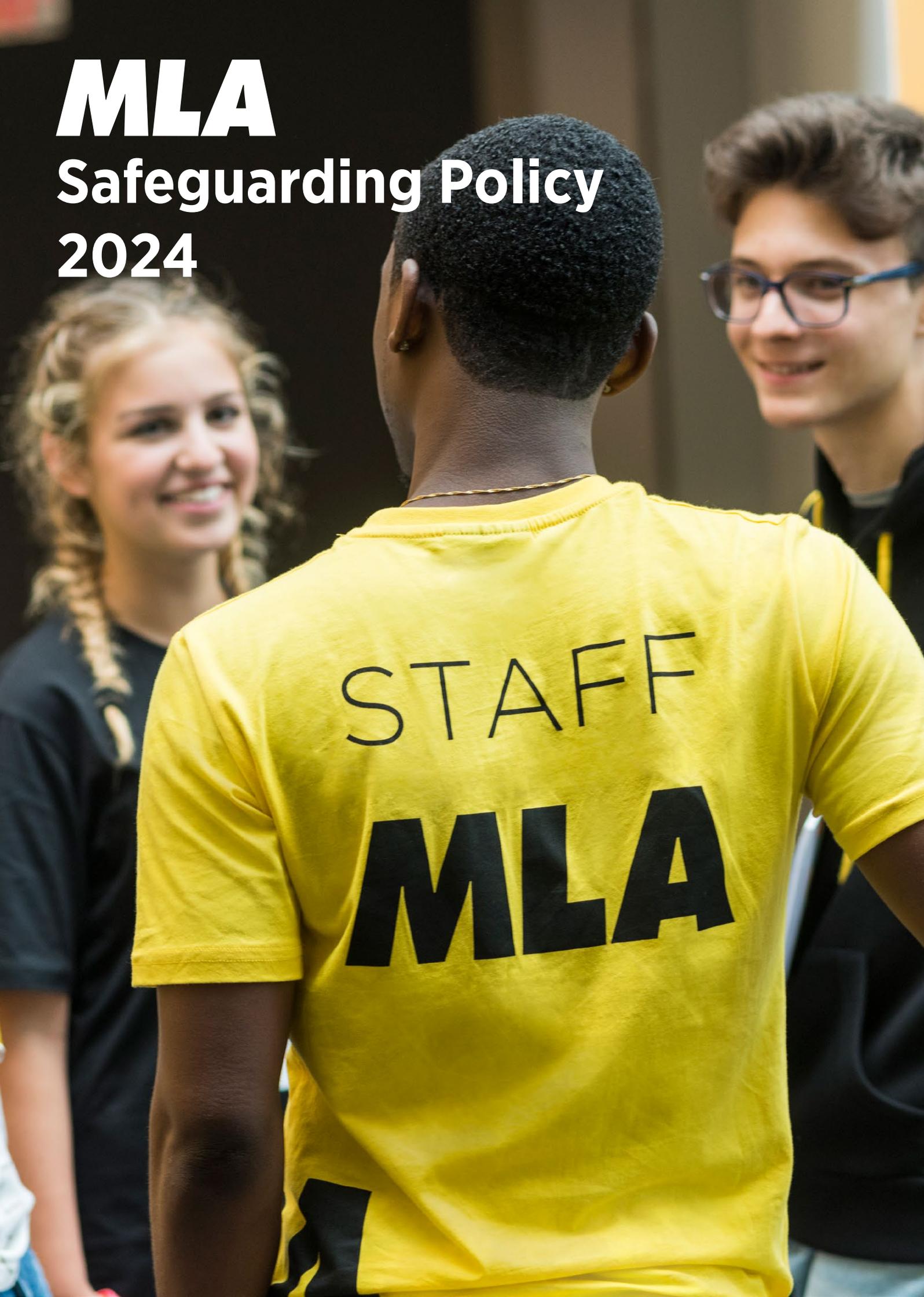


# **MLA**

## **Safeguarding Policy**

### **2024**



# Contents

<b>1 Our Safeguarding aims &amp; policy.....</b>	<b>4</b>
1.1 Context.....	4
1.2 Policy statement .....	4
1.3 Safeguarding Terminology.....	4
1.4 MLA Staff .....	4
1.5 MLA Staff Responsibilities .....	5
1.6 Safeguarding levels & cover at our centres.....	5
1.7 Contacts & Support.....	6
<b>2 What is Safeguarding?.....</b>	<b>6</b>
2.1 Our Seasonal Centres and Safeguarding Polices .....	8
2.2 Child Abuse; Different types of abuse and signs .....	8
2.3 Disclosure; If a student discloses abuse, what action do I take? .....	10
2.4 Digital protection.....	11
2.5 E Safety online, photos, videos & camera use.....	11
2.6 Bullying .....	12
2.7 Preventative measures in Safeguarding.....	12
2.8 Referral systems and procedures.....	12

# Contents

<b>3 Welfare Provision .....</b>	<b>14</b>
3.1 Safety of Students .....	14
3.2 Student Ratios & Supervision.....	15
<b>4 Prevent Duty .....</b>	<b>16</b>
<b>5 MLA Staff Recruitment and Induction Policy .....</b>	<b>16</b>
5.1 Safer Recruitment Policy .....	16
5.2 Staff Inductions .....	16
<b>6 Child Protection Record of Concern.....</b>	<b>17</b>
<b>7 Logbooks.....</b>	<b>18</b>
<b>8 Centre Rules.....</b>	<b>18</b>
<b>9 Abusive Behaviour Poster.....</b>	<b>20</b>
<b>10 Safeguarding Poster.....</b>	<b>21</b>
<b>11 Useful links.....</b>	<b>22</b>

# 1. Our Safeguarding aims & policy

## 1.1 Context

MLA Move Language Ahead, runs short courses in spring and summer in a number of centres using College and University campuses.

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. Student and group leader's accommodation is residential and provided at the centre.

## 1.2 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 (Move Language Ahead) is committed to providing an inclusive, supportive and safe environment for everyone who works here. This policy is shared with all employees, service providers, volunteers, interns, group leaders, agents and stakeholders.

MLA is committed to the welfare and safeguarding of children, young people and vulnerable adults. 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'.

This policy should be read in conjunction with our Prevent Policy and our Sexual Harassment Prevention and Action Policy.

## 1.3 Safeguarding Terminology

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

<b>Abuse</b>	Refers to any actions or situations which harm a person physically or emotionally.
<b>DBS</b>	Disclosure and Barring Service. Governmental body responsible for carrying out checks on the criminal record and barring lists of people in the UK.
<b>PVG</b>	Protecting Vulnerable Groups scheme. The Protecting Vulnerable Groups (PVG) scheme is managed by Disclosure Scotland. It helps ensure people who are unsuitable to work with children and protected adults cannot do regulated work with these vulnerable groups.
<b>Disclosure</b>	When a student (or staff member) informs a staff member of an incident or situation related to safeguarding that requires action.
<b>DSL</b>	Designated Safeguarding Lead. Responsible for all safeguarding matters. Trained to Specialist Safeguarding (formerly level 3)
<b>DSO</b>	Designated safeguarding officer at centre level. Acts as deputy to DSL trained at Advanced Safeguarding (Level 2) or Specialist Safeguarding (Level 3).
<b>GDPR</b>	General Data Protection Regulation. An EU regulation and law on data protection and privacy for all individuals within the EU and EEA
<b>LADO</b>	Local authority designated officer. Person with safeguarding responsibilities for a specific part of the UK
<b>LSCP</b>	Local Safeguarding Children's Partnership: responsible for co-ordinating all work to safeguard and promote the welfare of children in the local area.
<b>Prevent</b>	UK government strategy to combat radicalisation from terrorism and other forms of extremism in various sectors, including education.

## 1.4 MLA Staff

MLA staff working with young learners will all go through our safer recruitment process including online or face-to-face interviews, record checks of references, hold an enhanced DBS/PVG and Police Check (if resident/worked outside the UK) 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, Centre Directors, at Level 2 or Level 3 Safeguarding levels. There will also be several 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 children, young people and vulnerable adults in their care are safeguarded against all forms of harm.
- MLA Staff will have training on how to report or identify any concerns or allegations of risk of harm to students.
- 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.

### 1.5 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 children/young people/vulnerable adults of primary concern
- All children/young people/vulnerable adults, 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.

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 DSL and DSO 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.

### 1.6 Safeguarding levels & cover at our centres

Level 1	Basic Safeguarding	All staff	24 hours
Level 2	Advanced Safeguarding	Centre Directors & Welfare Managers at Centre Level	24 hours
Level 3	Specialist Safeguarding	Head Office Staff	24 hours

## 1.7 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

	<p><b>Specialist (formerly Level 3) Safeguarding trained</b></p> <p>DSL: <b>Academic Manager – Ruth Marin (r.marin@mlaworld.com)</b> <b>+44 7448 509226</b></p> <p>Cover DSL: <b>Academic Coordinator - Josh Williams</b> <b>(j.williams@mlaworld.com) +44 7311 409218</b></p> <p>DSO: Operations Coordinators</p> <p>DSO: Academic Coordinators</p> <p>DSO: Assistant Academic Manager</p>
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### MLA UK Centre Level Staff

	<p><b>MLA UK Centre Staff; Advanced (formerly Level 2) Safeguarding trained DSPs</b></p> <p>Centre Directors</p> <p>Welfare Managers</p>
	<p><b>MLA UK Centre Staff; Basic (formerly Level 1) Safeguarding trained</b></p> <p>Centre Admins</p> <p>Activity Leaders</p> <p>Teachers</p> <p>Night Guardians</p>

### UK Safeguarding

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

<b>Governing bodies &amp; legal frameworks for Safeguarding in the UK</b>	
NSPCC Website states	<ul style="list-style-type: none"> <li>• The UK's four nations – England, Northern Ireland, Scotland and Wales – each have their own child protection system.</li> <li>• 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.</li> <li>• 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.</li> </ul>
The Department for Education (DfE)	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
Education Scotland	<ul style="list-style-type: none"> <li>• Education Scotland will promote safe practice to protect children, young people and adults from harm, abuse and exploitation</li> </ul>
<b>Legislation and guidance</b>	<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"> <li>• the paramount nature of the child's welfare</li> <li>• the expectations and requirements around duties of care to children</li> </ul> <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"> <li>• placing a duty on local authorities to appoint children's services members who are ultimately accountable for the delivery of services</li> <li>• placing a duty on local authorities and their partners to co-operate in safeguarding and promoting the wellbeing of children and young people</li> </ul> <p>The Child and Young Person Act (2014) defines a 'child' or 'young person' as: anyone aged under 18 years of age). The extension of the use of the term 'child' beyond 16 years of age is to ensure that there is not an abuse of the position of trust that exists in a position of trust relationship. Where a young person aged 16-18 requires protection it must be noted that the Adult Support and Protection (Scotland) Act 2007 legislation may apply. Adults at risk as: Adults, aged 16 and over, who: a) are unable to safeguard their own well-being, property, rights or other interests. b) are at risk of harm; and c) because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.</p> <p>Safeguarding of Children and Vulnerable Adults: All children and young people have the right to be cared for and protected from harm, and to grow up in a safe environment in which their rights and needs are respected. The National Guidance for Child Protection in Scotland, which was published in May 2014, provides a clear definition of what abuse and neglect is, as well as expectations for all those working with children and young people regarding identifying and responding to child protection concerns. (National Framework for Child Protection and Learning 2012).</p> <p>Legal Information</p> <p>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:</p> <ul style="list-style-type: none"> <li>• 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).</li> <li>• 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).</li> </ul>

## 2.1 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 reassignment, 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 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

## 2.2 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;

<p>1.</p> <p><b>Neglect:</b> '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:</p> <p>provide adequate food, clothing and shelter (including exclusion from home or abandonment);</p> <p>protect a child from physical and emotional harm or danger;</p> <p>ensure adequate supervision (including the use of inadequate care-givers);</p> <p>or ensure access to appropriate medical care or treatment.</p>	<p><b>The physical signs of neglect may include:</b></p> <p>Constant hunger, sometimes stealing food from other children, Constantly dirty or smelly, Loss of weight or being constantly underweight, Inappropriate dress for the conditions.</p> <p><b>Changes in behaviour which can also indicate neglect include:</b></p> <p>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.</p> <p>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.</p>
<p>2.</p> <p><b>Emotional Abuse:</b> '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'.</p>	<p><b>The physical signs of emotional abuse may include:</b></p> <p>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.</p> <p><b>Changes in behaviour which can also indicate emotional abuse include:</b></p> <p>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>
<p>3.</p> <p><b>Sexual Abuse:</b> '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><b>Changes in behaviour which can also indicate sexual abuse include:</b></p> <p>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 developmental 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><b>The physical signs of sexual abuse may include:</b></p> <p>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><b>4.</b></p> <p><b>Physical Abuse:</b> '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><b>Physical signs Physical of abuse:</b></p> <p>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,</p> <p>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><b>Changes in behaviour which can also indicate physical abuse:</b></p> <p>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>
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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).

### 2.3 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"> <li>• Treat any allegation extremely seriously and act at all times towards the child as though you believe what they are saying.</li> <li>• 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.</li> <li>• Tell the child that they are right to tell you</li> <li>• Reassure them that they are not to blame</li> <li>• Allow the young person to speak without interruptions</li> <li>• Reassure the child that they are not alone and tell them what will happen next</li> <li>• Write down everything that is said and done. Record and date any facts.</li> <li>• 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</li> <li>• Follow up with the Welfare Manager/ Designated Person what actions were taken and ensure that the issue was addressed.</li> </ul>	<ul style="list-style-type: none"> <li>• Make any promises you can't keep such as promising confidentiality</li> <li>• Interrogate the young person. It is not your job to investigate</li> <li>• Cast doubt on what the child has told you, don't interrupt or change the subject.</li> <li>• Say anything that makes the child feel they are responsible for the abuse.</li> <li>• Condemn the alleged abuser.</li> <li>• Do nothing. Make sure you tell your Designated Person/police.</li> <li>• Discuss with anyone other than the Designated Person/police.</li> </ul>

Record keeping log (status/follow-up when)

Issue Tracking Template

ID	Description and Area or Room Number	Student Name(s)	Group Leader	Priority	Date Opened	Date Closed	Submitted by (Staff Name)	Action Taken	Status	Notes
1										
2										
3										
4										
5										
6										
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**2.4 Digital protection**

MLA Staff working directly with children should not use mobile phones on duty 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. 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

**2.5 E Safety online, photos, videos, and camera use.**

- Users bringing mobile phones into school should ensure that there is no inappropriate or illegal content on the device.
- 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.
- 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.
- 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.
- 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.
- 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.

- Children using school cameras to take photographs or videos should be supervised.
- 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.

## 2.6 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.

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

- carefully record all incidents
- offer the victim immediate support and help by putting MLA procedures into action

## 2.7 Preventative measures in Safeguarding

MLA aims to create a co-operative ethos through its pastoral structure, teaching methods and inter-personal 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 Guardian.

MLA Staff take preventative measures by ensuring that one-to-one interviews are in rooms with glass/open 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 to students. They do not accept friend requests on social media sites, and they are encouraged to set their accounts to hidden or private during their contract period. In addition, MLA Staff do not arrange to meet students privately and do not chat to students on social networking sites.

We also follow a safer recruitment process along with a full weekend of training for all managers, including Safeguarding at either Level 1, Level 2 or Level 3. We ensure we have a;

- MLA Safer Recruitment Process and Pre-Appointment Checks
- MLA New hires Pre-arrival Training
- MLA Management Training Weekend
- MLA Centre Staff Induction Training
- Risk Assessments

## 2.8 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 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 their 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

MLA follow procedures of centre rules at induction and in handbooks, these include:

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

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:

<b>Welfare Manager &amp; MLA Staff</b>	<ul style="list-style-type: none"> <li>• The Welfare Manager is specifically responsible for the wellbeing of each student ensuring that students, particularly those from overseas, feel safe, supported, and integrated into MLA's community. This includes providing advice and assistance regarding personal, social, and academic matters.</li> <li>• This friendly, helpful, supportive Welfare Manager is based in the centre office and is always pleased to help students.</li> <li>• Students have constant access to a responsible member of staff at all times day or night with our 24hr emergency contact number.</li> <li>• Key members of staff have received specialist child protection training and all members have received official background checks to confirm their suitability in working with children</li> </ul>
<b>Group Leader</b>	<ul style="list-style-type: none"> <li>• Supervision: Ensuring that students are well-supervised throughout the programme, both during academic sessions and in free time or extracurricular activities. The Group Leader is typically responsible for managing a group of students, making sure they adhere to rules and that they are safe.</li> <li>• Pastoral care: Supporting students with any issues they may encounter, such as homesickness, cultural adjustment, or other personal matters. This may involve referring students to additional support (e.g., Welfare Manager, counselling services) when needed.</li> <li>• Logistical support and accompaniment: Ensure that students follow schedules and programmes.</li> <li>• Communication with parents: Keep parents updated on their children's conditions and well-being, addressing any questions.</li> <li>• Coordination with local staff: Collaborate with the summer camp staff to ensure that activities run smoothly.</li> <li>• Emotional and disciplinary support: Provide emotional support to students, intervening in case of conflicts or inappropriate behaviour.</li> <li>• Monitoring of health and well-being: Ensure that students follow medical instructions and that any allergies or health issues are adequately managed.</li> <li>• Documents and permissions: Ensure that all documents, such as passports, medical authorisations, and travel permissions, are in order and easily accessible.</li> </ul>

<b>Activities &amp; Excursions &amp; Lessons</b>	<ul style="list-style-type: none"> <li>All areas of the MLA programme will be risk assessed, including all excursions. This will ensure student-adult ratios are met and any potential risks are prevented.</li> <li>Students must wear their MLA ID lanyard, especially when out on an excursion which has emergency contact details.</li> <li>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</li> <li>Students under the age of 16 are not placed in classes with students of 18 years or older</li> </ul>
<b>Transfers &amp; Travel</b>	<ul style="list-style-type: none"> <li>All transfer students are met on arrival at the airport and are taken back to the airport by MLA staff.</li> </ul>
<b>Accommodation</b>	<ul style="list-style-type: none"> <li>Residential accommodation is full board and all students will be provided a hot or packed meal three times a day. In some cases a prepaid card may be given in place of a packed meal.</li> <li>Night patrol staff supervise the centre site and accommodation during the night</li> <li>Students under 16 will be housed in separate accommodation from students ages 18.</li> </ul>
<b>Fire Safety</b>	<ul style="list-style-type: none"> <li>Fire safety training is provided to all individuals in MLA centres.</li> <li>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</li> </ul>
<b>Welfare log book</b>	<ul style="list-style-type: none"> <li>All incidents, missing students, welfare or safeguarding concerns should be logged.</li> <li>Each case should be recorded, as well as follow up actions to be taken and who has followed up on the point recorded.</li> </ul>

## 3. Welfare Provision

### 3.1 Safety of Students

The Centre Director, MLA staff and Group Leaders are collectively responsible for the supervision and security of all students 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.

<b>Security on Site</b>	<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"> <li>The location of the dormitories and locking systems.</li> <li>The lighting on the site.</li> <li>Any shared areas with other groups / members of the public.</li> <li>Road safety problems.</li> <li>Supervising needs in the cafeteria and sports areas.</li> <li>Telephone communications with the Centre Director or who is on duty at night.</li> <li>Emergency procedures including fire drills.</li> <li>Adequate means for securing the students' valuables.</li> </ul>
<b>Fire and Fire Practices</b>	<p>The Centre Director will ensure with venue managers 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 most venues carry out fire drills within approximately 24 hours of new students arriving on-site.</p>
<b>Emergency Procedures Activities &amp; Excursions</b>	
<b>Missing Student</b>	<p>In the unlikely event that a student cannot be located, the missing person procedure is immediately followed.</p> <p>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 via phone, text and our online system. Group Leaders will then contact the student via phone or text. Welfare Managers together with Group Leaders are responsible for returning the student to class.</p> <p>During activities and excursions Activity Leaders and/or Activity Managers and/or Welfare Managers will contact the Group Leader who will contact the student via phone. Group Leaders will be mostly responsible for returning the student to the activity.</p> <p>If the student is not found within 25 minutes, then a thorough search of the site will ensue. If this does not prove successful, the Centre Director and DSO will become involved. They will have the responsibility of assessing the situation and deciding when to contact the DSL and/or police (CD and DSL protocol guidelines).</p>
<b>Risk Assessments</b>	<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>

### 3.2 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.. 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: 11 – 17 years old

<b>Ratios</b>	1:15 on-site
<b>Free Time</b>	Students aged 11-17 years are allowed free time in groups of 3 or more.
<b>Lessons</b>	Oldest and youngest student can differ by a maximum of three years.
<b>Activities</b>	Students participating in the same sports should not differ in three years.
<b>Accommodation</b>	1:20 for students aged 12-17, and 1:15 for students under 12
<b>Risk Assessments</b>	Risk assessments for all parts of the programme.

#### Free Time

<b>What can students do on-site in their free time?</b>	Go to rooms. Stay in common rooms. Sit outside on the grass or in a student area. Visit shops in a specified area while on an excursion provided they stay in groups of 4 and follow procedures.
<b>Can students leave the campus?</b>	No. If students need to leave the campus for any reason, they must communicate their rationale to their group leader and MLA staff.
<b>Student supervision during free time</b>	All students are under supervision by centre staff and/or Group Leaders who are easily accessible.

## 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, Ruth Marin (r.marin@mlaworld.com) +44 7448 509226 supported by the Head Office staff
- The Cover Prevent Lead at MLA is the Academic Coordinator, Josh Williams (j.williams@mlaworld.com) +44 supported by the 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.
- Exemplifying core British values through documents given to students and the MLA syllabus, which includes a lesson British Values on arrival, as well as lessons on British culture and traditions.

If you have any concerns that any student may have been radicalised or may be vulnerable to radicalisation 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 on the website.

## 5. MLA Staff Recruitment and Induction Policy

### 5.1 Safer Recruitment Policy

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

<b>MLA Staff roles &amp; responsibilities</b>	Management responsibilities for recruitment
<b>The recruitment process including</b>	Management responsibilities for recruitment Recruitment panel Job adverts and content Inviting applicants to interview The interview; The selection process
<b>Employment checks</b>	Pre- appointment checks: Proof of ID References DBS/PVG and Police checks for overseas Qualifications Right to Work
<b>MLA Staff Inductions</b>	Pre-arrival Training and certificates Centre Inductions & Training Induction checklists
<b>Job Descriptions &amp; Specifications</b>	Expectations within each role

### 5.2 Staff Inductions

Inductions for all staff will be given in advance of working with our students. In some cases inductions will be split into multiple sections including self-guided online programmes, virtual meetings, and/or in-person centre meetings.



## 7. Logbooks

Each centre office has a logbook 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 Manager.

## 8. Centre Rules

We take the welfare and care of everyone involved with MLA seriously. We have clearly stated rules and procedures in place to support everyone:

We have centre rules which we expect all staff and students to respect and follow as part of the experience with MLA. Please note the following, if rules are not followed, MLA reserves the right to discipline staff and students. The punishment will depend on the seriousness of the behaviour; here are some punishments that we may use:

### For students

- Asking the individual/s to leave the classroom, discontinuing the activity
- Losing free time
- Reporting the incident to a member of the management team
- Informing the student's parents
- Sending the student home
- Banning the individual from any future dealings with MLA
- Contacting the Police

### For Adults

- Asking the individual/s to leave the premises
- Reporting the incident to a member of the management team
- Immediate dismissal
- Banning the individual from any future dealings with MLA
- Contacting the Police
- Informing the barring list service

### Alcohol & Drugs

The legal age for purchasing alcohol is 18. We do not tolerate the consumption of alcohol by students and/or on site at any time. Illegal drugs of any kind also will not be tolerated. Students found in possession of drugs will be removed from the programme immediately and may be prosecuted by the UK courts.

### Smoking

It is illegal to smoke anywhere inside in the UK. This includes inside accommodation rooms. Students must be over 18 years old to purchase cigarettes.

### Bullying

We welcome students from all different backgrounds and any part of the world. Any student found discriminating on the basis of nationality, sex, religion, ethnicity, sexual orientation, physical ability or age may be asked to leave the school. We have a Zero Tolerance policy to bullying.

The welfare manager will investigate and record the incident(s). The bully will be spoken to, to try to stop the behaviour. Punishment could include the bully receiving; a warning letter, telling their parents, telling the Police.

- Bullying is when a person hurts someone continually, this could be:
  - Physical – punching, hitting, touching, kicking.
  - Verbal – saying bad things about or to another person.
  - Cyber – by phone, texting, emails or social media.
- What to do if students feel bullied:
  - Share their feelings with a staff member or group leader.

- Come to the office and speak with the Welfare Manager.

### **Graffiti & Damage to the Site**

Students are asked to respect the MLA centre premises provided. It is unacceptable to write on or damage any part of the property. Students are asked to pay a damage deposit of £50 upon arrival. This will be retained should any damage be caused. Any damage to property could result in criminal charges (Please note there are a lot of CCTV cameras in the UK to catch students).

### **Curfew**

Evening activities end at 10.30pm each day. Students must return to their accommodation immediately. We expect students to be reasonably quiet after these times. There are MLA patrols after this time and group leaders will ensure their students are inside and behave well during the night. Good sleep is important for active participation in our courses.

### **Fire Equipment**

Misuse of fire equipment is a serious matter and may result in an automatic minimum penalty charge of £200. It may also mean expulsion without refund from the centre.

### **Safety**

The UK is not a dangerous country. However, we advise students not to carry passports/ID cards or large amounts of cash and valuables. The Centre Manager can store passports in the office safe. Students must not leave the centre unaccompanied by a member of the MLA team. In addition, road safety is an important issue. The UK drives on the opposite side of the road to some other European nations. Roads must be crossed looking right and should be crossed quickly and safely.

**Everyone participating (staff, group leaders and students) in an MLA programme are made aware of MLA's code of conduct before arrival at an MLA centre (handbooks).**

## 9. Abusive Behaviour Poster

This poster is displayed around the centre to ensure that all those at the centre are aware of what our policy on abusive behaviour is.

# 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.**

**We DO NOT accept anyone who promotes ideas or values that encourage extreme views or violence.**

## **MLA** Abusive Behaviour Policy

**We will take action.  
This could include for adults or children:**

- ◇ **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**



# 10. Safeguarding Poster

This poster is displayed around the centre to ensure that all those at the centre are aware of what our policy on safeguarding is. UK:

## Safeguarding



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 always 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:

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

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

DO	DON'T
<ul style="list-style-type: none"> <li>• Treat any allegation extremely seriously and act at all times towards the child as though you believe what they are saying.</li> <li>• 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.</li> <li>• Tell the child that they are right to tell you</li> <li>• Reassure them that they are not to blame</li> <li>• Allow the young person to speak without interruptions</li> <li>• Reassure the child that they are not alone and tell them what will happen next</li> <li>• Write down everything that is said and done. Record and date any facts.</li> <li>• 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</li> <li>• Follow up with the Welfare Manager/ Designated Person what actions were taken and ensure that the issue was addressed.</li> </ul>	<ul style="list-style-type: none"> <li>• Make any promises you can't keep such as promising confidentiality</li> <li>• Interrogate the young person. It is not your job to investigate</li> <li>• Cast doubt on what the child has told you, don't interrupt or change the subject.</li> <li>• Say anything that makes the child feel they are responsible for the abuse.</li> <li>• Condemn the alleged abuser.</li> <li>• Do nothing. Make sure you tell your Designated Person/ police.</li> <li>• Discuss with anyone other than the Designated Person/ police.</li> </ul>

**Designated Safeguarding Lead (DSL)**

Ruth Marin, Academic Manager  
 r.marin@mlaworld.com  
 +44 (0) 7448509226



## 11. Useful Links

Anti-bullying Alliance <https://anti-bullyingalliance.org.uk/anti-bullying-week/school-resources>

Ditch the Label <https://www.ditchthelabel.org/bullying-support-hub/>

NSPCC <https://learning.nspcc.org.uk/research-resources/schools/anti-bullying-resources>

Barring referrals guide: [https://assets.publishing.service.gov.uk/media/5ca5e31ce5274a77e1b48dc1/CCS0119367774-001\\_Barring\\_Referrals\\_Document\\_Flowchart\\_A5\\_Booklet\\_V3\\_DG-2.pdf](https://assets.publishing.service.gov.uk/media/5ca5e31ce5274a77e1b48dc1/CCS0119367774-001_Barring_Referrals_Document_Flowchart_A5_Booklet_V3_DG-2.pdf)

The Professionals Online Safety Helpline: [saferinternet.org.uk/helpline/professionals-online-safety-helpline](https://saferinternet.org.uk/helpline/professionals-online-safety-helpline)

The Revenge Porn Helpline: [revengepornhelpline.org.uk](https://revengepornhelpline.org.uk)

SWGfI Online Safety and Social Media: [Topic: Online Safety and Social Media | SWGfI](#)

UK Safer Internet Centre: <http://www.saferinternet.org.uk>

NSPCC - [NSPCC - Harmful sexual behaviour framework](#)

NICE: [NICE - Harmful sexual behaviour among children and young people](#)

Report Harmful Content: [reportharmfulcontent.com](https://reportharmfulcontent.com)

Prevent:

[The Prevent duty](#): an introduction for those with safeguarding responsibilities - GOV.UK ([www.gov.uk](https://www.gov.uk))

[ACT Early | Prevent radicalisation](#)

Scotland:

[National Guidance for Child Protection in Scotland 2021](#) - updated 2023

[Getting it right for every child](#)

[Prevent duty guidance](#): for Scotland

# THANK YOU!

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# **MLA**

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