the Centre staff, who will then pass them on to the relevant staff member. Serious complaints should be passed on to the Head Office, who will additionally review all survey summaries (see also Student Complaints Policy).
- The actions taken by management in response to students' views and opinions will be reported back to the students, both directly to the student concerned (where appropriate) and/or agency group leaders.

Reviewed:

May 2022

Reviewed by:

Emiliano Sallustri

Next Review:

May 2023

Review by:

Compliance Team



Language in Action Student Welfare Policy

AIMS

The aim of the Language in Action Student Welfare Policy is to promote good practice in providing students with appropriate well-being, safety and protection whilst in our care. Additionally, it aims to allow all staff to make informed and confident responses to specific student welfare issues.

POLICY

Language in Action has overall responsibility for the students in its care and therefore we take their welfare very seriously. For the purposes of this policy document the term student will be used to describe all people who participate at a Language in Action programme. In our provision for students Language in Action will ensure that:

- The welfare of the student is paramount.
- All students have equal opportunities, regardless of ability, religion, culture, gender, ethnic origin or class.
- Academic programmes and activities are provided, appropriate to their age, maturity and the centre's location, which will encourage each student to develop linguistically, socially and culturally.
- Tolerance, understanding and positive interaction is encouraged between students, as is a regard for each other's privacy and possessions.
- Students develop responsibility for themselves, for others and for their environment.
- All students, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have the right to protection from abuse*
- We raise awareness of student protection issues.
- All staff have a responsibility to report any concerns to the Welfare Officer of the centre.

*The term 'abuse' will include harassment, bullying, actual or threatened violence, damage to personal property, and verbal or other abuse based on racial, sexual or religious differences

POLICY STATEMENT

All Language in Action staff receive Basic Safeguarding and Prevent trainings and have a professional duty to take such steps that are reasonable to ensure that each student is safe from harm while involved in Language in Action activities. All students have a right to protection, and the needs of disabled students and others who may be particularly vulnerable must be taken into account. Language in Action will ensure the welfare of all students involved in its activities through adherence to the Student Welfare guidelines it has adopted.

For all activity and events involving students at Language in Action centres, the Welfare Officer (trained at Safeguarding Level 3) nominated for each centre will lead on student welfare, raising awareness of this policy and its guidelines among other staff and where appropriate the students, their accompanying Group Leaders and parents.

Students will be made aware of the school's focus on welfare and the key role in student welfare held by the Welfare Officer during Student Induction and on signage around the school.

Reviewed:

Apr 2022

Reviewed by:

Emiliano Sallustri

Next Review:

Apr 2023

Review by:

Emiliano Sallustri



Language in Action Supervision Ratios Policy

Policy on Supervision Ratios for Accommodation / Classrooms / Excursions / Social programme activities where under 18yr's students are involved.

Language in Action ensures that in all residential accommodation and classrooms, as well as on all excursions and activities where student under the age of 18yrs are involved, there is at least one member of staff (including agency group leaders) per 15/20 students.

Depending on the programme chosen, 16 and 17 y.o. students may have limit of supervision by LiA staff.

If there were a special needs student or student with a disability, we would ensure that there is another member of staff (including agency group leaders) to support them throughout their stay.

Lessons have a maximum class size of 18 students. One responsible adult will be assigned to each class.

All residential accommodation is supervised by trained staff available 24 hours a day in case of emergency.

All LiA members of staff leading activities/excursions have had experience working with students under the age of 18yrs, have had a DBS check and have had two references taken. These details are uploaded to our Staff Central Records once original documents have been seen.

Key members of staff from Agency partners are asked to sign a Declaration to state their staff have undergone checks to work with underage students. Agency group leaders (and other agency staff members) must receive a copy of the Safeguarding and Child Protection policy and being inducted on it upon arrival. They are also asked to read and sign the Code of Conduct and a suitability to work with children self-declaration.

Risk Assessments have been conducted on all main premises, on-site activities and off-site excursions.

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Language in Action Transfer Procedure

- Wear LIA lanyards and t-shirt
- Carefully plan your journey to get to the airport to make sure being on time: time to leave, and which is the best route to the airport (always check if there are service interruptions)
- Always be available – make sure your phone is charged and the LIA sim you are using is on
- Check the flight number to be sure you are on the right terminal and get updates on the flight status - if something is not regular, communicate it to the AM/CM
- Find the coach station area
- Get in touch with the coach driver – the number will be provided by the Management/Head Office, if not please ask
- Call the accompanying team leader once you see on the screen the group has landed.
- Before the arrival of the students, check which route to take to lead the group from the Terminal to the parking lot.
- Make sure that the coach is present at the scheduled time.
- Welcome the kids in a nice way and give them time to go to the toilet and in the meantime call the coach driver and tell you are about to come with the group.
- (Heathrow and Gatwick) Find and speak to the traffic Marshall to authorize the Coach to enter the car park telling your group is ready to get on the coach.
- Guide students to the coach.
- Tell the students to help the coach driver loading the big luggage first
- Make sure all students are on the coach before leaving – count them yourself and ask the agency group leader to do the same. DO NOT ALLOW the coach driver to leave the parking lot until all the students have been counted.
- Make sure that the coach takes the students to the college where they are staying or to the designated drop off point, checking the address.
- Constantly keep your colleagues and line managers up to date – they will be waiting the group for a welcoming as well as the check in procedures.

Full Day Excursions:

- Check with the driver that the drop off point is the same as the pick up point.
- Save the driver's phone number to call in case of need.
- Make sure the students are all on the coach.
- Make sure that the coach stops at the college entrance on the way back.
- Make sure kids don't leave anything on the bus.

How to behave in case of problems:

- Do not take the initiative, just follow the guidelines received from your Centre Manager.
- If something does not go as planned, notify your Centre Manager immediately!

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Language in Action Whistleblowing Policy

1. PURPOSE AND SCOPE

- All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. The Company believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation the Company believes it can help prevent malpractice: prevention is better than cure. That is the aim of this policy. This policy applies to all employees of the Company and to other workers within the Company including agency workers and home workers.
- By encouraging a culture of openness, the Company wants to encourage employees and workers to raise issues which concern them at work. They may be worried that by reporting such issues they will be opening themselves up to detrimental treatment or risking their job security; that is quite understandable but is not the case - all staff have statutory protection if they raise concerns in the right way. This policy is designed to give staff that opportunity and protection. It does not matter if they are mistaken. There is no question of employees having to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.
- If there is anything which employees think the Company should know about, they should use the procedure outlined in this policy. By knowing about malpractice at an early stage the Company stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, employees should not hesitate to 'blow the whistle' on malpractice. Note: This policy is not the procedure for general grievances. If an employee has a complaint about their own personal circumstances, then they should use the normal grievance procedure. If an employee has concerns about malpractice within the organisation, then they should use the procedure outlined in this policy.

The kinds of malpractice covered by this policy are:

- criminal offences;
- miscarriages of justice;
- danger to the health and safety of any individual;
- damage to the environment;
- breach of any legal obligation;
- deliberately concealing any of the above.

2. OUR GUARANTEE

- The Company is committed to this policy. If an employee uses this policy to raise a concern the Company gives them its assurance that they will not suffer any form of retribution or detrimental treatment. The Company will treat their concern seriously and act according to this policy. They will not be asked to prove anything about the allegation they raise but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice. If an employee asks for a matter to be treated in confidence the Company will respect their request and only make disclosures to third parties or other staff with their consent.
- If an employee is concerned about any form of malpractice, they should normally first raise the issue with their immediate superior. There is no special procedure for doing this—they can tell that person about the problem or put it in writing if they prefer.
- If they feel they cannot tell their immediate superior, for whatever reason, they should raise the issue with a company director.



3. HOW THE COMPANY WILL RESPOND

- After an employee has raised a concern, the Company will decide how to respond in a responsible and appropriate manner under this policy. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. External investigators may be brought in where necessary. The Company will endeavour to complete investigations within a reasonable time.
- The Company will keep the employee informed of the progress of the investigation carried out and when it is completed. The Company will not be able to inform them of any matters which would infringe the duty of confidentiality owed to others.

3. RAISING YOUR CONCERN EXTERNALLY (EXCEPTIONAL CASES)

- The main purpose of this policy is to give the employee the opportunity and protection they need to raise concerns internally. The Company would expect that in almost all cases raising concerns internally would be the most appropriate action for them to take.
- However, if for whatever reason, they feel they cannot raise their concerns internally and they reasonably believe the information and any allegations are substantially true, they can consider raising the matter with the appropriate regulator or authority.
- Caution: If an employee has good reasons for not using the internal or regulatory disclosure procedures described above, they may consider making wider disclosure by reporting the matter to the police or to the media, for example. However, whistle-blowers who make wider disclosures of this type will only be protected (from dismissal or suffering detrimental treatment) in certain circumstances. The Company recommends that employees take legal advice before following this course of action since we believe it will be in employees' own interests to do so.
- Public Concern at Work is a leading independent charity whose main objectives are to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice at www.pcaw.org.uk.
- Those using the procedure outlined in this policy to raise a concern are assured that they will not suffer any form of retribution or detrimental treatment. Any person who victimises a bona fide whistle-blower (eg by subjecting them to any form of detrimental treatment) will be liable to disciplinary action. Such a person is also liable to an employment tribunal claim (which may include liability for unlimited damages) brought by the whistle-blower against them personally. To ensure the protection of all our employees, those who maliciously make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.
- If you have any questions about the application of this policy, please contact a company director. To confirm you have read and understood this policy please sign and date below:

Employee name

Date

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