



# Language in Action

## Safeguarding & Child Protection Policy

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### 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: Daniele Pluchino (Deputy Head of Department)

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 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 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. 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 Deputy Head of Department 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 DSL. 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.

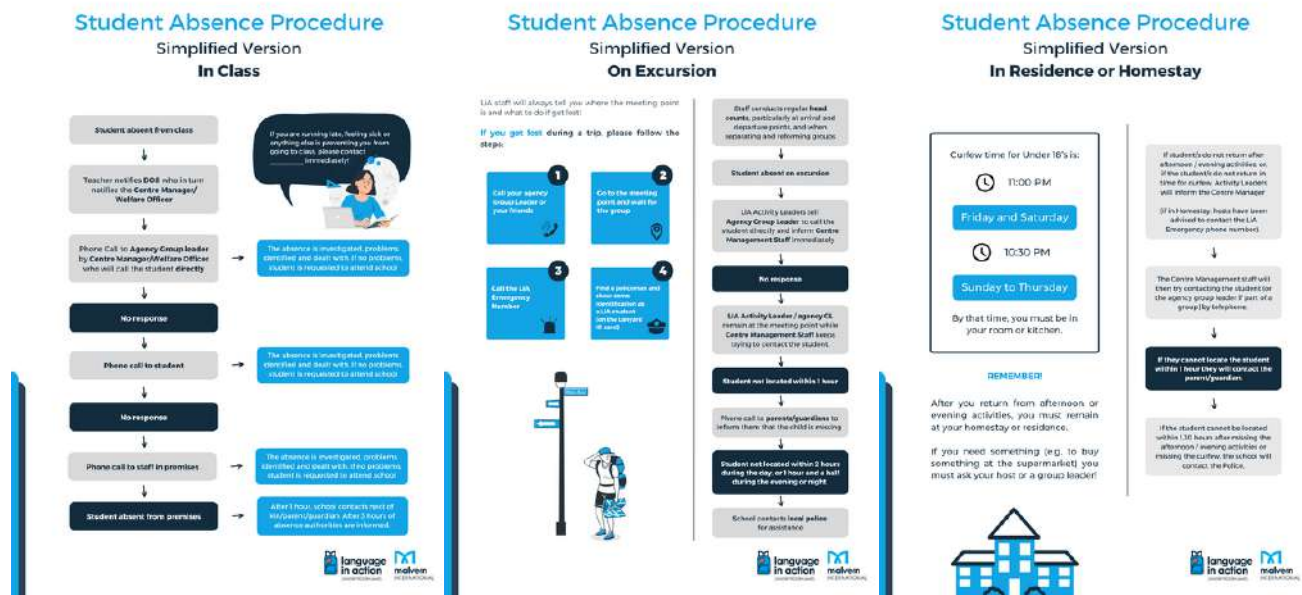


**3. SAFETY MEASURES/DEALING WITH STUDENTS/CONTACT WITH STUDENTS**

**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 House London)  
200 Pentonville Road, N1 9JP, London, UK  
Phone: [+44 20 7520 0470](tel:+442075200470)  
Email: [adam.ennis@malvernplc.com](mailto:adam.ennis@malvernplc.com)



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### 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.

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### LANGUAGE IN ACTION

#### STAFF DECLARATION

I have received and read the Language in Action Safeguarding and Child Protection policy and the Welfare policies and procedures.

I have received or have access to a copy of the Language in Action Staff Handbooks.

Signed \_\_\_\_\_

Date: \_\_\_\_\_

Print name here \_\_\_\_\_

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