



MLA Safeguarding Policy 2021

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1. Our Safeguarding aims & policy

Context

MLA world, operating in the UK as Go Languages Worldwide Ltd, runs short courses in spring and summer in a number of centres, including but not limited to;

1. Dulwich
2. Dover
3. Mile End
4. Roehampton
5. Worcester
6. Bath
7. Bristol
8. Reading
9. Edinburgh
10. Uxbridge
11. York
12. Carmarthen
13. Galway

Each location is subject to risk assessments before confirmation of the centre being run, during the week set up, with MLA staff at inductions, for all off-campus excursions and while students are on-site. Students are accepted as groups and accompanied by a group leader. Students are aged 11-17, attend general English classes with an activity programme and excursions off campus. Accommodation is residential and provided at the centre.

Policy statement

Our safeguarding and child protection policy statement makes it clear what MLA will do to keep the children who study and travel with us safe. Our Safeguarding Policy sets out:

- MLA's commitment to protecting all children
- MLA's more detailed policies and procedures put in place to keep children safe and respond to child protection concerns.
- MLA's commitment to a safer recruitment process to ensure our young learners protection and Safeguarding rights.

MLA is committed to the welfare and safeguarding of children and young people. All students should expect to feel safe within all areas of our seasonal programme. The primary concern at all times is the interests and safety of each student and the organisation takes all reasonable steps to protect children from harm, discrimination or degrading treatment and to uphold their rights. The Children Act 1989 states the legal definition of child is '*a person under the age of 18*'.

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Safeguarding Terminology

There are references to various safeguarding terms, please find below a short glossary;

Abuse	Abuse is an act, or series of acts, that causes harm. This may be sexual, emotional, physical or in some cases neglectful
Children's social work	Responsible for co-ordinating all work to safeguard and promote the welfare of children in the local area in Scotland.
DBS	Disclosure and Barring Service. Governmental body responsible for carrying out checks on the criminal record and barring lists of people resident in the UK.
Disclosure	When a student (or staff member) informs a staff member of an incident or situation related to safeguarding that requires action.
DSL	Designated safeguarding lead. Responsible for all safeguarding matters. Trained to Specialist safeguarding (formerly level 3)
DSO	Designated safeguarding officer. Acts as deputy to DSL with the same level of training.
DSP	Designated safeguarding person. Members of staff responsible for safeguarding on a centre level. Trained to Advanced safeguarding (formerly level 2)
GDPR	General Data Protection Regulation. An EU regulation and law on data protection and privacy for all individuals within the EU and EEA
LADO	Local authority designated officer. Person with safeguarding responsibilities for a borough/local authority area in England
LSCP	Local safeguarding children's partnership; responsible for co-ordinating all work to safeguard and promote the welfare of children in the local area in England.
Prevent	UK government strategy to combat radicalisation from terrorism and other forms of extremism in various sectors, including education.
Tulsa	Responsible for co-ordinating all work to safeguard and promote the welfare of children in the local area in Ireland.

MLA Staff

MLA staff working with young learners will all go through our safer recruitment process including face to face interviews, record checks of references, hold an enhanced DBS or Police Check to ensure they are able to work with young people, provide evidence of qualifications and work experience as part of process and in line with Safeguarding standards upheld in this policy. In addition, MLA staff working with young learners will have completed Safeguarding training to Level 1, 2 or 3. At centre level there will be twenty-four hours of Safeguarding protection in having Welfare Managers, Activity Managers, Centre Directors, Directors of Studies and Assistant Director of Studies at Level 2 and Level 3 Safeguarding levels. There will also be a number of designated Safeguarding Leads known to all staff and students. MLA Safeguarding;

- Everyone at our MLA centres will be aware of their Safeguarding duties, their moral and legal obligation to ensure all young people in their care are safeguarded against all forms of harm including online bullying.
- MLA Staff will have training on how to report or identify any concerns or allegations of risk of harm to students.

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- MLA Staff have meetings to ensure our policies and procedures on Safeguarding are being upheld.
- MLA deem it prudent to have detailed and rigorous control measures in place to safeguard children.
- Our Safeguarding Poster is available in our Handbooks, on our MLA Website, in this Policy and can be downloaded or is available in printed format on all our noticeboards at our centres.

MLA Staff Responsibilities

MLA staff and students are required to take shared responsibility for the safeguarding and safety of young people studying with us. They must be aware of and abide by the Safeguarding Policy, have completed basic awareness Level 1 Safeguarding training before starting and be aware of their duties and responsibilities when it comes to Safeguarding young learners during the seasonal course. All staff need to ensure that;

- The welfare of young people is of primary concern
- All young people, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to safeguarding from abuse.
- It is everybody's responsibility to report any concerns about abuse to the schools Designated Person, and the responsibility of the social services department and the police to conduct where appropriate a joint investigation.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately, up to and including suspension and/or termination of a staff member's contract. Where suspension occurs, it is a neutral act pending the outcome of an investigation.
- They know they are in a position of trust as per the Sexual Offences act 2003 and sexual relationships with under 18s (including 16 and 17 year olds) is a criminal offence.

The Designated Safeguarding Team and their names and contact details will be available for all staff and students and should be contacted about what to do should a safeguarding concern arise. The designated lead and officers will support MLA staff and students and the Welfare Manager by;

- Ensuring information received from any staff, volunteers, children, parents or carers who have child safeguarding concerns is recorded, actioned and followed up on.
- Assessing the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.
- Consulting initially with a statutory child safeguarding agency to check out any doubts or uncertainty and get more professional advice if needed.
- Making a formal referral to a statutory child safeguarding agency or the police.
- Recording statements from any member of staff who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.
- Taking action as needed for the situation, up to and including the suspension and/or termination of staff members and involving the police (for both victim and accused) if the incident in question is a crime.

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Safeguarding levels & cover at our centres

Level 1	Basic Safeguarding	All staff	24 hours
Level 2	Advanced Safeguarding	Management at Centre Level	24 hours
Level 3	Specialist Safeguarding	Head Office Staff	24 hours



Contacts & Support

MLA offers 24 hours Safeguarding cover with centre level Safeguarding policies and trained managers. MLA also have Head Office staff to support Safeguarding queries including Safeguarding leads and external support such as Government bodies and child support help lines.



MLA UK Head Office Staff; Specialist (formerly Level 3) Safeguarding trained

	MLA UK Head Office Academic Department & Staff; DSL; Sean Crawford, s.crawford@team.mlaworld.com , +44 (0) 7775 778704 DSO; Junior Academic Manager DSO; Assistant Academic Manager
	MLA UK Head Office Operations Department & Staff; DSO; UK Operations Manager DSO; UK Operations Manager

MLA UK Centre Level Staff

 	MLA UK Centre Staff; Advanced (formerly Level 2) Safeguarding trained DSPs Centre Directors Welfare Managers Activity Managers Director of Studies Assistant Director of Studies
	MLA UK Centre Staff; Basic (formerly Level 1) Safeguarding trained Centre Admins Activity Leaders Teachers Night Wardens Doctors

UK Safeguarding

	<p>LADO's; Local Authority Designated Officer of Allegations Management Provides advice and management of allegations in the local council.</p>
	<p>Other sources of Support & Advice: NSPCC – 0808 800 5000 ChildLine – 0800 1111 Family Lives Parentline – 0808 800 2222 Churches' Child Protection Advisory Service (CCPAS) – 0845 120 45 50</p>
	<p>In an emergency If you think a child is in immediate danger you should call 999.</p>

2. What is Safeguarding?

Safeguarding in this document is distinct from welfare, with the latter referring to the general care and support of staff and students at MLA centres. Safeguarding is active prevention and protection against the abuse of any person or persons under 18 who study at an MLA centre.

Governing bodies & legal frameworks for Safeguarding in the UK	
<p>NSPCC Website states</p>	<ul style="list-style-type: none"> The UK's four nations – England, Northern Ireland, Scotland and Wales – each have their own child protection system. Each nation has a framework of legislation, guidance and practice to identify children who are at risk of harm, take action to protect those children and prevent further abuse occurring and is responsible for its own policies and laws. This covers most aspects of safeguarding and child protection. Laws are passed to prevent behaviour that can harm children or require action to protect children. Guidance sets out what organisations should do to play their part to keep children safe.
<p>The Department for Education (DfE)</p>	<ul style="list-style-type: none"> is responsible for child protection in England. It sets out policy, legislation and statutory guidance on how the child protection system should work. Local safeguarding partners are responsible for child protection policy, procedure and guidance at a local level.
<p>Legislation and guidance</p>	<p>The Children Act 1989 provides the legislative framework for child protection in England. Key principles established by the Act include:</p> <ul style="list-style-type: none"> the paramount nature of the child's welfare the expectations and requirements around duties of care to children. <p>This is strengthened by the Children Act 2004, which encourages partnerships between agencies and creates more accountability, by:</p> <ul style="list-style-type: none"> placing a duty on local authorities to appoint children's services members who are ultimately accountable for the delivery of services placing a duty on local authorities and their partners to co-operate in safeguarding and promoting the wellbeing of children and young people

Both of these acts are amended by the **Children and Social Work Act 2017**, which received Royal Assent on 27 April 2017. Key provisions include:

- the Child Safeguarding Practice Review Panel was established to review and report on serious child protection cases that are complex or of national importance (Sections 12 to 15).
- the previous model of Local Safeguarding Children's Boards (LSCBs) has been replaced by local safeguarding partners who will publish reports on local safeguarding practice reviews (Section 17).

Our Seasonal Centres and Safeguarding Policies

In the United Kingdom all organisations that work with or come into contact with children should have safeguarding policies and procedures to ensure that every child, regardless of their age, disability, gender, race, religion or belief, sex, or sexual orientation, has a right to equal protection from harm.

Setting up and following good safeguarding policies, procedures while ensuring all MLA staff are trained on Safeguarding duties as we aim to ensure all children in our seasonal centres are kept safe from adults and other children who might pose a risk. This includes voluntary and community organisations, faith groups, private sector providers, as well as schools, hospitals and sports clubs with our training and risk assessments carried out. As a seasonal provider, our students are often living away from home for one to three weeks and are in our care during that time along with a guardian from their country.

Safeguarding against:

- | | | |
|----|--------------------|--|
| 1. | Child Abuse | Different types of abuse and signs
Knowing the four types of abuse and signs
Disclosure; If a child discloses, support with what to do |
| 2. | Digital protection | E safety online
Photos, videos & camera use
MLA staff duties & training |
| 3. | Bullying | Signs of bullying
Identifying and dealing with bullying |

Preventative measures

1. Safer Recruitment Process
2. Management Training Weekend
3. Centre Staff Induction Training

Referral systems and procedures

1. Procedures
2. Evidence logging and recording action taken.
3. Punishment

Child Abuse; Different types of abuse and signs

Four types of abuse

Abuse is any behaviour towards a person that deliberately or unknowingly causes harm, endangers life, or violates their rights. There are considered to be four types of abuse and these four different types of abuse often manifest themselves through different signs and symptoms, and it is important that all staff and volunteers know what they are and are able to recognise them. Signs and symptoms of abuse;

1.

Neglect: 'The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.

The physical signs of neglect may include:

Constant hunger, sometimes stealing food from other children,
Constantly dirty or smelly,
Loss of weight or being constantly underweight,
Inappropriate dress for the conditions.

Changes in behaviour which can also indicate neglect include:

Complaining of being tired all the time,
Not requesting medical assistance and/or failing to attend appointments,
Having few friends,
Mentioning being left alone or unsupervised.
Some of these signs may be difficult to observe. If you have any concern- even if you feel unsure- always discuss this with the centres Welfare Manager or the organisations Designated Person/lead.

2.

Emotional Abuse: 'The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone'.

The physical signs of emotional abuse may include:

A failure to thrive or grow particularly if a child puts on weight in other circumstances: e.g. in hospital or away from their parents' care,
Sudden speech disorders,
Persistent tiredness,
Development delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

Obsessions or phobias,
Sudden under-achievement or lack of concentration,
Inappropriate relationships with peers and/or adults,
Being unable to play,
Attention seeking behaviour,
Fear of making mistakes,
Self-harm,
Fear of parent being approached regarding their behaviour.

<p>3. Sexual Abuse: ‘Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.’</p>	<p>Changes in behaviour which can also indicate sexual abuse include: Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive, Fear of being left with a specific person or group of people, Having nightmares, Running away from home, Sexual knowledge which is beyond their age or development al level, Sexual drawings or language, Bedwetting, Eating problems such as over-eating or anorexia, Self-harm or mutilation, sometimes leading to suicide attempts, Saying they have secrets they cannot tell anyone about, Substance or drug abuse, Suddenly having unexplained sources of money, Not allowed to have friends (particularly in adolescence), Acting in a sexually explicit way with adults.</p> <p>The physical signs of sexual abuse may include: Pain or itching in the genital/anal area, Bruising or bleeding near genital/anal areas, Sexually transmitted disease, Stomach pains, Discomfort when walking or sitting down, Pregnancy.</p>
<p>4. Physical Abuse: ‘A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child’</p>	<p>Signs of physical abuse: Any injuries not consistent with the explanation given for them, Injuries which occur to the body in places which are not normally exposed to falls or games, Unexplained bruising, marks or injuries on any part of the body, Bruises which reflect hand marks or fingertips (from slapping or pinching), Cigarette burns, Bite marks, Broken bones, Scalds, Injuries which have not received medical attention, Neglect, under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care, Repeated urinary infections or unexplained stomach pains.</p> <p>Changes in behaviour which can also indicate physical abuse: Fear of parents being approached for an explanation, Aggressive behaviour or severe temper outbursts, Flinching when approached or touched, Reluctance to get changed, for example, wearing long sleeves in hot weather, Depression, Withdrawn behaviour, Running away from home.</p>

It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs. (Taken from ‘Working Together to Safeguard Children’, March 2013, Department of Education, HM Government, Appendix A, Page 85-86).

Disclosure; If a student discloses abuse, what action do I take?

A student may want to ‘test the water’ before disclosing’. She/he might do this by ‘hanging around’ a member of staff, asking trivial questions, helping to put things away etc. All must be aware that any casual conversation could be an opener to disclosure, so it is vital not to be dismissive and to take what is being said seriously. If someone discloses that there may be a child protection issue, the following guidelines should be stuck to:

DO	DON'T
<ul style="list-style-type: none"> <input type="checkbox"/> Treat any allegation extremely seriously and act at all times towards the child as though you believe what they are saying. <input type="checkbox"/> Tell the young person early on that you may have to share what they are telling you with someone else. Be honest about your own position, who you have to tell and why. <input type="checkbox"/> Tell the child that they are right to tell you <input type="checkbox"/> Reassure them that they are not to blame <input type="checkbox"/> Allow the young person to speak without interruptions <input type="checkbox"/> Reassure the child that they are not alone and tell them what will happen next. <input type="checkbox"/> Write down everything that is said and done. Record and date any facts. <input type="checkbox"/> Inform the Welfare Manager or Designated Person/lead immediately. NB if the designated person is not immediately available but you believe the student is in immediate danger, contact the police directly and inform the Designated Person/lead ASAP. <input type="checkbox"/> Follow up with the Welfare Manager/Designated Person what actions were taken and ensure that the issue was addressed. 	<ul style="list-style-type: none"> ▪ Make any promises you can't keep such as promising confidentiality. ▪ Interrogate the young person. It is not your job to investigate. ▪ Cast doubt on what the child has told you, don't interrupt or change the subject. ▪ Say anything that makes the child feel they are responsible for the abuse. ▪ Condemn the alleged abuser. ▪ Do nothing. Make sure you tell your Designated Person/police. ▪ Discuss with anyone other than the Designated Person/police.

Managing an Allegation/Serious Issue

An allegation is information which indicates an adult may have:

- Behaved in a way that has/may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in such a way that indicates s/he would pose a risk of harm if working closely or regularly with a child.

Responding to an allegation:

A member of the Designated Staff team should respond as follows

- Ensure the safety of the child as a first priority.
- Inform DSL or a senior manager immediately
- If the allegation is about DSL or a senior manager, discuss with other Designated Staff
- Ensure a written record is made by the person who made the allegation and remind them of the need for confidentiality.

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- Contact the local authorities (LSCP/Children's social work/Tulsa) for guidance. Done by DSL/senior manager
- Follow guidance of local authority
- If safe and appropriate, try to return the child to a normal routine.

Next steps begin with an initial discussion between DSL or a senior manager and relevant local authorities in which actions will be agreed. These will include:

- Immediate action to protect the student
- When and what parents should be told
- What should be said to the person facing the allegation and should s/he be suspended

Depending on the situation the following agencies will have to get involved:

- Children's Social Care (for the under 18 victim)
- LADO (Children's Social Work in Scotland, Tulsa in Ireland), who deals with allegations against staff working with children
- Police (for both victim and accused) if the offence is a crime
- No agency if the incident is passed back to MLA to deal with under existing disciplinary procedures

The response of these authorities will depend on:

- The exact allegation made
- The potential resolution
- Whether parents of the under 18 involved wish to press charges against the accused
- Whether the response of MLA is deemed sufficient

Possible suspension

- Suspension is not automatic; it should be considered where students are at risk of serious harm, or the concern is so serious that it would result in an instant dismissal. Suspension is a neutral act pending the result of an investigation.
- To fulfil their duty of care to employees, MLA will provide support to the accused, including a named contact from the Designated Staff team.
- The reason for any suspension must be communicated to the accused within 24 hours.

All those involved in the incident or allegation must maintain confidentiality regarding the accused at all times:

- The DSL or senior manager must remind them not to talk about the matter as it is a child protection/serious issue. Gossip and leaks to media can be very damaging to an accused who has not yet been found guilty.
- The victim's identity should not be revealed and s/he is advised not to talk about the incident
- The designated staff team may discuss the allegation/serious incident amongst themselves, but not with anyone outside MLA, including partners or friends outside of work

- Records of child protection/serious issues are kept where no-one outside the Designated Staff can access them; physical copies must be locked away and digital records in a dropbox folder to which only Designated Staff have access.

Digital protection

MLA Staff working directly with children should not use mobile phones as it is inappropriate and distracts them from paying full attention to the children in their care. Therefore, calls should be taken and made during break times unless there is an emergency.

Students in classrooms will follow our phone & digital policy which states that all phones and use are for educational purposes only. A phone box is in each lesson and measures are in place to ensure that policy is adhered to. We do the following to support this policy;

- E Safety as part of student Induction
- Bullying policy
- Preventative measures

E Safety online, photos, videos & camera use

1. Users bringing mobile phones into school should ensure that there is no inappropriate or illegal content on the device.
2. Staff should ensure their social media accounts are set to private and/or hidden and that automatic photo uploads to a cloud service is disabled.
3. Personal mobile phones should not be used to take any images of a child. Any photos of children taken should be for school purposes only and with agreement with the appropriate person.
4. During student enrolment permission of the parent or guardian is sought for photos and videos of their child to be used as a part of the course and for promotional material.
5. Students are made aware that they should not secretly take photos or videos of any person on site, and if they do they will be appropriately punished.
6. In all classrooms there are “phone boxes” in which students put their phones when they are not being used as part of the lesson.
7. Personal cameras should not be brought into school. Only the designated school’s cameras should be used to take images of the children. Images taken on the school’s cameras must be deemed suitable without putting the child/children in any compromising positions that could cause embarrassment or distress. Once downloaded onto the school system images on school cameras should be deleted. Photographs should not be distributed or shown outside of school.
8. Children using school cameras to take photographs or videos should be supervised.
9. Photographs of a child or group of children taken for the purpose of showing their achievements or participating in activities are permitted as they can be an effective form of recording progress, but again they must be taken on school equipment.

Bullying

MLA accepts that it is the basic entitlement of all students to receive an education free from humiliation, oppression and abuse. MLA also recognises its responsibility to create a secure and safe environment for all students in its care so that parents may send their children to our centres in the confident knowledge that they will be protected from all forms of bullying.

MLA Staff can help by intervening, even if they only suspect that someone is being bullied. For example, a bullied child might be paired with a more popular child or group of children so that they are helped to become part of the group. Gangs of bullies can be split up. Group work aimed at encouraging interdependency should be encouraged. Areas in which a victim is successful can be built on to increase self-confidence.

1. Signs of Bullying

Bullying may be defined as the wilful, conscious desire to hurt, threaten or frighten someone. It can involve physical or verbal attacks, name calling, malicious gossip, damaging or stealing the property of the victim or coercing the victim into acts which she/he does not wish to do. Physical assault in varying degrees of severity is distressing but verbal abuse is also painful.

2. Identifying and dealing with bullying

MLA Staff should watch for early signs of distress in students - deterioration of work, spurious illness, isolation, the desire to remain with adults. Whilst this behaviour may be symptomatic of other problems, it may be the early signs of bullying.

If a student or guardian reports a case of bullying to you:

- listen carefully and record all incidents
- offer the victim immediate support and help by putting the school's procedures into action.

Preventative measures in Safeguarding

MLA aims to create a co-operative ethos through its pastoral structure, teaching methods and interpersonal relationships. MLA endeavours to provide adequate supervision of classrooms and other areas of the school accessible to students, at all times, as well as during excursions. In addition, the school accommodation areas are supervised at night by a Night Warden.

MLA Staff take preventative measures by ensuring that one-to-one interviews are in rooms with glass doors, record and have countersigned all records of conversations and never offer students lifts in private vehicles. We ask MLA Staff to make sure other adults are always around, they are aware of sharing jokes and use of inappropriate language and physical contact is understood. MLA Staff and students do not give out personal phone numbers or email addresses. They do not accept friend requests on social media sites, and their accounts are set to hidden or private. In addition, MLA Staff do not arrange to meet students privately and do not chat to pupils on social networking sites.

We also follow a safer recruitment process along with a full weekend of training for all managers with Advanced safeguarding training (formerly level 2). We ensure we have a;

1. Safer Recruitment Process
2. MLA Management Training Weekend
3. MLA Centre Staff Induction Training
4. Risk Assessments

Referral systems and procedures

Isolated incidents of safeguarding concern, bullying or suspicion of bullying must be dealt with by MLA Staff immediately. All cases must be logged, actioned and followed up on. A written report of any incidents or suspicions should be sent to the Director of Studies, Activity Manager and Centre Director. Instances of persistent or widespread bullying should be referred to the Centre Director. In any case MLA will;

Procedures

- Provide the victim(s) with support and reassurance.
- Interview all students (victims and perpetrators) involved in the alleged bullying or issue.
- Arrange an interview or write a letter to make the unacceptable nature of the behaviour and the consequences of any repetition, clear to the bully and his/her guardian.
- Inform the victim(s) and parents/guardians of the outcome of the investigations and of the measures taken.
- Decide on appropriate disciplinary action which might include punishment of the perpetrators, but also advice on support to prevent any repetition of such behaviour.
- Keep a full written record of the incident, investigations and outcome.
- Record evidence to support the case and action taken.
- Inform and involve external agencies (including the police), in cases where the perpetrators are not members of the programme.

Punishment

Follow procedures of centre rules at induction or on noticeboards and in handbooks which include;

- Written or verbal warnings given and recorded
- An exit meeting with management
- Dismissal from the course or role
- Referral to the UK Police or Child Protection Service

3. Welfare Provision

MLA place great importance on providing adequate welfare for our learners. All students should expect to feel safe within all areas of the MLA programme. The primary concern at all times must be the interests and safety of each student and the organisation takes all reasonable steps to protect children from harm, discrimination or degrading treatment and to uphold their rights. Ways in which we do this are:

Welfare Manager & MLA Staff	<ul style="list-style-type: none"> The Welfare Manager who is specifically responsible for the pastoral care of each student. This friendly, helpful, supportive individual is based in the centre office and is always pleased to help you. Students have constant access to a responsible member of staff at all times day or night with our 24hr emergency contact number. Key members of staff have received specialist child protection training and all members of have received official background checks to confirm their suitability in working with children
Activities & Excursions & Lessons	<ul style="list-style-type: none"> All areas of the MLA programme will be risk assessed, including all excursions. This will ensure student-teacher ratios are met and any potential risks are prevented. Students are obligated to wear an ID card, especially when out on an excursion which has emergency contact details. Supervision of classrooms and other areas of the school accessible to students, at all times. Staff are easily accessible and can be found throughout the day
Transfers & Travel	<ul style="list-style-type: none"> All transfer students are met on arrival at the airport and are taken back to the airport by MLA staff.
Doctors & Medical Support	<ul style="list-style-type: none"> A MLA doctor who is based on site to provide assistance with any medical problems you may have. We also have close links to local hospitals and other emergency services.
Accommodation	<ul style="list-style-type: none"> Residential accommodation is full board and all students will be provided a hot or packed meal three times a day. Night patrol staff to supervise the centre site and accommodation during the night
Fire Safety	<ul style="list-style-type: none"> Fire safety training is provided to all individuals at a MLA Centre. Students will be told what to do in the unlikely event of a fire. On arrival, students will be shown fire exits and any other procedure specific to the centre
Welfare log book	<p>All incidents, missing students, welfare or safeguarding concerns should be logged.</p> <p>Each case should be recorded, what follow up action needs to be taken and who has followed up on the point recorded.</p>

Safeguarding Policy 2021



Safety of Students

The Centre Director, MLA staff and Group Leaders are collectively responsible for the supervision and security of all teenagers / juniors at all times. Even if you aren't officially 'on duty', you are legally bound by this responsibility should you be present when a situation arises.

Security on Site	<p>Knowing what problems could arise on site will enable staff to foresee difficulties and dangers. The staff as directed by the Centre Director should consider:</p> <ul style="list-style-type: none"> • The location of the dormitories and locking systems. • The lighting on the site. • Any shared areas with other groups / members of the public. • Road safety problems. • Supervising needs in the cafeteria and sports areas. • Telephone communications with the Centre Director or who is on duty at night. • Emergency procedures including fire drills. • Adequate means for securing the students' valuables.
Fire and Fire Practices	<p>The Centre Director will ensure that all fire extinguishers and smoke detection systems have been checked and are in good working order. All staff and students are briefed on what to do in the event of a fire alarm and there is a fire drill within 24 hours of new students arriving on-site.</p>
Emergency Procedures	<p>Activities & Excursions</p>
Missing Student	<p>In the unlikely event that a student cannot be located, the missing person procedure is immediately followed.</p> <ul style="list-style-type: none"> • During English language lessons; Missing students from classes are marked in their registers online flagging alerts to the Director of Studies. They will contact the Welfare Manager who will in turn contact the Group Leader and Student via email, text and our online system. • During activities and excursions Activity Leaders, Managers will contact the Welfare Manager who will in turn contact the Group Leader and Student via email, text and online system. • When the student has been found a record will be made online during English Language lessons and with the Welfare Manager during Activities about the action taken and reasons for absence. • If the student is not found within 15 minutes, then a thorough search of the site will ensue. If this does not prove successful, the Centre Director will become involved. He/she will have the responsibility of assessing the situation and deciding when to contact the police.
Risk Assessments	<p>Conducted before students arrive, during the centre set up and for each aspect of the seasonal programme all areas will be risk assessed and signed copies kept with the Centre Director.</p>

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Student Ratios & Supervision

All students are subject to supervision and ratios of staff to students are based on age. Students under 18 are not permitted to leave the centre unaccompanied at any time. It is important that all students travelling abroad have travel insurance in case of medical or other emergency. For advice on this matter please contact us. All students are under supervision by centre staff who are easily accessible. Students cannot leave the campus/centre without supervision. Please note the following;

Students; 9–10 years old

Ratios	1:15 on-site 1:10 off-site
Free Time	Students aged 9-10 are NOT allowed unsupervised free time.
Lessons	Oldest and youngest student can differ by a maximum of three years.
Activities	8-11s should not be participating in the same sports as 12-17s.
Accommodation	In residential accommodation; 1:15 for students under 12
Risk Assessments	Separate risk assessments for younger and older courses. Younger to have specific reference to issues due to their age (distraction, lack of co-ordination) and measures to mitigate those risks (higher ratios, staff training/experience with younger learners, first aid box available)

Students; 11 – 17 years old

Ratios	1:15 on-site
Free Time	Students aged 11-12 are NOT allowed unsupervised free time. Students aged 13-17 years are allowed free time in groups of 4.
Lessons	Oldest and youngest student can differ by a maximum of three years.
Activities	8-11s should not be participating in the same sports as 12-17s.
Accommodation	In residential accommodation; 1:20 for students aged 12–17
Risk Assessments	Separate risk assessments for younger and older courses.

Free Time

What can students do on-site in their free time?	Go to rooms. Stay in common rooms. Sit outside on the grass or in a student area.
Can students leave the campus?	No. If students need to leave the campus for any reason, they speak to their group leader and explain why they want to leave campus. The group leader will speak to an MLA manager. If the reason is acceptable, the group leader and/or a member of MLA staff will accompany the student.
Student supervision during free time	Activity and welfare staff are responsible for supervising students during free time. This will include posting at least one staff member in each public area (common rooms, outside) and patrolling accommodation corridors.

4. Prevent Duty

MLA understands its responsibilities under the Counter Terrorism & Security Act 2015 to reduce the likelihood of people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways shown below. Everyone- management, staff, sub-contractors and students- must be involved in this endeavour. Ways in which we do this is:

- Having a Prevent Lead who is trained to deal with any concerns.
- The Prevent Lead at MLA is **the Academic Manager** supported by **the academic and operations Head Office staff**
- Training staff, both online and face-to-face on the key areas of prevent. This is aimed at raising awareness, what signs to look out for in students and staff, explaining terminology, identifying who to contact in the event of concern, and also what to do.
- Making sure sub-contractors are aware of Prevent and what is expected of them.
- Having filters on computers to stop students/staff looking up extreme websites.
- Exemplifying core British values through documents given to students, notices around school, via stand-alone classes on British culture & traditions on arrival and via the MLA syllabus. Our approach is to educate that this is how things are in UK, which may be different to the student's own country.

If you have any concerns that any student may have been radicalised or may be vulnerable to radicalization please express your concern to the Welfare Manager at your centre or either of the Prevent Leads. For further information, please see the MLA Prevent Policy. This can be found in the Centre Office.

5. MLA Staff Recruitment and Induction Policy

We have a safer recruitment policy which is available online for more detailed information, it states;

MLA Staff roles & responsibilities	Management responsibilities for recruitment
The recruitment process including;	Recruitment panel
	Job adverts and content
	Inviting applicants to interview
	The interview; face to face
	The selection process
Employment checks	Reference checks x 2
	DBS & Police checks
	Qualifications checks
MLA Staff Inductions	Centre Inductions & Training
	Induction checklists
Job Descriptions & Specifications	Expectations within each role

6. Child Protection Record of Concern

If you suspect that the students may be suffering abuse or neglect, or you have received a disclosure of abuse from a student or you have heard about an allegation of abuse, you must complete the child protection record of concern form and email it to the Designated Person immediately. Ensure the case is logged, actioned and follow up on.

Student's Details	
Full Name:	Date of Birth:
Gender:	Nationality:
Course Start/End Date:	Student ID
Agent Details:	Group Leader details:
Preferred Language of Student:	Is there any type of language support needed to talk with student?
Does the student know the form is being completed? If yes what did he/ she say? If no, why not?	
Why are you concerned about this student? Please provide a description of any incidents/conversations and the dates that they occurred. You must clear what is fact and hearsay . You must not ask leading questions or try to investigate concern yourself.	

If an allegation of abuse has been made, give any details you have about the abuser.	
Does the student have any visible injury, or have they told you they have been injured?	
If yes has medical advice been sought?	
Your details:	
Full Name:	Name and position this record was handed to:
Position:	Date and time the person above received this record:

7. Log books

Each centre office has a log book either kept electronically or a physical copy where all complaints, absences and minutes are logged, actioned and followed up on. Safeguarding concerns are logged with the Welfare officer.

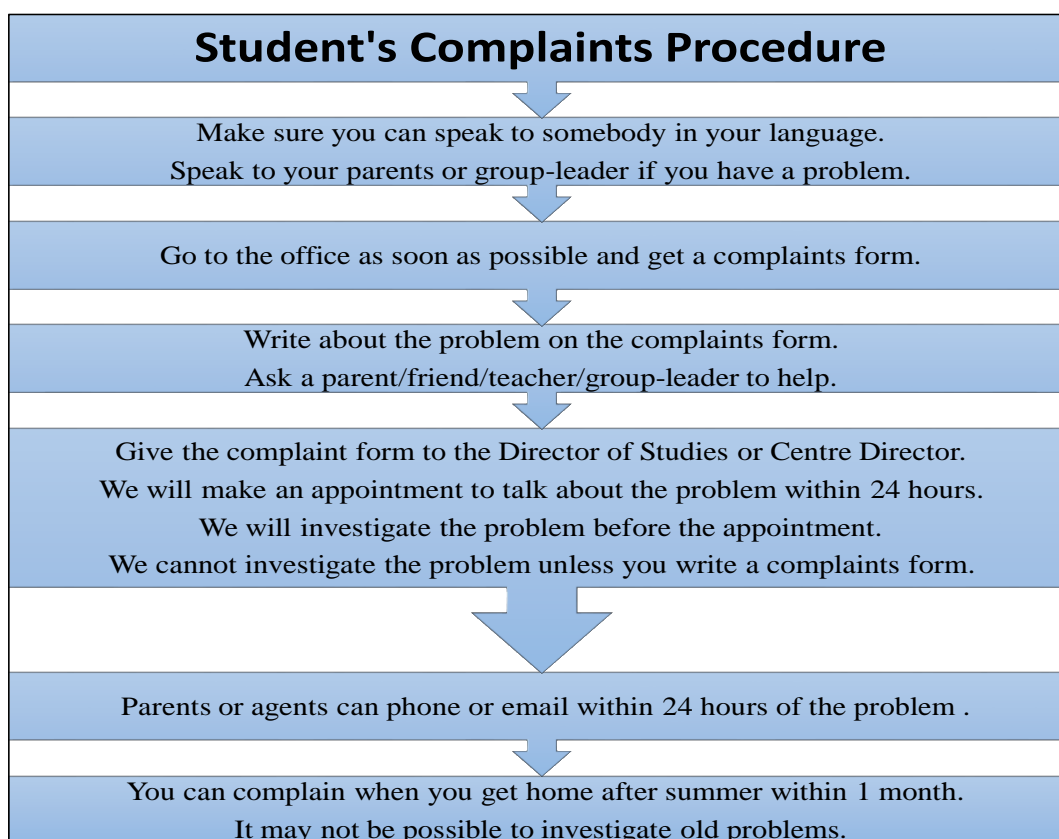
Student's Complaints Poster 2020



Student Complaints Procedure 2020

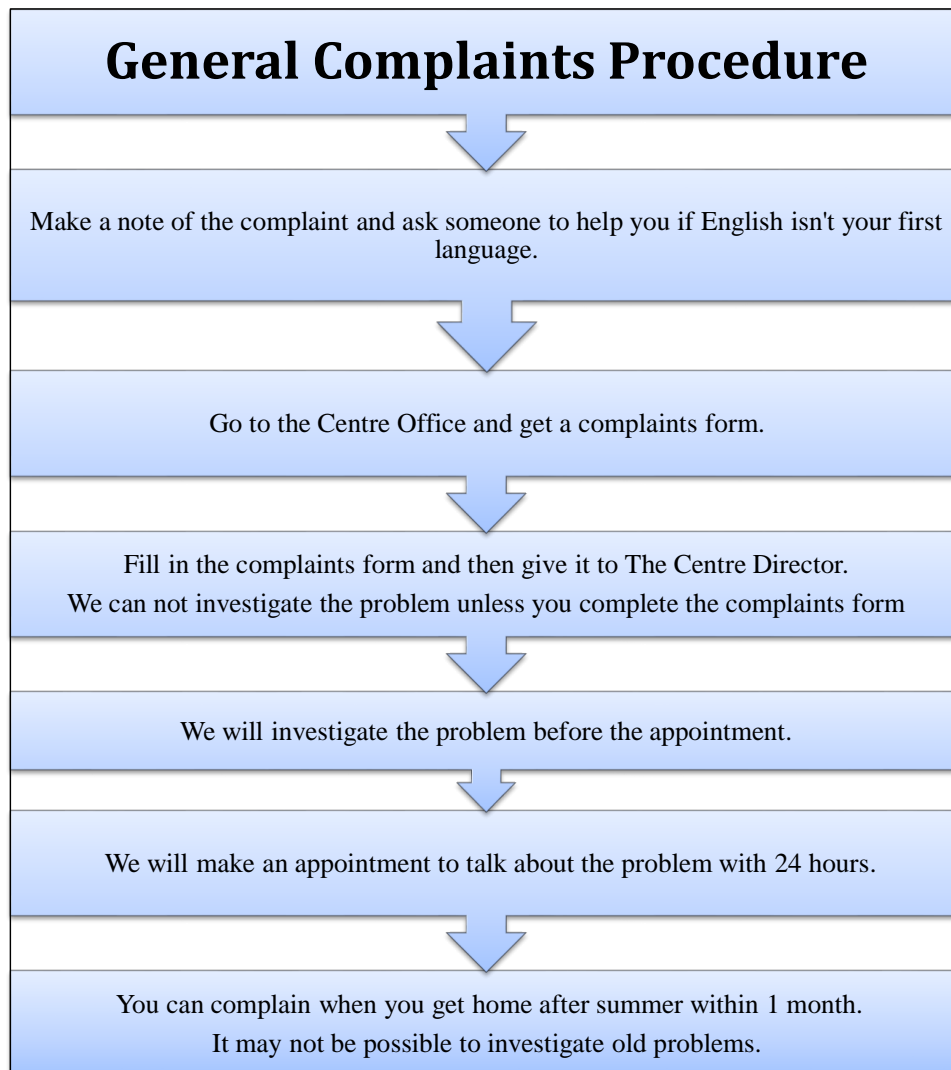
Often a student can address his or her complaint to the staff member and the problem may be resolved between them and the student. If a student feels his or her complaint has not been adequately addressed, or in cases where a student wishes to lodge a complaint with the school about its admissions, attendance, or academic progress policies or how any one or more of these policies is being implemented, that student may address his complaint to the Academic Team or UK Director.

If either the student making the complaint or the member of staff to whom the complaint has been addressed is not satisfied that the issue has been adequately resolved, then either the student or the Go Languages Worldwide staff member may approach the UK Director or Academic Team. After a thorough review of the student's complaint, the Director will issue a ruling on the student's complaint. This ruling will be normally be considered final.



Complaints are investigated by management and are resolved as quickly as possible.

General Complaints Poster 2020



Complaints are investigated by management and are resolved as quickly as possible.

Safeguarding Poster 2020



Safeguarding Poster –2020

Safeguarding Key Points

MLA is committed to the welfare and safeguarding of children and young people. All students should expect to feel safe within all areas of the MLA seasonal programme. All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.

The primary concern at all times must be the interests and safety of each student and the organisation takes all reasonable steps to protect children from harm, discrimination or degrading treatment and to uphold their rights. Ways in which we do this are:

Supervision <ul style="list-style-type: none"> <input type="checkbox"/> Transferred from the airport by GL staff. <input type="checkbox"/> Night Patrol staff. <input type="checkbox"/> Supervision of classrooms and all areas accessible to students. <input type="checkbox"/> 24hr emergency contact number. <input type="checkbox"/> Student are not permitted to leave the centre unaccompanied. <input type="checkbox"/> Students must wear an ID card, especially when out on an excursion which has emergency contact details. 	Recruitment <ul style="list-style-type: none"> <input type="checkbox"/> All staff have at least child protection level 1 training. <input type="checkbox"/> We ensure appropriate staff are recruited, trained effectively and retained. <input type="checkbox"/> All staff will have DBS checks to ensure their suitability in working with children.
Well-being <ul style="list-style-type: none"> <input type="checkbox"/> Welfare Manager responsible for the pastoral care of each student. <input type="checkbox"/> MLA Doctor who is based on site. <input type="checkbox"/> First aiders. <input type="checkbox"/> Fire Marshalls and fire safety training. 	Risk Assessments <ul style="list-style-type: none"> <input type="checkbox"/> All areas of the programme is risk assessed including excursions. <input type="checkbox"/> We ensure ratios are met and preventative measures taken.

If someone discloses that there may be a child protection issue, the following guidelines should be followed.

DO: <ul style="list-style-type: none"> <input type="checkbox"/> Treat any allegation extremely seriously and act at all times towards the child as though you believe what they are saying. <input type="checkbox"/> Tell the young person early on that you may have to share what they are telling them with someone else. Be honest about your own position, who you have to tell and why. <input type="checkbox"/> Tell the child that they are right to tell you. <input type="checkbox"/> Reassure them that they are not to blame. <input type="checkbox"/> Allow the young person to speak without interruptions. <input type="checkbox"/> Reassure the child that they are not alone & tell them what happens next. <input type="checkbox"/> Write down everything that is said and done. Record and date any facts. <input type="checkbox"/> Inform the Welfare Manager or Designated Person immediately. NB If the designated person is not immediately available but you believe the student is in <i>immediate danger</i>, contact the police directly and inform the Designated Person ASAP. <input type="checkbox"/> Follow up with the Welfare Manager/Designated Person what actions were taken and ensure that the issue was addressed. 	DON'T: <ul style="list-style-type: none"> <input type="checkbox"/> Make any promises you can't keep such as promising confidentiality. <input type="checkbox"/> Interrogate the young person. It is not your job to investigate. <input type="checkbox"/> Cast doubt on what the child has told you, don't interrupt or change the subject. <input type="checkbox"/> Say anything that makes the child feel they are responsible for the abuse. <input type="checkbox"/> Condemn the alleged abuser.
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DSL; Designated Safeguarding Lead; Tania Marques UK Academic Manager

DSO; Designated Safeguarding Officers; Sean Crawford, Phillip Zueger, Jake Rothauge, Carmine D'Orazio.

For more information on bullying, the missing person's procedure, recognition of the four types of abuse, and our safer recruitment policy, please see the MLASafeguarding policy. This can be accessed on our website.

Code of Conduct Poster 2020

Code of Conduct 2020

- All staff report to the Centre Director.
- Any complaints should be put to the Centre Director or the Director in a professional manner.
- You should take a genuine interest in the academic and non-academic needs and problems of the students.
- If you are concerned about a student you need to alert other members of staff and follow on action taken.
- MLA expects you to carry out your role in a positive, professional and cheerful manner.
- We expect you to complete your contractual obligations and adhere to the highest standards of professional integrity.
- Failure to treat students and colleagues equally regardless of race, nationality, gender, sexual orientation or age will result in disciplinary action, termination of contract and if necessary referral to outside authorities.
- You are the ambassadors of the Company in every moment off-duty and on-duty.



Breach of the above could be considered gross misconduct.
In the case of a disciplinary for gross misconduct, staff would normally be suspended immediately.
Suspension is a neutral act pending the outcome of an investigation

Abusive Behaviour Poster 2020

RESPECT AND TOLERANCE

Everyone in an MLA centre has a right to feel safe at all times.

We DO NOT accept violence, threatening behaviour, disorderly conduct or abuse against staff or students

Disorderly conduct' means: verbal abuse, insulting words or behaviour causing alarm, harassment or distress

'Threatening behaviour' is when a person fears that violence is going to happen to them.

MLA Move
Language
Ahead

ABUSIVE BEHAVIOUR

**We will take action.
This could include:**

- ◇ Being taken out of the classroom/activity
- ◇ Losing free time
- ◇ Speaking to a manager
- ◇ Your parents are told
- ◇ You are sent home
- ◇ You are banned from MLA
- ◇ We contact the police



CENTRE RULES 2020

ALCOHOL AND DRUGS

It is illegal for under 18s to consume alcohol. Illegal drugs of any kind are not tolerated. If we find you with drugs or alcohol you will go home and the UK police may be told.

SMOKING

It is illegal for under 18s to buy cigarettes and to smoke inside.

BULLYING

Students here are from all parts of the world and all deserve respect. Do not make fun of anyone's nationality, sex, ethnicity, sexual orientation, physical ability or age. If you do, you may be sent home.

IF YOU FEEL BULLIED

**Talk to a teacher or activity leader
Come to the office and speak to the Welfare Manager**



PUNISHMENTS

- ◇ **You are told to exit the class or activity**
- ◇ **Lose your free time**
- ◇ **Talk to a manager**
- ◇ **A written warning**
- ◇ **Your parents are told**
- ◇ **You get sent home**
- ◇ **You get banned from MLA**
- ◇ **The police are called**

Types of bullying:

- ◇ **Physical—punching, hitting, touching, kicking**
- ◇ **Verbal—saying bad things about you or to you**
- ◇ **Cyber—by phone, texting, emails or social media**

GRAFFITI AND DAMAGE TO THE SITE

You are guests in this centre—please respect the property. DO NOT write on or damage any part of the centre. If you do, you will lose your £50 deposit and the police may be told (There are security cameras in operation)

BED TIMES AND CURFEW

Evening activities finish at 10:30 every day. Students go to their rooms and stay quiet. MLA staff and group leaders check that students are in their rooms and behaving well at night. Good sleep is important to have energy for our courses!

FIRE EQUIPMENT

If you damage or misuse fire extinguishers or alarms there is a minimum penalty charge of £200. You will also be sent home

SAFETY

The UK is not a dangerous country. However, you should not carry passports, lots of money or expensive items. The Centre Director can keep passports in the office safe.

You MUST NOT leave a centre without a member of MLA staff.

And remember, cars in the UK drive on the LEFT ←not the right →. Look in both directions when crossing the road. Cross quickly and safely.



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