

Department	ELT (Language in Action)	Implementation Date	10 th June 2026
Official name of the policy	LiA Health & Safety Addendum	Last Reviewed/Update Date	10 th June 2026
Policy Owner	Adam Ennis	Approval Date	17 th June 2026
Policy Approvers	Matthew Huda (Group H&S Coordinator), James Findlay (Group COO), Emiliano Sallustri (MD)		

Language in Action Summer Programme Health and Safety Addendum

This addendum is an initial programme-specific supplement to the Malvern International Group Health & Safety Policy v1.5 and is intended to apply to Language in Action junior summer programme operations delivered across ten UK centres during the current summer season. Language in Action presents its centres as junior summer camp locations across the UK, including London university and city-centre accommodation settings as well as other residential campuses.

Purpose and status

This addendum should be read alongside the Group Health & Safety Policy, the Group Safeguarding and Prevent framework, the Business Continuity Plan, local site risk assessments, host-institution emergency procedures, and programme operating handbooks. It is designed to translate the Group policy into programme controls that reflect junior residential delivery, under-18 supervision, excursions, transport movements, welfare response, and shared-site working with host venues.

The Group policy already requires specific risk assessment for young persons, same-day reporting of incidents involving under-18 students, portable first aid kits for off-site activities, annual review of fire and first-aid arrangements, and close reliance on host-site emergency procedures where programmes operate on partner premises. This addendum therefore sets out the additional centre-level and programme-level arrangements that Language in Action managers must apply before opening, during operation, and at close-down of each summer centre.

Scope

This addendum applies to all Language in Action junior summer centres operated by or on behalf of Malvern International during the summer period, including teaching venues, residences, dining areas, arrival and departure points, excursion routes, transfer arrangements, and any contracted activity venue used for enrolled students. It applies to all staff, managers, teachers, activity leaders, group leaders where relevant, residential staff, contractors, visitors, and students participating in the programme.

For the current summer, the addendum is intended to cover the eleven UK centres promoted through the Language in Action centres portfolio, subject to final operational confirmation from the Head of Juniors and the summer operations team. A final controlled version should insert before issue. The confirmed site list, centre opening dates, designated local leads, emergency contact cascade, and any centre-specific exceptions are included in Annex A.

Operating context

Language in Action delivers junior programmes for young learners and markets summer language programmes for ages 11 to 19 across centres in London and elsewhere in the UK. The centres portfolio includes a mix of university-style campuses and city-centre residences. A full list is provided in Annex A.

Because this operating model combines teaching, accommodation, catering, social programming, and frequent off-site travel, the principal health and safety risks include fire and evacuation, supervision failure, transport and road-

crossing incidents, lost student situations, medical episodes, excursion incidents, slips and trips, unauthorized absence, behavioural incidents, and failures in communication between Malvern staff and host-site teams. Additional attention must be given to public transport, crowd density, busy roads, student movement between buildings, and the safeguarding-health and safety overlap created by off-campus free time and urban excursions

Governance and accountability

Overall accountability remains with Malvern International in line with the Group Health & Safety Policy, with operational oversight resting with the Chief Operating Officer and the Group Health & Safety Coordinator. For Language in Action operations, the Head of Juniors must ensure that this addendum is issued, centre teams are briefed on it before opening, and programme-specific risk assessments are completed and signed off before students arrive (signed off between the Centre Manager, Programme Manager and the Group H&S Coordinator).

Each centre has a named Centre Manager/Coordinator with day-to-day responsibility for local implementation of this addendum, liaison with the host institution, verification of emergency arrangements, and oversight of local incident reporting.

Where the host institution controls the premises, Malvern staff must treat host emergency procedures, fire systems, security protocols, welfare reporting routes, and contractor/site restrictions as the primary premises controls, while still applying Malvern's own supervision, incident reporting, and young-person risk controls. Before opening, Language in Action obtain written or emailed confirmation of the host site's fire procedure, first-aid provision, security arrangements, emergency contacts, and escalation process for out-of-hours incidents.

Centre pre-opening controls

Before any centre opens, a centre opening file must be completed and approved, containing the local young-person risk assessment, centre and excursion risk assessments, residence risk assessment where applicable, first-aid needs assessment, emergency contacts, fire and evacuation information, staff rota, supervision plan, student medical summary, and transport arrangements. No centre should open to students until these documents have been checked by the relevant summer operations lead. This forms part of the Centre Operating Pack which is completed for each Language in Action centre ahead of the summer delivery.

The pre-opening review must confirm that classrooms, residences, communal areas, dining facilities, and external routes used by students are safe, clearly signed where possible, and suitable for the age group attending. The review must also confirm how students move between residence and teaching sites, especially where centres require walking routes or short travel between accommodation and teaching locations.

A site induction must be prepared for students and staff at each centre and must cover fire evacuation, assembly points, curfews where used, road safety, security of personal belongings, behaviour expectations, lost-student procedure, first-aid arrangements, welfare contacts, and rules for leaving supervised activities. Students must receive this induction on arrival and again before their first excursion or unsupervised free-time period, where such free time is permitted by programme rules and parental consent.

Staffing and supervision

The Group policy sets baseline ratios of 1:20 for taught sessions, 1:15 for off-site activities and excursions, and 1:15 for residential programmes or programmes involving students under 16 during off-site activity, with higher standards to apply where risk assessment or partner rules require them. This addendum adopts those ratios as the minimum starting point for Language in Action centres and requires each centre risk assessment to specify any tighter ratio for younger cohorts, SEND needs, mixed-arrival days, airport transfers, evening activities, swimming, high-density city visits, or overnight residential supervision.

At no point are junior group students to be left without clearly identified responsible staff, and handover between teaching, activity, and residential teams must be documented through rotas, registers, or handover logs. Any free-time model must define exactly who is allowed independent time, for how long, within what boundaries, with what sign-out process, and with what parental consent and emergency contact controls in place.

All staff are trained before taking up duty on local emergency procedures, incident reporting, safeguarding escalation, missing student response, medical response, transport supervision, and behavioural expectations. New starters arriving after centre opening must complete an abbreviated but recorded induction before working unsupervised with students.

Student health and medical arrangements

The Group policy requires collection of parental consent, at least two emergency contacts, medical information, allergy information, and consent for emergency medical treatment where parents cannot be reached. For Language in Action operations, this information is collated via our admissions processes. Where agency partners collect this information on our behalf, Language in Action provide the template file for this to ensure the correct information is corrected inline with our policy and external guidelines (i.e. British Council). This information is stored centrally with our admissions team in line with GDPR guidelines.

Each centre must identify students with high-risk medical needs before arrival, including severe allergies, asthma, diabetes, epilepsy, mental health concerns, or medication that may affect participation in sport, travel, or late-evening activity. Individual healthcare or support plans should be prepared where the risk assessment indicates a need, and relevant staff must know what action to take in an emergency, including where medication is stored and who carries it. This information is stored at centre level as part of the centre master allocation sheets and is available to all relevant centre staff at all times.

Medication arrangements must distinguish between self-administration, supervised self-administration, and controlled storage by staff, depending on age, risk, and parental instructions. Staff must not administer prescription medication without written parental consent and clear instructions, and any medication incident must be recorded and escalated under the same-day reporting requirement for under-18 students. A medicine log is held at each centre for each intake of students.

First aid and emergency response

The Group policy requires at least one appointed person per site during operational hours, qualified first aiders where the first-aid needs assessment indicates this, and portable first-aid kits to be used on activities. For Language in Action centres, at least one trained first aider should be rostered and contactable during all core programme hours, all excursions, and all overnight residential periods, with cover levels increased on large excursion days and arrival or departure days.

Emergency response cards are carried by centre managers and excursion leaders and must include the local site address, nearest urgent care or A&E route where available, emergency services instructions, host-site emergency contact, Malvern escalation contacts, and the procedure for informing parents or guardians. In any immediate threat to life, staff must call 999 first and then notify the centre leadership and Group escalation contacts in line with the Group policy and Business Continuity arrangements.

All first-aid treatment, accidents, incidents, and near misses must be recorded promptly, with same-day notification to the Group H&S Coordinator and the relevant summer operations lead where an under-18 student is involved. Serious or potentially notifiable incidents must be escalated immediately so that RIDDOR assessment and business continuity thresholds can be considered without delay.

Fire safety and evacuation

The Group policy requires a current fire risk assessment for each site, at least one designated fire marshal arrangement per site, and confirmed evacuation plans communicated through induction. Because most Language in Action centres operate in host premises, the Language in Action team obtain the host's fire procedures, confirm how roll calls will be completed for junior groups, and ensure Malvern staff understand assembly points, alarm signals, evacuation routes, and any stay-put or phased-evacuation restrictions relevant to the site.

For residential centres, night-time fire response arrangements must be explicit and include staff room locations, wake-up and sweep responsibilities, roll-call method, assembly management, and escalation to parents or guardians where an evacuation materially affects student welfare or accommodation continuity. For under-18 groups, additional roll-call controls must be used at assembly points so that every room group, class group, or excursion group can be reconciled quickly against an up-to-date register.

Where a centre uses more than one building or a split residence-and-study model, the centre must document the separate evacuation and regrouping arrangements for each building and the process for confirming all students are accounted for across the whole programme, not just within one building. This is particularly important for London centres where accommodation and teaching may be in different nearby venues.

Excursions and off-site activity

The Group policy requires a specific activity risk assessment for every off-site activity involving under-18 students and states that the assessment must address route, transport, venue safety arrangements, supervision ratios, emergency procedures, and participant welfare needs. For Language in Action, excursion planning must also include a written itinerary, group lists, headcount points, meeting points, transport contingency, lost-student response, welfare and toilet breaks, meal planning where relevant, and clear arrangements for students who become unwell or need to leave the activity early.

Excursions in London require enhanced controls because groups may be moving through crowded public spaces, stations, buses, and underground routes. Centre teams must carry out route-specific planning for road crossings, station interchanges, platform safety, crowd management, heat exposure, hydration, and separation risks.

Before departure, leaders must brief students on behaviour, buddying where used, emergency contact numbers, meeting times, prohibited conduct, photography or water safety rules where relevant, and what to do if separated from the group. At least one staff member on each excursion must hold the full student register, emergency contacts, consent information relevant to the trip, and any medication or medical summary required for participating students. See the Language in Action Missing & Unaccounted Student Policy for further specific information on this.

Transport and transfers

Airport transfers, coach transfers, and local transport movements must be covered by written procedures and relevant risk assessments before the programme starts. Transfer plans must set out supervision responsibilities at collection and drop-off, identity checks for arriving students, waiting-area control, luggage handling, late arrival procedures, and escalation if booked transport fails or a student does not arrive as expected.

All transfer arrangements are managed by Ariosto Ponterio, our Marketing and Processes Manager who liaises with our providers and Centre Management staff on the provision of suitable transport as required by our programmes.

Where public transport is used, staff will position themselves to supervise boarding and alighting effectively, prevent students being separated by closing doors or crowd flow, and conduct headcounts before departure and immediately after arrival. No student should be authorised to travel independently outside the normal programme supervision model unless this has been specifically risk assessed and permitted under written parental or guardian consent.

If external coach or transport providers are used, the Centre Manager or operations lead will ensure booking details, emergency contact information, pickup points, and provider expectations are documented and shared with supervising staff. Any transport-related near miss, delay with welfare consequences, or student separation incident must be recorded and reviewed as part of the centre's reactive monitoring.

Residential accommodation

The Group policy requires a residential H&S risk assessment, a designated residential welfare lead (for Language in Action this is the Centre Manager or Campus Coordinator), clear out-of-hours emergency procedures, and accommodation arrangements that are suitable for under-18 students. For Language in Action, each residential centre maintains rooming lists, floor plans or location guides where available, curfew and quiet-hours procedures, gender and age-appropriate accommodation controls, sign-in and sign-out rules, visitor restrictions, and overnight staffing cover proportionate to the number and age of students.

Residential teams conduct welfare checks in line with the programme risk assessment and must record concerns including illness, emotional distress, room absence, unsafe behaviour, or damage that may create a health and safety risk. Any bedroom move, welfare isolation arrangement, or temporary alternative accommodation must be approved by the Centre Manager/Campus Coordinator and documented with the reason, supervision plan, and communication actions taken.

Safeguarding overlap

Many summer programme incidents involve both health and safety and safeguarding considerations, especially where the issue concerns missing students, unauthorised absence, peer-on-peer conduct, online contact, harassment, self-harm indicators, or unsafe free-time arrangements. Where this overlap exists, the safeguarding procedure takes precedence for immediate child-protection action while health and safety reporting and investigation continue in tandem.

Please see the Language in Action Safeguarding Operational Addendum 2026 and specifically the escalation chain (§8 Table 11) and the OOH structure (§3.3) for further information. Safeguarding matters escalate via the Language in Action DSL, Emiliano Sallustri in coordination with Group Safeguarding & Prevent Coordinator, Giulia Mella.

The centre team must know who the designated safeguarding contacts are at programme and group level and how they interface with the Centre Manager/Campus Coordinator and Group escalation contacts. Student supervision boundaries, signing-out rules, room access rules, and nighttime welfare response must be consistent across the local H&S plan and the safeguarding plan so that staff are not given conflicting instructions.

Missing student and unauthorized absence response

The missing student procedure is set out in the LIA Missing and Unaccounted Student Policy v2.0, Section 5. This addendum recognises that H&S considerations at the point of a missing student event require the elevated response defined in that policy.

Welfare, behaviour, and environmental conditions

Staff must actively manage fatigue, heat, dehydration, poor nutrition, and emotional distress because these issues can quickly become health and safety incidents in intensive summer programmes. Daily programme planning should include access to drinking water, shaded or indoor breaks during hot weather, suitable meal breaks, realistic travel times, and a process for reducing participation where a student is unwell or overwhelmed.

Programme adjustments will be made and risk assessments updated in line with government advice on adverse weather conditions including heatwaves alerts and thunderstorms.

Behaviour management arrangements must support safety in classrooms, residences, dining halls, and public places, including clear rules on running, horseplay, tampering with fire equipment, leaving groups without permission, and dangerous conduct on roads or public transport. Sanctions for unsafe behaviour should be aligned with the student code of conduct and safeguarding framework, with serious or repeated breaches escalated to centre leadership and, where appropriate, to parents, guardians, or group leaders.

Contractors, visitors, and external providers

The Group policy requires appropriate control of contractors and visitor sign-in arrangements, including local briefing and compliance with site procedures. For Language in Action centres, all external activity providers, transport providers, venue contacts, and short-term contractors must be subject to proportionate pre-use checks, including confirmation of their safety arrangements, contact details, insurance status where relevant, and the division of responsibilities during the activity.

Visitors to residential or teaching areas must be managed through local sign-in or host security arrangements and must not have unsupervised access to under-18 students unless appropriately authorised and vetted under the wider safeguarding framework. Group leaders accompanying students must be briefed on their role boundaries, including when Malvern staff retain supervisory control for teaching, residence, transport, and emergency decisions.

Monitoring, audit, and review

The Group policy requires active monitoring through inspections and reactive monitoring through incident review, with findings reported through the H&S governance structure. During the summer, each Language in Action centre should complete a short weekly health and safety review covering incidents, near misses, excursion issues, fire and first-aid checks, staffing gaps, medical concerns, and actions outstanding. This information is recorded in the centre Incident Log and is available to Group H&S Coordinator to review in season.

The Juniors leadership team should review incident patterns across all centres to identify repeated themes such as transport delays, student separations, repeat trip hazards, medication issues, or late-night residential concerns. Significant trends or serious incidents should be escalated through the Juniors H&S Committee structure and, where required, into the Group Business Continuity and safeguarding governance routes.

This addendum should be treated as a live operational document for the current summer and reviewed after the first two weeks of centre operation and again at end of season, with lessons learned used to produce a controlled Version 1.0 for future years.

Annex A – Language in Action Summer 2026 Junior Centre List & Appointed Centre Staff

Centre Name / Location	Centre Manager/Campus Coordinator	Contact Number	Centre Operating Dates	Centre Address	Teaching Premises Address (if different)
UCL Bloomsbury Campus	Tyler Iles	+44 (0)7300 463924	25/06/2026 – 20/08/2026	UoL Garden Halls 1 Cartwright Gardens, London WC1H 9EN	IOE, 20 Bedford Way, London WC1H 0AL
UOL Bloomsbury Garden Halls	Tyler Iles	+44 (0)7300 463924	25/06/2026 – 20/08/2026	UoL Garden Halls 1 Cartwright Gardens, London WC1H 9EN	Malvern House London 200 Pentonville Rd, London N1 9JP
UOL Bloomsbury Parry Hall	Tyler Iles	+44 (0)7300 463924	25/06/2026 – 20/08/2026	Hughes Parry Hall, 19-26 Cartwright Gardens, London WC1H 9EF	Malvern House London 200 Pentonville Rd, London N1 9JP
Wembley Campus	Ailbhe Kennedy	+44 (0)7300 463929	07/07/2026 – 18/08/2026	Unite Students 23 Olympic Way, London HA9 0FR	Lycee International School, 54 Forty Ln, Wembley HA9 9LY
UEL Docklands Campus	Habeb Ramos	+44 (0)7301 947518	02/07/2026 – 13/08/2026	UEL Docklands, University Way, London E16 2RD	
University of Westminster Harrow Campus	Alexis Kadejo	+44 (0)7301 947514	02/07/2026 – 30/07/2026	Watford Rd, Northwick Park Roundabout, Harrow HA1 3TP	
Middlesex University	Selina Wei Shang	+44 (0)7301 947519	30/06/2026 – 11/08/2026	The Burroughs, London NW4 4BT	
Colindale Campus	Selina Wei Shang	+44 (0)7708 761944	30/06/2026 – 11/08/2026	Platt Hall, Chancellor Pl, London NW9 5LJ	Barnet & Southgate College, 7 Bristol Ave, London NW9 4BR
Canterbury Christ Church University	Ellie Delaney	+44 (0)7301 947517	30/06/2026 – 14/07/2026	St George's Centre, St George's Pl, Canterbury CT1 1UT	CCCU, N Holmes Rd, Canterbury CT1 1QU
Liverpool Hope University	Sandy Huskisson	+44 (0)7301 947515	09/07/2026 – 06/08/2026	Hope University Hope Park, Liverpool L16 9JD	
University of Manchester	Caroline Keane	+44 (0)7301 947516	07/07/2026 – 04/08/2026	Dalton Ellis Hall, Conyngham Rd, Manchester M14 5RL	