

## Safeguarding Children and Adults at Risk of Harm Policy

Date of renewal / updates / review	Annually
Named person responsible for monitoring	Sasha Young
Agreed by Senior Safeguarding Team	01/02/2022

The Language Gallery is a private language school with 3 UK schools (London, Nottingham, and Birmingham). The Language Gallery Nottingham (1 Royal Standard Place, Nottingham, NG1 6FS, United Kingdom) only accepts students over the age of 18. We provide adult English language courses for 16+ and closed groups for students aged 12-15 at the following locations:

- London (1st floor, Sceptre Court, 40 Tower Hill, London, EC3N 4DX),
- Birmingham (2nd floor, 63 Church St, Birmingham B3 2DP)
- Online (Teams)

All individual students aged 16 and 17 not living with family are accommodated in half-board homestay and are highly encouraged to book a taxi transfer upon arrival in the UK.

This policy sets out how The Language Gallery will meet its statutory duty under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and help them to achieve good outcomes. The Language Gallery will achieve this by providing a safe learning environment and ensuring school staff have the skills and knowledge to take action where children need extra because they are in need or need to be protected from harm.

### Key Terminology

- **Child / Children:** Any student who has not reached their 18th birthday.
- **Child Protection:** The processes involved in protecting children from direct harmful behaviour or abuse.
- **Designated Safeguarding Lead:** The member of staff responsible for major decisions, implementation of this policy and training.
- **Designated Safeguarding Staff:** The member of staff responsible for day-to-day welfare matters and recording systems.
- **The Senior Safeguarding Team:** Comprised of the Designated Safeguarding Lead and two Deputy Designated Safeguarding Leads.
- **Duty of Care:** The legal responsibility of adults who work with students aged under 18 to look after them properly.
- **Inclusive Practice:** Recognition of the diversity of students, especially those with special educational needs or disabilities (SEND), enabling all students to study at The Language Gallery.
- **Group Leader:** An assigned adult from the student's home country who accompanies them and has responsibility for them whilst in the UK.
- **Protected Disclosure:** Responsibility to report serious wrongdoing in the workplace by providing protection for employees who wish to 'blow the whistle.'
- **Safeguarding:** Promoting the welfare of students under the age of 18 and adults at risk of harm and protecting them from harm or mistreatment.
- **Safer Recruitment:** Recruitment procedures and practices which aim to prevent the appointment of people who may present a risk.
- **Staff:** Any employee of The Language Gallery or affiliated companies.



- **Adult at Risk of Harm:** An adult at risk of harm is a person aged 18 years or over, whose personal circumstances may result in the individual being considered more at risk than many other adults. Factors in determining risk may include a physical disability, special needs, ability to communicate with others in English, or a lack of local knowledge / customs. The level of each individual's level of risk is dependent on individual circumstances and cannot be assumed prior to arrival in the school. Moreover, it cannot be assumed that the individual's level of risk remains constant both on campus and off campus or does not change during their time with The Language Gallery.

## Our Values

The Language Gallery values are to offer equal opportunities for all staff and students, celebrating multi-culturalism and tolerance, and to achieve academic excellence. We aim to provide language skills, an experience, and a sense of community to all our students.

## Our Principles

The Language Gallery is fully committed to safeguarding the welfare of all students studying at any of our UK schools. We believe all students have the right to a safe and secure learning experience. We recognise our responsibility to promote safe practice and protect children and adults at risk from harm, abuse, exploitation and radicalisation. The Language Gallery acknowledges its duty to respond appropriately to any allegations, reports or suspicions of abuse. The Language Gallery staff all work together to encourage an ethos which embraces difference, diversity and respects the rights of all our students.

In implementing this policy The Language Gallery will abide by the following principles:

- The welfare of the child / adult at risk of harm adult is paramount.
- All under-18s and adults at risk of harm have the right to be safeguarded from abuse, regardless of their age, gender, disability, racial origin, religious beliefs, sexuality, language, socio-economic status or appearance.
- All adults working with students under the age of 18 know their legal and moral responsibility to protect students from harm, abuse and exploitation.
- To educate students on how to keep safe and how to recognise behaviour that is not acceptable.
- All adults working with students under the age of 18 understand their responsibility to maintain standards set out in the policy and to make The Language Gallery a safe and caring educational environment.
- Make a commitment to safer recruitment, selection and vetting of staff, accommodation providers and other suppliers.
- Parents and accommodation providers are informed of the work The Language Gallery does to protect students under the age of 18 and adults at risk of harm.
- Each school has trained Designated Safeguarding Staff (DSS) and that staff know the procedures for reporting any concerns.
- Procedures relating to staff and student conduct are implemented in a consistent and equal way.
- The Language Gallery will encourage a culture where safeguarding is taken seriously with regular staff training and commitment to safeguarding procedures.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately. In these cases, The Language Gallery will work

with the appropriate Local Safeguarding Board (child or adult as appropriate), and, where necessary, the Police and Social Services.

- All personal data will be processed in accordance with the requirements of GDPR and the Data Protection Act (2018).

## Safeguarding Contacts

### The Language Gallery Senior Safeguarding Team

The Senior Safeguarding Team is trained to Specialist safeguarding for Designated Lead (formerly level 3). The Designated Safeguarding Lead has responsibility for the oversight of The Language Gallery's Safeguarding Children, Young People and Adults at Risk of Harm Policy and any issues related to safeguarding students, with delegated responsibility to the Designated Safeguarding Staff. The role of the Senior Safeguarding Team is to:

- monitor and update the Safeguarding Policy and any relevant documents and files across all schools.
- support and advise the Designated Safeguarding Staff in the day-to-day implementation of the policies.
- keep up to date with any developments in regards to safeguarding and child protection.
- keep staff updated in regard to any training sessions and changes to the relevant policies.
- receive information from any staff, volunteers, children, parents or carers who have safeguarding concerns and record it.
- consult initially with a statutory safeguarding agency to test out any doubts or uncertainty.
- make a formal referral to a statutory safeguarding agency or the police when necessary.
- record statements from any member of staff who feels that a child has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.
- record all information in writing in accordance with the Data Protection Act (2018) and GDPR.

<b>Senior Safeguarding Team</b>	
<b>Designated Safeguarding Lead</b>	<b>Sasha Young</b> Student Services Manager <a href="mailto:Sasha.young@thelanguagegallery.com">Sasha.young@thelanguagegallery.com</a>
<b>Deputy Designated Safeguarding Leads</b>	<b>Lea Aylett</b> Academic Director <a href="mailto:Lea.Aylett@thelanguagegallery.com">Lea.Aylett@thelanguagegallery.com</a>  <b>James Carter</b> Academic Manager <a href="mailto:James.Carter@thelanguagegallery.com">James.Carter@thelanguagegallery.com</a>

### The Language Gallery Designated Safeguarding Staff

The Designated Safeguarding Staff are responsible for the day-to-day welfare of students and will liaise directly with the Designated Safeguarding Lead on any serious issues raised. The

Designated Safeguarding Staff should be trained to at least Advanced Safeguarding for Designated Staff (formerly level 2). The role of the Designated Safeguarding Staff is to:

- receive information about events that are planned in The Language Gallery that may involve students under the age of 18 or adults at risk of harm and plans that indicate how safeguarding will be covered.
- liaise with the Designated Safeguarding Lead over all concerns related to Safeguarding.
- assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.

Birmingham	
The Designated Safeguarding Staff	Academic Manager
	Academic Student Support Officer
Local Safeguarding Children Board <a href="http://www.lscbbirmingham.org.uk/">http://www.lscbbirmingham.org.uk/</a>	<a href="mailto:cass@birminghamchildrenstrust.co.uk">cass@birminghamchildrenstrust.co.uk</a> +44 (0) 121 303 1888 +44 (0) 121 675 4806 (out of office hours)

London	
The Designated Safeguarding Staff	Designated Safeguarding Lead
	Deputy Designated Safeguarding Lead
Local Safeguarding Children Board <a href="http://www.childrenandfamiliestrust.co.uk/the-lscb/">http://www.childrenandfamiliestrust.co.uk/the-lscb/</a>	<a href="mailto:MASH@towerhamlets.gov.uk">MASH@towerhamlets.gov.uk</a> +44 (0) 20 7364 5601 / 5606 +44 (0) 20 7364 4079 (24-hour contact)

Nottingham	
The Designated Safeguarding Staff	Academic Student Support Officer
	Academic Manager
Local Safeguarding Children Board <a href="https://nottinghamshirescb.proceduresonline.com/index.html">https://nottinghamshirescb.proceduresonline.com/index.html</a>	<a href="mailto:mash.safeguarding@nottscc.gov.uk">mash.safeguarding@nottscc.gov.uk</a> +44 (0) 115 876 4800 (24-hour contact)

Other useful telephone numbers:

Emergency 24-hour school telephone: +44 (0) 203 750 7051	
Emergency Services: 999 (or 112)	ChildLine: 0800 1111
NSPCC: 0808 800 5000	NSPCC Whistleblowing Helpline: 0800 028 0285

## Responsibilities of staff and representatives at The Language Gallery

It is the responsibility of all staff, students and representatives of the school to report any concerns about welfare and safeguarding to the Designated Safeguarding Lead immediately. The Designated Safeguarding Lead will deal with the concern following the procedures documented in this policy.

To make sure the Safeguarding policy is implemented and that all staff members are aware of all under-18s and adults at risk of harm at The Language Gallery, different departments are required to follow guidelines specific to their job role.

- It is the responsibility of the Sales Representative to collect a completed and signed Parental Consent form at the time of booking. No bookings for students under 18 will be accepted without this document. This should be signed by the student's parents or legal guardian. This document can be found on the website.
- During the course it is the responsibility of the teaching staff to report any absence to the Designated Safeguarding Staff at the beginning of classes who will then contact the student and inform the Designated Safeguarding Lead if required.
- Any tour operators working with The Language Gallery must have a satisfactory safeguarding policy in place.
- All students under 18 who want to take part in any tour or activity arranged by our representatives must have the appropriate signed parental consent form.
- Students under 18 travelling as unaccompanied minors (i.e. without a parent or guardian) are highly encouraged to book an airport transfer. If students under the age of 18 are travelling with parents or guardians, The Language Gallery requires details of how the child will travel from the point of entry in the UK to the school and / or accommodation. The Language Gallery works with designated companies to arrange transfers to and from airports on arrival and departure of students; all drivers working for these companies are required to have a DBS check.
- All staff have a personal responsibility to make sure that they behave in line with the Code of Conduct:
  - To be vigilant and report any concerns they personally observe;
  - To respond in line with this policy to a disclosure or allegation.
  - Staff will not be penalised for reporting any concerns and their report will remain confidential.
- All staff and students at The Language Gallery must wear their lanyard and ID card.
  - Staff wear red lanyards
  - Adult students wear blue lanyards (or yellow in Nottingham only)
  - Students aged under 18 wear yellow lanyards in Birmingham and London
  - Visitors wear orange lanyards in Birmingham and London (red with a ULaw logo in Nottingham)
- All visitors are required to report to reception when they enter the school. If they need to enter another part of the school they will be escorted by a member of Management or Security staff. The Visitor Policy is available from Student Support Officers.

## Associated Legislation and Guidelines

This Policy aims to follow relevant legislation and guidelines, including:

- The Education Act (2002) Section 175
- The Children Act (1989 and amendments)
- The Children Act 2004
- Working Together to Safeguard Children 2018
- Safeguarding of the Vulnerable Adult Guidance 2006
- Aimsafer: A Framework for Safeguarding Children & Young People in Higher Education Institutions
- Keeping Children Safe in Education 2020
- SEND code of practice: 0 to 25 years 2015



- Equality Act 2010
- Prevent Duty as part of Counter Terrorism and Security Act 2015
- Information Sharing 2018

All students are required to follow the school's Code of Conduct. The Code of Conduct can be found on the website and is given to all students on their first day. All students are also required to abide by the IT policy, the Anti-bullying Policy and the PREVENT policy for The Language Gallery. These policies can be found on the notice boards in the school and upon request from our dedicated Student Services team.

## Review

This policy and relevant procedures will be regularly monitored and reviewed:

- In accordance with changes in legislation and guidance on the safeguarding of children and adults at risk of harm or any changes within The Language Gallery.
- Following any issues or concerns raised about the safeguarding of children or adults at risk of harm within The Language Gallery.
- In all other circumstances, at least annually.

The full policy is available on The Language Gallery website and from all Sales Representatives. All relevant information in the policy is sent to any third party providers (including accommodation providers).

## Code of Conduct

### Code of Practice for Staff

All staff must be familiar with The Language Gallery Code of Practice for Staff which takes a common sense approach that reduces opportunities for the abuse of young people and adults at risk of harm and help to protect staff and students from any false allegations.

- All students will be treated with respect and with respect to their personal privacy.
- All staff must maintain neutral, friendly relationships with students whilst avoiding exclusivity or overfamiliarity.
- Be sure, whenever possible, there is more than one adult present during activities or that you are within sight or hearing of others.
- Be careful when talking about sensitive issues with children or adults at risk of harm.
- Exercise caution in initiating any physical contact with children or adults at risk of harm.
- Staff in a position of trust should be aware that inappropriate physical intimacy with students aged under 18 is not permitted and any relationship outside that of a teacher / student relationship will not be tolerated and disciplinary action will be taken in accordance with the Sexual Offences Act 2003.
- Staff must keep an appropriate appearance in the school, online and on social programme activities or trips.
- Challenge unacceptable behaviour and report all allegations or suspicions of abuse.
- Staff must only use their school email address for any electronic contact with a student before, during and after a course.
- Staff must not share personal phone numbers with students.



- Staff must be aware that personal web or social media profiles can be viewed by anyone and therefore should be especially cautious about public web profiles and privacy settings.
- Staff are not allowed to use social networking with any students or exchange personal phone numbers with students.
- If a student confides sensitive personal information staff have a duty to listen and respond in a professional manner in accordance with organisational guidelines.

The full Staff Code of Conduct is given to all staff upon commencement of employment and is available upon request from Line Managers.

## Code of Behaviour for Students

All students must be familiar with The Language Gallery Code of Conduct. Parents/carers of children taking part in The Language Gallery activities must also know of the Code of Conduct. The Code of Conduct is available in the Parental Consent Form (available on The Language Gallery website) and repeated during induction on the students' first day.

The Language Gallery aims to raise awareness of welfare among staff and students, and students are encouraged to report any suspicions regarding the welfare of their fellow students to the Designated Safeguarding Staff or Lead. There is information about the signs of abuse and neglect, and suspicious behaviour on display in the classrooms and main student areas throughout the schools. These documents are also available digitally to staff and students (including their parents) upon request.

All students at The Language Gallery should respect and acknowledge:

- The rules set out in the Code of Conduct.
- Students must keep an appropriate appearance in the school and on social programme excursions.
- Serious incidents of misbehaviour such as fighting, racial or sexual abuse, damage to property, indecent language and failure to obey instructions will normally lead to expulsion from the activity and The Language Gallery.
- Students under 18 are not permitted to connect with staff on social networking sites.

Students studying at The Language Gallery centres in the United Kingdom should respect and acknowledge:

- The rights and dignity of all students, staff and other adults at The Language Gallery.
- That smoking is banned in all buildings in the UK (including The Language Gallery) and is only allowed in specifically designated outdoor areas.
- That the legal age to purchase cigarettes and alcohol is 18.
- That drinking alcohol is against the law for those under 18. It is also illegal for adults to purchase alcohol or tobacco products for those aged under 18.
- That taking drugs or new psychoactive substances (NPS) is against UK law.
- That inappropriate physical intimacy among students is not permitted.
- That inappropriate physical intimacy among students aged under 18 and staff is a criminal offence.

## Attendance

The Language Gallery has a legal duty of care for all students aged under 18 years old during their allotted class times. Students aged 16 to 17 are not supervised outside of class times unless they are participating in an event or excursion with The Language Gallery. The Attendance Policy is highlighted on the students' first day induction. Individual students under the age of 16 not travelling with a parent / guardian or group leader will have access to a TLG representative / staff 24 hours a day.

- Students aged under 18 years old will be highlighted on the class registers to ensure their teacher can provide a suitable level of care in the classroom.
- If a student is more than 5 minutes late to class this will be reported to the Student Support team in order for them to call the student and ensure they are safe.
- A record of these calls will be made and students (aged 16+) who are repeatedly late or absent must attend a meeting with the Academic Manager / Designated Safeguarding Staff. They will also be subject to the school attendance policy.
- All under 18s studying in-centre are required to sign in / out at reception at the start and end of each school day.

## Missing Student Policy

The missing student Policy will take effect if the student misses the curfew to return to their accommodation (usually 10PM); in this case the homestay host is required to inform the school or the accommodation provider. Similarly, if the student is more than 5 minutes late to class, the Student Support Officer will revert to the Missing Student Policy.

- The school will try to contact the missing student (or group leader, where applicable).
- The School will try to contact the missing student's friends (if known).
- The school will contact the emergency contact or next of kin.
- If the student is not found within 24 hours, they will be reported missing to the Police (via 101). The member of staff with the emergency phone must keep the homestay and student's emergency contact/next of kin updated.
- If The Language Gallery feels that there is a risk to the student's safety, personal details of the student will be shared with the relevant agencies as is in line with GDPR, Information Sharing 2018 and the Data Protection Act 2018.
- Any updates must be communicated with all parties involved, including the Police and a report must be written on return to work and kept in a secure safeguarding concerns file. Any and all notes will be kept securely and shared only with the relevant parties.
- In order to prevent a reoccurrence, a written agreement must be signed by the student and their parent/guardian to agree that any reoccurrences may result in expulsion from the school and its services, with no refund offered.

## Safeguarding in Online Classes

Online classes take place on Teams and The Language Gallery follows the below procedure to minimise risk to all students:



1. Centre staff (usually a member of the student support team) share the online induction link with new students on the Friday before their course start date. All correspondence is done through official The Language Gallery email addresses.
2. During online induction, general information is shared including attendance policy and people to speak to.
3. Level tests are completed.
4. Staff verify identity of the student using passport received at time of application.
5. Specific class links as relevant to the student's level are shared with new students.
6. Teachers are informed of the new students to attend their class.
7. Waiting rooms are to be used before classes start and teachers check names against class registers before admitting anyone into class.
8. All staff and students to make sure their cameras are on during class to ensure who is attending. The place that staff and students are attending their online classes from should be appropriate, where possible a virtual background should be used or a completely neutral background (for example not a bedroom with personal affects).
9. Students (especially those under the age of 18) are informed not to use their full names, to share personal details within the class or to share their class links.
10. Academic Manager or a member of the safeguarding team to do safeguarding periodic "spot checks" in online classes.
11. When making use of Breakout rooms, teachers monitor any groups with students under the age of 18.
12. Any chat option available will be moderated by the teacher and direct messaging options between students made unavailable to students.
13. Attendance policy is maintained as described in this policy and upheld in online classes.

Further information is available to students about keeping safe online in the student handbook which is shared prior to arrival.

## SMART learning and Social Programme

The Language Gallery offers an extended learning programme known as SMART Learning. This provides a range of activities for students in addition to their normal classes and is available for students over 16 years old (with parental consent). These activities may be on-site within the school, or off-site as part of SMART learning trips. For this programme The Language Gallery commits that:

- The codes of conduct for staff and students (outlined above) are applied during this programme.
- During SMART Learning activities including students under the age of 18, a member of The Language Gallery staff with a valid DBS check and who has received Safeguarding and Prevent Duty training will be present at all times.
- The Language Gallery will aim to supervise students in a ratio of 1 adult to 12-15 students for any off-site activities.
- Parents must give written permission, on the Parental Consent form, for their child to participate in activities outside of the school.
- Any external speakers will be checked by The Language Gallery's External Speaker Policy, to make sure they are suitable for contact with children and adults at risk of harm.
- Any tour operators working with The Language Gallery must have an acceptable Safeguarding Policy in place.



- Any use of communications and technology during the course will follow The Language Gallery's ICT Acceptable Use Policy and students will be made aware of this.

The Language Gallery also offers an optional paid Social Programme to all students over the age of 16. The Language Gallery does not take responsibility for the supervision of students over the age of 16 outside of class times. Parents are made aware of this before enrolment is completed as the Parental Consent form and Code of Conduct must be returned with the application form. Parents must give written permission, on the Parental Consent form, for their child to participate in Social Programme activities.

## Accommodation

- Homestay accommodation is organised through agencies that meet British Council requirements and are independently registered with the British Council.
- Students under 18 will, as a preference, not be accommodated with students over 18 years old.
- All agencies must have acceptable safeguarding policies and practices in place, including the use of DBS checks for homestay providers.
- Students aged 12 to 17 enrolling on summer camps that include residence accommodation or boarding houses will have a designated member of staff to make sure students adhere to their curfew and are supervised overnight. They will be provided full-board meal plans and supervised by group leaders.
- All homestays are visited in accordance with British Council requirements (at least every 2 years, though our homestay providers aim to visit more frequently) to make sure standards are maintained.
- Homestay accommodation that is claimed to fall below the British Council required standard, or fails to meet The Language Gallery standards, the accommodation will be reported to the relevant homestay agency, and "blacklisted" by The Language Gallery.
- All complaints relating to homestay are investigated immediately. In the case of a serious complaint, or if information is passed to the school giving cause for concern, it will be reported to the relevant authorities immediately.
- When in homestay or residence accommodation, students are entitled to their privacy. Both hosts/residence staff and students must maintain appropriate levels of dress when in shared areas.
- The safeguarding policies for our homestay accommodation providers can be provided on request from The Language Gallery Accommodation departments:
  - London students [Life.L@TheLanguageGallery.com](mailto:Life.L@TheLanguageGallery.com);
  - Nottingham students - [Life.N@TheLanguageGallery.com](mailto:Life.N@TheLanguageGallery.com);
  - Birmingham students [Life.B@TheLanguageGallery.com](mailto:Life.B@TheLanguageGallery.com)).
- Students aged under 16 or under 18 with a disability living with a family who is not their own immediate family for longer than 27 nights must be registered as a private fostering agreement with the relevant local authorities depending on their address. A list of Local Safeguarding Children Boards can be found:
  - [www.londonscb.gov.uk/london\\_scb\\_contacts/](http://www.londonscb.gov.uk/london_scb_contacts/) (London);
  - <https://www.nottinghamshire.gov.uk/care/safeguarding/mash> (Nottingham);
  - [www.lscpbirmingham.org.uk](http://www.lscpbirmingham.org.uk) (Birmingham).

## Transport

- On arrival students under the age of 18 are highly encouraged to book an airport transfer, unless they are travelling with a parent or legal guardian.
- Students under the age of 16 must book an assisted transfer which includes a named person collecting the student from the airport and assisted check-in upon departure.
- All drivers working for the transfer services are DBS checked and have a current roadworthiness certificate.

## Media Relations

For any activity run by The Language Gallery which involves young people, parents or guardians must be given the opportunity to refuse permission for photographs, videos or other images to be made of their children. Parents must give written permission, on the Parental Consent form, for their child to be involved in any media. Permission must also be granted for children to be interviewed by the press, broadcasters or other media.

## Safeguarding Procedures

### Child Safeguarding Procedures

Where under-18s are concerned, there are statutory responsibilities for any organisation to follow regarding the safety of young people. The Language Gallery has a Designated Safeguarding Lead who is responsible for implementing this policy and has specific responsibility for the safeguarding of students under the age of 18 years old. In addition, there are Designated Safeguarding Staff who are responsible for the day-to-day welfare of all students at the school.

- Any concerns regarding the welfare of under-18s must be reported to the Designated Safeguarding Staff immediately and the relevant course of action will be taken.
- Any incidents and outcomes will be recorded by the Designated Safeguarding Lead in line with the Data Protection Act (2018) and GDPR.
- All staff should know the appropriate responses and actions when a student shares information to them.
- All staff should be aware that in accordance with statutory requirements where child safeguarding issues are involved, it is not possible to offer confidentiality to a person under 18 as any disclosures must be reported.
- Before students start the school, any information regarding the potential vulnerability has to be supplied by either the agent or the individual, and The Language Gallery will assess whether the appropriate measures can be put in place to meet the potential student's needs.
- Any special arrangements and concerns will be recorded by the admissions team and Designated Safeguarding Lead in line with the Data Protection Act 2018 and GDPR.

An emergency contact number for The Language Gallery is provided to all parents / legal guardians and students before their course starts.



## Adults at Risk of Harm Procedures

- Before students start at the school, any information regarding possible vulnerability must be given by the agent or the student, and The Language Gallery will assess whether the appropriate measures can be put into place to meet the potential student's needs.
- Any special arrangements and concerns will be recorded by the Designated Safeguarding Lead in line with the Data Protection Act (2018) and GDPR.
- Any students who declare SEND will be treated equally.
- Students will also be safeguarded against concerns relating to FGM and PREVENT. The full PREVENT Policy is available from Student Support team.

## Reporting and Monitoring Procedures

All members of staff should be aware that they have a responsibility to safeguard children and adults at risk of harm. If a concern is raised, they should not keep the information to themselves. The Designated Safeguarding Lead should be informed immediately to make sure as much information is recorded as possible. Important information could be missed if this is not done.

- Any concerns about the wellbeing and welfare of a child or adults at risk of harm should be reported to the Designated Safeguarding Lead as soon as possible.
- It is the duty of staff to report only, not to investigate - this is the role of the Designated Safeguarding Lead and, where appropriate, the Police and Social Services.
- In the event that the Designated Safeguarding Lead is not available, any concerns should be directly addressed to the deputy DSL or Designated Safeguarding Staff.
- Safeguarding issues will take priority over any other work a person has.
- All concerns will be recorded by the Designated Safeguarding Lead and kept in accordance to the Data Protection Act (2018) and GDPR.
- The Designated Safeguarding Lead will consult the relevant authorities and LSCB if they need any advice or support.
- All staff have a legal obligation to inform the DSL about any concerns they have of a staff member or student not following the Code of Conduct.
- Any Protected Disclosure will remain confidential and any staff or student reporting a concern will not be penalised or subjected to unfair or discriminatory treatment.

In the case of a serious issue (the student is in immediate danger of harm / abuse), staff are required to communicate the threat immediately with the Designated Safeguarding Lead who will then contact the relevant agencies. In the event that the Designated Safeguarding Lead is unavailable or the subject of the allegation, report immediately to the Deputy Designated Safeguarding Leads.

## Definition of Abuse

Abuse is the physical, sexual, or emotional mistreatment, or neglect of a person, which deliberately or unknowingly causes harm, threatens their life or violates their rights.

## Recognising Abuse

Abuse can take four forms, all of which can cause long term damage to a child:

- Physical abuse: may include hitting, shaking, burning, poisoning or any way of causing physical harm.
- Emotional abuse: persistent emotional maltreatment of a person. Usually involved in most types of ill treatment but can occur alone.
- Neglect: persistent failure to meet a person's or child's basic physical and/or psychological needs.
- Sexual abuse and/or exploitation: forcing or enticing a person to take part in sexual activities, including prostitution and can include non-contact activities such as involving children in looking at pornographic material or encouraging children to behave in sexually inappropriate ways.
  - This includes abuse of trust – please see Sexual Offences Act 2003 for further information.
  - Child Sexual Exploitation (CSE) is another type of sexual abuse in which children are sexually exploited for money, power or status. Children may be tricked into believing they are in a loving, consensual relationship or may also be groomed online.
  - Female Genital Mutilation (FGM) is included within this broader definition. This is the partial or total removal of external female genitalia for non-medical reasons. Religious, social or cultural reasons are sometimes given for FGM. It's dangerous and a criminal offence and any adult has the legal duty to report this if they find out it has happened.

Most types of abuse can take one or several of these forms and can take place online and face to face. For example, bullying (delivered verbally or via text message) and domestic violence are often both physical and emotional forms of abuse. This list is not exhaustive and sometimes there is a mixture of two or more forms of abuse at any time. It is important that each person familiarises themselves with signs of abuse to help fight it.

Other common types of abuse include:

- Psychological or bullying: repeatedly being made to feel unhappy, humiliated, afraid or devalued by others.
- Financial or material: stealing or denying access to money or possessions.
- Discriminatory: abuse motivated by discriminatory attitudes towards race, religion, gender, disability or cultural background.
- Radicalisation: being drawn into extremist ideologies, especially those relating to political or religious views.

## Signs of Abuse

A person may be experiencing abuse if he or she is:

- frequently dirty, hungry or inadequately dressed
- left in unsafe situations (being left alone or unsupervised) or without medical attention
- constantly "put down", insulted, sworn at or humiliated



- demonstrating changes in behaviour – withdrawn behaviour, attention seeking or depression
- seemingly afraid of family, carers, or partners
- severely bruised or injured
- displaying sexual behaviour which doesn't seem appropriate for their age
- growing up in a home where there is domestic violence
- living with family, guardians or partners involved in serious drug or alcohol abuse
- a victim of FGM

Remember, this list does not cover every possible type of abuse. Other things may be seen in the person's behaviour or circumstances which may cause reason for concern. Abuse can also be disclosed by the child/person in question or reported by another.

## Students reporting concerns

- A student under 18 or adult at risk of harm may choose any person to confide in, this could be a teacher or other trusted member of staff.
- In this case, the member of staff should listen to the student's concerns and must inform the student that they may have to report this to the Designated Safeguarding Lead, or the Police and / or local authorities. The disclosure will only be discussed with the relevant authorities and will not be discussed privately or informally.
- Concerns may be raised from any student about a student. Students should feel they can talk openly with staff in such cases.
- If two students aged under 18 are involved in an accusation these students will be kept apart (in classes, accommodation and during organised social activities) until an investigation has taken place. The usual reporting procedure must be followed.

## Data Safeguarding

- It should be noted that although technically a "child," consent is still required from young people in the same way as for an adult with regards to matters of data protection.
- All data collected on students is securely stored and only shared with the relevant individuals; this may include teachers, administration staff, homestay hosts, and external providers (i.e. taxi transfer provider, accommodation providers). Only when a specific service has been requested will data be passed on to external companies, and only the relevant information will be shared. This may include name, date of birth, contact details and nationality.
- All concerns are kept private and confidential and recorded in line with the Data Protection Act (2018), Information Sharing 2018 and GDPR.
- All staff who are using the student database will be aware of students under the age of 18 as a red pop-up note will appear on individual student profiles.

## Allegations of Abuse or Inappropriate Behaviour Involving Staff

- Allegations involving any staff member should be reported to the Designated Safeguarding Lead immediately. All information will be collected and the relevant procedures will be followed.



- All information about the people involved in an allegation will be kept in accordance with the Data Protection Act (2018) and GDPR.
- The Designated Safeguarding Lead will contact the Local Safeguarding Children Board, and follow the advice and suggested actions they provide.
- Whilst a complaint is being investigated, the member of staff may be suspended, and if the complaint is upheld, the staff member will be dismissed and any relevant authorities informed immediately.
- It should be noted that whilst a child can consent to sexual activity once they reach the age of 16, the Sexual Offences (Amendment) Act 2003 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under 18 where the adult is in a position of trust.

## Allegations of Abuse or Inappropriate Behaviour Involving Other Students

Abuse may also take place between students. This typically (but is not limited) to bullying and harassment within the school property or online (i.e. Cyber Bullying). Forms of bullying that are illegal may be reported to the police. These include, but not limited to:

- Violence or assault, including sexual violence and sexual harassment; this may include up-skirting or sexting.
- Theft.
- Repeated harassment or intimidation, e.g. name calling, threats and abusive phone calls, messages, emails or text messages.
- Hate crimes.

Most 'low level' incidents will be dealt with at the time by teachers if it happens in class or on activities. However, if the bullying / abuse is severe (e.g. a serious assault), or if it continues despite efforts to deal with it, incidents should be referred to the Designated Safeguarding Lead as soon as possible. If the bully or abuser is under 18, a member of the Safeguarding team must also be available to support both the students separately. Additionally, the legal guardians / parents of both students must be contacted immediately and informed of the situation.

## Training in Safeguarding Under-18s and Adults at Risk of Harm

The Designated Safeguarding Lead holds responsibility to ensure all non-teaching staff have the correct training with the Academic/Centre Manager of each school ensuring all teaching staff complete the online E-Learning Basic Safeguarding Training course in the first week of their employment with a refresher course every three years and an in-house CPD session each year.

- It is compulsory for all staff members to take the E-Learning Basic Safeguarding Training within one week of acceptance of employment. All staff members are expected to retake this course every 3 years but are encouraged to remind themselves of the signs of abuse on a regular basis.
- Annual written assessments regarding Basic Safeguarding Awareness are completed by all staff members to ensure understanding of materials.
- The Language Gallery aims to have two staff members who have attended Advanced Safeguarding Training in each school.



- All training is recorded and, where relevant, certificates or evidence of training is stored securely in accordance with Data Protection and GDPR.
- If staff members have any questions or worries about the Safeguarding Policy they can speak to the Designated Safeguarding Lead.
- Staff are required to complete annual in-house CPD training sessions on Safeguarding and relevant changes to the field including awareness of new issues such as FGM or PREVENT.

## Safer Recruitment

The Language Gallery is committed to the Safer Recruitment of all staff members and third parties that work with our students. As a school we only work with trusted agents and group leaders. The Language Gallery has dedicated individuals to recruit all staff members, agencies and accommodation providers ensuring the best for our students. All third party agents that work with The Language Gallery do so as trusted agents with an established reputation and based on satisfactory reference checks. Group leaders travelling with students will have a police clearance certificate from their country and will sign a declaration outlining their responsibilities. The Language Gallery homestay accommodation providers all comply with British Council guidelines.

All prospective employees are required to complete an application form and submit a CV providing their employment history and the names of 2 referees who will explicitly be asked questions regarding the applicant's suitability to work with students under the age of 18. All gaps in employment must be satisfactorily explained. Employees and homestay hosts working closely with students under the age of 18 at The Language Gallery must have an Enhanced DBS disclosure. Employees who have lived abroad prior to employment with The Language Gallery are subject to extra ID checks and will potentially be requested to provide evidence for a police check to be carried out in their previous country of residence. Proof of the applicant's right to work in the UK will also be requested.

A shortlist of applicants will be invited to interview. The job description will provide the criteria for each role and evidence of a candidate's suitability will be sought in the application form, CV and interview. Applicants will be assessed by at least one member of senior management and notes will be taken. All candidates will be interviewed, preferably, in person; Teams will be used for applicants who are not in the UK at any time during the recruitment period. All interviews will include questions to find out the applicant's motivation for and experience of working with children.

Upon acceptance of employment staff members will have a DBS check as is relevant to their position. A centralised record of all staff DBS or other applicable vetting checks is kept in a secure location in accordance with the Data Protection Act (2018) and GDPR. Any member of staff who begins their employment with TLG without a current DBS check is not allowed to be alone in a closed room with any student under the age of 18. All staff pending DBS checks will be supervised and are asked to sign a document stating they understand their responsibilities. Classes with under 18s should be taught by a teacher with a clear DBS check, in the case this is not possible classes will be conducted in an open door classroom. For homestay hosts, all adults residing in the household will require an individual DBS check.

As an organisation using the Disclosure and Barring Service (DBS) checking service to assess applicant's suitability for positions of trust, The Language Gallery complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other



information revealed. Having a criminal record will not necessarily prevent applicants from working for The Language Gallery. An assessment will be undertaken to assess the relevance of any conviction to the particular post; the assessment will include consideration of the nature of the work and the working environment.

A 'satisfactory' check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. Should the school be informed of a previous conviction which does not indicate a direct threat to the safety of the students, The Language Gallery will interview the staff member to garner more information.

The Language Gallery will consider any convictions which have been recorded in terms of the following:

- Nature, seriousness and relevance of the offence
- How long ago the offence occurred
- If the offence was a one-off or part of a history
- Circumstances of the offence being committed
- Country of conviction
- Decriminalisation

If the Line Manager and senior management consider that there is no threat, a rationale will be provided and kept on file stating the reasons. Employees must report any subsequent criminal convictions or endorsements to their Line Manager immediately, who will then pass the information on to the HR department. Failure to do so will result in disciplinary action being taken. Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the details of the Protection of Children Act 1999.