

**Malvern International PLC
Group Safeguarding & Prevent Policy
Operational Implementation Addendum
Language in Action — Summer Centres**

Field	Detail
Document title	Language in Action: Safeguarding & Prevent Operational Implementation Addendum
Parent policy	Group Safeguarding & Prevent Policy (v2.0, March 2026)
This addendum version	Version number — 1.0
Prepared by	James Findley COO, Giulia Mella Group Safeguarding and Prevent Coordinator, Adam Ennis Head of Juniors, Emiliano Sallustri MD – ELT
Date	24th June 2026
Co-signed by	Managing Director ELT Chief Operating Officer Group Safeguarding & Prevent Coordinator
Season covered	Summer 2026 (June – August 2026)
Next review due	April 2027 — (must be completed before each summer season)

This addendum is an operational implementation schedule subordinate to and governed by the Malvern International PLC Group Safeguarding & Prevent Policy (v2.0). It does not create a separate or independent safeguarding framework. Group-level accountability, governance and escalation routes remain as set out in the main policy. Central oversight by the Group Safeguarding & Prevent Coordinator and the COO (Executive Sponsor) applies to all activities covered by this addendum.

1. Purpose and Scope of This Addendum

Language in Action (LIA) operates summer residential and day centres across multiple locations in England. The seasonal nature of LIA operations, the engagement of temporary and seasonal staff, and the fact that all participants are under the age of 18 create specific operational safeguarding requirements that complement the Group Safeguarding & Prevent Policy.

This addendum sets out how the Group policy is implemented operationally across LIA summer centres. It provides:

- Named DSL and Deputy DSL designations at centre level, with confirmation of training status
- LADO contact details mapped to each operating borough
- Confirmation that the LIA Single Central Record meets the Group standard
- Confirmation of training log completeness for seasonal staff
- The escalation chain from centre level to Group oversight
- Centre-specific operational protocols for welfare, disclosures and absence

This addendum must be completed and co-signed before each summer season opens. It must be made available to all LIA staff, the Group Safeguarding & Prevent Coordinator, and the COO. It will be reviewed as part of the Group's annual policy review cycle each September.

2. Governance and Central Oversight

LIA safeguarding sits within the Group safeguarding governance framework. The following governance principles apply throughout the summer season and are non-negotiable:

- The COO acts as Executive Sponsor for safeguarding across all Group operations including LIA. This does not change during the summer season.
- The Group Safeguarding & Prevent Coordinator provides oversight of all LIA safeguarding activity, receives regular reports from LIA DSLs, and is the escalation point above centre level.

- All DSLs and Deputy DSLs named in this addendum are appointed under the Group policy framework. Their authority derives from that framework, not from this addendum.
- The Group safeguarding inbox (safeguarding@malvernplc.com) remains active and monitored throughout the summer season. LIA centre staff may use this route in addition to direct DSL contact.
- No safeguarding decision that meets the referral threshold (LADO, MASH, police, children's social care) may be taken at centre level without notifying the Group Safeguarding & Prevent Coordinator and the COO. They are both informed immediately. Once the internal escalation has taken place, the DSL makes the referral.

2.1 Managing Director ELT — Safeguarding Responsibilities

The Managing Director ELT holds operational accountability for the implementation of this addendum across all LIA summer centres. They are also the Designated Safeguarding Lead for the LIA division. Specific responsibilities include:

- Ensuring all DSL and Deputy DSL appointments named in Section 3 are confirmed, trained, and have KCSIE 2025-compliant job description clauses before centres open.
- Ensuring the LIA Single Central Record (Section 5) is complete and signed off before the season opens, in liaison with the HR manager.
- Ensuring all seasonal staff complete Level 1 safeguarding induction before they work with students.
- Receiving and reviewing safeguarding summary reports from the Group Safeguarding & Prevent Coordinator during the season.
- Escalating any systemic safeguarding concern to the Group Safeguarding & Prevent Coordinator and the COO without delay, in accordance with the escalation chain in section 8 of this document.

In the absence of the LIA Managing Director, these responsibilities are to be covered by the Group Safeguarding & Prevent Coordinator, supported by the Head of Juniors and the COO.

Role	Name	Direct Telephone	Email
Managing Director - ELT	Emiliano Sallustri	+44 7471830607	Emiliano.sallustri@malvernplc.com
Head of Juniors	Adam Ennis	+44 7961215882	Adam.ennis@malvernplc.com
Group Safeguarding and Prevent Coordinator	Giulia Mella	+44 151 433 8448	Giulia.mella@malvernplc.com
Chief Operating Officer	James Findlay	+44 7939073254	James.findlay@malvernplc.com
Deputy Head of Juniors	Daniele Pluchino	+39 347 6778250	Daniele.pluchino@malvernplc.com

3. Named DSL and Deputy DSL Designations — Summer 2026

In accordance with KCSIE 2025 (para 102), a Designated Safeguarding Lead must be available in person or by telephone at all times when students are on site. For LIA summer centres, this means a named, trained DSL or Deputy DSL must be identifiable and contactable for every centre, every day, throughout the season.

Deputy DSLs must be trained to the same Level 3 standard as the DSL and must have a job description containing the KCSIE 2025-compliant safeguarding clause. The safeguarding clause must be inserted into each job description before the individual commences work. In each centre a DDSL cover is present and trained at level 3.

Note: A person cannot act as DSL or Deputy DSL unless: (a) they hold current Level 3 safeguarding training; (b) their job description contains an explicit safeguarding responsibility clause; and (c) they are named in this addendum. Centre Managers, Campus Coordinators, Tour Coordinators and Activity Leaders with welfare duties may support welfare monitoring but may not act as Deputy DSL unless they meet all three criteria.

3.1 Group Safeguarding & Prevent Coordinator (Group Oversight)

Role	Name	Telephone	Email
Group Safeguarding & Prevent Coordinator	Giulia Mella	+44 151 433 8448	Giulia.Mella@MalvernPLC.com

3.2 Named DSLs and Deputy DSLs by Centre

Centre Name / Location	DSL Name	Level 3 Training Date (DSL)	Level 3 Training Date (Deputy)	JD Confirmed (Y/N)	Clause
All Centres	Emiliano Sallustri	22/6/2026	22/6/2026	YES	

Centre Name / Location	Deputy DSL Name(s)	Contact Number	Level 3 Training Date (DSL)	Level 3 Training Date (Deputy)	JD Confirmed (Y/N)	Clause
UCL Bloomsbury Campus	Tyler Iles	+44 (0)7497 661611	22/6/2026	22/6/2026	YES	
UOL Bloomsbury Garden Halls	Tyler Iles	+44 (0)7497 661611	22/6/2026	22/6/2026	YES	
UOL Bloomsbury Parry Hall	Tyler Iles	+44 (0)7497 661611	22/6/2026	22/6/2026	YES	
Wembley Campus	Ailbhe Kennedy	+44 (0)7398 702857	22/6/2026	22/6/2026	YES	
UEL Docklands Campus	Habeeb Ramos	+44 (0)7398 703213	22/6/2026	22/6/2026	YES	
Harrow Campus	Alexis Kadejo	+44 (0)7398 703230	22/6/2026	22/6/2026	YES	
Middlesex University	Selina Wei Shang	+44 (0)7398 702794	22/6/2026	22/6/2026	YES	
Colindale Campus	Selina Wei Shang	+44 (0)7398 702885	22/6/2026	22/6/2026	YES	
Canterbury Christ Church University	Ellie Delaney	+44 (0)7398 703219	22/6/2026	22/6/2026	YES	
Liverpool Hope University	Sandy Huskisson	+44 (0)7398 703220	22/6/2026	22/6/2026	YES	
Manchester University	Caroline Keane	+44 (0)7398 703557	22/6/2026	22/6/2026	YES	

3.3 Out-of-Hours DSL Cover

A DSL or Deputy DSL must be reachable outside normal teaching hours for the duration of the programme, including evenings, weekends and UK bank holidays. The arrangements set out below apply to all LIA summer centres.

3.3.1 Definition of Out-of-Hours

For LIA Summer 2026, out-of-hours is defined as:

- Weekdays: from 18:00 to 09:00 the following morning
- Weekends: continuous from Friday 18:00 to Monday 09:00
- UK bank holidays falling within the programme dates: 24 hours

During these periods, every LIA centre must have a named, contactable Deputy DSL on duty.

3.3.2 Centre-Level Cover — Two-Tier Model

Each LIA centre operates a two-tier Deputy DSL cover model for out-of-hours:

Tier 1 — On-rotas Deputy DSL. The Deputy DSL on rota for that period is the first point of contact for any out-of-hours safeguarding concern. The on-rotas Deputy DSL holds the centre safeguarding phone (see Section 3.3.4) for the duration of their shift.

Tier 2 — Cover Deputy DSL. A second Level 3-trained Deputy DSL is named as Cover for each rota slot. The Cover Deputy DSL is activated when: (a) the on-rota Deputy DSL is off-rota for that period; or (b) the on-rota Deputy DSL does not respond within the SLA set out in Section 3.3.5.

Both Deputy DSL roles must hold current Level 3 safeguarding training and a confirmed KCSIE 2025-compliant JD clause (per Section 3.2). The per-centre Deputy DSL rota covering full programme dates must be appended to this addendum and signed off by the LIA MD before centre opening.

3.3.3 Centre Welfare Staff On Site

All LIA Summer 2026 centres are residential. Each centre has a designated welfare staff member on site (typically the Campus Coordinator; the role holder is centre-specific and recorded in Section 3.2). Welfare staff provide physical presence with students out-of-hours, including in residential accommodation, and report operationally to the on-rota Deputy DSL. Welfare staff are not designated DSLs and may not take safeguarding decisions independently. Any concern arising out-of-hours must be escalated by welfare staff to the on-rota Deputy DSL immediately.

3.3.4 Contact Channels

Each centre operates a dedicated safeguarding phone line, active 24 hours, 7 days a week, for the duration of the programme. The line is held physically by the on-rota Deputy DSL during their shift and transferred at handover. The number is:

- Published to all centre staff at induction
- Displayed at residence reception and front-of-house
- Provided to students aged 16 in their welcome pack with clear guidance on when to call

WhatsApp messaging may be used as a supplementary channel for non-urgent communication and where mobile signal is inconsistent. All urgent concerns and disclosures must be initiated by phone call, not text, to confirm receipt by the on-rota Deputy DSL.

3.3.5 Response Time SLA

The on-rota Deputy DSL must respond to incoming safeguarding contact within the following targets:

- *Urgent* (immediate risk to safety, disclosure of abuse, missing student, medical incident, allegation against staff): within **15 minutes** of first contact attempt
- *Non-urgent* (general welfare concern, low-level pastoral matter, advice request): within **60 minutes** of first contact attempt

If the on-rota Deputy DSL does not respond within the urgent SLA, the caller must immediately contact the Cover Deputy DSL on their direct line as recorded in Section 3.2.

3.3.6 Out-of-Hours Escalation Flow

The out-of-hours internal escalation sequence is:

1. **Tier 1** — On-rota Deputy DSL (centre safeguarding phone)
2. **Tier 2** — Cover Deputy DSL (Cover direct line, Section 3.2)
3. **Tier 3** — LIA Managing Director (DSL), reachable 24/7 throughout the season; contact recorded in Section 3.1 / Table 1
4. **Tier 4** — Group Safeguarding & Prevent Coordinator. Acts as DSL cover *only* when the LIA MD has signalled formal absence (annual leave or sickness). Outside those windows, the Coordinator is contacted at Level 3 of the Escalation Chain (Section 8) for referral decisions, not as DSL cover.
5. **Tier 5** — Chief Operating Officer (Executive Sponsor). Acts as Coordinator cover when the Coordinator has signalled formal absence. Also contacted at Level 4 of the Escalation Chain for serious incidents.

For any situation involving immediate risk to life or physical safety, 999 must be called *before* internal escalation, in line with Level 5 of the Escalation Chain (Section 8).

3.3.7 Edge Case — Both Centre Deputy DSLs Unreachable

If both the on-rota Deputy DSL and the Cover Deputy DSL fail to respond within the urgent SLA (15 minutes total elapsed from first contact attempt), the caller — welfare staff, Campus Coordinator, or any staff member on site — must:

- Contact the LIA Managing Director directly using the number recorded in Section 3.1 / Table 1
- If the situation involves immediate risk to life or physical safety, call 999 first, then notify the LIA MD
- Document the failure of Tier 1 and Tier 2 cover. Each such occurrence must be reviewed at the next governance call and triggers a rota review.

3.3.8 Documentation

All out-of-hours concerns and disclosures must be logged on the LIA safeguarding incident log immediately at the point of handling, by the on-rota Deputy DSL — not retrospectively the following morning. Detailed handling protocol is set out in Section 7.4 (*Out-of-Hours Safeguarding Incidents*).

3.3.9 Items to be Confirmed Before Centres Open

The following operational items are flagged for resolution and sign-off ahead of programme opening:

- Per-centre welfare staff identification (Campus Coordinator default; centre-specific exceptions to be confirmed in Section 3.2)
- Morning handover protocol from Tier 1 on-rota Deputy DSL to the in-hours team — *currently no formalised handover process exists; this must be defined before centres open*
- Group sign-off on use of WhatsApp as a supplementary channel, with data protection assessment for personal device use in safeguarding communications
- Group-level confirmation that the COO functions as Coordinator cover during Coordinator formal absence, given no Deputy Coordinator role exists

3.4 Centre Safeguarding Monitoring

In addition to the responsibilities of the DSL and Deputy DSLs, the LIA HO co-lead has a monitoring and supervisory function in relation to safeguarding across their designated centres. This includes reviewing weekly safeguarding summaries to monitor themes, trends, and potential patterns, and ensuring that safeguarding processes and procedures are being consistently followed and are operating effectively.

The HO co-lead role is limited to the review of anonymised summaries only; they do not have access to full safeguarding records or detailed case information and are not involved in the safeguarding escalation or decision-making chain.

Centre Name / Location	Centre Safeguarding Monitoring
UCL Bloomsbury Campus	Adam Ennis
UOL Bloomsbury Garden Halls	Adam Ennis
UOL Bloomsbury Parry Hall	Adam Ennis
Wembley Campus	Daniele Pluchino
UEL Docklands Campus	Daniele Pluchino
Harrow Campus	Daniele Pluchino
Middlesex University	Beatrice Bellina
Colindale Campus	Beatrice Bellina
Canterbury Christ Church University	Beatrice Bellina
Liverpool Hope University	Ariosto Ponterio
Manchester University	Ariosto Ponterio

4. LADO Contact Mapping by Operating Borough

Where an allegation is made against a person who works with children and the allegation meets the harm threshold, the LADO must be contacted within one working day (KCSIE 2025). LADO contacts are local authority-specific. Each LIA operating centre must have the correct LADO contact for its borough recorded below and readily accessible to the centre DSL.

Centre Name	Local Authority / Borough	LADO Name	LADO Telephone	LADO Email	Date Verified
UCL Bloomsbury Campus	London Borough of Camden	Jacqueline Fearon	020 7974 4556	LADO@camden.gov.uk	08.06.26
UOL Bloomsbury Garden Halls	London Borough of Camden	Jacqueline Fearon	020 7974 4556	LADO@camden.gov.uk	08.06.26
UOL Bloomsbury Parry Hall	London Borough of Camden	Jacqueline Fearon	020 7974 4556	LADO@camden.gov.uk	08.06.26
Wembley Campus	London Borough of Brent	Florence Lyndsay-Walters	020 8937 4300	brent.lado@brent.gov.uk	08.06.26
UEL Docklands Campus	London Borough of Newham	Alex Mihu	0203 373 6706	LADO@newham.gov.uk	08.06.26
Harrow Campus	London Borough of Brent	Florence Lyndsay-Walters	020 8937 4300	brent.lado@brent.gov.uk	08.06.26
Middlesex University	London Borough of Barnet	Rob Wratten	020 8359 4066	LADO@barnet.gov.uk	08.06.26
Colindale Campus	London Borough of Barnet	Rob Wratten	020 8359 4066	LADO@barnet.gov.uk	08.06.26
Canterbury Christ Church University	Kent County Council	Duty LADO assigned on each day	Not available – referral link instead	lesasenquiries@kent.gov.uk	08.06.26
Liverpool University Hope	Liverpool City Council	Catherine Ballans & Pauline Trubshaw	0771 670 2034 & 0784 172 7309	lado@liverpool.gov.uk	08.06.26
Manchester University	Manchester City Council	Duty LADO assigned on each day	0161 234 1214	LADO@manchester.gov.uk	08.06.26

5. LIA Single Central Record (SCR)

All individuals working with students at LIA summer centres including permanent staff, seasonal employees, volunteers, agency staff, and temporary workers must appear on the LIA Single Central Record before they commence work. This is a subset of the Group SCR maintained to the same standard as the Group policy requires.

The LIA SCR must record, for each person:

- Identity check confirmed
- Enhanced DBS check date obtained
- Children's barred list check confirmed as included within the Enhanced DBS (separate column), or as a standalone check where the individual commenced work before the DBS certificate was returned
- Prohibition from teaching check date (for all teaching staff)
- Section 128 direction check date (for management roles)
- Right to work check date
- Overseas criminal records check where applicable (staff who have lived or worked outside the UK)
- References date received and from whom
- Date commenced in post

Note: Seasonal and temporary staff are not exempt from SCR requirements. KCSIE 2025 is explicit that every person in regulated activity must be on the SCR, including those engaged for a single day. Agency staff: written confirmation from the agency that all required checks have been conducted must be obtained and retained. The children's barred list check must always be confirmed as included before any individual in regulated activity commences work.

5.1 SCR Ownership and Location

Field	Detail
SCR Owner (role)	Kelly McGrath – Head of HR
SCR Location / System	Central HR Documents – LiA – HR Information Log
Access permissions	Kelly McGrath – Head of HR Grace Crowley – HR Partner Michelle Lara – HR Administrator Giulia Mella – Group Safeguarding & Prevent Coordinator Emiliano Sallustri – MD ELT
Date last audited	8 th June 2026
Signed off by	Kelly McGrath – Head of HR

5.2 SCR Pre-Season Confirmation

Confirmation	Confirmed (Y/N)	Name	Date
All staff in regulated activity have an Enhanced DBS with children's barred list confirmed as included. RA is in place in case of delays.	Y	Grace Crowley – HR Partner	22/06/2026
No individual in regulated activity has commenced work without barred list clearance. RA is in place in case of delays.	Y	Grace Crowley – HR Partner	22/06/2026
All agency/supply staff: written confirmation of checks received from agency	Not applicable – we do not use agencies		
Overseas checks completed for all applicable staff. RA is in place if not possible to obtain overseas checks.	Y	Grace Crowley – HR Partner	22/06/2026
SCR is accessible to Group Safeguarding & Prevent Coordinator (only when required upon a specific enquiry)	Y	Grace Crowley – HR Partner	22/06/2026

6. Safeguarding Training — LIA Staff

All LIA staff must be familiar with the Group Safeguarding Policy and this addendum and must complete safeguarding training appropriate to their role before working with students. Training records must be maintained separately for LIA staff as a distinct dataset within the Group training log, to enable audit by the Group Safeguarding & Prevent Coordinator and, where applicable, the British Council.

6.1 Training Requirements by Role

Role Category	Required Level	Training	When Required	Who Confirms Completion
All seasonal staff (any role)	Level 1	—	Before first day of work with students	HR Lead / Centre Manager
Campus Coordinators with welfare duties	Level 2		Before programme opens	LIA MD / Group Coordinator
Named Deputy DSLs and cover	Level 3		Before programme opens — certificate required	LIA MD / Group Coordinator
Named DSLs	Level 3 — refresher every 2 years		Current at date of season opening — certificate required	LIA MD / Group Coordinator

6.2 Training Log — Pre-Season Confirmation

Field	Detail
Training log location / system	SCR and personnel files
Total seasonal staff engaged this season	152 seasonal staff recruited for 2026
Number with Level 1 induction completed pre-start	152
Number with Level 2 completed	4
Number with Level 3 completed (DDSLs)	10
Confirmed by (name / role)	Grace Crowley – HR Partner
Date confirmed	24/06/2026

7. Centre-Level Operational Protocols

The following protocols set out how the Group policy is applied operationally at LIA centre level during the summer season. They complement and do not replace the provisions of the Group Safeguarding & Prevent Policy, including the age-differentiated provisions in Sections 5.1A, 5.4 and 5.5 of the main policy.

7.1 Daily Welfare and Safeguarding Check

This section sets out the daily process by which each LIA centre verifies that every student under 18 is accounted for and well, and that any emerging welfare or safeguarding signal is captured, logged and reviewed. It operationalises the Group policy duty of care obligations (Sections 5.1A, 5.4 and 5.5) and complements — without replacing — the per-class attendance procedure of the LIA *Attendance and Lateness Policy*.

7.1.1 Principle. Every student under 18 must be accounted for at least once per day, every day of the programme including weekends and bank holidays, covering both physical presence and observable welfare signals.

7.1.2 Cadence. The Daily Welfare and Safeguarding Check is performed once per day at end of day, consolidating inputs collected through the day. The check runs seven days a week for the full duration of the programme; on non-academic days, academic-session inputs are omitted but the consolidation point remains.

7.1.3 Inputs During the Day. Teachers record class attendance at each session per the *Attendance and Lateness Policy*. The Campus Coordinator runs roll-calls and head counts at non-academic activities and at residence pre-curfew, and records any welfare signal observed in contact with students. On excursion days, the Tour Coordinator and named Tour Guides run the ad hoc procedure of §7.1.5. Any LIA staff member, agency Group Leader or welfare staff member must report welfare or safeguarding signals to the Campus Coordinator or Centre Manager without delay.

7.1.4 Consolidation by Centre Manager. At end of day, the Centre Manager consolidates all inputs into the Daily Welfare Log and verifies that every enrolled student under 18 is accounted for in one of the following states: present at all scheduled sessions; on authorised absence per the *Attendance and Lateness Policy* §6; on excursion per §7.1.5; under welfare monitoring with flag status recorded. Any student whose status cannot be verified at consolidation triggers the *Missing and Unaccounted Student Policy* timeline immediately, without buffer. The Centre Manager signs off the log before close of day.

7.1.5 Excursion Days — Ad Hoc Procedure. On excursion days, the Tour Coordinator is the accountable consolidator for excursion students. Each excursion group has a named primary Tour Guide accountable for head counts at: departure from centre, arrival at destination, before any group split, after any group reform, and on return to centre. Where a group splits, each sub-group has a named Tour Guide accountable for the same head-count triggers. End-of-excursion reconciliation feeds back into the Centre Manager's Daily Welfare Log. Any student not accounted for at any head count triggers the *Missing and Unaccounted Student Policy* Section 5.A timeline immediately.

7.1.6 Daily Welfare Log. The Daily Welfare Log is maintained as a shared Excel workbook, one log per centre, archived in a shared cloud folder accessible to the LIA DSL, the Centre Manager, the Campus Coordinator, and the Group Safeguarding & Prevent Coordinator. For each day, the log records: student roll with status (present / authorised absence / excursion / welfare flag / unaccounted); welfare flags raised with timestamp, raised-by, brief description and current status; cross-reference to any LIA Safeguarding Form entry per §7.2; end-of-day Centre Manager sign-off. Field structure is standardised across all LIA centres to enable Group-level pattern review.

7.1.7 Review and Escalation. The Centre Manager reviews and signs off the Daily Welfare Log at end of each day. The LIA DSL reviews the logs across all centres on a weekly cadence, identifies patterns and shares raw weekly data with the Group Safeguarding & Prevent Coordinator in line with §3.4 governance; HO co-leads receive anonymised summaries only. Escalation thresholds applied to log entries: any single welfare flag with an apparent safeguarding dimension is escalated same-day by the Centre Manager to the LIA DSL; two welfare flags concerning the same student within seven days is escalated to the LIA DSL by the Centre Manager; three or more welfare flags across different students within seven days at the same centre is escalated by the LIA DSL to the Group Coordinator; any unaccounted student outside the *Missing and Unaccounted Student Policy* timeline triggers escalation per that policy and §8 of this addendum.

7.1.8 Welfare Signals. Welfare signals are observed on a discretionary basis by staff trained at Level 1 (or above) safeguarding. They include, but are not limited to, visible distress, withdrawal or social isolation, marked changes in behaviour or mood, signs of physical injury or unexplained marks, indications of being unsafe in residence, signs of harmful peer relationships, and any disclosure or partial disclosure. Staff are not expected to diagnose — they flag, and the LIA DSL assesses. Signals meeting the safeguarding threshold are recorded on the LIA Safeguarding Form (§7.2) in addition to the Daily Welfare Log.

7.2 Disclosure Handling at Centre Level

All staff must follow the disclosure handling procedure set out in Annex G of the Group Safeguarding & Prevent Policy. The following centre-level additions apply:

7.2.1 Disclosure recording form location and access arrangements

All disclosures, safeguarding concerns and cases must be recorded in the central [Safeguarding Form](#).

7.3 Absence and Missing Student Protocol

Unexplained absence of any student under 18 must be treated as a potential safeguarding concern from the outset. The following centre-level process applies, in addition to Sections 5.4 and 5.5 of the Group policy:

Unexplained absence of any student under 18 must be treated as a potential safeguarding concern from the outset. The following centre-level process applies, in addition to Sections 5.4 and 5.5 of the Group policy, and the full step-by-step procedure is set out in the LIA *Missing and Unaccounted Student Policy* (v2.0, May 2026), which forms part of this safeguarding framework.

7.3.1 Principle. Any student under 18 who cannot be accounted for in a scheduled context — academic session, on-site evening or non-academic activity, residential return or curfew, or off-site excursion — must be reported to the Centre Manager immediately. The Centre Manager is the first operational escalation point at centre level. The DSL must be informed at the point at which parent or guardian contact is initiated or earlier where the concern is serious.

7.3.2 Centre-level response by context. The Missing and Unaccounted Student Policy defines four operational contexts with mandatory escalation timelines:

- *On excursion:* student-side immediate actions, Tour Guide notifies Tour Coordinator and Centre Manager at minute zero, continuous mobile contact attempts, parent contact at 1 hour, police contact at 2 hours (daytime) or 1.5 hours (evening or night).
- *On site during classes:* teacher notifies DoS and Centre Manager immediately, parent contact at 1 hour, police contact at 2 hours.
- *On site evening or non-academic activities:* Campus Leader notifies Campus Coordinator and Centre Manager immediately, parent contact at 1 hour, police contact at 1.5 hours.
- *In residence (curfew or non-return):* Campus Leader notifies Campus Coordinator and Centre Manager immediately, parent contact at 1 hour after curfew or missed activity, police contact at 1.5 hours.

7.3.3 DSL involvement. In all four contexts, the DSL must be informed by the Centre Manager at the 1-hour mark, prior to parent contact. The DSL confirms with the Centre Manager whether police involvement is to be initiated at the next threshold. Upon any police involvement, the DSL escalates immediately to the Group Safeguarding & Prevent Coordinator (Level 4 of Section 8) and the COO (Level 5).

7.3.4 Parent and guardian notification. Parent, guardian or responsible adult contact attempts and outcomes must be documented by the centre DSL in line with Section 7.5 of this addendum. Where the student is part of a group, the agency Group Leader is notified in parallel; the DSL retains responsibility for confirming that parents have been informed by the Group Leader.

7.3.5 Record keeping. All missing or unaccounted student incidents must be logged on the LIA Safeguarding Form, to which the Group Safeguarding & Prevent Coordinator has access, within 24 hours of resolution, in line with the retention standards of Section 6 of the standalone policy.

7.3.6 Post-incident review. Any incident involving police contact, or any incident deemed serious by the DSL, triggers a post-incident debrief within 5 working days, jointly reviewed by the Centre Manager and the DSL, with findings shared with the Group Safeguarding & Prevent Coordinator where pattern escalation is required.

7.3.6 Reference document. Full procedural detail, role-by-role responsibilities and escalation tables by context are set out in the LIA *Missing and Unaccounted Student Policy* v2.0. That document is the authoritative operational source. This section is the safeguarding-framework-level summary and does not supersede or replace it.

7.4 Out-of-Hours Safeguarding Incidents

This section sets out the response process when a safeguarding concern arises out-of-hours, in addition to the cover arrangements in Section 3.3. For missing or unaccounted students, the dedicated procedure in the LIA *Missing and Unaccounted Student Policy* (Section 5) applies and takes precedence over this section.

7.4.1 Scope. This protocol covers safeguarding concerns arising during the out-of-hours window defined in Section 3.3.1, including: a disclosure of abuse made by a student; an allegation made against a member of staff, contractor or agency Group Leader; a peer-on-peer safeguarding incident; a welfare concern about a student's mental health, behaviour or wellbeing; or any matter the receiving staff member considers may meet the safeguarding threshold. Medical emergencies, missing students and operational incidents are covered by their respective protocols.

7.4.2 Initial Response — Receiving Staff Member. Any LIA staff member, welfare staff, Campus Coordinator or agency Group Leader who becomes aware of an out-of-hours safeguarding concern must contact the on-rota Deputy DSL on the centre safeguarding phone (Section 3.3.4) immediately. Where there is immediate risk to life or physical safety, 999 is called first and the on-rota Deputy DSL notified directly afterwards. Disclosure conversations must follow Annex G of the Group Safeguarding & Prevent Policy: listen, do not lead, do not promise confidentiality, record the student's own words. The student must be kept in a safe place with appropriate adult presence until the Deputy DSL is engaged. No investigative action is to be taken, and no contact is to be made with any person who may be the subject of the concern.

7.4.3 Deputy DSL Action. The on-rota Deputy DSL receiving the contact must acknowledge the report, assume operational responsibility for the concern from that moment, and apply the disclosure handling procedure set out in Annex G of the Group policy where the concern arises from a student disclosure. The concern must be logged immediately on the central LIA Safeguarding Form (referenced in Section 7.2) at the point of handling — retrospective logging at the start of the following working day is not permitted. The Deputy DSL then assesses severity and determines whether same-day escalation to the LIA DSL is required. Any disclosure of abuse, any allegation against staff, contractor or Group Leader, and any peer-on-peer incident with apparent harm must be escalated to the LIA DSL the same day, regardless of hour. Where Tier 2 Cover Deputy DSL is engaged due to Tier 1 non-response, the Cover Deputy DSL assumes the same responsibilities and documents the Tier 2 activation.

7.4.4 Escalation Out-of-Hours. The escalation chain in Section 8 (Table 11) applies in full out-of-hours, with no deviation. Level 3 — the LIA DSL — is contacted directly by the Deputy DSL by phone. Level 4 — Group Safeguarding & Prevent Coordinator — is informed by the LIA DSL where the concern involves a referral to LADO, MASH, police or children's social care, an allegation against a member of staff, or any concern of a serious or pattern nature. Level 5 — COO — is informed for concerns at the threshold described in Table 11. Out-of-hours escalation is by phone, not email. Where the LIA DSL is in signalled formal absence, the Group Coordinator covers per Section 3.3.6 (Tier 4).

7.4.5 LADO, MASH and Police Routes Out-of-Hours. KCSIE 2025 requires LADO contact within one working day where the harm threshold for an allegation against staff is met. Out-of-hours, this means that LADO contact on the next working day is compliant, except where the borough provides a dedicated out-of-hours line. Where a borough OOH LADO line is recorded for the centre in Section 4 (Table 6), the line must be used. Where no LADO out-of-hours route exists for the relevant borough, and the situation involves immediate risk, 999 is the operative contact and LADO is informed on the next working day. The LIA DSL, in consultation with the Group Coordinator where reachable, determines which route applies and documents the decision on the Safeguarding Form.

7.4.6 Parent and Guardian Notification. In line with Section 7.5, parent, guardian or responsible adult contact must be initiated within 24 hours of any safeguarding referral, welfare concern or medical incident. Where the concern arises out-of-hours, the timing of parent contact is determined by the LIA DSL in consultation with the Group Coordinator where appropriate; contact may be deferred to the morning where doing so does not increase risk to the student. Where the student travels as part of a group, the agency Group Leader is notified in parallel and the LIA DSL retains responsibility for confirming that parents have been informed by the Group Leader.

7.4.7 Morning Handover. At the start of each working day, the Deputy DSL who held the rota during the preceding out-of-hours window must brief the Centre Manager on any safeguarding concern or incident handled, regardless of severity. Handover is delivered in person where feasible, or by phone. The Centre Manager confirms receipt in writing on the LIA Safeguarding Form. No safeguarding matter handled out-of-hours may remain undisclosed to the Centre Manager at the start of the next working day.

7.4.8 Documentation Review. All out-of-hours safeguarding entries on the LIA Safeguarding Form are reviewed by the LIA DSL within 24 hours of submission. Pattern review is conducted weekly by the LIA DSL with the Group Coordinator, in line with Section 3.4 governance, where anonymised summaries are shared with the relevant HO co-lead for monitoring purposes.

7.4.9 Worked Example. Illustrative scenario for inspection-readiness. A residential student aged 16 discloses bullying by another student to a welfare staff member at 23:00 on a Saturday evening. The welfare staff member listens without leading, reassures the student, secures the student's safety and contacts the centre safeguarding phone immediately. The on-rota Deputy DSL receives the call within the urgent SLA (Section 3.3.5), captures the student's account in their own words, applies Annex G procedure and logs the disclosure on the LIA Safeguarding Form at the point of handling. The Deputy DSL contacts the LIA DSL the same evening for briefing. The LIA DSL assesses severity, judges that the LADO threshold is not met but elects to inform the Group Coordinator within 24 hours for awareness. Parent contact is deferred until Sunday morning given the late hour and absence of immediate risk; on Sunday morning the Deputy DSL briefs the Centre Manager who confirms receipt in writing on the Safeguarding Form. Post-incident review follows within 5 working days; pattern findings, if any, are shared with the Group Coordinator for Group-level review.

7.5 Communication with Parents and Guardians

In accordance with Section 5.1A of the Group policy, the following provisions apply to all LIA students Under 18 specifically:

- A named parent, guardian or responsible adult must be identified for each student Under 18 on enrolment and their contact details recorded.
- That contact must be notified promptly and within 24 hours in any of the following circumstances: unexplained absence; welfare concern; safeguarding referral; medical incident; or any situation where the DSL considers notification appropriate.
- If the student is part of a group and travelling with a Group Leader, they must be notified immediately in the circumstances listed above. It is the DSL responsibility to receive confirmation from the Group Leader that the student's parents or guardians have been informed.
- Attempts to contact and outcomes must be documented by the centre DSL.

7.5.1 Source and Custody of Contact Data. Parent, guardian and responsible adult contact details are collected pre-arrival via the LIA Student Form, completed by the parent and submitted through the agency where applicable. The form captures named contacts, primary and secondary phone numbers, email, relationship to student, and parental consent in line with UK GDPR. The Centre Manager verifies that contact data is current and complete on enrolment day and is responsible for keeping it updated throughout the student's stay. Incomplete or unreachable contact details must be flagged to the DSL within 24 hours of arrival.

7.5.2 Operational Responsibility at Centre. The LIA DSL retains accountability for parent and guardian contact under this section. Operational execution is delegated to the Centre Manager during working hours and to the on-rota Deputy DSL out-of-hours. The Campus Coordinator may execute contact on behalf of the Centre Manager where instructed and where the matter is non-safeguarding (e.g. routine absence notification). All safeguarding-relevant contact decisions remain with the DSL.

7.5.3 Communication Channels. Primary channel is voice call to the recorded parent or guardian number, followed by a confirmation email summarising the conversation. Where the parent is non-English speaking and the agency Group Leader is acting as cultural bridge, the call may be made jointly. Staff must never use personal mobile devices, personal email or social messaging for parent contact; only LIA-issued contact channels are used, and every interaction is logged in the LIA Safeguarding Form.

7.5.4 Coordination with Group Leader for Grouped Students. Where a student travels as part of an agency group, the agency Group Leader is notified in parallel with — not in place of — the parent/guardian contact attempt. The DSL retains responsibility for confirming with the Group Leader that the parents have been informed, and records that confirmation on the Safeguarding Form. The Group Leader does not substitute the parent for safeguarding decision-making.

7.5.5 No-Response Protocol. Where parent or guardian contact cannot be established within the 24-hour window required by the preamble of this section, the Centre Manager escalates to the DSL the same day. The DSL evaluates whether additional escalation routes are required (secondary parent contact, agent contact, embassy contact for unaccompanied minors with consular implications) and documents the decision. Persistent inability to reach the responsible adult constitutes a welfare concern in its own right and is reviewed by the DSL within the Daily Welfare Log (§7.1)

7.5.6 Documentation. All parent/guardian contact attempts, channels used, time of contact, outcome and any subsequent action are documented by the centre DSL on the LIA Safeguarding Form (§7.2) where the matter is safeguarding-relevant, or on the daily welfare log routine attendance notifications. Records are retained per the retention standard of the LIA Missing and Unaccounted Student Policy (Section 6).

7.5.7 Privacy and Data Handling. Parent and guardian contact details are stored and accessed in line with the UK GDPR, the Data Protection Act 2018 and the Group data handling provisions of the parent policy. Access is restricted to the LIA DSL, Centre Manager, Campus Coordinator and Group Safeguarding & Prevent Coordinator. Contact details are deleted at end of the retention period defined for the related student record. Communications with parents are confidential within the safeguarding chain and not discussed outside it.

8. Escalation Chain

The following escalation chain applies to all safeguarding concerns arising at LIA summer centres. It is non-negotiable and must be followed regardless of the nature or apparent severity of the concern. Staff must never bypass a level unless the person at that level is the subject of the concern.

Level	Role	Named Individual	Contact	When to Escalate to This Level
1	Any member of staff — initial concern	Any staff member on site	In person	Immediately upon identifying a concern — report to centre DDSL same day
2	Centre Deputy DSL	Please see section 3.2	Please see section 3.2	All welfare concerns and disclosures. Immediate for urgent matters.
3	LIA DSL	Emiliano Sallustri	Emiliano.sallustri@malvernplc.com / +447471830607	All welfare concerns and disclosures. Immediate for urgent matters.
4	Group Safeguarding & Prevent Coordinator	Giulia Mella	Giulia.mella@malvernplc.com / +44 151 433 8448	All referrals to external agencies. Any concern the DSL cannot resolve. Any pattern of concern. Out-of-hours escalation.
5	COO (Executive Sponsor)	James Findley	james.findley@malvernplc.com / +44 07939073254	Significant or serious incidents. Any referral to LADO, MASH or police. Allegations involving senior staff.
6	Emergency services	999	999	Immediate risk to life or physical safety — contact before notifying any internal level.

An exception to this escalation chain occurs if a LiA student goes missing. In that case, the escalation timelines in the Missing and Unaccounted Student Policy, section 5, must be followed. All other procedures apply.

9. British Council Accreditation — Implementation Notes

Language in Action holds British Council accreditation as the inspected entity. The following notes confirm how this addendum supports LIA's compliance with the British Council's safeguarding inspection criteria, within the Group governance framework.

BC Criterion	What It Requires	How This Addendum Addresses It
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S1	Named member of staff responsible for implementing the safeguarding policy	Section 3.2 names the DSL and Deputy DSLs at each centre. Each has a KCSIE 2025-compliant JD clause.
S2	Ensuring that all members of staff are familiar with the safeguarding policy and have received training appropriate to their role	Section 6.1 specifies level of training required for each role. Section 6.2 links to the training log.
S4	Recruitment procedures covering all roles with substantial access to under-18s, including DBS and barred list checks	Section 5 confirms LIA SCR completeness including children's barred list for all regulated activity roles.
S8	Suitable arrangements are in place to ensure contact with parents, guardians or nominated representative	Section 7.5 confirms procedures and circumstances around which parents, guardians or nominated representatives must be contacted.
M9	DSL job description references the safeguarding role explicitly	Section 3.2 includes JD clause confirmation column. Clause must be present before the individual commences.
W1	Risk assessments as required evidence for emergency plan	Risk assessments are the responsibility of the LIA MD per the Group RACI. Centre-level risk assessment reference:

10. Sign-Off

This addendum must be signed by all three parties before it is published and before any LIA summer centre opens for the season. An unsigned addendum has no standing. If any section remains incomplete at the point of proposed sign-off, the addendum must not be signed until all gaps are resolved.

Role	Name	Signature	Date
LIA Managing Director	Emiliano Sallustri	<i>Emiliano Sallustri</i>	24/6/2026
Chief Operating Officer	James Findley	<i>James Findley</i>	24/6/2026
Group Safeguarding & Prevent Coordinator	Giulia Mella	<i>Giulia Mella</i>	24/6/2026

By signing above, each party confirms that:

- All yellow highlighted fields in this addendum have been completed in full
- All named DSLs and Deputy DSLs hold current Level 3 safeguarding training and have KCSIE 2025-compliant job description clauses
- The LIA Single Central Record is complete and has been audited
- All LADO contacts have been verified as current for this season
- This addendum is subordinate to and consistent with the Group Safeguarding & Prevent Policy (v2.0)
- Central oversight by the Group Safeguarding & Prevent Coordinator and COO applies throughout the season

This addendum must be retained securely and made available on request to the Group Safeguarding & Prevent Coordinator, the British Council, ISI, or any other relevant inspection or oversight body.

