

## **SAFEGUARDING POLICY FOR THE WELFARE OF STUDENTS UNDER 18 YEARS OF AGE AND BROADER COLLEGE COMMUNITY**

Until recently the college only accepted students aged 18 and over. It has now been decided to extend to 16- and 17-year-olds and Enhanced DBS checks are required for all teachers, administrators and managers who may possibly have one to one unsupervised contact with these students.

Leeds Language College restricts its courses to students aged 16 plus.

1. The college principal has been designated under-18-year-old Designated Protection Lead and his deputy, the Vice Principal and Director of Studies, the Academic Executive, and Administration Lead are responsible to him for safeguarding both under 18-year-olds and vulnerable adults.
2. Teachers will be warned if a student aged 16-17 joins their classes and have been briefed on monitoring student safety in class, as well as avoiding discussion topics which would be unsuitable for students aged under eighteen.
3. Teachers are encouraged to organise study trips and to fill in a risk assessment for each. The study trips include preparation and review activities. Junior students can only be taken to leisure trips to venues which are suitable for their age.
4. Junior visiting groups (students aged 16 and 17) would normally be allocated at least one teacher and one group leader/teaching assistant per 10 students for leisure activities.
5. Overseas and local group leaders and any staff coming into unsupervised contact with under 18-year-old students will be Enhanced DBS checked.
6. Where a leisure or sports activity has been formally organised, it will be supervised by an adequately trained guide or instructor.
7. Home stay Accommodation arranged through the college is only available to students over 18 years of age.
8. Students under 18 years of age would be expected to accompany adult family members to the UK or stay as part of a visiting school group accommodated in a hotel or special residential accommodation.
9. The college has had enquiries from overseas groups who have stated they wish to arrange their own accommodation in Leeds or have asked for residential accommodation. We have inspected various residential venues in Leeds to ensure they meet our standards and are appropriately managed.
10. Students aged under 18 must have their application form for a course counter-signed by an adult parent or guardian who has been informed of the college's terms and conditions. This person will normally take responsibility for ensuring the student arrives at the college on time and has adequate provision to arrive home safely. The parent/guardian must also complete a form informing the college about care arrangements made for the student during their stay.

11. The college shall discourage students aged under 18 from attending late classes and will advise students to attend classes earlier in the day. The final decision should be undertaken by the adult parent/guardian of a student aged under 18.
12. Students aged under 18 will not be permitted to drink alcohol, smoke cigarettes or other substances at Leeds Language College. Any incidents seen, heard, or reported through third persons shall be written down in the Incidents and Accidents file and immediately reported to parents, guardians, and the relevant authorities.
13. Where a teacher has not been DBS cleared, they will not be permitted to have unsupervised contact with under-age learners. They will not be allocated under-age learners to teach, and it is the responsibility of the Designated Safeguarding Lead to check whose classes under-age learners are allocated to. The Director of Studies, the Academic Executive and the Administration Lead will support this arrangement by checking whose classes under-age learners are allocated to and raising concerns if there is no DBS clearance for a teacher in place.
14. All staff are asked to be aware that some individuals may use social media, electronic devices such as mobile phones, tablets, and cameras to groom and exploit under-age students. Teachers are required to report any cases of inappropriate or suspicious on-line conduct or activity such as cyber-bullying, stalking, or photographing of under-age students.
15. Any students identified as vulnerable will be identified to the Principal and Administrator and regular welfare and pastoral checks will be in place for such learners.
16. Responsibilities - Leeds Language College Ltd will:
  - Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
  - Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with under-age learners or vulnerable adults. This includes the way in which information about individuals in our programmes is gathered and communicated
  - Implement stringent safeguarding procedures when recruiting, managing, and deploying staff and associated personnel
  - Ensure staff receive training on safeguarding at a level commensurate with their role in the organization
  - Follow up on reports of safeguarding concerns promptly and according to due process
17. Staff and associated personnel must not:
  - Engage in sexual activity with anyone under the age of 18
  - Sexually abuse or exploit children
  - Subject a child to physical, emotional, or psychological abuse, or neglect
  - Engage in any commercially exploitative activities with children including child labour or trafficking
18. Staff and associated personnel must not:
  - Sexually abuse or exploit at risk adults
  - Subject an at-risk adult to physical, emotional, or psychological abuse, or neglect
19. Staff and associated personnel must not:
  - Exchange money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
  - Engage in any sexual relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics.

Additionally] staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by an [NGO] staff member or associated personnel to the appropriate staff member

20. Enabling reports – Leeds Language College Ltd. will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by ensuring the rights to whistleblowing are respected.

21. We will also accept complaints from external sources such as members of the public, partners, and official bodies.

22. How To Recognise Signs of Abuse: Abuse in children includes:

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. Bumps and bruises do not always mean a child is being physically abused. All children have accidents, trips, and falls. And there is not just one sign or symptom to look out for. But it is important to be aware of the signs.

Physical abuse symptoms include:

- bruises
- broken or fractured bones
- burns or scalds
- bite marks.

It can also include other injuries and health problems, such as:

- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from drowning, suffocation, or poisoning.
- Head injuries in babies and toddlers can be signs of abuse so it is important to be aware of these.

Visible signs include:

- swelling
- bruising
- fractures
- being extremely sleepy or unconscious
- breathing problems
- seizures
- vomiting
- unusual behaviour, such as being irritable or not feeding properly.

- If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation does not match the injuries, then this should be reported.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child. It is sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate, or ignore a child.

Emotional abuse includes:

- humiliating or constantly criticising a child
- threatening, shouting at a child, or calling them names
- making the child the subject of jokes, or using sarcasm to hurt a child
- blaming and scapegoating
- making a child perform degrading acts
- not recognising a child's own individuality or trying to control their lives
- pushing a child too hard or not recognising their limitations
- exposing a child to upsetting events or situations, like domestic abuse or drug taking
- failing to promote a child's social development
- not allowing them to have friends
- persistently ignoring them
- being absent
- manipulating a child
- never saying anything kind, expressing positive feelings or congratulating a child on successes
- never showing any emotions in interactions with a child, also known as emotional neglect.

Signs of emotional abuse

- There might not be any obvious physical signs of emotional abuse or neglect. And a child might not tell anyone what is happening until they reach a 'crisis point'. That is why it is important to look out for signs in how a child is acting.

As children grow up, their emotions change. This means it can be difficult to tell if they are being emotionally abused. But children who are being emotionally abused might:

- seem unconfident or lack self-assurance
- struggle to control their emotions
- have difficulty making or maintaining relationships
- act in a way that is inappropriate for their age.

The signs of emotional abuse can also be different for children at different ages.

Signs in babies and toddlers:

Babies and pre-school children who are being emotionally abused or neglected might:

- be overly affectionate to strangers or people they do not know well
- seem unconfident, wary, or anxious

- not have a close relationship or bond with their parent
- be aggressive or cruel towards other children or animals.

Older children might:

- use language you would not expect them to know for their age
- act in a way or know about things you would not expect them to know for their age
- struggle to control their emotions
- have extreme outbursts
- seem isolated from their parents
- lack social skills
- have few or no friends.

Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

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.

Signs of sexual abuse

- Knowing the signs of sexual abuse can help give a voice to children. Sometimes children will not understand that what is happening to them is wrong. Or they might be scared to speak out. Some of the signs you might notice include:
  - Avoiding being alone with or frightened of people or a person they know.
  - Language or sexual behaviour you would not expect them to know.
  - Having nightmares or bed-wetting.
  - Alcohol or drug misuse.
  - Self-harm.
  - Changes in eating habits or developing an eating problem.
  - Changes in their mood, feeling irritable and angry, or anything out of the ordinary.

If a child is being or has been sexually abused online, they might:

- spend a lot more or a lot less time than usual online, texting, gaming, or using social media
- seem distant, upset, or angry after using the internet or texting
- be secretive about who they are talking to and what they are doing online or on their mobile phone
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop, or tablet.
- Children and young people might also drop hints and clues about the abuse.

If you are worried about a child and want to talk to them, we have advice on having difficult conversations.

**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. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Types of neglect

Neglect can be a lot of different things, which can make it hard to spot. But broadly speaking, there are 4 types of neglect.

#### Physical neglect

- A child's basic needs, such as food, clothing, or shelter, are not met or they are not properly supervised or kept safe.

#### Educational neglect

- A parent does not ensure their child is given an education.

#### Emotional neglect

- A child does not get the nurture and stimulation they need. This could be through ignoring, humiliating, intimidating, or isolating them.

#### Medical neglect

- A child is not given proper health care. This includes dental care and refusing or ignoring medical recommendations.

#### Signs of neglect

- Neglect can be really difficult to spot. Having one of the signs does not necessarily mean a child is being neglected. But if you notice multiple signs that last for a while, they might show there is a serious problem.

Children and young people who are neglected might have:

#### Poor Appearance and Hygiene

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes
- having the wrong clothing, such as no warm clothes in winter
- having frequent and untreated nappy rash in infants.

#### Health and Development Problems

- anaemia
- body issues, such as poor muscle tone or prominent joints
  - medical or dental issues
- missed medical appointments, such as for vaccinations
- not given the correct medicines
  - poor language or social skills
  - regular illness or infections
  - repeated accidental injuries, often caused by lack of supervision
  - skin issues, such as sores, rashes, flea bites, scabies, or ringworm
  - thin or swollen tummy
  - tiredness
  - untreated injuries
  - weight or growth issues.

### Housing and Family Issues

- living in an unsuitable home environment, such as having no heating
- being left alone for a long time
- taking on the role of carer for other family members.

### Change in Behaviour

- becoming clingy
- becoming aggressive
- being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behaviour
- finding it hard to concentrate or take part in activities
- missing school
- showing signs of self-harm
- using drugs or alcohol.

**Other Details:** It is important to be aware of more specific types of abuse and exploitation that fall within these categories. They are child exploitation, cyberbullying and online abuse, criminal exploitation, County Lines, trafficking, modern slavery, domestic abuse, FGM, honour-based abuse, grooming, missing.

### Signs of bullying

No single sign will indicate for certain that your child's being bullied, but watch out for:

- belongings getting 'lost' or damaged
- physical injuries, such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to whoever is bullying them)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

### Signs of grooming

It can be difficult to tell if a child is being groomed – the signs are not always obvious and may be hidden. Older children might behave in a way that seems to be "normal" teenage behaviour, masking underlying problems.

Some of the signs you might see include:

- being very secretive about how they are spending their time, including when online
- having an older boyfriend or girlfriend
- having money or new things like clothes and mobile phones that they cannot or will not explain
- underage drinking or drug taking
- spending more or less time online or on their devices
- being upset, withdrawn, or distressed
- sexualised behaviour, language, or an understanding of sex that is not appropriate for their age

- spending more time away from home or going missing for periods of time.
- A child is unlikely to know they have been groomed. They might be worried or confused and less likely to speak to an adult they trust. If you are worried about a child and want to talk to them, we have advice on having difficult conversations.

#### Signs of Criminal Abuse

- Frequently absent from and doing badly in school.
- Going missing from home, staying out late and travelling for unexplained reasons.
- In a relationship or hanging out with someone older than them.
- Being angry, aggressive, or violent.
- Being isolated or withdrawn.
- Having unexplained money and buying new things.
- Wearing clothes or accessories in gang colours or getting tattoos.
- Using new slang words.
- Spending more time on social media and being secretive about time online.
- Making more calls or sending more texts, possibly on a new phone or phones.
- Self-harming and feeling emotionally unwell.
- Taking drugs and abusing alcohol.
- Committing petty crimes like shop lifting or vandalism.
- Unexplained injuries and refusing to seek medical help.
- Carrying weapons or having a dangerous breed of dog.

#### Signs Female Genital Mutilation Might Happen

- A relative or someone known as a 'cutter' visiting from abroad.
  - A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
  - A female relative, like a mother, sister or aunt has undergone FGM.
  - A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
  - A girl has an unexpected or long absence from school.
  - A girl struggles to keep up in school.
  - A girl runs away – or plans to run away - from home.
- Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts. People who behave abusively come from all backgrounds and walks of life. They may be people in positions of trust; they may also be relatives, friends, neighbours, or people who use the same services as the person experiencing abuse

#### 23. How to report a safeguarding concern:

- Staff members who have a complaint or concern relating to safeguarding should report it immediately the designated safeguarding lead, the College Principal.
- If the staff member does not feel comfortable reporting to the Principal, they may report the matter to the Director of Studies and Vice Principal, Academic Executive or Administrator.



## 24. Responding to People who have Experienced or are Experiencing Abuse

Leeds Language College Ltd recognises that it has a duty to act on reports, or suspicions of abuse or neglect. It also acknowledges that taking action in cases of abuse is never easy.

Responding if a member of staff at Leeds Language College Ltd Receives an Allegation

- a) Reassure the person concerned.
- b) Listen to what they are saying.
- c) Record what you have been told/witnessed as soon as possible.
- d) Remain calm and do not show shock or disbelief.
- e) Tell them that the information will be treated seriously.
- f) Ask questions to ensure you gather the full facts but do not start to investigate or ask detailed or probing questions.
- g) Use the vulnerable adult/child's own words where possible.
- h) Do not promise to keep it a secret.
- i) Tell the child or vulnerable adult what you are going to do next and explain that you will need to get help to keep him/her safe.

If you witness abuse or abuse has just taken place, the priorities will be:

- a) To call an ambulance if required.
- b) To call the Police if a crime has been committed.
- c) To preserve evidence.
- d) To keep yourself and others safe.
- e) To inform the Designated Safeguarding Lead.
- f) To record what happened in the agreed place/file/log.

## 25. Allegations made against a Member of Staff

If a member of staff has information which suggests a member of staff has:

- a) Behaved in a way that has harmed or may have harmed a vulnerable adult/child.
  - b) Possibly committed a criminal offence against, or related to, a vulnerable adult/child.
  - c) Behaved towards a vulnerable adult/child in a way that has indicated she/he is unsuitable to work with vulnerable adults/children.
  - d) The member of staff should immediately report this to their line manager or Designated Safeguarding Lead, in line with the grievance procedure and the contents of this policy.
- If appropriate, the Designated Safeguarding Lead (s) will consult with/make a referral to the LADO (Local Authority Designated Officer).
  - If the allegation is made about the Designated Safeguarding Lead (s), staff must inform their line manager who will in turn inform the Director of Studies and Vice Principal.

## 26. Recording and Managing Confidential Information

Leeds Language College Ltd is committed to maintaining confidentiality wherever possible and information regarding safeguarding issues should be shared only with those who need to know.

27. For further information, please see Leeds Language College Ltd's Confidentiality and Data Protection Policies. All allegations/concerns should be recorded in the agreed place/file/log where safeguarding concerns are recorded.

- The information should be factual and not based on opinions. Record what the person tells you, what you have seen and names of witnesses if appropriate.
- The information that is recorded will be kept secure and will comply with Leeds Language College Ltd's Data Protection Policy.

28. Disseminating/Reviewing Policy and Procedures

- This safeguarding policy and procedures will be clearly communicated to staff.
- The Designated Safeguarding Lead (s) will be responsible for ensuring that this is done.
- The safeguarding policy and procedures will be reviewed annually by the college management team.
- The Designated Safeguarding Lead (s) will be involved in this process and can recommend changes
- The Designated Safeguarding Lead (s) will also ensure that any changes are clearly communicated to staff. It may be appropriate to involve staff.

29. Making a Referral

- Please dial 999 if the person is in immediate danger.
- If you have a concern about a child or a young person, you will need to complete and submit a Multi-Agency Referral Form (MARF) using the following link:  
<https://www.multiagencysafeguardinghub.com/leeds-mash/>

30. Response – Leeds Language College will follow up safeguarding reports and concerns according to policy our standard complaints procedure, whilst maintaining appropriate confidentiality.

31. Leeds Language College Ltd. will apply appropriate disciplinary measures to staff found in breach of policy.

32. Leeds Language College Ltd. will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

33. Confidentiality: It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be kept secure at all times.

## PERSONS RESPONSIBLE

- **Health and Safety is the responsibility of everyone at Leeds Language College Ltd.**
- **The following are specifically responsible for coordinating activities in the following areas and can be approached at any time.**

PERSON RESPONSIBLE	TASKS	CONTACT DETAILS IF RELEVANT
1. PRINCIPAL – ADAM PRIESTLEY	DESIGNATED SAFEGUARDING LEAD 16–17-YEAR-OLDS	<p style="text-align: center;">Adam Priestley:  <a href="mailto:adam@leedslanguagecollege.com">adam@leedslanguagecollege.com</a>                      Emergency Contact Number:  <b>07340 062 713</b></p> <p style="text-align: center;">Richard Jarrett  <a href="mailto:academicoffice@leedslanguagecollege.com">academicoffice@leedslanguagecollege.com</a></p> <p style="text-align: center;">Veronica Omeni  <a href="mailto:veronica@leedslanguagecollege.com">veronica@leedslanguagecollege.com</a>                      Tel: +44 (0) 113 242 75 34                      U.K.: 0113 242 75 34</p> <p style="text-align: center;">Cynthia Able - Administrator  <a href="mailto:info@leedslanguagecollege.com">info@leedslanguagecollege.com</a>                      Tel: +44 (0) 113 242 75 34                      U.K.: 0113 242 75 34</p>
1. ACADEMIC EXECUTIVE – RICHARD JARRETT 2. VICE PRINCIPAL AND D.O.S – VERONICA OMENI	DEPUTY DESIGNATED SAFEGUARDING LEADS 16–17-YEAR-OLDS	
1. PRINCIPAL – ADAM PRIESTLEY 2. ACADEMIC EXECUTIVE – RICHARD JARRETT 3. VICE PRINCIPAL AND D.O.S – VERONICA OMENI	PASTORAL SUPPORT	
1. PRINCIPAL – ADAM PRIESTLEY 2. VICE PRINCIPAL AND D.O.S – VERONICA OMENI 3. ACADEMIC EXECUTIVE – RICHARD JARRETT	PERSONAL EVACUATION PLAN DISABLED STUDENTS	
1. ACADEMIC EXECUTIVE – RICHARD JARRETT 2. SAVILLS(LANDLORD) 3. GARY BLAKELEY (SITE MANAGER, TECHNICAL SERVICES AND MAINTENANCE)	FIRE	
1. PRINCIPAL – ADAM PRIESTLEY 2. ADMINISTRATION – CYNTHIA ABLE 3. ACADEMIC EXECUTIVE – RICHARD JARRETT 4. VICE PRINCIPAL AND D.O.S – VERONICA OMENI - ADMINISTRATION	FIRST AID	
1. VICE PRINCIPAL AND D.O.S – VERONICA OMENI 2. ACADEMIC EXECUTIVE – RICHARD JARRETT 3. TEACHERS AND NOMINATED ACTIVITY SUPERVISORS FOR INDIVIDUAL GROUPS DURING TRIPS AND OUTINGS	OFF-SITE RISK ASSESSMENTS	
1. ADMINISTRATORS, TEACHERS, ALL STAFF, STUDENTS AND VISITORS TO LEEDS LANGUAGE COLLEGE LTD.	GENERAL WELFARE ON COLLEGE PREMISES, APPLICATION OF AND ADHERENCE TO ALL COLLEGE RULES, POLICIES AND PROCEDURES	
1. PRINCIPAL – ADAM PRIESTLEY	WRITTEN POLICY AND RISK ASSESSMENT	
1. PRINCIPAL – ADAM PRIESTLEY 2. ADMINISTRATION MANAGER – SANTA NEKRASOVA	ACCOMMODATION	